

Jumping
Higher for
the Country





Disclaimer and Limitation of Liability

References for preparing the PT Bank Negara Indonesia (Persero) Tbk or BNI 2021 Annual Report used the standard parameters and criteria applicable in Indonesia, where BNI carries out its business activities. This Annual Report uses the standards as stated in the Financial Services Authority Regulation No. 29/POJK.04/2016 concerning the Annual Report of Issuers or Public Companies, as well as the Financial Services Authority Circular Letter No. 16/SEOJK.04/2021 concerning the Annual Report Form and Content for Issuers or Public Companies.

This annual report contains statements of BNI's financial condition, results of operations, policies, projections, plans, strategies, and objectives. The prospective statements in this annual report are made based on various assumptions regarding current and future conditions as well as the environment in which BNI conducts its business activities. These statements have the prospect of risk, uncertainty, and may result in actual developments that are materially different from those reported.

This annual report contains the words "BNI", "Company", or "Bank", which refers to PT Bank Negara Indonesia (Persero) Tbk. Sometimes the word "we" is also used on the basis of convenience to refer to BNI in general. This report is presented in two languages, Indonesian and English, and can be viewed and downloaded on the official BNI website, www.bni.co.id.

Cover Theme



2021

Jumping Higher for the Country

To face the continuing COVID-19 pandemic required an endless fighting spirit. The Indonesian Badminton National Team's success in bringing home the Thomas Cup after 19 years certainly inspired many parties. Their success story during these uncertain times was like finding an oasis in the middle of a desert, and brought relief and optimism to everyone to help face any challenge.

The 2021 BNI Annual Report theme is "Jumping Higher for the Country" and uses visuals of badminton players performing jumping smashes, which when combined with a motion effect stroboscope gives the impression of dynamic motion. This portrays 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 on from BNI's 75th Anniversary theme "Jump Higher", and demonstrates BNI's commitment to innovations and transformation to deliver easy access that BNI provides to customers in Indonesia and overseas. In addition, BNI took great pride in being appointed by the Ministry of SOEs as the SOE Badminton Coaching Branch, and during 2021 the Indonesian National Badminton Team won international championships and brought Indonesia's name back to the world stage.

Theme Continuity



2020

UNITING ENERGY TO REVIVE THE COUNTRY

In Indonesia's situation that continues to struggle to deal with the pandemic, BNI serves as one of the drivers of the national economy that strive to unite the energy to stem the spread of the pandemic while simultaneously reviving the country from the pandemic's negative impacts.



2019

DIGITALIZATION FOR EXCELLENT SERVICES

BNI continues to transform in developing and strengthening its digital banking capabilities. The digitalization of distribution channels as well as business processes have enabled BNI to consistently grow its business each year on the strength of expanded market access as well as higher operating efficiency. The ongoing initiatives at digital technology capability enhancement will bring BNI ever closer to become a highly competitive digital bank in the Industry 4.0 era.



2018

ADAPTING QUICKLY TO FACE CHANGE

PT Bank Negara Indonesia (Persero) Tbk's performance in 2018 strengthened as they recorded achievements that exceeded the banking standards. Bank BNI continued its transformation and adapted quickly to the current changes in the modern banking industry. In the technology disruption era, BNI has become one of the banks that has advantages based on digital technology. This has been achieved through digital transformation, starting from internal process improvements, then preparing its competent human capital to master technology, to offering its customers many electronic and digital services and products, such as BNI DigiCare, DigiDeal, DigiMaster, and DigiSport. For BNI, the digital services transformation is necessary when facing the challenge of becoming a bank that remains relevant and offers fast, flexible and mobile solutions to its customers.



2017

STRENGTHENING COMPETITIVE ADVANTAGE

Based on the Vision and Mission of the Company, BNI strives to provide the best contribution to encourage economic growth and development for the realization of the welfare of the whole society. It is implemented, coordinates, and cooperates with other institutions from countries, governments, individuals, communities, fellow financial companies, and other private entities. Beside to its contribution to the nation and the State, BNI seeks to assert its existence by striving to become one of the major players in the financial sector, especially banking through comprehensive financial services to all banking customers and value added benefits to all stakeholders, customers, investors, employees, and the financial industries.

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BNI COMPETITIVE ADVANTAGE

CORPORATE SEGMENT LOAN GROWTH



Corporate loans is still the segment with the largest loan share at BNI and has averaged 47.6% over the last 5 years. Specifically in December 2021, the composition of corporate loans at BNI was **49.4%** and became a catalyst for the growth of other credit segments.

PEOPLE'S BUSINESS LOAN (KUR) GROWTH



BNI's PBL performance as of December 2021 grew by **35.0%** (YoY). The MSME business is the government's main concern in the recovery of the Indonesian economy. As a commitment to support this step, BNI takes part as an agent of development, namely supporting government programs other than through the distribution of Social Assistance, Farmer Cards, Pre-Employment Cards, and others.

CONSUMER LOAN GROWTH, PAYROLL ONLY

BNI's consumer credit growth increased by 10.2% (YoY) as of December 2021 and is the highest compared to peers. This growth was supported by a significant growth in payroll credit, which was **18.3%** (YoY).



CASH MANAGEMENT IMPROVEMENT

The number of Cash Management transactions increased by **114.7%** from 230 million transactions in 2020 to **494 million transactions** in December 2021. Fee Based Income from Cash Management increased by 13.7% from Rp270 billion in 2020 to Rp307 billion in 2021.



FOREIGN BRANCH OFFICES (KCLN) NETWORK EXPANSION

BNI has a network spread throughout the world and is the best compared to its peers, namely:

- 6 Overseas Branch Offices (KCLN) in Singapore, Hong Kong, Tokyo, New York, London, and Seoul;
- 1 sub branch, 2 remittance centers;
- 1 remittance company and 13 remittance representatives;
- BNI collaborates with 1,600± correspondent banks and 100± remittance partners.



API DEVELOPMENT MANAGEMENT (PROGRAMMING INTERFACE APPLICATION)

BNI API advantages include:

- BNI API Service is a pioneer in open banking;
- Assists the Government in verifying data on beneficiaries and distribution of aid;
- Assists in the seamless, fast, precise and efficient transaction process;
- To be the only banking API service for verification of distribution of pre-employment cards and social assistance for wages below Rp5 million for the Ministry of Manpower.



Strengthening Capital Through the Issuance of BNI Additional Tier 1 Capital Bond 2021



The issuance of the BNI Additional Tier 1 Capital Bond 2021 is monumental because BNI is the first bank in Indonesia to issue an Additional Tier 1 capital instrument

On September 30, 2021, the Financial Services Authority (OJK) issued its approval letter for listing the 2021 BNI Additional Tier 1 Capital Bond as a component of Additional Tier 1 Capital based on the issuance of the BNI Additional Tier 1 Perpetual Non-Cumulative Capital Securities (hereinafter referred to as “AT-1”) Capital Securities amounting to USD600 million by BNI. The listing of AT-1 Capital Securities as a component of Additional Core Capital (Additional Tier 1) became effective as of September 30, 2021. The registration approval was in accordance with OJK Regulation No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks, as amended by OJK Regulation No. 34/POJK.03/2016, which stipulates that additional core capital instruments (Capital Securities AT-1) are calculated as capital components after obtaining OJK approval. Information on AT-1 Capital Securities issuance plan and completion was published by BNI in an Information Disclosure at the Indonesia Stock Exchange and on the BNI website on September 17, 2021 and September 27, 2021. With the listing of AT-1 Capital Securities as a component of Additional Tier 1 Capital, BNI's Capital Adequacy Ratio (CAR) increased 1.5%, where BNI's CAR in June 2021 was 18.2% to 19.7% per year. December 31, 2021.





Delivering ESG Commitments



As a bank that supports sustainable finance in Indonesia, BNI is highly committed to realizing the ESG idea



Environmental, Social & Governance (ESG) is an important factor in realizing the Sustainable Development Goals (SDGs). To that end, BNI has established an ESG Sub-Committee under the Risk Management & Anti Fraud Committee as part of the Bank's strategic policy to integrate the impact of sustainable finance risks with banking business risks. In addition, the ESG Sub-Committee involving top management reflects BNI's strong commitment to encouraging ESG implementation through the involvement of its leaders.

BNI's annual report for the fiscal year 2021 also contains a cross-reference to the ESG Rating issued by the global rating agency Morgan Stanley Capital International (MSCI). This cross-reference describes BNI's efforts to include information related to ESG issues in the Annual Report, as well as an evaluation so that BNI can align its business achievements with an ESG-based framework.

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 given the right to act as a foreign exchange bank.

1955

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

1960

BNI supports the Indonesian economy and introduces various banking services such as Floating Banks and Mobile Banks.

1968

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

1986

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

1989

BANK BNI

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

2009

BNI shareholders agreed to separate BNI Syariah business units as an independent business entity.

2008

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

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 increases to 23.64%.

2004

BNI

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

1999

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

1997

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

1996

BNI offers initial public shares and lists its shares on the Jakarta and Surabaya Stock Exchanges. This makes BNI the first government bank to become a public company.

2010

BNI issues new shares through a Rights Issue so that public ownership increases to 40%.

2012

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

2013

BNI joins a strategic partnership with Sumitomo Life Insurance Company which purchases new shares issued by PT BNI Life Insurance worth Rp4.2 trillion.

2014

BNI's Net Income for the first time breaks the double-digit figure (Rp10.8 trillion), as one result of BNI's transformation programs implemented since 2008.

2015

In order 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 restates its vision: "Becoming a Superior Financial Institution in Service and Performance".

2016

For the second time BNI achieves a double-digit profit of Rp11.4 trillion with better fundamentals, indicated by a coverage ratio of 146% and CAR of 19.4%.

2017

Sustainable Bond I BNI Phase I Issuance In 2017 with a value of Rp3 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) Issuance in 2018 with a value of Rp100 billion for a period of 5 years with a fixed interest rate of 8% per annum. The MTN were registered at OJK, effective June 8, 2018.

2019

In 2019, BNI became the first Government Bank to launch Digital Account Opening through its mobile banking application. Issuance of Negotiable Certificates of Deposit (NCD) with a value of Rp2.39 trillion on September 25, 2019.

2021

To strengthen its capital structure, BNI issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) on the Indonesia Stock Exchange on March 30, 2021 for USD500 million with an interest rate of 3.75%, as well as Additional Tier 1 (AT1) Perpetual Non-Cumulative Capital Securities on the Singapore Stock Exchange on September 24, 2021 for USD 600 million with a yield of 4.3% p. a. The AT-1 Capital Securities issuance 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 "Unggul" has been prefixed with "Ter", meaning that BNI's commitment will be the most superior. This is reflected in the net profit increase of 292.6%, a jump for BNI.

Merger of the Subsidiary Company, PT Bank BNI Syariah, into PT Bank BRI Syariah Tbk together with PT Bank Syariah Mandiri, then PT Bank BRI Syariah Tbk changed its name to PT Bank Syariah Indonesia Tbk ("BSI"). BNI fully supports this merger, which is carried out in order to encourage a fundamentally strong Islamic banking ecosystem that is universal, open, inclusive, and reaches out to all segments of society.

BNI Securities Pte. Ltd. ("BSPL"), a subsidiary of PT BNI Sekuritas, officially operates in Singapore. BSPL reflects BNI's strong desire to increase its capacity at regional and global levels.

2020

BNI carried out a restatement of the Company's vision of "To Become a Prime Financial Institution that excels in services and sustainable performance" and a Mission restatement of "Providing excellent services and digital solutions to all customers, as the primary partner of choice" and "Strengthening international services to support the needs of our global business partners". This is carried out to strengthen BNI's excellence in international business through overseas and local network, partnership cooperation as well as development of digital banking in response to challenges and competition whereby BNI will always continuously excel in services and performance. Moreover, in order to support the formation of a national Islamic bank with a global capacity, BNI together with Bank BRI and Bank Mandiri, BNI Syariah, Bank Syariah Mandiri, and Bank BRI Syariah signed a Conditional Merger Agreement for the merger of BNI Syariah, Bank Mandiri Syariah, and Bank BRI Syariah to become an Bank Syariah Indonesia (BSI).

2021 Achievements



BNI's business jump is reflected in its promising business growth in 2021. This good performance lays a strong foundation for BNI to continue to optimize its potential and achieve the best results in the future.

Rp532.1
trillion



In 2021, Total Loans Disbursed - Net increased by 4.3% from Rp510.2 trillion last year.

Rp729.2
trillion



In 2021, Total Customer Deposits increased by 15.5% from Rp631.5 trillion last year.

Rp55.9
trillion



In 2021, Total Operating Income increased by 13.7% from Rp49.2 trillion last year.

Rp10.9
trillion



In 2021, Income for the Year* increased by 232.2% from Rp3.3 trillion last year.

*Income For the Year Attributable to Equity Holders of The Parent Entity

19.7%



In 2021, Minimum Capital Adequacy Ratio increased by 2.9% compared to 16.8% last year.

3.7%



In 2021, Non Performing Loans (NPL) (Gross) ratio decreased by 0.6% compared to 4.3% last year.

79.7%



In 2021, the Loan to Total Deposit Ratio (LDR) decreased by 7.6% compared to 87.3% last year.

**1.6%**

In 2021, the Cost of Fund Ratio decreased by 1.0% compared to 2.6% last year.

69.4%

The Current Account Savings Account (CASA) ratio in 2021, increased by 1.0% compared to 68.4% last year.

4.7%

In 2021, the Net Interest Margin (NIM) increased by 0.2% compared to 4.5% last year.

10.4%

In 2021, Return on Equity (ROE) increased by 7.5% compared to 2.9% last year.

**81.2%**

In 2021, The ratio of Operating Expenses to Operating Income (BOPO) decreased by 12.1% compared to 93.3% last year.

43.3%

In 2021, Cost to Income Ratio (CIR) decreased by 0.9% compared to 44.2% last year.

**73.4
thousand**

The number of BNIDirect users until the end of 2021, grew 17.8% compared to active users at the end of 2020 of 62.3 thousand.

**10.8
million**

The number of active users of the BNI Mobile Banking application until the end of 2021 grew by 38.9% compared to active users at the end of 2020 of 7.8 million.



Anthony Sinisuka GINTING



Satisfaction lies in effort, not in achievement. Full effort is a complete victory.
- Mahatma Gandhi

The cover features a large orange circle on the right and a dark blue curved shape on the left. A thin orange line with three dots connects the two shapes. A runner's leg and foot are visible on the left side.

Performance 2021

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Important Financial Data Overview

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021*	2020**	YOY 2020-2021 (%)		2020	2019	2018	2017
Assets								
Cash	13,684	16,908	(19.1)	♥	17,324	15,362	14,044	11,578
Current Accounts with Bank Indonesia	48,682	33,550	45.1	▲	35,066	37,104	35,591	32,701
Current Accounts with other banks - Net	19,570	15,678	24.8	▲	16,108	14,963	13,134	21,335
Placements with Other Banks - Net	92,290	56,141	64.4	▲	61,329	47,777	39,324	28,593
Marketable Securities - Net	25,803	22,632	14.0	▲	29,687	27,162	32,044	36,050
Securities Purchased under Agreements to Resell - Net	22,011	8,666	154.0	▲	8,666	411	-	679
Bills and Other Receivables - Net	19,563	17,894	9.3	▲	17,894	19,208	24,587	15,701
Acceptance Receivables - Net	20,543	20,499	0.2	▲	20,576	18,558	20,295	18,106
Derivative Receivables- Net	494	1,461	(66.2)	♥	1,461	312	605	217
Loans - Net	532,141	510,174	4.3	▲	541,979	539,862	497,887	426,790
Government Bonds	111,429	84,150	32.4	▲	90,659	81,029	86,791	79,849
Prepaid Taxes	1,051	1,050	0.1	▲	1,050	1,050	1,624	623
Prepaid Expenses	3,096	2,699	14.7	▲	2,807	2,609	2,337	2,319
Investment in Associates	8,689	-	100.0	▲	-	-	-	-
Equity Investments - Net	830	4,177	(80.1)	♥	813	523	604	713
Other Assets	11,849	13,383	(11.5)	♥	13,758	11,801	11,900	10,381
Other Assets - Net	26,883	26,257	2.4	▲	27,362	26,525	26,127	22,805
Deferred Tax Assets - Net	6,230	4,591	35.7	▲	4,800	1,349	1,676	891
Total Assets	964,838	839,910	14.9	▲	891,337	845,605	808,572	709,330
Liabilities								
Obligations Due Immediately	4,554	5,508	(17.3)	♥	5,561	5,273	4,160	4,868
Deposits from Customers	729,169	631,551	15.5	▲	647,572	582,541	552,172	492,748
Deposits from Other Banks	14,377	9,245	55.5	▲	9,023	11,584	13,874	11,683
Derivative Payables	110	414	(73.4)	♥	414	203	322	114
Securities Sold Under Agreements To Repurchase	1,829	2,590	(29.4)	♥	2,590	2,183	21,524	2,390
Acceptance Payables	5,588	5,423	3.0	▲	5,500	5,341	4,417	4,507
Accrued Expenses	1,242	1,125	10.4	▲	1,182	997	876	972
Taxes Payable	1,284	1,060	21.1	▲	1,148	568	481	80
Employee Benefits	6,138	5,652	8.6	▲	6,344	4,392	3,512	4,094
Provisions	2,276	1,421	60.2	▲	1,422	185	178	192
Other Liabilities	20,542	18,038	13.9	▲	18,280	14,901	14,608	14,731
Securities Issued	2,986	2,985	0.0		2,985	2,985	2,987	2,986

IN BILLION RUPIAH,
UNLESS OTHERWISE
STATED

	2021*	2020**	YOY 2020-2021 (%)		2020	2019	2018	2017
Borrowings	32,458	44,114	(26.4)	♥	44,114	57,236	52,025	44,722
Subordinated Securities	15,765	100	15.665	▲	100	100	100	-
Total Liabilities	838,318	729,226	15.0	▲	746,236	688,489	671,238	584,087
Temporary Syirkah funds								
Deposits from Customers	-	-			31,881	31,770	26,603	23,350
Deposits from Other Banks	-	-			349	341	358	494
Mudharabah Sukuk Issued	-	-			-	-	-	496
Total Temporary Syirkah funds	-	-			32,230	32,112	26,961	24,340
Equity								
Share Capital	9,055	9,055	0.0		9,055	9,055	9,055	9,055
Additional Paid-in Capital/Agio Saham	17,010	14,568	16.8	▲	14,568	14,568	14,568	14,568
Transactions with Non-Controlling Interests	2,257	2,257	0.0		2,257	2,257	2,257	2,257
Asset revaluation reserve	15,442	14,882	3.8	▲	14,963	14,947	14,979	12,283
Unrealized Gains (Losses) on Available-for-Sale Marketable Securities and Government Bonds, Net of Tax	1,949	2,424	(19.6)	♥	2,424	(822)	(3,914)	22
Exchange Difference on Translation of Foreign Currency Financial Statements	(17)	23	(173.9)	♥	23	48	85	93
Retained Earnings	78,250	64,878	20.6	▲	66,981	82,463	71,047	60,314
Treasury Shares	(207)	(79)	162.0	▲	(79)	-	-	-
Non-Controlling Interests	2,781	2,676	3.9	▲	2,680	2,488	2,297	2,311
Total Equity	126,520	110,684	14.3	▲	112,872	125,004	110,374	100,903
Total Liabilities, Temporary Syirkah funds and Equity	964,838	839,910	14.9	▲	891,337	845,605	808,572	709,330

*) On February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia 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.

CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

IN BILLION RUPIAH,
UNLESS OTHERWISE
STATED

	2021*	2020**	YOY 2020-2021 (%)		2020	2019	2018	2017
Interest Income and Sharia Income	50,026	52,144	(4.1)	♥	56,173	58,532	54,139	48,178
Interest Expense and Sharia Expense	(11,779)	(18,103)	(34.9)	♥	(19,021)	(21,930)	(18,692)	(16,240)
Interest Income and Sharia Income - Net	38,247	34,041	12.4	▲	37,152	36,602	35,446	31,938
Premium Income and Investments Return	5,886	5,330	10.4	▲	5,330	6,158	5,997	6,871
Claims Expense	(4,487)	(3,859)	16.3	▲	(3,859)	(4,461)	(4,286)	(5,104)
Premium Income and Investments Return - Net	1,399	1,471	(4.9)	♥	1,471	1,697	1,712	1,768
Other Operating Income	16,219	13,640	18.9	▲	13,413	13,713	11,613	11,507

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021*	2020**	YOY 2020-2021 (%)		2020	2019	2018	2017
Total Operational Income	55,865	49,152	13.7	▲	52,036	52,012	48,771	45,212
Other Operating Expenses	(24,801)	(22,142)	12.3	▲	(24,214)	(23,687)	(21,783)	(20,863)
Allowance for Impairment Losses	(18,297)	(22,038)	(17.0)	▼	(22,590)	(8,838)	(7,388)	(7,126)
Operating Income	12,767	4,502	154.0	▲	5,231	19,487	19,599	17,223
Non-Operating (Expense)/Income - Net	(216)	(96)	128.1	▲	(119)	(118)	221	(57)
Income Before Tax Expenses	12,551	4,406	154.5	▲	5,112	19,369	19,821	17,165
Tax Expense	(1,574)	(1,611)	(2.2)	▼	(1,791)	(3,861)	(4,729)	(3,395)
Income for the Year	10,977	2,796	230.5	▲	3,321	15,509	15,092	13,771
Income for The Year Attributable to:								
Non-controlling interests	79	41	92.7	▲	41	124	77	154
Equity holders of the Parent Entity	10,898	3,280	232.2	▲	3,280	15,384	15,015	13,616
Other Comprehensive Income								
Other Comprehensive Income/Loss for the Year After Taxes	745	872	(14.6)	▼	871	2,875	(856)	1,847
Total Comprehensive Income for the Year	11,722	4,193	179.6	▲	4,193	18,384	14,236	15,618
Comprehensive Income for the Year Attributable to:								
Non-controlling interests	102	191	(46.9)	▼	191	191	(14)	214
Equity holders of the Parent Entity	11,620	4,001	190.4	▲	4,001	18,192	14,250	15,403
Earnings Per Share Attributable to Equity holders of the Parent Entity (in full Rupiah amount)	585	176	232.4	▲	176	825	805	730

STATEMENT OF CONSOLIDATED CASH FLOWS

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021	2020	YOY 2020-2021 (%)		2019	2018	2017
Cash Flows from Operating Activities	97,479	74,254	31.3	▲	(12,611)	(4,274)	33,626
Cash Flows from Investing Activities	(15,656)	(11,992)	30.6	▲	13,484	(9,612)	(23,274)
Cash Flows from Financing Activities	1,719	(17,139)	(110.0)	▼	(18,491)	20,609	3,245
Net Increase/(Decrease) In Cash And Cash Equivalents	83,542	45,123	85.1	▲	(17,618)	6,723	13,597
Effect of Losing Control	(37,614)	-	-		-	-	-
Effect of Foreign Currency Exchange Rate Changes	505	600	(15.8)	▼	(119)	221	96
Cash and Cash Equivalents at Beginning of the Year	126,908	81,185	56.3	▲	98,922	91,977	78,284
Cash and Cash Equivalents at the End of Year	173,340	126,908	36.6	▲	81,185	98,922	91,977

*) On February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia 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.

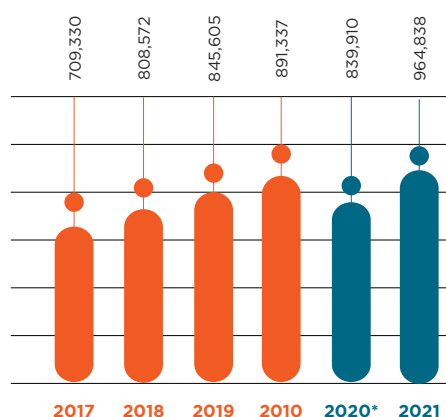
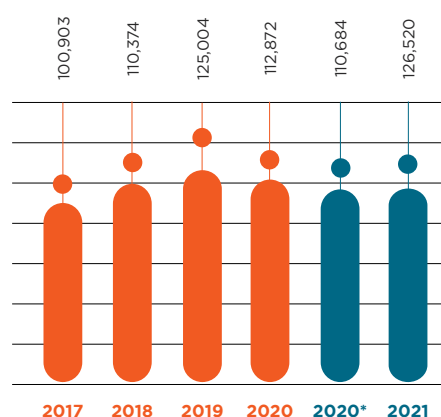
FINANCIAL RATIOS

IN BILLION RUPIAH, UNLESS
OTHERWISE STATED

	2021	2020	YOY 2020-2021 (%)		2019	2018	2017
Capital							
Common Equity Tier 1 (CET1) Ratio	16.4	15.7	0.7	▲	18.7	17.4	17.5
Tier 1 Ratio	17.7	15.7	2.0	▲	18.7	17.4	17.5
Tier 2 Ratio	2.0	1.1	0.9	▲	1.1	1.0	1.1
Minimum Capital Adequacy Ratio	19.7	16.8	2.9	▲	19.7	18.5	18.5
Fixed Assets Against Capital	21.1	25.1	(4.0)	▼	22.0	24.5	23.4
Asset Quality							
Distressed Earning Assets and Distressed Non-Earning Assets to Total Earning Assets and Non-Earning Assets	2.8	3.1	(0.3)	▼	1.8	1.4	1.5
Distressed Earning Assets to Total Earning Assets	2.6	2.9	(0.3)	▼	1.6	1.4	1.5
Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets	6.5	6.2	0.3	▲	2.2	1.9	2.1
LLR/NPL Gross (Coverage Ratio)	233.4	182.4	51.0	▲	133.5	152.9	148.0
CKPN Fulfillment for Earning Assets	5.9	2.9	3.0	▲	2.2	2.1	2.7
CKPN Fulfillment for Non-Earning Assets	29.4	13.9	15.5	▲	14.8	16.3	19.9
Gross NPL	3.7	4.3	(0.6)	▼	2.3	1.9	2.3
Net NPL	0.7	0.9	(0.2)	▼	1.2	0.8	0.7
Loans to Total Earning Assets	63.2	66.9	(3.7)	▼	65.5	62.1	59.2
Core Debtor Loans to Total Loans	31.2	30.3	0.9	▲	29.0	20.2	26.6
Foreclosed Collateral to Total Loans	0.3	0.3	0.0		0.0	0.2	0.1
Profitability							
Return on Assets (ROA)	1.4	0.5	0.9	▲	2.4	2.8	2.7
Return on Equity (ROE)	10.4	2.9	7.5	▲	14.0	16.1	15.6
Interest Margin (NIM)	4.7	4.5	0.2	▲	4.9	5.3	5.5
Other Operating Income to Operating Income	29.9	28.3	1.6	▲	29.3	26.5	27.3
Profit (Loss) to Total Assets	1.1	0.3	0.8	▲	2.0	2.0	2.1
Profit (Loss) to Total Equity	8.9	2.7	6.2	▲	12.5	14.0	13.9
Total Liabilities to Total Assets	87.3	87.4	(0.1)	▼	85.0	86.3	85.8
Total Liabilities to Total Equity	687.9	689.6	(1.7)	▼	567.5	628.4	603.8
Fee Based Income to Total Other Operating Income	84.0	88.4	(4.4)	▼	82.8	82.8	84.9
Earnings per Share (EPS) (In Rupiah full amount)	585	176	232.4	▲	825	805	730
Liquidity							
Loan to Deposit Ratio (LDR)	79.7	87.3	(7.6)	▼	91.5	88.8	85.6
Liquid Assets to Total Assets	24.8	20.2	4.6	▲	18.6	19.7	20.2
Total Liquid Assets to Short-Term Funding	31.35	25.8	5.6	▲	18.4	17.8	24.8
Total MSME Loans to Total Loans	20.1	20.7	(0.6)	▼	20.4	19.5	18.3
RIM Ratio	74.1	75.4	(1.3)	▼	86.6	84.6	80.0

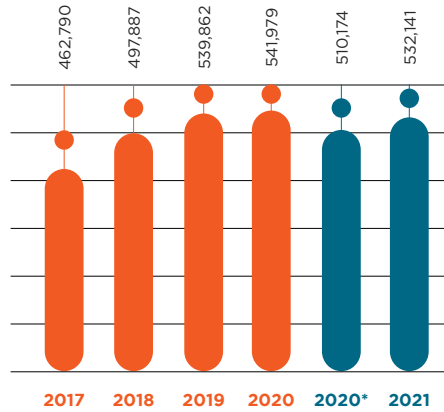
IN BILLION RUPIAH, UNLESS OTHERWISE STATED

	2021	2020	YOY 2020-2021 (%)		2019	2018	2017
Rasio Current Account/Saving Account (CASA)	69.4	68.4	1.0	▲	66.8	65.3	63.7
Rasio Cost of Fund (CoF)	1.6	2.6	(1.0)	▼	3.2	2.8	3.0
Compliance							
LLL Percentage							
Related Party	Nihil	Nihil			Nihil	Nihil	Nihil
Unrelated Party	Nihil	Nihil			Nihil	Nihil	Nihil
LLL Excess Percentage							
Related Party	Nihil	Nihil			Nihil	Nihil	Nihil
Unrelated Party	Nihil	Nihil			Nihil	Nihil	Nihil
Minimum Mandatory Reserve (GWM)							
Primary Rupiah GWM	7.7	5.4	2.3	▲	6.7	6.5	6.6
Foreign Currency GWM	4.0	4.0	0.0		8.0	8.0	8.0
Net Open Position (NOP)	0.9	3.2	(2.3)	▼	2.4	2.0	2.5
Efficiency							
BOPO (Operating Cost/Operating Income)	81.2	93.3	(12.1)	▼	73.2	70.2	70.8
CIR (Cost to Income Ratio)	43.3	44.2	(0.9)	▼	43.9	42.5	43.9
Others							
Operating Income/Employee (Rp Million)	1,985	1,738	14.2	▲	1,732	1,633	1,464
Number of Outlets (full amount, unaudited)	2,183	2,219	(2.4)	▼	2,245	2,378	2,270
Number of ATM (full amount, unaudited)	16,385	18,230	(10.1)	▼	18,659	18,311	17,966
Number of Employees (full amount, unaudited)	27,177	27,202	(0.1)	▼	27,211	27,224	27,803

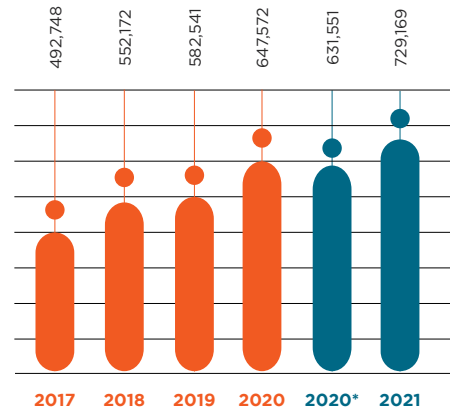
**Total Assets
(Rp-billion)**

**Total Equity
(Rp-billion)**


*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

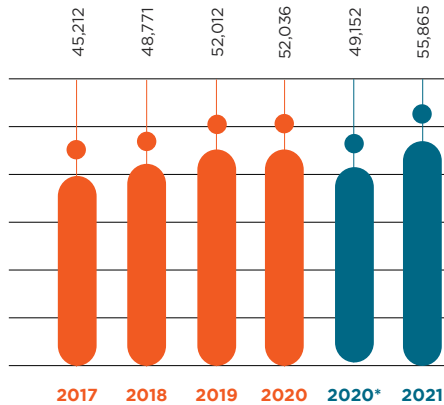
Loans Disbursed - Net (Rp-billion)



Customer Savings - Net (Rp-billion)

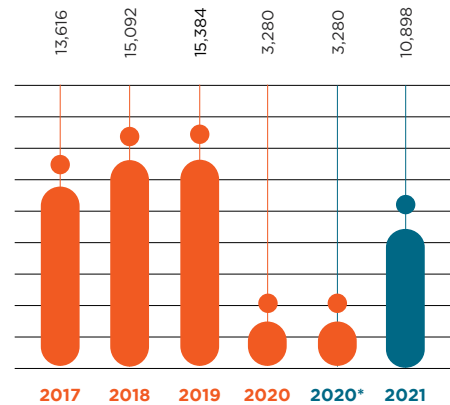


Operational Income (Rp-billion)



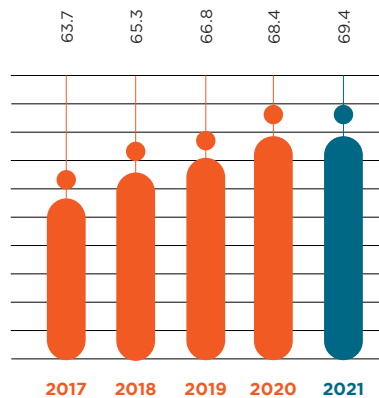
Net Income

Income for Attributable to Equity holders of the Parent Entity
(Rp-billion)

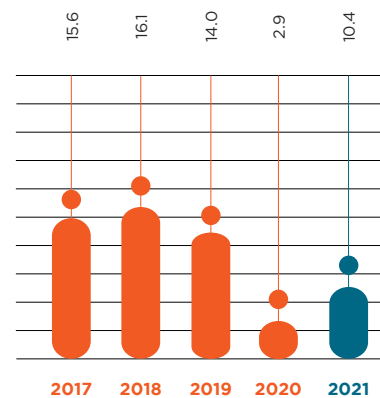


*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Current Account Saving Account (CASA) (%)



Return on Equity (ROE) (%)

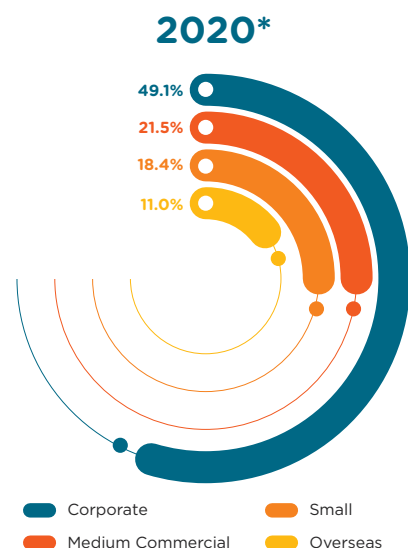
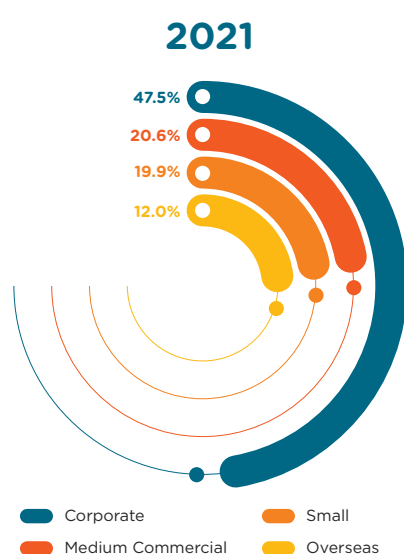


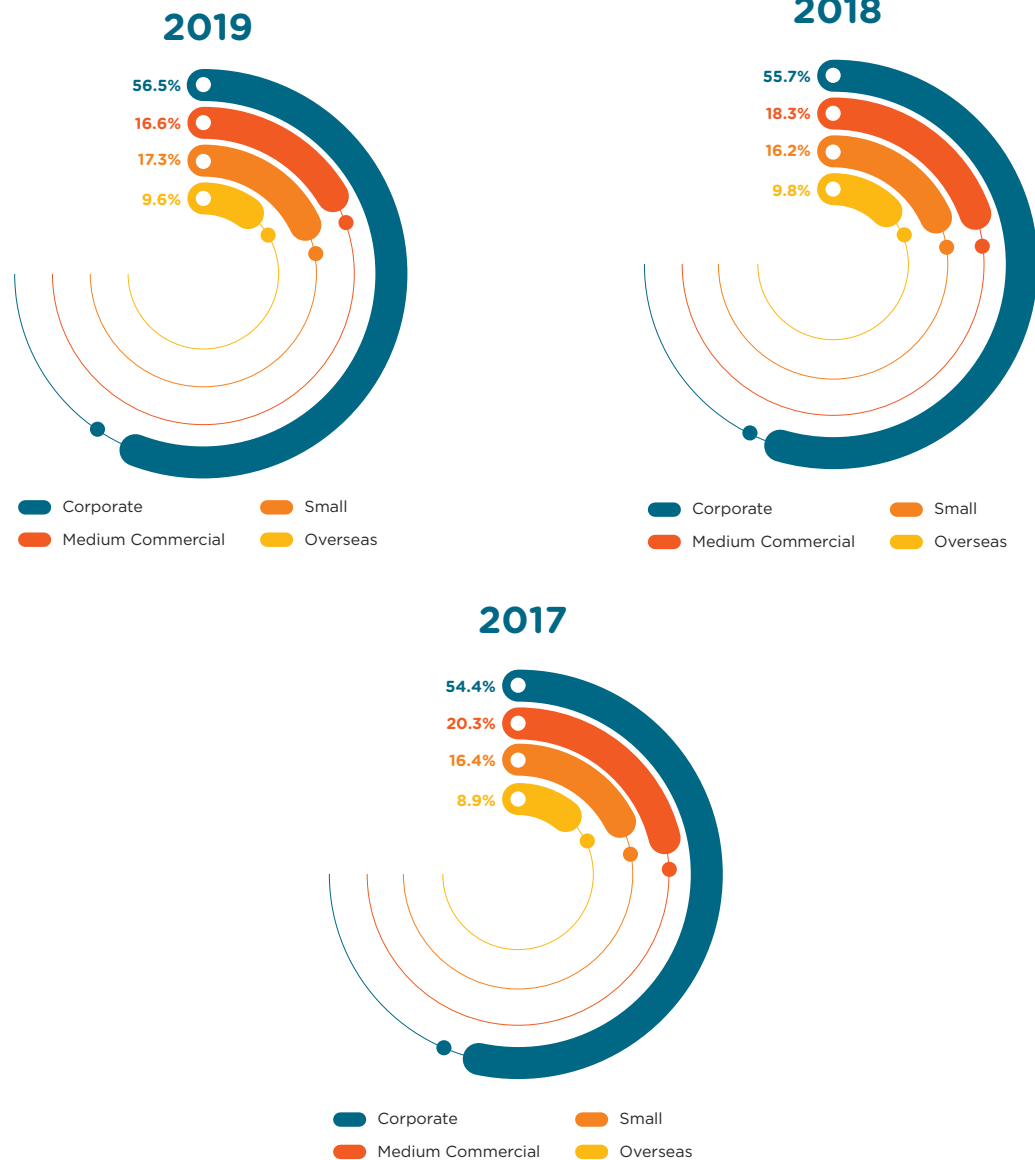
Operation and Organization Review

BUSINESS BANKING LOAN PRODUCT PERFORMANCE

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021	2020*	YOY 2020-2021 (%)		2019	2019	2018	2017
Corporate	229,028	226,473	1.1	▲	256,601	246,629	227,781	188,024
Medium Commercial	99,132	99,463	(0.3)	▼	67,193	72,691	74,731	70,261
Small	95,752	84,800	12.9	▲	84,800	75,461	66,063	56,479
Overseas	58,446	50,972	14.7	▲	53,114	41,750	39,918	30,734
Total	482,358	461,708	4.5	▲	461,708	436,531	403,493	345,499

*Product performance in 2020 after re-segmentation from Corporate to Medium Commercial

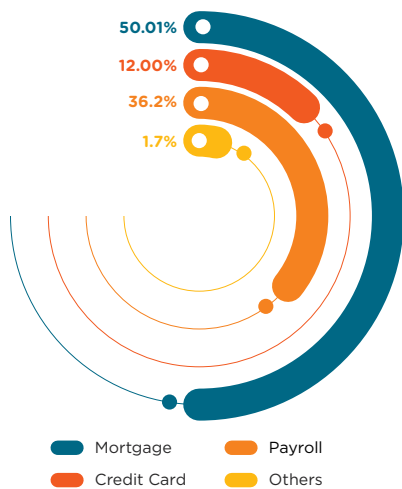




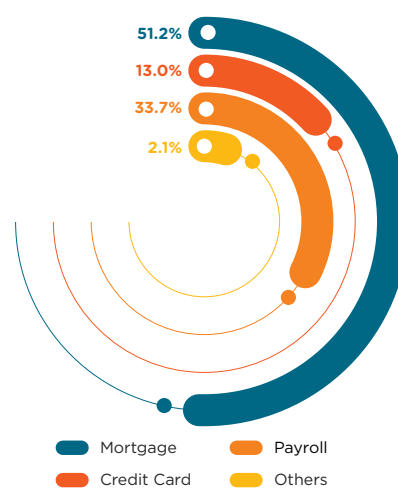
CONSUMER LOAN PRODUCT PERFORMANCE

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021	2020	YOY 2020-2021 (%)		2019	2018	2017
Mortgage	49,573	46,038	7.7	▲	44,128	40,753	37,066
Credit Card	11,868	11,647	1.9	▲	12,844	12,558	11,635
Payroll	35,799	30,269	18.3	▲	26,522	23,744	17,687
Others	1,788	1,923	(7.0)	▼	2,431	2,680	5,057
Total	99,028	89,877	10.2	▲	85,925	79,735	71,445

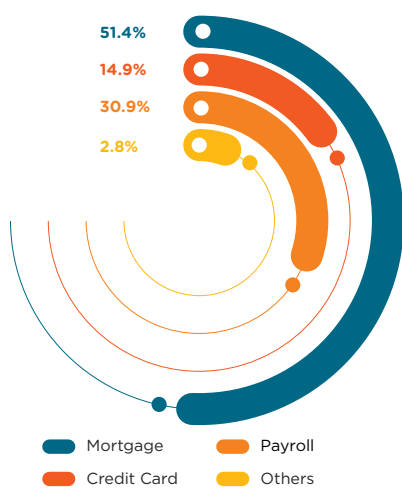
2021



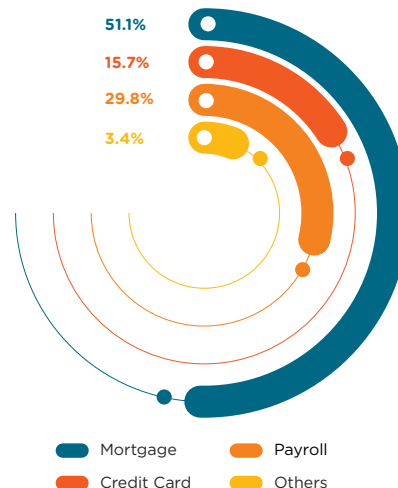
2020



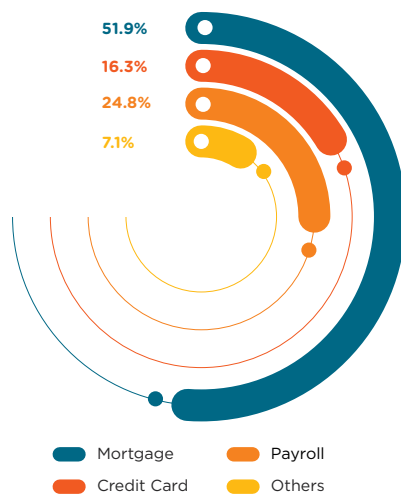
2019



2018



2017

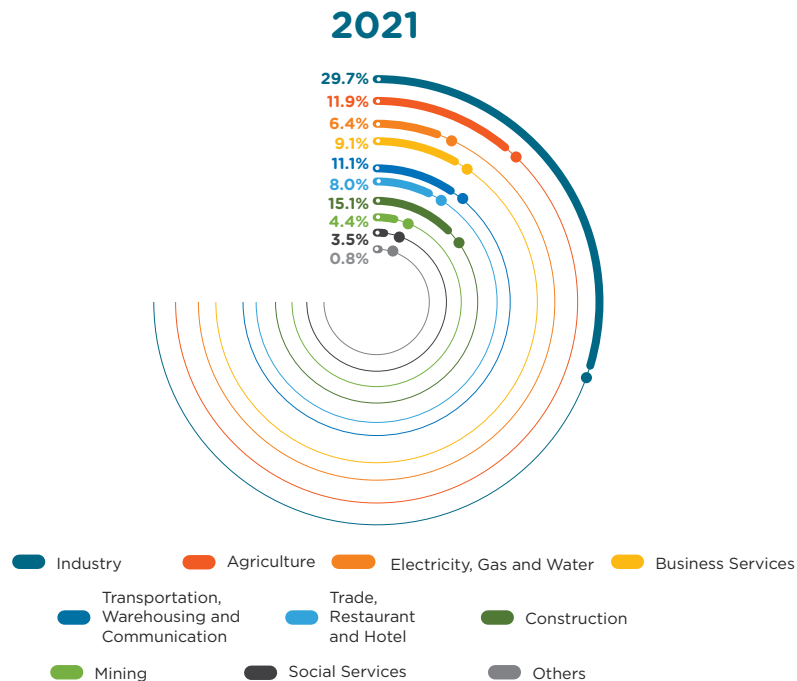


CORPORATE SEGMENT LOAN PRODUCT PERFORMANCE INCLUDING OVERSEAS BASED ON SECTOR

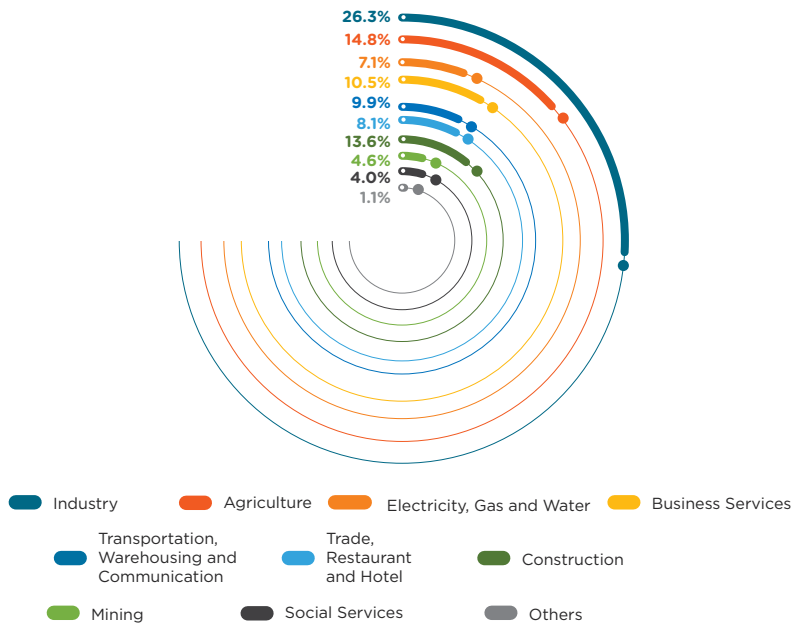
IN BILLION RUPIAH,
UNLESS OTHERWISE
STATED

	2021	2020*	YOY 2020*-2021 (%)		2020	2019	2018	2017
Industry	85,360	72,911	17.1	▲	81,257	76,404	69,407	55,941
Agriculture	34,241	40,954	(16.4)	▼	45,280	42,844	38,189	38,840
Business Services	26,056	29,236	(10.9)	▼	34,714	37,101	28,978	27,842
Electricity, Gas and Water	18,454	19,799	(6.8)	▼	21,377	29,100	22,578	25,232
Transportation, Warehousing and Communication	31,787	27,514	15.5	▲	30,740	18,807	20,780	17,439
Construction	43,470	37,707	15.3	▲	39,394	28,172	22,290	16,869
Trade, Restaurant and Hotel	23,094	22,355	3.3	▲	28,647	31,763	32,478	16,490
Mining	12,524	12,788	(2.1)	▼	12,925	9,718	15,559	9,496
Social Services	10,127	11,230	(9.8)	▼	12,429	9,892	7,310	5,496
Others	2,361	2,952	(20.0)	▼	2,952	4,627	5,130	5,114
Total	287,474	277,446	3.6	▲	309,715	288,430	262,699	218,758

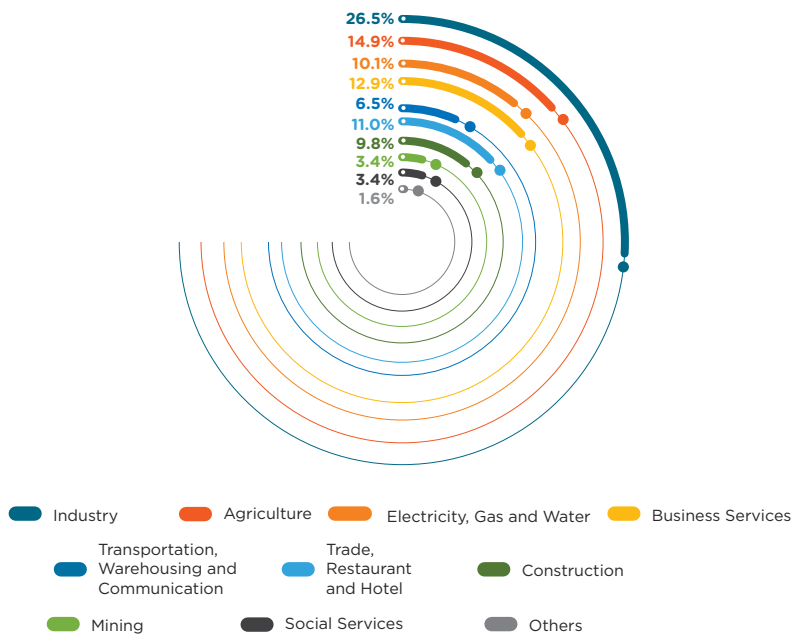
*Product performance in 2020 after re-segmentation from Corporate to Medium Commercial



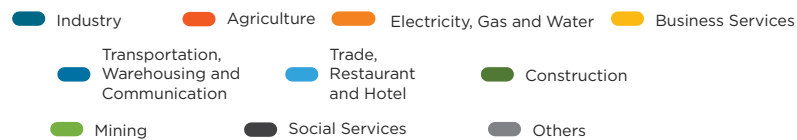
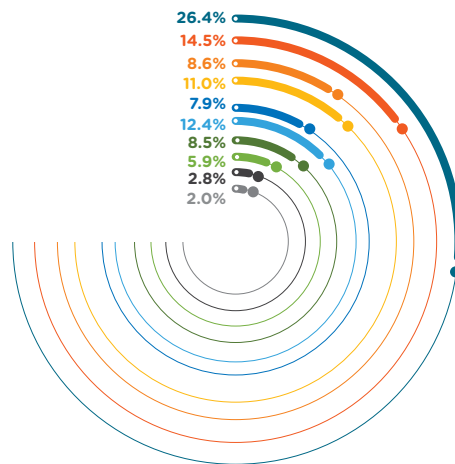
2020*



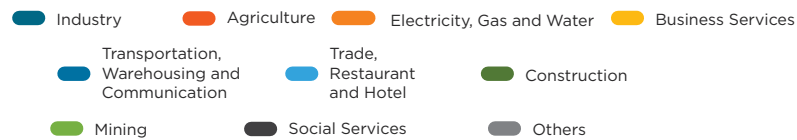
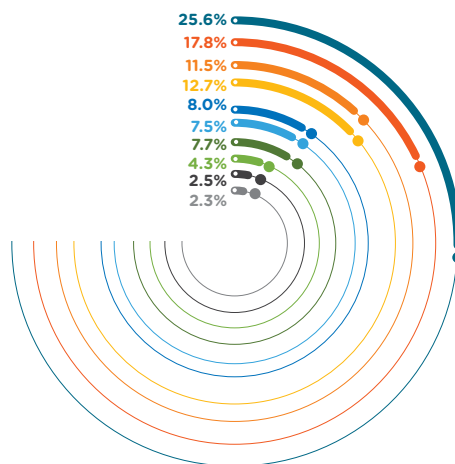
2019



2018

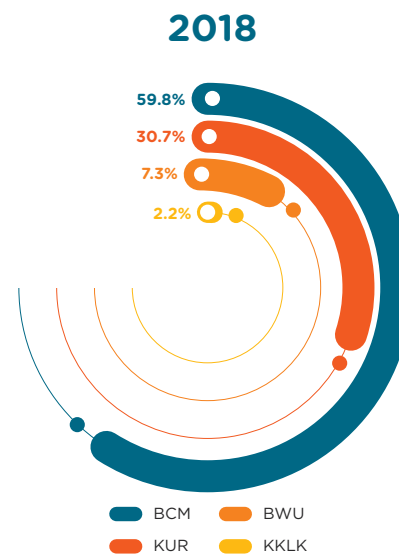
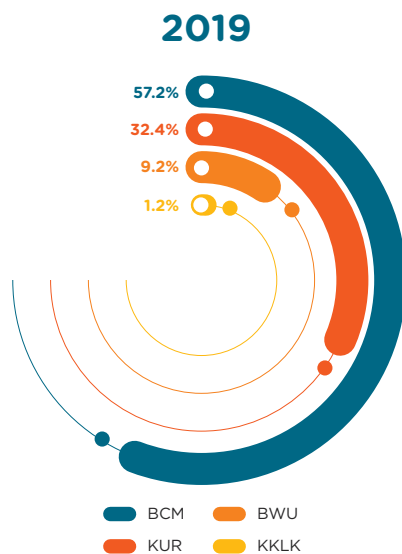
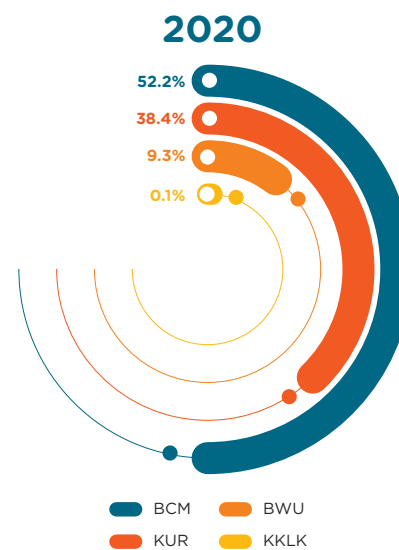
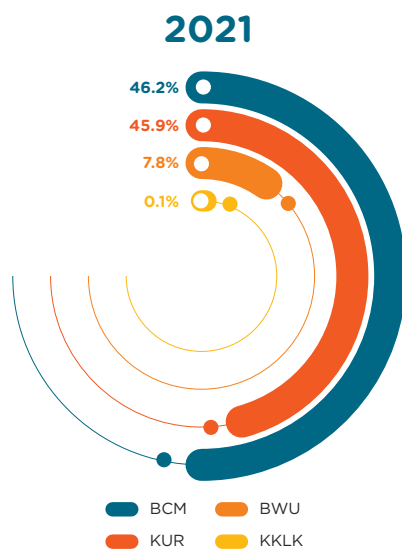


2017

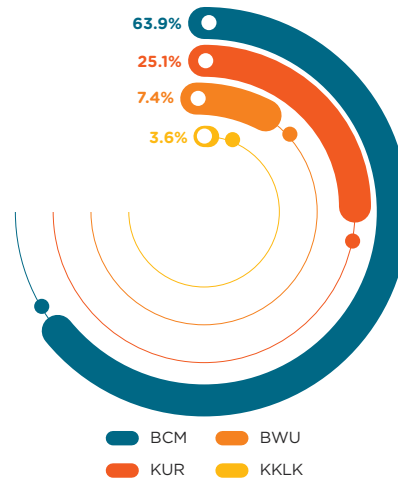


BUSINESS BANKING SMALL SEGMENT LOAN PRODUCT PERFORMANCE

IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021	2020	YOY 2020-2021 (%)		2019	2018	2017
BCM	44,230	44,262	(0.1)	♥	43,142	39,521	36,095
KUR	44,008	32,602	35.0	▲	24,482	20,289	14,194
KKLK	50	78	(35.9)	♥	880	1,459	2,019
BWU	7,464	7,858	(5.0)	♥	6,957	4,794	4,171
Total	95,752	84,800	12.9	▲	75,461	66,063	56,479



2017

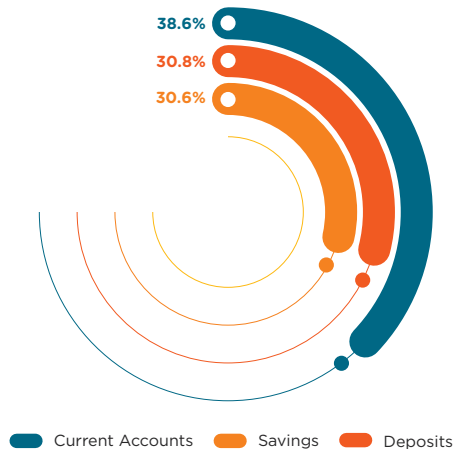


THIRD PARTY FUNDS PERFORMANCE- EXCLUDING TEMPORARY SYIRKAH FUNDS

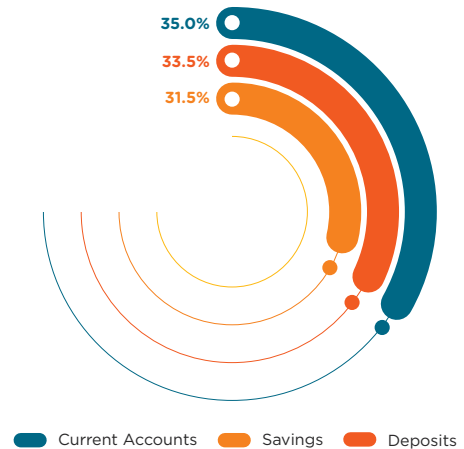
IN BILLION RUPIAH, UNLESS OTHERWISE STATED	2021	2020*	YOY 2020*-2021 (%)	2020	2019	2018	2017
Current Accounts	281,398	221,050	27.3	224,663	202,227	168,107	142,233
Savings	224,670	211,278	6.3	223,686	191,390	196,254	174,041
Deposits	223,101	199,223	12.0	199,223	188,924	187,812	176,475
Total	729,169	631,551	15.5	647,572	582,541	552,172	492,748

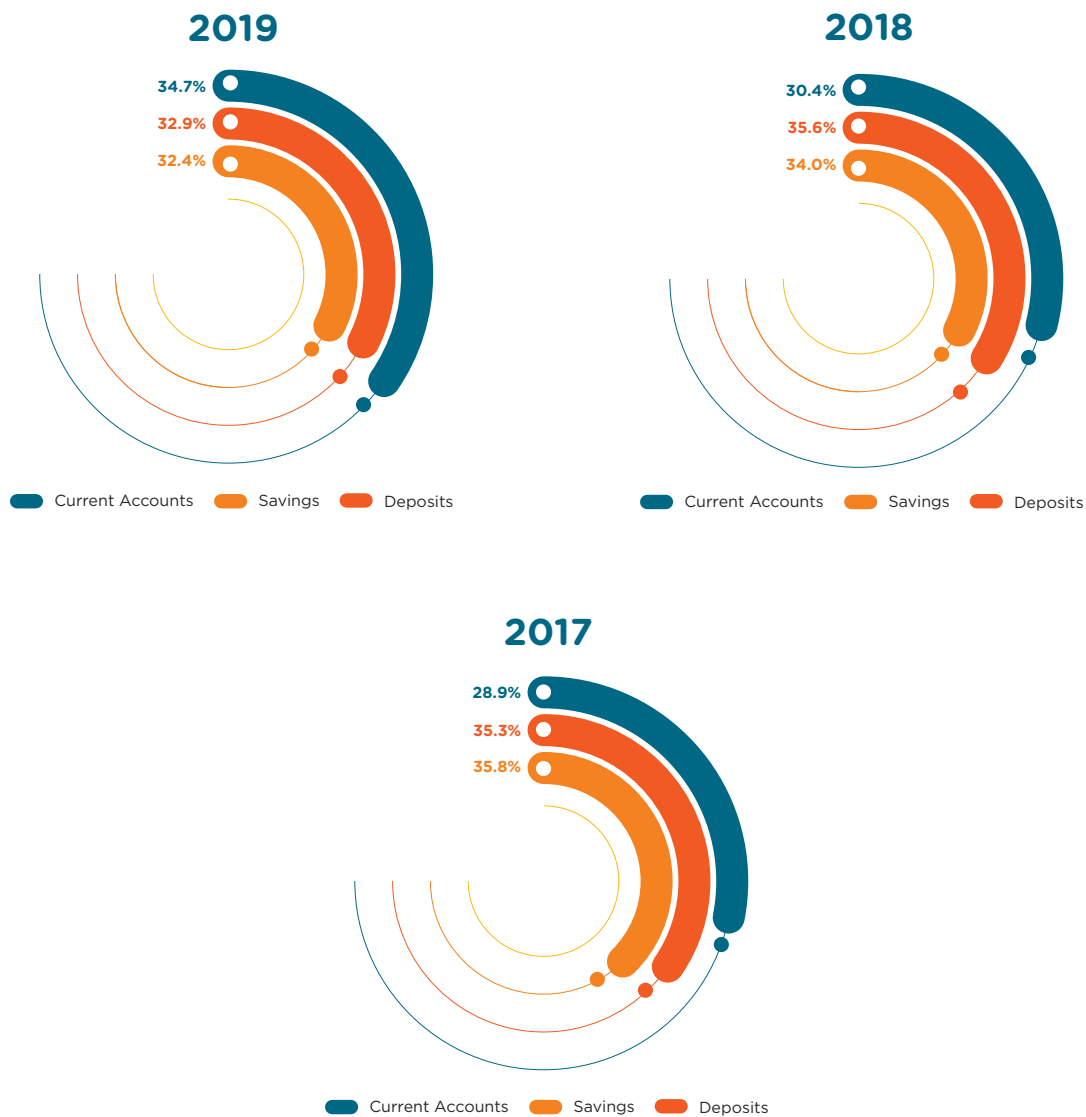
*2020 performance not including BNI Syariah performance

2021



2020*





COMPANY RATING 2021

RATING AGENCY	RATING
PEFINDO	
Corporate Rating	AAA/Stable
Moody's	
Outlook	Stable
Bank Deposits	Baa2/P-2
Baseline Credit Assessment	Baa3
Adjusted Bseline Credit Assesment	Baa3
Counterparty Risk Assesment	Baa2/P-2
Fitch Rating	
Long Term Foreign Currency	BBB-/Stable
Long Term Local Currency	BBB-/Stable
Short Term Foreign Currency	F3



RATING AGENCY	RATING
Support Rating Floor	BBB-
Support Rating	2
Viability Rating	bb+
National Long Term Rating	AA+/Stable
National Short Term Rating	F1+
Standard & Poor's	
Outlook	Negative
Long Term Foreign Issuer Credit	BBB-
Long Term Local Issuer Credit	BBB-
Short Term Foreign Issuer Credit	A-3
Short Term Local Issuer Credit	A-3

Shares Overview

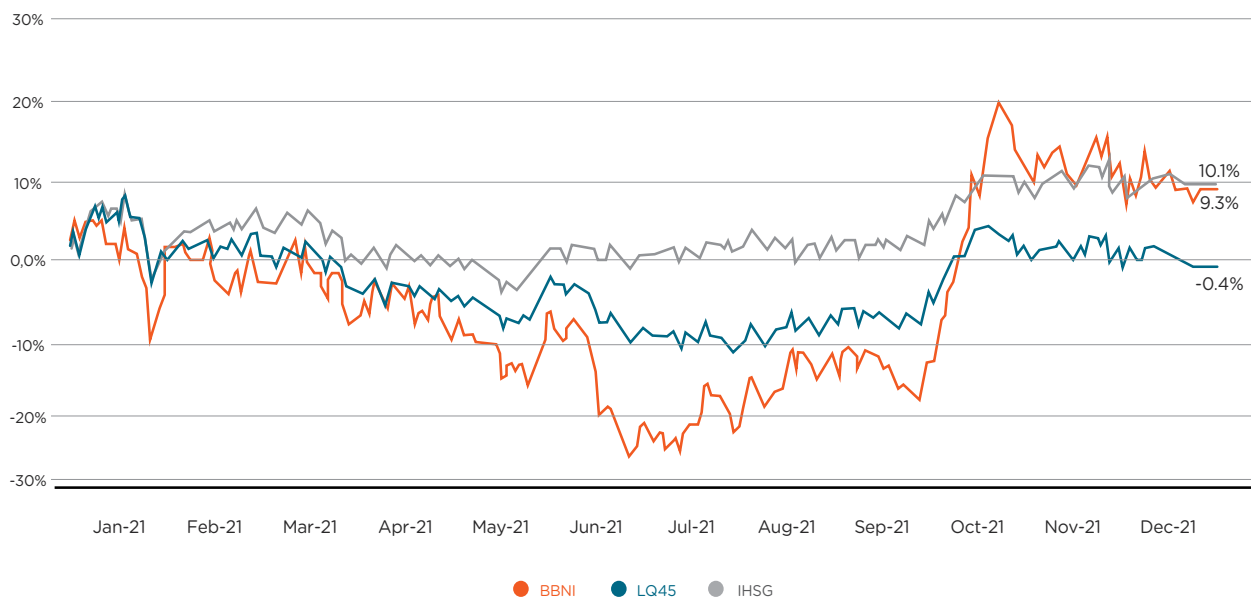
Stock Code: BBNI

“BNI has listed and traded its shares on the Indonesia Stock Exchange (formerly the Jakarta Stock Exchange and Surabaya Stock Exchange) since November 25, 1996. BNI was the first state bank to become a Public Company.”

INFORMATION ON BBNI SHARE MOVEMENT 2019-2021 ON THE INDONESIA STOCK EXCHANGE

PERIOD 2020	NUMBER OF SHARES (SHARES)	SHARE PRICE (RP/SHARE)				AVERAGE TRANSACTION VOLUME	MARKET CAPITALIZATION (RP-MILLION)
		OPENING	HIGHEST	LOWEST	CLOSING		
2021							
Quarter I	18,648,656,458	6,250	6,525	5,550	5,725	38,471,373	106,763,558
Quarter II	18,648,656,458	5,725	6,000	4,580	4,630	26,230,830	86,138,345
Quarter III	18,648,656,458	4,630	5,450	4,580	5,375	22,733,217	100,236,528
Quarter IV	18,648,656,458	5,375	7,450	5,350	6,750	37,222,193	125,878,428
2020							
Quarter I	18,648,656,458	7,775	7,925	3,160	3,820	38,982,174	71,237,871
Quarter II	18,648,656,458	3,680	4,860	3,330	4,580	73,678,088	85,410,843
Quarter III	18,648,656,458	4,540	5,350	4,330	4,440	58,924,427	82,800,032
Quarter IV	18,648,656,458	4,570	6,675	4,510	6,175	56,459,735	115,115,455
2019							
Quarter I	18,648,656,458	8,725	9,600	8,600	9,400	19,358,250	175,297,379
Quarter II	18,648,656,458	9,400	9,850	8,100	9,200	25,243,072	171,567,636
Quarter III	18,648,656,458	9,375	9,375	7,350	7,350	20,388,339	137,067,623
Quarter IV	18,648,656,458	7,275	7,950	6,675	7,850	22,655,693	146,391,947

Graph of BBNI, JCI, and LQ45 Stock Price Movements Throughout 2021 Relative to Closing Prices Year 2020 (Year to Date)



CORPORATE ACTIONS

1. Tier 2 Capital Bond

To support the Bank's 2021 Business Plan and strengthen its capital structure using relatively stable or non-fluctuating funding, on March 30, 2021 BNI issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) amounting to USD 500,000,000 (five hundred million US Dollars) with an interest of 3.75% (three point seven five percent) per year. This was the first issuance by BNI based on the Euro Medium Term Note program that started on May 6, 2020 and was renewed on March 22, 2021 ("EMTN Program"). Based on the EMTN Program, BNI can issue debt securities in stages up to a maximum principal amount of USD 2,000,000,000 (two billion US Dollars). The issuance of this USD 500,000,000 Debt equates of less than 20% the Bank's equity based on the audited Financial Statements as of December 31, 2020.

Proceeds from the debt securities issuance were used for financing and general funding purposes, to strengthen BNI's increasingly solid financial condition during the economic recovery. Moody's International Rating Agency gave a Ba2 rating and Fitch gave a BB rating for BNI's Tier 2 Capital Bond. During the challenging economic conditions due to the pandemic, these Tier 2 Capital Bonds issuance received a positive response from global investors, resulting in requests reaching USD 2.2 billion or oversubscribed up to 4.4 times the issue value. The high demand from global investors is an indication of the high level of foreign investor confidence in the Company thanks to the its performance and strategy during the pandemic, as well as global investor confidence in the national economic recovery process.

2. Additional Tier-1 Capital Securities (AT-1)

Management has prioritized capital strengthening as one of its strategic steps within the framework of the company's transformation program, the objective being to optimize the momentum during the national economic recovery as well as to strengthen the company's fundamentals through systematic and comprehensive improvement efforts.

To strengthen its capital, BNI's took advantage of the positive momentum in the securities market in 2021 and issued perpetual bonds, classified as Additional Tier 1 (AT1) instruments, amounting to USD 600,000,000 (six hundred million United US Dollars). The BNI's completed the issuance of its AT1 Perpetual Non-Cumulative Capital Securities (hereinafter referred to as "AT-1 Capital Securities") on September 24, 2021 with a distribution (yield) of 4.3% (four point three percent) per annum, following Regulation S (Reg S) of the US Securities Act, and they were listed on the Singapore Stock Exchange. This transaction is a major event as the Company became the first bank in Indonesia to issue Additional Tier 1 capital instruments.

3. Shares Buyback

In the midst of a surge in positive cases of Covid-19 (second wave) that occurred in July 2021, JCI tends to fluctuate and have an impact on prices shares so that BBNI's share price is at level Rp4,630 on June 30, 2021 and made BNI shares undervalued with Price to Book Value (PBV) of 0.75x or has been far at below the 10-year average PBV of 1.60x. The condition of the weakening of stock prices is not reflects BNI's ongoing fundamental condition improve as the transformation program progresses enterprise and digital strengthening, which is reflected from more efficient business operations and asset quality continues to improve. On the other hand, BNI planning to run a program of ownership employee share and ownership program shares by the Board of Directors and the Board of Commissioners as part of the long-term incentive. Then, the condition an exchange where stock valuations are depressed to a level that does not reflect the company's fundamentals actually become one of the moments the right one to make a repurchase (buyback) shares in order to support BNI plans to prepare a remuneration program in the form of shares.

The Company's Share Buyback is carried out for a period of 3 (three) months from July 22, 2021 to October 21 2021. During this period, the Company has purchase 24,682,600 shares, worth Rp128,026,122,396 which is recorded as treasury stock. Share Buyback Fee comes from the Company's internal cash, the impact the Company's operational costs do not material, so that the Profit and Loss is still in line with the Company targets. Execution of Purchase transactions Return of Shares The Company does not provide material negative impact on the Company's business activities, considering that the Company have sufficient capital and cash flow to carry out concurrent transaction financing with the Company's business activities. Corporate action This further convinces investors that BNI have strong financial fundamentals.

MERGER OF BNI SYARIAH (BNIS) WITH BRI SHARIA (BRIS) AND BANK SYARIAH MANDIRI (BSM) INTO BANK SYARIAH INDONESIA (BSI)

To strengthen the national sharia banking performance and at the same time elevating Indonesia's sharia economy in the global arena, on October 12, 2020, PT Bank Negara Indonesia (Persero) Tbk, PT Bank Mandiri (Persero) Tbk, PT Bank Rakyat Indonesia (Persero) Tbk, PT Bank BNI Syariah ("BNIS"), PT Bank Syariah Mandiri ("BSM"), and PT Bank BRI Syariah Tbk ("BRIS") agreed on an action plan to merge BNIS, BSM and BRIS, and signed a Conditional Merger agreement. This Merger was supported by the Government of the Republic of Indonesia as the ultimate controlling shareholder of the above parties and would become effective after approvals were obtained from the competent authorities, and with due observance of the provisions of the articles of association of each related company, as well as the provisions of prevailing laws.

In the merger action plan, BNI and BNIS Subsidiaries carried out several stages in accordance with prevailing legal provisions, including:

1. Announced a Summary of the Merger Plan to the public, and announced the Merger plan to employees of each Merger-Participating Bank on October 21, 2020, as well as announced additional information and/or changes to the Summary of the Merger Plan to the public on December 11, 2020.
2. Within the time limit specified in Article 127 paragraph (4) of the Company Law (i.e. no later than 14 days after

the announcement of the Summary of the Merger Plan) and in Article 37 paragraph (1) of PP No. 28/1999 (i.e. no later than 7 days before the summons for the BNIS general meeting of shareholders), no BNIS creditors raised objections to the proposed Merger.

3. BNIS together with BRIS and BSM submitted a business merger statement to OJK (Capital Market Supervisor) on October 21, 2020 and obtained an effective statement from the OJK Capital Market Supervisor in accordance with OJK Letter No. S-289/D.04/2020 dated December 11, 2020.
4. The approval of the BNIS shareholders was obtained based on a BNIS Shareholders outside the EGMS Decision on December 15, 2020, and was followed by the signing of the Deed of Merger before a notary on December 16, 2020 as stated in the Merger Deed No. 103 dated December 16, 2020, as restated in Deed No. 37 dated January 14, 2021, drawn up before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta.
5. Obtained a copy of the OJK Board of Commissioners Decision No. 4/KDK.03/2021 dated January 27, 2021 concerning the Granting of a Permit for the Merger of PT Bank Syariah Mandiri and PT Bank BNI Syariah into PT Bank BRI Syariah Tbk and License to Change the Name by Using the Business License of PT Bank BRI Syariah Tbk to become a business license for PT Bank Syariah Indonesia Tbk. as the Merged Bank.
6. Obtained a Minister of Law and Human Rights Letter No. AHUAH.01.10-0011384 dated January 28, 2021 concerning the Receipt of Notification of the Merger of BNIS and BSM into BRIS, which had been received and recorded in the Legal Entity Administration System and became effective on February 1, 2021.
7. Obtaining a Minister of Law and Human Rights Letter No. AHU-0006268. AH.01.02.TAHUN 2021 dated February 1, 2021 concerning amendments and restatements of all articles of the BSI articles of association.

After these stages were completed, on February 1, 2021, BNIS effectively merged with BSM and BRIS, and was no longer a part of the 2021 consolidated financial statements of BNI and its Subsidiaries. The name of the merged entity was PT Bank Syariah Indonesia Tbk ("BSI"). Hereinafter, the capital and shareholders composition of the Merged Bank will be based on Deed No. 38/2021, and the BRIS Shareholder Register issued by PT Datindo Entrycom as the BRIS Securities Administration Bureau, whereby BNI owns 24.9% of BSI's shares.

SHARE DIVIDEND

After approval by the shareholders at the 2020 Annual General Meeting of Shareholders (GMS) held on March 29, 2021, the BNI's distributed Dividends equal to 25% of the Company's net profit for the 2020 Fiscal Year of Rp3,280,403,281,976. Dividends paid amounted to Rp820,100,820,494.

The Dividend per share distributed amounted to Rp44.02 per share. As the Government owns 60% of the shares, the Company paid dividends of Rp492,577,663,633.03 to the state treasury account. For the 40% of the shares owned by the public, Rp327,523,159,322.46 were paid to shareholders based on their respective ownership. Share Dividend distribution for the last 5 (five) years is as follows:

	DIVIDEND DISTRIBUTION YEAR				
	2021 (FOR BUSINESS RESULTS IN 2020)	2020 (FOR BUSINESS RESULTS IN 2019)	2019 (FOR BUSINESS RESULTS IN 2018)	2018 (FOR BUSINESS RESULTS IN 2017)	2017 (FOR BUSINESS RESULTS IN 2016)
Total Dividends Distributed (Rp-billion)	820,10	3.846,12	3.753,78	4.765,76	3.968,56
Dividend per Share (Rp)	44,02	206,24	201,29	255,56	212,81
Dividend Ratio (%)	25% of net income in 2020	25% of net income in 2019	25% of net income in 2018	35% of net income in 2017	35% of net income in 2016
Date of Announcement	March 29, 2021	February 24, 2020	May 14, 2019	March 20, 2018	March 20, 2017
Date of Payment	April 30, 2021	March 24, 2020	June 14, 2019	April 20, 2018	April 20, 2017

TEMPORARY SUSPENSION AND/OR DELISTING OF SHARES

In 2021 was no temporary suspension of stock trading and/or delisting of shares.



Bonds, Sukuk and/or Convertible Bonds Overview

List of Outstanding Bonds for the Period 2020-2021

BOND NAME	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE	
BNI Phase I Sustainable Bonds I in 2017	July 11, 2017	June 22, 2017	5 Years	Rupiah	Rp3.000.000.000.000	
BNI Tier II Capital Bond 2021	March 30, 2021	March 30, 2021	5 Years	US Dollar	USD 500.000.000	
BNI Additional Tier I Capital Bond 2021	September 24, 2021	September 24, 2021	Non Callable 5.5 years	US Dollar	USD 600.000.000	

Other Funding Sources

BNI Medium Term Notes (MTN)

NAME	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE	
Medium Term Notes Subordinasi I BNI Tahun 2018	August 10, 2018	August 10, 2018	5 years	Rupiah	Rp100.000.000	



	BID PRICE	MATURITY DATE	INTEREST RATE	RATING	LISTING EXCHANGE	TRUSTEE	STATUS
	100.00	July 11, 2022	8.00% p.a	<ul style="list-style-type: none"> 2021: idAAA (Pefindo) 2020: idAAA (Pefindo) 	Bursa Efek Indonesia (BEI)	PT Bank Rakyat Indonesia (Persero) Tbk	Active/Not Yet Due
	100.00	March 30, 2026	3.75%	<ul style="list-style-type: none"> 2021 : BB (Fitch) 2021 : Ba2 (Moody's) 	SGX Listing	HSBC Corp Ltd.	Active/Not Yet Due
	100.00	March 24, 2027	4.3%	2021 : Ba3 (Moody's)	SGX Listing	HSBC Corp Ltd.	Active/Not Yet Due

	BID PRICE	MATURITY DATE	INTEREST RATE	RATING	LISTING EXCHANGE	WALI TRUSTEE	STATUS
	100.00%	August 10, 2023	8.00% p.a	<ul style="list-style-type: none"> 2021: idAAA (Pefindo) 2020: idAAA (Pefindo) 	Bursa Efek Indonesia (BEI)	PT Bank Rakyat Indonesia (Persero) Tbk	Active/Not Yet Due

Negotiable Certificate of Deposit (NCD)

NAME	ISSUE DATE	EFFECTIVE DATE	TENOR	VALUE (RP-MILLION)	MATURITY DATE	DISCOUNT RATE	STATUS
NCD BNI Year 2020							
NCD BNI I Year 2020 Series A	May 12, 2020	-	3 months	400,000	August 10, 2020	5.40%	Paid
NCD BNI I Year 2020 Series B	May 12, 2020	-	6 months	580,000	November 9, 2020	5.60%	Paid
NCD BNI I Year 2020 Series C	May 12, 2020	-	9 months	50,000	February 8, 2021	5.70%	Paid
NCD BNI I Year 2020 Series D	May 12, 2020	-	360 days	360,000	May 7, 2021	5.80%	Paid

Global Certificate of Deposit BNI

NAME	ISSUE DATE	EFFECTIVE DATE	TENOR	VALUE (RP-MILLION)	MATURITY DATE	DISCOUNT RATE	STATUS
Global CD BNI - 2020							
Zero Coupon (No Interest)							
CD BNI January 2020 USD CD - Mizuho	January 13, 2020	January 17, 2020	188 days	4,000,000	July 23, 2020	2.35%	Paid
CD BNI January 2020 USD CD - Mizuho	January 13, 2020	January 17, 2020	273 days	4,000,000	October 16, 2020	2.40%	Paid
CD BNI January 2020 USD CD - Mizuho	January 22, 2020	January 30, 2020	182 days	2,000,000	July 30, 2020	2.35%	Paid
CD BNI January 2020 USD CD - Mizuho	January 22, 2020	January 30, 2020	274 days	2,000,000	October 30, 2020	2.40%	Paid
CD BNI February 2020 USD CD - BNP Paribas	January 28, 2020	February 4, 2020	184 days	6,000,000	August 6, 2020	2.35%	Paid
CD BNI February 2020 USD CD - BNP Paribas	January 28, 2020	February 4, 2020	353 days	2,000,000	January 22, 2021	2.50%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 4, 2020	February 11, 2020	184 days	9,800,000	August 13, 2020	2.40%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 4, 2020	February 11, 2020	353 days	4,700,000	January 29, 2021	2.55%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 5, 2020	February 12, 2020	90 days	9,100,000	May 12, 2020	2.40%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 5, 2020	February 12, 2020	182 days	35,000,000	August 12, 2020	2.58%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 12, 2020	February 19, 2020	182 days	4,100,000	August 19, 2020	2.40%	Paid
CD BNI February 2020 USD CD - BNP Paribas	February 12, 2020	February 19, 2020	355 days	1,500,000	February 8, 2021	2.50%	Paid
CD BNI February 2020 USD CD - MUFG	February 13, 2020	February 21, 2020	355 days	15,000,000	February 10, 2021	2.55%	Paid
CD BNI February 2020 USD CD - Mizuho	February 14, 2020	February 21, 2020	355 days	5,000,000	February 10, 2021	2.55%	Paid
CD BNI March 2020 USD CD - BNP Paribas	March 3, 2020	March 10, 2020	184 days	4,800,000	September 10, 2020	1.75%	Paid
CD BNI March 2020 USD CD - MUFG	March 10, 2020	March 17, 2020	184 days	4,000,000	September 17, 2020	1.40%	Paid
CD BNI March 2020 USD CD - Mizuho	March 17, 2020	March 20, 2020	288 days	4,400,000	September 24, 2020	1.45%	Paid
CD BNI July 2020 USD CD - MUFG	July 9, 2020	July 15, 2020	184 days	15,000,000	January 15, 2021	1.15%	Paid

Global Certificate of Deposit BNI

NAME	ISSUE DATE	EFFECTIVE DATE	TENOR	VALUE (RP-MILLION)	MATURITY DATE	DISCOUNT RATE	STATUS
CD BNI July 2020 USD CD - MUFG	July 9, 2020	July 14, 2020	184 days	23,200,000	January 14, 2021	1.15%	Paid
CD BNI July 2020 USD CD - MUFG	July 9, 2020	July 15, 2020	184 days	135,000,000	January 15, 2021	1.20%	Paid
CD BNI August 2020 USD CD - MUFG	August 25, 2020	August 28, 2020	92 days	12,700,000	November 28, 2020	0.90%	Paid
CD BNI November 2020 USD CD - MUFG	November 9, 2020	November 17, 2020	181 days	25,000,000	May 17, 2021	0.95%	Paid
CD BNI November 2020 USD CD - MUFG	November 17, 2020	November 20, 2020	188 days	18,000,000	May 27, 2021	0.95%	Paid
CD BNI November 2020 USD CD - MUFG	November 17, 2020	November 20, 2020	188 days	25,000,000	May 27, 2021	0.95%	Paid
CB BNI January 2021 USD CD - MUFG	January 21, 2020	January 28, 2020	355 days	50,000,000	January 18, 2022	1.1%	Paid
Fixed Coupon (With Interest)							
CD BNI Januari 2020 USD CD - MUFG	January 21, 2020	January 28, 2020	91 days	28,000,000	April 28, 2020	2.55%	Paid
CD BNI Februari 2020 USD CD - MUFG	February 3, 2020	February 10, 2020	274 days	74,200,000	November 10, 2020	2.33%	Paid
CD BNI Maret 2020 USD CD - MUFG	February 3, 2020	March 10, 2020	92 days	72,600,000	June 10, 2020	1.68%	Paid
CD BNI Juni 2020 USD CD - HSBC	June 9, 2020	June 17, 2020	91 days	122,600,000	September 16, 2020	0.68%	Paid
CD BNI September 2020 USD CD - Credit Agricole	September 1, 2020	September 10, 2020	91 days	138,000,000	December 10, 2020	0.75%	Paid
CD BNI November 2020 USD CD - Credit Agricole	November 6, 2020	November 13, 2020	91 days	32,200,000	February 12, 2021	0.69%	Paid
CD BNI Desember 2020 USD CD - Mizuho	December 3, 2020	December 10, 2020	90 days	50,000,000	March 10, 2021	0.695%	Paid

Event Highlights 2021

JANUARY



January 2, 2021

BNI's Emerald customers grew by 11% supported by Wealth Management services

During 2020, BNI Wealth customers' Assets Under Management (AUM) grew to Rp155 trillion per 31 December 2020, a growth 11% compared to the same period in 2019.



January 4, 2021

BNI Smartfarming Trials Grow in 5 Provinces

COVID-19 pandemic has increasingly encouraged the Government to organize agricultural programs for national food security. One form of support by BNI is the BNI Smartfarming program.



January 27, 2021

Facing the Pandemic, BNI Transformation

BNI has taken the initiative to transform in an effort to accelerate continuous financial performance improvements, as well as perfect BNI's long-term plans. This BNI Transformation Program is based on the BNI RACE values, namely Risk Culture, Agile, Collaboration, and Execution Oriented.



FEBRUARY

February 15, 2021

BNI & BKPM Cooperation Facilitating Domestic and Foreign Investment



The Investment Coordinating Board (BKPM) collaborated with BNI as outlined in a Memorandum of Understanding on Investment Facilitation and Banking Services for Investors. The BKPM and BNI Memorandum of Understanding included providing information on roles, facilitatng, and education related to investment opportunities; transactions and other banking services required by investors; facilitatng both foreign investors who come to Indonesia and Indonesian investors who carry out investment activities overseas; cooperation in the preparation, procurement of information and implementation of investment promotions at home and abroad; and cooperation in the promotion and development of banking services provided by BNI.

February 28, 2021

Helping MSMEs Survive, An Important Role for BNI



BNI has succeeded in becoming a promoter in boosting export and business performance of micro, small and medium enterprises. The strategies carried out by BNI include fostering MSME Exports and optimizing the diaspora network, creating a leading export business ecosystem, and establishing a digital value chain. One of BNI's fostered partners is Batik Arjuna Cemerlang. The business, which was started in 1966, has been able to print exports of up to USD5 billion.

MARCH



March 25, 2021

Strengthening Capital, BNI Issues Tier 2 Subordinated Notes

On March 23, 2021, BNI completed its market assessment activity (roadshow) and pricing related to the issuance of debt securities denominated in United States (US) Dollars in the form of Tier 2 Subordinated Notes in the amount of USD500,000,000 (five hundred million US Dollars) with an interest rate of 3.75% (three point seven five percent) per year for a tenor of 5 years. Issuance was completion on March 30, 2021.



March 29, 2021

BNI Distributes 25% Dividend 2020

At the Annual General Meeting of Shareholders (AGMS) BNI approved the distribution of dividends related to 25% of net profit for the fiscal year 2020 of approx. Rp820.1 billion. Government-owned shares accounted for 60%, and BNI will pay dividend of Rp492.58 billion to the state general treasury account.



March 30, 2021

BNI Delivers 4,675 KPR Sejahtera FLPP

BNI once again held the Prosperous Home Ownership Loan (KPR) Mass Credit Agreement activity through the revolving fund scheme for the Housing Financing Liquidity Facility (FLPP). This FLPP Prosperous KPR mass contract activity was given to 4,675 debtors, doubled from last year's 2,046 debtors. This activity was held to accelerate the distribution of subsidized mortgages for Low-Income Communities (MBR) through the FLPP revolving fund scheme or the FLPP Prosperous KPR as part of a series of activities to celebrate BNI's 75th anniversary.



APRIL



April 11, 2021

Targeting Double-Digit Growth in Overseas Branch Offices, BNI Develops International Business,

BNI is optimistic that international business can grow despite the Covid-19 pandemic not being over yet. BNI has the largest network of Overseas Branch Offices (KCLN) in the country. This transformation effort has produced positive results where revenue from BNI's international business grew by 26.8% in 2020 even though Indonesia was suffering from the Covid-19 pandemic. KCLN as one of the main contributors to BNI's international banking sector also recorded a profit growth of 67.5% in 2020, with net interest growth (NII) growing by 61.6% and non-interest income (FBI) growing by 49.7%.



April 12, 2021

BNI Collaborated with J.P. Morgan, Money Transfers are Getting Easier

BNI applied block-chain technology from JP Morgan to simplify the data validation process in money transfer transactions from overseas Indonesians. This service is already being used for remittances from Taiwan to Indonesia.



April 16, 2021

Relocation of Seoul Office, BNI Ready to Meet Indonesian & Korean Entrepreneurs

BNI succeeded in relocating the Seoul branch office as well as establishing the BNI Korea Desk. BNI's strategic move will be the most appropriate moment for the company to more aggressively bring together Indonesian and South Korean entrepreneurs. Moreover, BNI's Overseas Branch Office (KCLN) is currently located in the central business district and has duties as a trade & investment center, as well as an advisor for Indonesian MSMEs to penetrate the global market.

MAY



May 4, 2021

BNI Mobile Banking, Best Among National Bank Mobile Apps

At a time when people's need for digital devices is increasing, BNI has succeeded in presenting BNI Mobile Banking as the best banking service provider application among other national banks. This was the recognition given in the Bank Service Excellence Monitor (BSEM) 2021 survey conducted by Marketing Research Indonesia (MRI). Many of the BNI Mobile Banking features BSEM saw as a superior digital service, surpassing national banks providing similar services.



May 18, 2021

Exim Bank Taiwan Collaborates with BNI, Provides Relending Facility

BNI is exploring the expansion of banking services to the East Asia region, including Taiwan, where Indonesia currently has great potential in developing economic and trade cooperation. The Relending facility from Exim Bank Taiwan can be utilized by BNI customers who import goods from Taiwan with an easy process, up to 100% of the transaction value.



May 25, 2021

BNI Becomes Official Supporter of the National Badminton

PP PBSI General Chairman Agung Firman Sampurna and BNI President Director Royke Tumilaar signed a Memorandum of Understanding (MoU) for Sponsorship Cooperation of the National Training Center (Pelatnas) of the All Indonesian Badminton Association (PBSI) in Jakarta, Tuesday (25/5). With this support, BNI has committed to ensuring that the national badminton youth athlete development program will continue.



JUNE



June 4, 2021

Actively Supporting Exports, BNI Wins Consulate Award 2020

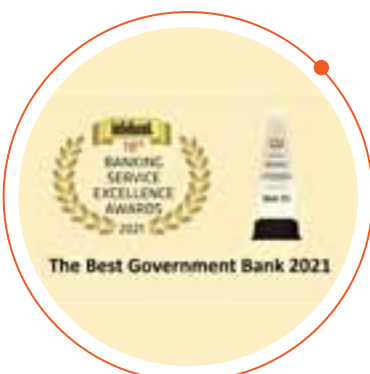
During its 75th Anniversary, BNI received an award from the Indonesian Consul General for Hong Kong and Macau during the 2020 Consulate Award event. The awards were given as BNI Hong Kong, one of the Company's overseas branch offices, had succeeded in becoming BNI's arm in encouraging exports from Indonesia and open access to international markets for Indonesian exporters.



June 28, 2021

Achieving MURI Record, Virtual Mass Contract for 750 BNI Agen46 BNI KUR Recipients

The disbursement of People's Business Loans (KUR) to Laku Pandai agents is not a myth, as proven by 750 BNI Agen46 or Laku Pandai agents managed by BNI receiving KUR disbursements from the bank, which will be 75 years old on July 5, 2021. The simultaneous signing of the KUR Agreement in all BNI service areas was carried out virtually on Monday, (28/6/2021). The BNI President Director, Royke Tumilaar, was present online to witness this event.



June 29, 2021

BNI, Best State-Owned Bank 2021

BNI has again positioned itself as the best state-owned bank in customer service excellence. For this achievement, the bank led by Royke Tumilaar received a special award as "The Best Government Bank in Service Excellence 2021".

JULY



July 5, 2021

Entering the Diamond Age, BNI Heading Towards Indonesia's International Bank

BNI is now a place where tens of millions of people entrust their savings, and hundreds of thousands of people receive financing from BNI, with nearly 800,000 companies registering their accounts with BNI. There are also 154,000 small business owners receiving additional income from joining BNI Agen46, which is an extension of BNI for the community have limited access to the nearest bank outlet.



July 5, 2021

Being Different, BNI Presents New BNI Mobile Banking at 75th Anniversary

In 2021, BNI is 75 years old and ready to Leap Higher, innovation and ease of service to the public through digital access, such its New BNI Mobile Banking, with more complete features and the number of users until the end of 2021 which increased significantly by 38.9% compared to last year.



July 29, 2021

BNI Ready to Bring Indonesian MSMEs to the European Market

Carrying the theme "UMKM Go Global with BNI", BNI London held the 2021 BNI UK SME's Business Summit in collaboration with the Indonesian Diaspora in the UK, the Indonesian Embassy in London and business actors in the country to explore the potential for business improvement and expand market access in the UK for Indonesian exporters. Through this webinar, BNI London bridges Indonesian exporters to enter the European market with potential superior commodities such as processed spices, coffee, chocolate, and industrial production. For this, BNI London will finance the MSME Diaspora importing bankable Indonesian products.



AUGUST



August 19, 2021

Gokil, BNI Rewards Badminton Contingent with Rp6.4 billion

The badminton athletes who won the Tokyo 2020 Olympics and their supporting officials, including the women's doubles pair, who won the Tokyo 2020 Gold Medals, Greysia Polii and Apriyani Rahayu, and the bronze medalists, Anthony Sinisuka Ginting, expressed their gratitude for their struggle for Indonesia.



August 24, 2021

BNI Launches its BNIFX Web-Based Forex Transaction Platform

As BNI's effort to make it easier for small and medium business actors who want to increase business capacity through a digital platform, BNI presents Xpora as a digital solution to meet the business needs of these business actors. BNI launched its BNIFX Web-Based foreign exchange transaction Platform. The launch was carried out at the BNIFX Grand Launching event via "The Future Digital Transaction Platform for Corporate Clients" Talkshow attended by corporate customers and BNI Hi-movers. The enthusiasm of BNIFX Web users is very high, as can be seen from the number of FX transactions made through the BNIFX web have increased significant by 300% since launch.



August 25, 2021

Inviting the Younger Generation to Save Waste, BNI achieves MURI Record

BNI supports environmental safety and digitization of waste bank management in the school environment. The Beriuq To Digital program is a collaboration between BNI and the Financial Services Authority (OJK), and the Government West Lombok Regency, which contains a campaign to be earthly active save with trash. For this achievement, BNI has also received appreciation from the Indonesian Record Museum (MURI) in 2021. This activity was carried out through the Beriuq to Digital movement implemented at elementary to middle school levels

SEPTEMBER



September 3, 2021

Smesco Collaborates with BNI to Open Xpora Branch

As BNI's effort to make it easier for small and medium business actors who want to increase business capacity through a digital platform, BNI presents Xpora as a digital solution to meet the business needs of these business actors. BNI Xpora showcase visited by the Minister of BUMN together with the Minister of Cooperatives and SMEs.



September 15, 2021

BNI Securities Pte. Ltd. Officially Operates in Singapore

BNI Securities Pte. Ltd or BSPL is now officially operating in Singapore. The subsidiary of PT BNI Sekuritas will run a capital market service business from the country becoming a bridge for domestic businesses and customers of BNI with global investors.



September 16, 2021

Strengthening Transactional Banking Business, BNI Presents 3 Innovations

BNI is committed to strengthening the transactional banking business. The goal is that customers can conduct financial transactions more effectively and efficiently so as to support productivity. To support this, BNI has presented 3 innovations, namely: First, Online Bank Guarantees that allow customers to apply for bank guarantees as well as monitor the process up to the completion of transactions through the BNIDirect platform. Second, financing solutions where customers can conduct supply chain transactions with vendors and suppliers through the Financial Supply Chain Management (FSCM) platform. Third, with API Corporates, an open banking solution in the form of an application programming interface (API). These solutions will integrate customer system applications with BNI transactional services.



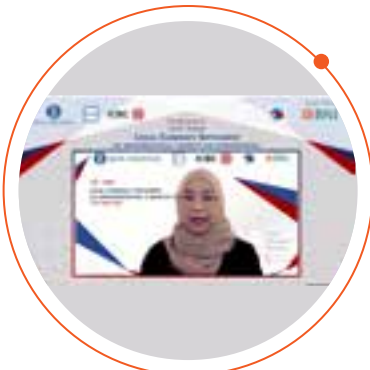
OCTOBER



October 4, 2021

First in Indonesia, BNI Issues AT - 1 Bond

BNI issued Additional Tier-1 Capital Bond 2021 amounting to USD 600 million or around Rp8.6 trillion (IDR/USD exchange rate of Rp14,299). BNI became the first bank in Indonesia to issue this instrument.



October 7, 2021

BI Cooperates with BNI to Spread LCS Benefits for Businessmen

BNI actively supports Bank Indonesia in introducing the Local Currency Settlement (LCS) transaction scheme. This scheme benefits businesses accustomed to transacting in multicurrency. This was the common thread in the BNI speaker session in the LCS Implementation & Benefits for Entrepreneurs Webinar organized by Bank Indonesia (BI) and the Indonesian Employers Association (APINDO) in Jakarta, Wednesday (October 6, 2021).



October 9, 2021

Individual Company Application Launched, Payment Through BNI

Ministry of Law and Human Rights (Kemenkumham) appointed BNI as one of the partner banks to implement the Sole Proprietorship application. Individual company applications from the Ministry of Law and Human Rights makes it easier for businesses to register, change, and submit financial reports. The application was launched in Badung, Bali on Friday (October 8, 2021). Present at the launch were Minister of Law and Human Rights Yasonna H. Laoly along with the Ministry of Law and Human Rights, Governor of Bali I Wayan Koster, and BNI Managing Director Treasury and International Henry Panjaitan.

NOVEMBER



November 3, 2021

BNI EDC Transaction Reaches Rp50 Trillion

BNI recorded a total volume of electronic data capture or EDC transactions of more than Rp50 trillion until September 2021. As a form of appreciation to merchants, BNI held a Merchant Gathering at the Pidari Lounge, Hutan Kota Plataran, Jakarta, Wednesday (3/11/2021).



November 6, 2021

Excellent, BNI Brings MSMEs to the Dubai Market

Towards the end of the year, BNI's MSME segment business development efforts were increasingly aggressive. The Company succeeded in facilitating national MSME debtors to enter the Al Jaber Gallery at the Mall of Dubai. Al Jaber Gallery is the largest souvenir shop chain in the United Arab Emirates and was founded in 1960. The owner of Al Jaber Gallery is Abdulla Jaber Belshalat is an entrepreneur in the field of handicrafts and antiques.



November 17, 2021

BNI Wins Gold Sustainability Report Award

BNI received the Gold Rank Award at the Asia Sustainability Reporting Rating ASRRAT 2021 event. This achievement demonstrates the commitment and management of BNI's sustainability report governance. This event was initiated by the National Center for Sustainability Reporting (NCSR) in conjunction with the Sustainability Practitioner Conference (SPC).



November 17, 2021

Thomas Cup Returns After 19 Years Away

The Indonesian badminton team's victory in the race for the 2020 Thomas Cup in Denmark was a proud achievement that was felt by all Indonesians. The world men's team badminton championship trophy finally returned to Indonesia after 19 years of waiting. Indonesian athletes Anthony Sinisuka Ginting, men's doubles Fajar Alfian and Muhammad Rian Ardianto, and Jonatan Christie, as well as other players, proudly brought this trophy to Indonesia. They beat a tough Chinese team 3-0 in the final. PT Bank Negara Indonesia (Persero) Tbk (BNI), as the official sponsor of the All-Indonesian Badminton Association (PBSI) again, showed its appreciation by handing over coaching funds of Rp5 billion.



DECEMBER



December 3, 2021

BNI supports IPB University Drive for Campus Financial Ecosystem Acceleration through the IPB Cashless Application

BNI together with the Bogor Agricultural Institute (IPB) developed a digital financial ecosystem so as to create a cashless society on the campus. One of the products delivered through this collaboration is IPB Cashless.



December 8, 2021

BNI Recives Most Trusted Company Award at CGPI Award 2020

BNI again received the Most Trusted Company award based on Corporate Governance Perception Index (CGPI) 2020 with the theme Building Company Resilience in the Framework of Good Corporate Governance (GCG) on Wednesday (12/8/2021).

Greysia POLII-Apriyani RAHAYU



To be a champion, compete; to be a great champion, compete with the best; but, to be the greatest champion, compete with yourself.

- Matsuna Dhliwayo



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Negara Indonesia (Persero) Tbk



Agus Dermawan Wintarto Martowardojo
President Commissioner/Independent Commissioner

Board of Commissioners' Report



Dear Esteemed Shareholders and Stakeholders,

During the dynamic development of the COVID-19 pandemic in 2021, especially the emergence of the Delta wave, BNI continued to improve its performance and make positive contributions to its stakeholders. For this reason, the Board of Commissioners welcomes and appreciates the hard work carried out by the Board of Directors and all BNI Hi-Movers that helped the Company record a net profit growth of 232% compared to the previous year. Looking forward, the Board of Commissioners will continue its policy supervisory function to maintain and improve BNI's good corporate governance achievements.

The Board of Commissioners realizes that the challenges faced in 2021 were not easy. Therefore, during 2021, we carried out intensive communication with the Board of Directors to discuss significant issues at BNI, including its consistency in implementing the 2021 business plan, developing the Company, and improving the quality of internal control. The directives given to the Board of Directors followed the mechanisms set out in the Articles of Association and the prevailing laws and regulations. The focus of our attention during 2021 primarily covered the aspects of loans, digital strengthening, Company transformation, human capital, and strengthening the subsidiary companies' performance.

On this occasion, please allow me on behalf of the Board of Commissioners to deliver our Board of Commissioners supervisory and advisory report on the course of management carried out by the Board of Directors throughout 2021.

ECONOMY AND BANKING IN 2021

The COVID-19 pandemic created extraordinary conditions that impacted the economy and all industrial sectors. The economic decline was caused by an imbalance in economic demand and supply due to the lockdown policies in many regions across the world. Furthermore, the global economy is also overshadowed by the Fed's tapering off policy, inflationary pressures in various countries, as well as concerns about supply chain disruptions and rising energy prices.

The economy started to improve at the beginning of 2021, supported by the start of a mass vaccination program to achieve herd immunity, so that community mobility could return to normal. However, the emergence of a new Delta variant in mid-2021 increased the risk of the virus spreading and had an impact on the pace of economic recovery. Regardless of this, during this stressful situation, the Indonesian economy in 2021 grew by 3.69%, much better than the negative economic growth of 2.07% in 2020.

After 2020, the banking industry came under considerable pressure, and throughout 2021 the national banking industry showed its resilience, which was reflected in loan growth that began to move positively helped by the controlled COVID-19 pandemic and businesses confidence in the future economic conditions. In addition, loan quality improvements were also reflected in the loan restructuring for debtors affected by the declining COVID-19, and the improvement in the Non-Performing Loan (NPL) ratio. This illustrated the improving risk profile of the banking industry.

In addition to the economic conditions, the social restriction policies imposed to suppress the spread of COVID-19 encouraged a change in people's transactional behavior, with the most fundamental change being a change from cash to cashless. Through the "stay at home" policy, people were encouraged to do their transactions through digital channels. As more and more people started using digital channels, the financial services sector including banking were encouraged to innovate by offering its digital products and services.

BOARD OF DIRECTORS' BANK MANAGEMENT PERFORMANCE ASSESSMENT

For our main role as supervising the Board of Directors' Bank management, the Board of Commissioners uses the shareholders perspective to see to what extent the Board of Directors has optimized all the Bank's resources. This perspective is a fundamental factor for the Board of Commissioners in monitoring BNI's overall performance achievement.

The Board of Commissioners assessment considers several aspects as the basis for the assessment, including external factors, such as economic conditions and the banking industry. Measuring the Board of Directors' performance achievement is calculated by the fulfillment of their own duties and responsibilities and targets, as well as those of the Subsidiaries. The results are then stated in the targets in the Bank Business Plan (RBB), which after consultation with the Board of Commissioners is reported to OJK.

The Board of Commissioners also includes the Board of Directors' Key Performance Indicators (KPI) as an assessment parameter, as mandated by the Ministry of SOEs as the shareholder's proxy.

The Board of Commissioners accepts the above performance appraisal criteria, and their use in the Board of Directors' performance assessment. The assessment aspects reflect BNI's growth orientation to not only focus on operational and business performance, but also places this change as an important step that must be realized to enable BNI's future performance to run systemically and sustainably to grow with its stakeholders. In addition, assessment aspects such as ESG, and the involvement of female, millennial and disabled employees, demonstrate BNI's commitment to realizing sustainable growth in accordance with the spirit of the Sustainable Development Goals (TPB).

Apart from achieving the set targets, the Board of Commissioners appreciates the efforts made by the Board of Directors to strengthen BNI's performance during conditions that have not fully recovered. A revision of the 2021-2023 RBB has been prepared by the Board of Directors together with the Board of Commissioners' directives and show the strategic efforts of BNI management in adapting to changing situations and conditions. Banking challenges in 2021 are still quite large considering that the recovery process from the global economic impact due to COVID-19, predicted to continue into 2022, requires management to take strategic steps to continue to strengthen BNI's foundation in navigating uncertain conditions.

The Bank's management success in the midst of the recovery is reflected in the achievement of the financial targets set out in the 2021 RBB Revision, where the realization of BNI's TPF collections exceeded the target, together with raising funds in current, savings, and time deposit accounts; while lending was relatively similar to the previously set target, total loan disbursement were still above the previous year. The success of achieving this business expansion target had a positive impact on the profitability target. Net profit for the year exceeded its target, along with profitability indicators such as Return On Assets (ROA) and Return On Equity (ROE) which also exceeded the set targets.

When compared to the previous year, BNI's performance helped strengthen its business foundation during the uncertain conditions. BNI's total assets in 2021 grew by 14.9% compared to the previous year. The growth in total assets was due to an increase in loans focused on resilient industrial sector and prudently given to top-tier debtors.

The good performance achievement can also be seen in the increase in customer deposits and subordinated securities. The growth in BNI's TPF was in line with the increase in low-cost funds or Current Account Saving Accounts (CASA), which grew 17.1% compared to the previous year. Strong CASA growth resulted in an improvement in Cost of Funds from 2.6% in 2020 to 1.6% in 2021, currently making BNI one of the banks with the most efficient cost of funds ratio. BNI's capital has also strengthened thanks to BNI's success in strengthening its capital structure through the issuance of Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) and Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021), which boosted the Capital Adequacy Ratio (CAR) from 16.8% in 2020 to 19.7% in 2021.

In addition, efforts to systematically improve loan quality through effective policies started to show results with a continuing downward trend in Non Performing Loans (NPL) and Loans at Risk (LaR). Meanwhile, in order to anticipate future volatility, the Company has increased the adequacy ratio of reserves to NPL (NPL Coverage Ratio) from 182.4% in 2020 to 233.4% in 2021.

By strengthening its business management, in 2021 BNI recorded a net profit of Rp10.9 trillion, an increase of 232.2% compared to the previous year. The Board of Commissioners expresses its appreciation for this performance achievement, and hopes that this achievement will provide a strong foundation for BNI's future business growth. In particular, the Board of Commissioners would like to continue to encourage the Board of Directors to make efforts to improve loan quality, especially the improvement of end to end loan processes so that quality loan growth can be obtained, and manage Loan at Risk (LaR) performance and maximize contributions from Overseas Branch Offices and Subsidiaries.

VIEW ON THE BUSINESS PROSPECTS FOR 2022 DEVELOPED BY THE BOARD OF DIRECTORS

As we 2022, the world is again overshadowed by the emergence of the Omicron variant of the COVID-19 virus, which increases the risk of spreading the virus and raises the potential for reintroducing social restrictions policies that will impact the global and national economy.

Even though overshadowed by uncertain conditions due to the new COVID-19 virus variant, the uneven economic recovery between countries and regions, the existence of energy shortages due to the increase in commodity consumption in 2021, the upward trend in inflation rates and the possibility of increasing global interest rates due to the tapering off policy of the Central Bank of America,

many institutions remain optimistic that the Indonesian economy in 2022 will strengthen in the range of 4.7% to 6.5%. The Indonesian government, as quoted in the Ministry of Finance Report in January 2022, projects that the Indonesian economy in 2022 will grow optimistically at the level of 5.2%, an increase from 3.7% in 2021.

This optimism is thanks to the successful handling and control of the COVID-19 pandemic and the acceleration of the community vaccination program. It is estimated that COVID-19 will become endemic in Indonesia in 2022 after 70% of the population is vaccinated, and this will accelerate the national economic recovery. In addition, community activities and economic activities will gradually improve and have a major impact on other aspects; such as production activities, trading activities, consumption patterns, to other aspects that encourage economic growth.

Optimism for strengthening Indonesia's economic recovery in 2022 is also supported by the performance of Indonesia's economic fundamentals. The inflation rate in 2022 is projected to remain in the BI target range of 3.0+1%, while for the BI 7-Day Reverse Repo Rate (BI7DRR), Bank Indonesia is projecting to maintain its benchmark interest rate in the range of 3.5% to 4% in 2022 to support the national economic recovery momentum.

The Board of Commissioners welcomes BNI's performance projections as outlined in the 2022 RBB. The Board of Commissioners view is that the financial projections set out in the 2022 RBB are realistic with a relatively challenging growth rate as an effort to recover the economy from the impact of the COVID-19 pandemic. Loan growth in 2022 is expected to be more progressive when compared to 2021, which will ultimately have a positive impact on BNI's profitability in 2022. The Board of Commissioners fully supports and is ready to become a strategic partner for the Board of Directors to achieve this projection.

In addition, the official operation of BNI Securities Pte. Ltd. ("BSPL") at the Monetary Authority of Singapore ("MAS") that started in 2021, will strengthen BNI's position as a global bank that provides banking and capital market services, which in turn will provide added value to BNI's business and services, especially in conducting banking services expansion to global investors.

SUPERVISION OF BANK STRATEGIES AND POLICIES APPLICATION AND FREQUENCY AND METHOD OF PROVIDING ADVICE TO THE BOARD OF DIRECTORS

The working relationship between the Board of Commissioners and the Board of Directors is built on mutual respect between the two. There are limits on the responsibilities and roles carried out by both the Board of Commissioners and the Board of Directors, with the Board of Commissioners in charge of supervising the BNI Board of Directors and business groups' management, and providing advice to the Board of Directors, and ensuring that BNI implements Good Corporate Governance (GCG).

The Board of Commissioners provides advice and suggestions to the Board of Directors through the Board of Commissioners meetings, meetings of committees under the Board of Commissioners, written directives and opinions, as well as working visits by the Board of Commissioners.

1. Board of Commissioners' Meetings

The Board of Commissioners holds its own internal meetings, as well as meetings by inviting the Sector Director and/or Senior Executive Vice President related to the meeting agenda, and regular meetings of the Board of Commissioners with the Board of Directors.

2. Meetings of the Committees under the Board of Commissioners

The committees under the Board of Commissioners active role is to assist and support the smooth functioning of the Board of Commissioners through committee meetings as well as evaluations, studies or reviews on matters pertaining to the Board of Commissioners' duties.

3. Written Directives and Opinions

Providing written directives and opinions from the Board of Commissioners to the Board of Directors in response to reports on the Board of Directors duties, requests for approval or consultation submitted by the Board of Directors, as well as for information concerning strategic and significant issues.

4. Working Visits by the Board of Commissioners

The working visits by the Board of Commissioners to the BNI work units helps the Board of Commissioners provide directives and opinions to the Board of Directors based on the results of the said working visits.

Board of Commissioners meetings, either internally, or by inviting the relevant Director and/or Senior Executive Vice President, is the most effective forms of formal supervision. In these meetings, the Board of Commissioners can provide advice, direction, and input to the Board of Directors on specific themes as well as recent discussions on BNI's performance.

During 2021, the Board of Commissioners held 62 internal meetings by inviting the relevant Directors, and held 12 Joint Meetings with the Board of Directors. These meetings served as a forum for the Board of Commissioners to conduct intensive and in-depth evaluations of current themes, some of which were:

- Discussions on the latest developments in economic and industrial conditions;
- Discussions on the Bank's Risk Profile and Health Level, including studies on Risk Appetite and Risk Tolerance, as well as the Minimum Capital Adequacy Requirement according to the Risk Profile;
- The latest monthly report on BNI's consolidated financial performance;
- Discussions on the follow-up process of the GMS resolution concerning the general audit services for BNI's Consolidated Financial Statements for Fiscal Year 2021, followed by the Kick Off Meeting for auditing the Consolidated Financial Statements for Fiscal Year 2021 by the appointed Public Accounting Firm (KAP);
- Discussions on the approval of the updated Anti-Money Laundering and Prevention of Terrorism Financing (APU and PPT) DPLK BNI Policy;
- Discussions on developments and plans for the BNI Network and Services;
- Discussions on BNI's Bank Business Plan (RBB) Revision for the 2021-2023 Period;
- Discussion on strengthening capital, including the issuance of Additional Tier 1 Capital Bond 2021;
- Discussions on the development in Good Corporate Governance implementation;
- Discussions on BNI's equity participation in Subsidiary Companies and discussions on proposals from the Subsidiaries' management;
- Discussions on BNI Material Matters.

In particular, the Board of Commissioners emphasizes the importance of its supervisory function for the Bank's Corporate Plan and Business Plan (RBB) by monitoring and evaluating the application of BNI's strategic policies. In 2021, in response to the impact of the COVID-19 pandemic, the Board of Directors together with the Board of Commissioners reviewed and revised the 2019-2023 Corporate Plan and the 2021-2023 RBB.

The Board of Commissioners also supports the Board of Directors' efforts during the COVID-19 pandemic for the BNI Corporate Transformation, a strategic step to support the strategic direction in the revised 2019-2023 BNI Corporate Plan and 2021 Strategic Policy. The BNI Corporate Transformation Program's strategic initiatives include quick win, mid term, long term, and enabler development characteristics. BNI's Corporate Transformation was later reduced to 3 (three) derivative programs, Credit Quality Improvement, SME Exporter Hub (BNI Xpora), and Capital Management - Additional Tier 1, which together will create a strong foundation to support BNI's future growth. The Board of Commissioners advised that the implementation of BNI Corporate Transformation should be carried out continuously in accordance with the plan that has been launched.

The Board of Commissioners specifically would like to note BNI's performance achievement, especially for the growth in Loan at Risk (LaR). The Board of Commissioners will continue to encourage the Board of Directors to make every effort to improve loan quality, Improvements processed credit, optimal LaR management, and reviewed credit policies to ensure the adequacy of existing policies and procedures.

In terms of increasing Fee Based Income, the Board of Commissioners would also like to remind BNI that they must continue to optimize the value chain and supply chain of BNI customers and increase digital transactions, strategic partnerships with aggregator companies, to optimize BNI growth performance. In addition, the Board of Commissioners would like to see improvements in product knowledge deepening, and cross-selling financing structure variations by optimizing BNI's trade finance products, cash management products and treasury products.

The Board of Commissioners would like to remind the Board of Directors to continuously monitor the concentration risk of core debtors, as well as the Risk Appetite and Risk Tolerance, which to date have not been exceeded but have the potential to exceed and there must be care they are not violated. This is a special concern for the Board of Directors considering any decline in loan quality from core debtors will greatly burden BNI in terms of establishing CKPN.

BANK HEALTH LEVEL

The Bank's Health Level is derived from a Risk-Based Bank Rating assessment of the Bank's condition and performance. The Bank's Health Level helps BNI identify problems earlier, giving it time to develop and implement corrective actions, and determine future business strategies.

BNI Health Level Assessment was carried out based on 4 (four) factors:

1. Risk Profile

The Risk Profile Assessment was carried out by assessing the risks inherent in BNI's activities, and the Risk Management Application Quality (KPMR) against 8 (eight) risk types.

2. Good Corporate Governance

The Corporate Governance Assessment looks at the quality of BNI's management's implementation of Good Corporate Governance principles.

3. Profitability (Earnings)

The Profitability Assessment factor evaluates the earnings performance, sources, sustainability, and management.

4. Capital

The Capital Assessment includes an evaluation of the adequacy of the Bank's Capital and Capital adequacy management. When assessing the Capital adequacy, BNI correlates capital adequacy with its Risk Profile.

The Bank's Health Level Assessment is reported to the regulator (OJK) every 6 months in June and December. The results of BNI's Health Level for the period ending December 31, 2021 was at the "Healthy" rating level meaning that:

1. The Bank's condition is generally healthy, and the Bank is deemed capable of facing any significant negative effects from changes in business conditions and other external factors;
2. The assessment factors (Risk Profile, Governance, Profitability, and Capital) are good. If there are any weaknesses, they were not significant.

HUMAN CAPITAL

In terms of Human Capital (HC), the Board of Commissioners' view is that the Bank's HC strategies and policies have gone well. BNI continues to treat employees as strategic partners and as stakeholders for achieving the Bank's objectives through strategic policies that focus on effective employee competency development. Every year, through a range of programs the Board of Directors HC efforts have enhanced a risk awareness culture and a compliance culture.

The Board of Commissioners view is that the application of BNI's HC Architecture as the Bank's policy architecture in the area of HC, will achieve the Employee Value Proposition (EVP), namely "Together we make BNI the best place to contribute, learn and grow". The emphasis on the phrase "Together" shows that employees and BNI are 2 (two) interrelated and inseparable entities that together can realize BNI's vision. The Board of Commissioners would like to send a message to all BNI leaders that they need to understand human capital concepts and policies, and use an approach that can be applied to motivate and develop all employees under their supervision, including supervising the transformation process. Management is also required to continuously improve the HC competencies and capabilities, so as to create superior HC, with sufficient competence, discipline to comply with regulations, with the ability to support the progress of the Company's organization, and behave in accordance with the organization's culture.

The Board of Commissioners also welcomes the efforts made by management to address the situation during the COVID-19 pandemic. A number of initiatives to adjust to new life habits at work were carried out last year and had a positive impact, and need to be continued. Efforts to develop technology-based tools to support employee productivity are a form of BNI's commitment to continue increasing its employee competency levels during the social pressures brought on by COVID-19.

INFORMATION TECHNOLOGY

Strengthening information technology infrastructure is a must for modern financial institutions. The Board of Commissioners has encouraged the Board of Directors to continue to strengthen the Bank's information technology infrastructure. This is in line with the global financial services trend in digital finance.

The Board of Commissioners hopes that BNI can continue to innovate its digitization services, to stay at the forefront of providing the best digital banking services. The Board of Commissioners supports the Board of Directors' efforts to provide added value to customers through the adopted key technologies, which have made a significant contribution to developing BNI's digital banking products and services in recent years.

The Board of Commissioners also supervises the continued Information Technology system's compliance in accordance with applicable regulations, including BNI's principal IT system support, in terms of policies, standards and procedures, and information security aspects. To improve information security, apart from implementing protection based on international standards, BNI has also formed a special Information Security Division that has combined several units with functions related to information security to maintain independence and focus more on evaluating, running, monitoring and improving cyber security.

VIEW ON CORPORATE GOVERNANCE IMPLEMENTATION

The Ministry of SOEs, the Financial Services Authority (OJK), the Indonesia Stock Exchange (IDX), and regulators in the capital market and the Indonesian business world development, are committed to encouraging the application of GCG principles and practices as values that must be carried out by all business entities in Indonesia. BNI welcomes with open arms the regulators' good intentions, especially as GCG implementation through its 5 (five) basic principles of transparency, accountability, responsibility, independence, and fairness, has proven will provide positive results for the business world's sustainability and the investment climate.

As the body in charge of supervising the GCG implementation by the Board of Directors, the Board of Commissioners view is that BNI's GCG implementation has continued to improve over time. The policy tools being continuously being updated, through to the evaluation and monitoring of GCG, reflects the Board of Directors' commitment to applying GCG principles and practices in all areas of the Bank's operations and business.

One of the important aspects for the successful implementation of GCG principles is a good synergy and collaboration between the supporting organs of the Board of Commissioners and the Board of Directors. With this support, all aspects of the GCG principles can be implemented and monitored, including compliance,

risk management, auditing, HC and IT development as the foundations for realizing the Bank's accountability.

The Board of Commissioners would specifically like to emphasize the importance of a code of ethics based on Core Values, where its application form part of the integrity behavior of BNI Hi-Movers, which in turn will shape personal behavior in their daily lives.

RISK MANAGEMENT

Risk management at BNI is carried out by integrating it with business strategy. Risk management is proactive and forward looking with the aim of maximizing added value for shareholders, comprehensively managing capital, and ensuring profitability and sustainable business growth.

Therefore, BNI has implemented a General Risk Management Policy as a strategic and comprehensive basic reference for the implementation of Risk Management. BNI's Risk Management guidelines cover the policies and procedures as the basis for managing each risk, and for guiding the application of Risk Management.

The Board of Commissioners encourages the effective application of Risk Management based on the established Risk Governance. Risk Governance clearly regulates the roles and responsibilities, decision-making processes, interrelationships between Risk management functions, as well as establishing policies that ensure Risks are managed properly.

The Board of Commissioners also prioritizes risk mitigation efforts through active risk management supervision. This supervisory function is carried out through the Board of Directors and Board of Commissioners Meeting forum (Radikom), as well as through the Risk Monitoring Committee, Integrated Governance Committee and Audit Committee meetings. The supervisory mechanism is carried out by:

- Approving BNI's risk management policies, including risk management strategies and frameworks based on risk appetite and risk tolerance;
- Evaluating risk management policies and strategies;

- Evaluating the Board of Directors accountability and providing improvement directives for BNI's risk management policies;
- Ensuring risk management policies and processes are implemented effectively and are integrated into the overall BNI risk management process.

With the support of the Risk Monitoring Committee, the Board of Commissioners continues to monitor the Board of Directors' risk management initiatives to mitigate the Bank's main risk factors and prevent risks from occurring, and to ensure the Bank's long-term business sustainability.

The Board of Commissioners' supervisory function is carried out through the Board of Directors and Board of Commissioners Meeting forum (Radikom), as well as through Risk Monitoring Committee, Integrated Governance Committee and Audit Committee meetings.

For Risk Management to run effectively, it is based on the established Risk Governance that clearly regulates the roles and responsibilities, decision-making processes, interrelationships between Risk management functions, as well as the appropriate policies.

For Integrated Risk Management, the BNI Financial Conglomerate has a shared commitment for each Financial Services Institution's duties and responsibilities, as outlined in the BNI Financial Conglomerate Corporate Charter, as approved and signed by the President Director and President Commissioner of all Financial Services Institutions Members of the BNI Financial Conglomerate.

The Board of Commissioners is of the opinion that the Bank Only risk management, and the integrated Bank risk management in 2021 is running properly. The Board of Commissioners view is that BNI has adequate policies, risk tolerance and risk limits that are reviewed regularly with the approval of the Board of Directors. BNI also has adequate an ongoing risk identification, measurement, monitoring and control processes for all material risk factors, and is supported by the Risk Management Information System.

Looking forward, the Board of Commissioners would like to remind the Board of Directors to always prioritize risk culture and risk management when developing Bank policies, to ensure they are always being developed and adapt to the regulators and related institutions provisions, as well as international best practices related to risk management.

INTERNAL CONTROL SYSTEM

The Control System is a continuous supervisory mechanism carried out by the Bank's management and all employees at all levels. An effective Internal Control System is an important Bank management component and forms the basis for sound and safe Bank operations. The Internal Control System is the responsibility of all parties, as outlined in the duties and responsibilities of all parties, including the Board of Commissioners and Board of Directors.

The Board of Commissioners places the Internal Control System as an important supervisory component in managing the Bank and as a reference for healthy and controlled Bank operations. The Internal Control System supports the Bank's objectives achievements, increases value for stakeholders, minimizes the risk of losses, and maintains compliance with prevailing laws and regulations.

The internal control framework is structured to ensure compliance with adequate financial and operational controls, financial reporting, operational effectiveness and efficiency, as well as compliance with prevailing laws and regulations. BNI's Internal Control System refers to OJK Circular Letter No. 35/SEOJK.03/2017 dated July 7, 2017 concerning Internal Control System Standard Guidelines for Commercial Banks, and is in line with the COSO and Basel Committee – Internal Control framework, and covers 5 (five) key interrelated elements in the Bank's internal control system: management supervision and control culture, risk identification and assessment, control activities and separation of functions, accounting systems, information and communication, as well as monitoring activities and corrective actions for deviations/weaknesses.

The Board of Commissioners is of the opinion that BNI's Internal Control Systems are sufficient.

PERFORMANCE ASSESSMENT OF COMMITTEES UNDER THE BOARD OF COMMISSIONERS

Board of Commissioners' Support Committees



The Board of Commissioners' supervisory management duties and functions in the Bank are supported by the Audit Committee, Risk Monitoring Committee, Nomination & Remuneration Committee, and the Integrated Governance Committee.

A Committee Charter for each Committee contains the guidelines for the duties of the Committees under the Board of Commissioners. The committees under the Board of Commissioners have also reviewed and updated their respective Committee Charters in accordance with the prevailing regulatory provisions. At the beginning of each year these Committees prepare individual Work Plan Programs that are used as a reference in carrying out their duties in assisting the Board of Commissioners, and include monitoring, reviewing and providing advice or recommendations to the Board of Commissioners on matters related to the functions and duties of the committees concerned.

The Committees under the Board of Commissioners performance appraisal is carried out based on the following factors:

- Achievement of all Committees' Work Plans/Programs set in early 2021; and
- Implementation of Committee Meetings and Committee members' attendance level.

The committees' programs/work plans are carried out through the committee meeting mechanism of inviting the relevant Directorate or divisions/work units as well as in-depth reviews/evaluations by each committee outside the meeting forum, with the results submitted in writing to the Board of Commissioners.

In 2021, the Board of Commissioners' view is that these committees carried out their functions, duties and responsibilities properly, as follows:

- The Audit Committee carried out its functions, duties and responsibilities, including reviewing financial information to be issued by the Bank to the public and/or the authorities. The Audit Committee also reviewed compliance with laws and regulations

related to the Bank's activities, as well as evaluated the effectiveness of audit/services provided by the Public Accounting Firm (KAP), including the independence and objectivity of the KAP. The Audit Committee also conducted an assessment of BNI's internal control system, evaluated the Whistle Blowing System and evaluated the anti-fraud strategy program, as well as reviewed the Company's Good Corporate Governance (GCG) implementation;

- The Risk Monitoring Committee provided support to the Board of Commissioners for the Bank's risk management duties and responsibilities, including reviews on the BNI Bank Health status, BNI risk profile, integrated risk profile, and duties carries out by the BNI Risk Management Committee and Integrated Risk Management Committee, and reviewed the main issues related to operational, legal, compliance, strategic, reputation, loan, liquidity market, insurance and Intra-Group risks, as well as conducted a review of the Bank's loan policies;
- The Nomination and Remuneration Committee carried out its supervisory functions, duties and responsibilities for the nomination and remuneration policies at all organization levels, including the Board of Commissioners, Board of Directors and employees in accordance with prevailing regulations, and conducted reviews of prospective BNI management candidates from internal BNI, to be proposed to the GMS, reviewed the proposals for the management of subsidiary companies, reviewed the HC management nomination system as a whole, and also evaluated the transfer, promotion and employee sanctions systems;
- The Integrated Governance Committee supervised the consistency and sustainability of the integrated corporate governance across the Bank's financial conglomerate group, including reviewing and discussing the performance of subsidiary companies and their development strategy, encouraged and provided suggestions for improving the synergy between subsidiary companies as part of the BNI Group, evaluated and provided recommendations to the Board of Commissioners on the implementation of Integrated Governance, evaluated and provided advice on the Anti-Fraud, Anti-Money Laundering and Prevention of Terrorism Financing (APU-PPT) Strategies for all members of the BNI Financial Conglomerate, as well as encouraged acceleration and provided suggestions so that BNI Incorporated runs smoothly and has an impact on each subsidiary company's profitability together with adequate risk management and internal control, fulfillment of quality human capital, and good governance.

In particular, all committee members coming from independent parties, or not from the Board of Commissioners undergo performance assessment. The committee chairpersons' evaluates/assesses the independent party committee members' performance every 6 (six) months or at any time. The evaluation or assessment includes Performance Appraisal Indicators, including but are not limited to, competence and expertise, quality of output, discipline and attendance level of the committee members concerned, as well as implementation of duties and obligations in accordance with the committee charter and work rules applicable to independent members of the committees under the Board of Commissioners. The evaluation and assessment results are submitted as recommendations to the Board of Commissioners to extend or continue or terminate the appointment of the relevant committee members.

The Board of Commissioners would like to express its thanks for the performance and implementation of duties shown by all committees. The committees' support forms the basis for the Board of Commissioners to provide formal input to the Board of Directors to continuously improve the Bank management.

VIEW ON THE IMPLEMENTATION AND MANAGEMENT OF THE BANK'S WHISTLEBLOWING SYSTEM (WBS) AND THE ROLE OF THE BOARD OF COMMISSIONERS IN THE SYSTEM

The Whistleblowing System (WBS) is part of BNI's commitment to make GCG principles the foundation of every aspect of the Bank's daily operations and business. The WBS's reporting mechanism ensures the confidentiality of the reporter, aims to detect early and prevent the occurrence of irregularities or violations in every aspect of the Bank's business activities. Our view is that the WBS creates a transparent, sincere, honest and responsible working climate within the Bank, where BNI Hi-Movers play an active role in reporting violations within BNI.

BNI's "WBS to CEO" mechanism is an early detection mechanism in the WBS for violations that may cause financial losses, including matters that can damage the Bank's image and reputation.

To strengthen the existing WBS, WBS management is also carried out by an external party, Deloitte who manage whistleblowing reports and encourage all parties including BNI Hi-Movers to report any violations or indications of

fraud. WBS's goal is to create a clean work environment with integrity that is more effective and independent.

In carrying out supervision to ensure the implementation of the BNI WBS, the Board of Commissioners together with the Audit Committee and other units always evaluates and follows up on reports received. Reports proven true based on the results of an examination are followed up with administrative sanctions that take the form of warning letters through to termination of employment (PHK) or other actions, including transfers and counseling.

During 2021, the WBS mechanism received 54 reports with the most complaints sent via email. Of all reports received through the WBS, 63% completed the examination process,

with 37% being proven. Following consultation with the Board of Commissioners, management studied the available evidence and took firm steps against fraud violations. For other violations, sanctions were given based to the weight of the error, including demotions in the position level.

The Board of Commissioners is of the opinion that the WBS further strengthens BNI's GCG. The Board of Commissioners has provided directives to the Board of Directors to increase the socialization of WBS to enhance the employees' understanding and concern in reporting violations, so as to create a clean and integrity work environment.

BOARD OF COMMISSIONERS' STRUCTURE AND COMPOSITION CHANGES IN 2021

In 2021, there was a change to the Board of Commissioners' composition through an Annual General Meeting of Shareholders for Fiscal Year 2020 decision dated March 29, 2021. The following shows the Board of Commissioners membership composition chronology throughout 2021.

Chronology of BNI's Board of Commissioners' Composition Changes in 2021

PERIOD JANUARY 1 TO MARCH 29, 2021	PERIOD MARCH 29 TO DECEMBER 31, 2021	EXPLANATION
Agus Dermawan Wintarto Martowardojo (President Commissioner/Independent Commissioner)	Agus Dermawan Wintarto Martowardojo (President Commissioner/Independent Commissioner)	-
Pradjoto (Vice President Commissioner/Independent Commissioner)	Pradjoto (Vice President Commissioner/Independent Commissioner)	-
Joni Swastanto (Commissioner)		Joni Swastanto ceased serving as Commissioner after the Fiscal Year 2020 AGMS on March 29, 2021
Sigit Widyawan (Independent Commissioner)	Sigit Widyawan (Independent Commissioner)	-
Askolani (Commissioner)	Askolani (Commissioner)	-
Ratih Nurdianti (Commissioner)	Ratih Nurdianti (Commissioner)	-
Asmawi Syam (Independent Commissioner)	Asmawi Syam (Independent Commissioner)	-
Iman Sugema (Independent Commissioner)	Iman Sugema (Independent Commissioner)	-
Susyanto (Commissioner)	Susyanto (Commissioner)	-
Septian Hario Seto (Independent Commissioner)	Septian Hario Seto (Independent Commissioner)	-
	Erwin Rijanto Slamet (Independent Commissioner)	Erwin Rijanto Slamet was appointed as Independent Commissioner at the Fiscal Year 2020 AGMS on March 29, 2021

On behalf of the Board of Commissioners and all BNI Hi-Movers, I would like to express my deepest appreciation and gratitude to Joni Swastanto who for the last five years has sincerely contributed, and shown his dedication to the progress of BNI, especially when carrying out the Board of Commissioners' supervisory function, and has actively participated in providing advice and suggestions to the Board of Directors and management of Bank Negara Indonesia.

Therefore, the Board of Commissioners' membership composition as of December 31, 2021 was as follows.

BNI Board of Commissioners' Structure as of December 31, 2021

NAME	POSITION	BASIS FOR APPOINTMENT	EFFECTIVE DATE*)
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	AGMS Decision on February 20, 2020	June 23, 2020
Pradjoto	Vice Commissioner/ Independent Commissioner	AGMS Decision on February 20, 2020	June 23, 2020
Sigit Widyawan	Independent Commissioner	AGMS Decision on March 20, 2018	September 7, 2018
Asmawi Syam	Independent Commissioner	AGMS Decision on February 20, 2020	June 23, 2020
Iman Sugema	Independent Commissioner	AGMS Decision on February 20, 2020	August 19, 2020
Septian Hario Seto	Independent Commissioner	AGMS Decision on February 20, 2020	August 19, 2020
Erwin Rijanto Slamet	Independent Commissioner	AGMS Decision on March 29, 2021	August 6, 2021
Askolani	Commissioner	EGMS Decision on August 30, 2019	December 20, 2019
Ratih Nurdianti	Commissioner	AGMS Decision on May 13, 2019	March 16, 2020
Susyanto	Commissioner	AGMS Decision on February 20, 2020	August 3, 2020

*The Board of Commissioners became effective after obtaining OJK 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 the Main Parties of Financial Services Institutions.

CLOSING

To all shareholders and investors, the Board of Commissioners would like to express its gratitude for the trust that has been given. Also, to the regulators and stakeholders, the Board of Commissioners would like to express its deepest gratitude for the support given. To the Board of Directors and all employees, please allow

the Board of Commissioners to express its pride in the synergy that has been created. We hope that these harmonious relationships will cement the basis for BNI to continue to grow sustainably, and continue to provide added value to shareholders and all stakeholders.

Jakarta, February 21, 2022

On behalf of PT Bank Negara Indonesia (Persero) Tbk. Board of Commissioners



Agus Dermawan Wintarto Martowardojo
President Commissioner/Independent Commissioner

Board of Commissioners





- 1 **Agus Dermawan Wintarto Martowardojo**
President Commissioner/Independent Commissioner
- 2 **Pradjoto**
Vice Commissioner/Independent Commissioner
- 3 **Sigit Widyawan**
Independent Commissioner
- 4 **Asmawi Syam**
Independent Commissioner
- 5 **Septian Hario Seto**
Independent Commissioner
- 6 **Iman Sugema**
Independent Commissioner
- 7 **Askolani**
Commissioner
- 8 **Ratih Nurdianti**
Commissioner
- 9 **Susyanto**
Commissioner
- 10 **Erwin Rijanto Slamet**
Independent Commissioner



2

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Royke Tumilaar
President Director

Board of Directors' Report



Dear Esteemed Shareholders and Stakeholders,

On behalf of the Board of Directors and all BNI Hi-Movers, please allow me to submit the performance report for PT Bank Negara Indonesia (Persero) Tbk for the fiscal year 2021. BNI's operational and business performance achievements in 2021 demonstrates BNI's commitment to grow its business and deliver added value for its shareholders and stakeholders, especially during the Corona Virus Disease 2019 (COVID-19) pandemic that continued throughout 2021.

NATIONAL ECONOMY AND BANKING INDUSTRY CONDITION IN 2021

The situation and conditions in 2021 continued to suffer from the previous year problems. The COVID-19 pandemic that dragged the global economy to the brink of recession in 2020 was still the main theme in 2021. Some countries simultaneously carried out health and economic recovery programs, including social restriction policies, vaccination programs for all communities, providing fiscal budget stimulus and monetary stimulus by lowering benchmark interest rates and quantitative easing policies, and relaxation of financial sector and other policies.

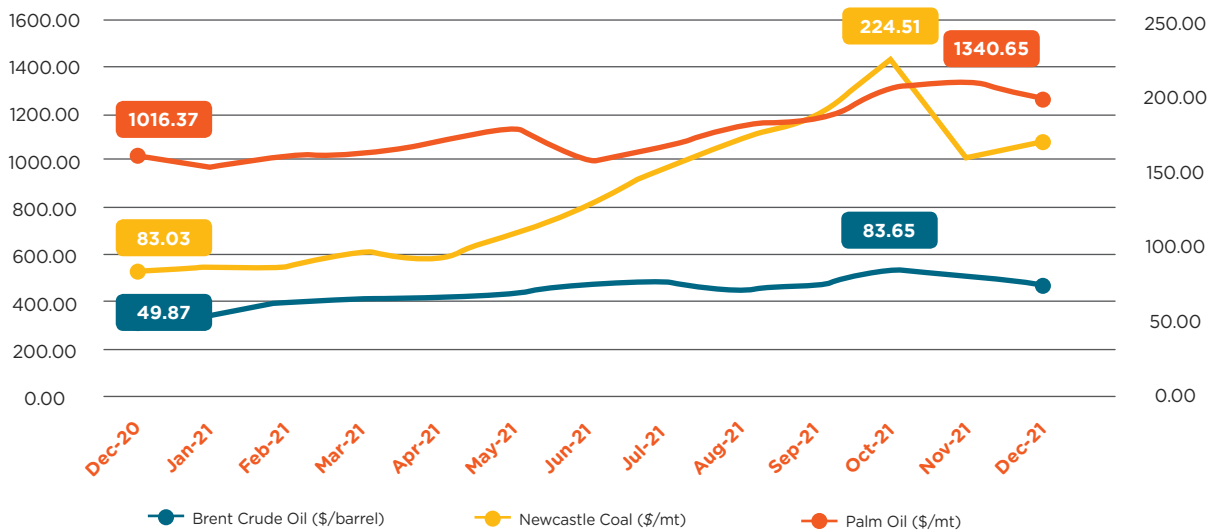
Prior to the surge in cases of the Delta variant of COVID-19, the world was very optimistic about global economic recovery in 2021. In Q2 2021, there was an economic recovery in countries with large Gross Domestic Product (GDP) levels, including the Chinese economy that grew positively by 7.9%, the United States economy that grew by 12.2%, the Eurozone that grew by 14.3% and Japan that grew by 7.5%, with the Indonesian economy also growing by 7.07% in Q2 2021.

The momentum for global economic recovery in the first half of 2021 was then hit by an explosion of cases of the Delta variant of the COVID-19 virus, which first emerged in Asia (India). In the period from October 2020 to early April 2021, the increasing trend of Delta variant cases was mainly seen in Europe and North America. The rapid spread of the COVID-19 Delta variant forced many countries to re-implement public mobility restrictions/lockdowns, which then had an impact on the economic

slowdown. In Q3 2021, China's economic growth slowed to 4.9%, the United States to 4.9%, the European Zone to 3.9% and Japan grew to 1.2%.

After the spread of the COVID-19 Delta variant was under control, the global economy again faced a new variant namely Omicron variant of the COVID-19 virus. The surge in positive cases of this new COVID-19 variant in South Africa in early November 2021 increased tensions in the global economic uncertainty until the end of 2021 and the beginning of 2022.

The acceleration of global economic recovery is also overshadowed by the energy crisis, especially in China, India and Europe. The increase in demand after the recovery of community activities and economic activities that exceeded the availability of production/supply capacity has triggered a surge in oil prices followed by increases in global coal and CPO prices. The world price of Brent oil touched its highest level of US\$83.6 per barrel in October 2021, far above the December 2020 price of US\$48.6 per barrel. Likewise, coal prices reached a peak level in October 2021 of US\$224.51 per metric ton from the December 2020 position of US\$79.3 per metric ton. The world CPO price reached its highest level in November 2021 at US\$1,341 per metric ton from previously in December 2020 of US\$1,016 per metric ton.



Source : World Bank Commodity Market Outlook Monthly Prices

At the national level, the surge in the spread of the Delta variant of the COVID-19 virus forced the Indonesian government to implement an Emergency/Level 4 Community Activity Restriction (PPKM) policy since July 3, 2021, which then had an impact on the stalled national economic recovery. On an annual basis (Year on Year), the cumulative Indonesian economy in 2021 grew by 3.69% (YoY), while Indonesia's economic growth in the fourth quarter of 2021 grew by 5.02% (YoY) or slowed down compared to the growth in the second quarter of 2021 which was 7.07% (YoY), but still higher than the economic growth in the first quarter of 2021 (negative 0.71% YoY). Based on the quarter to quarter period, Indonesia's economic growth was also recorded to experience a slowdown from the second quarter of 2021 pre-variant Delta by 3.31% (QtQ) to 1.55% (QtQ) and 1.06% (QtQ) in the third quarter and IV 2021.

Despite being overshadowed by uncertain conditions caused by the COVID-19 virus Delta and Omicron variants, plus the energy scarcity, the upward trend in inflation rates, and the increase in global interest rates, as reported by the Central Statistics Agency (BPS), Indonesia's economy recovered with 3.69% growth in 2021, far above the negative 2.07% economic growth in 2020.

The economic recovery in 2021 could be seen in the early indicator development up to December 2021 compared to the previous year. These included increased people's mobility from the pre-pandemic levels, a stronger consumer confidence, increasing retail sales, the Purchasing Managers' Index (PMI) still in the expansion zone, increasing electricity consumption in the industrial and business sectors, and a positive performance in motor vehicle sales. Inflation remained low with the 2021 Consumer Price Index (CPI) standing at 1.87% (YoY), below the target range of 3.0±1%. The trade balance

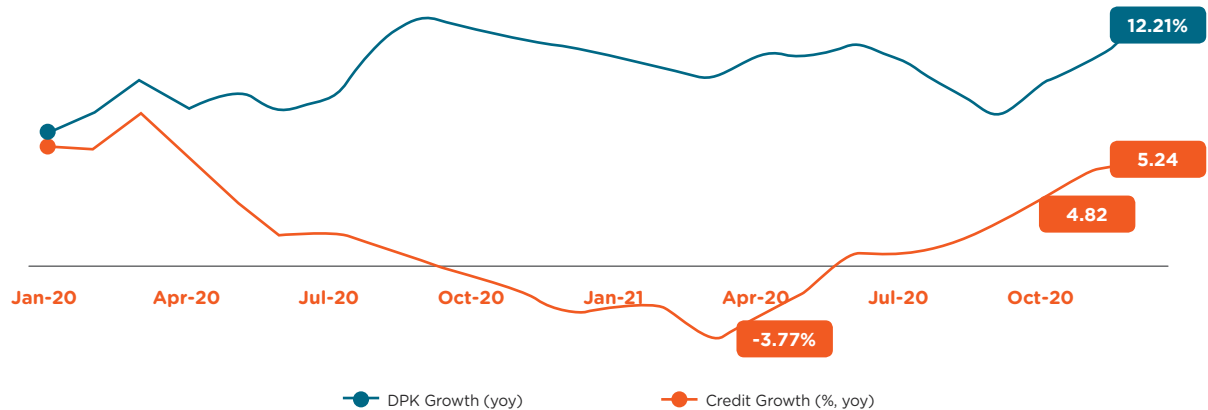
surplus continued into December 2021 and cumulatively in 2021 reached USD35.34 billion. Foreign exchange reserves stood at USD144.9 billion, equivalent to 8 months of goods and services imports. These developments were also supported by the global economy's continued improvement, with PMI, consumer confidence and retail sales remaining strong.

Increased public confidence was reflected in the growth in investment funds, especially in the capital market and property sector. Also during 2021, the Indonesia Stock Exchange (IDX) increased with the Composite Stock Price Index (JCI) rising 10.08% Year to Date (YtD), to close at 6,581.48, compared to 5,979.07 at the same time last year.

With the global and national economies gradually recovering, added to the optimism of economists' expectations in 2021, the Bank's downstream loan growth trended higher. By December 2021, loan growth had accelerated away from the contraction zone, growing by 5.24% (YoY), higher than the Bank's loan growth in November 2021 of (4.82% YoY), and in October 2021 of (3.24% YoY). Likewise, the Bank's third party funds (TPF) continued to grow in line with the Bank's increased loan growth. As of December 2021, the Bank's deposit growth was 12.21% (YoY) exceeding the growth in November and October 2021 of 10.48% (YoY) and 9.4% (YoY), respectively.

Banking credit quality (NPL) as of December 2021 was 3.0% or slightly improved from 3.2% in October 2021. The Financial Services Authority (OJK) decided to extend the relaxation period for bank loan restructuring until March 31, 2023. This credit restructuring program decision helped maintain banking stability and debtor performance that had already started to improve.

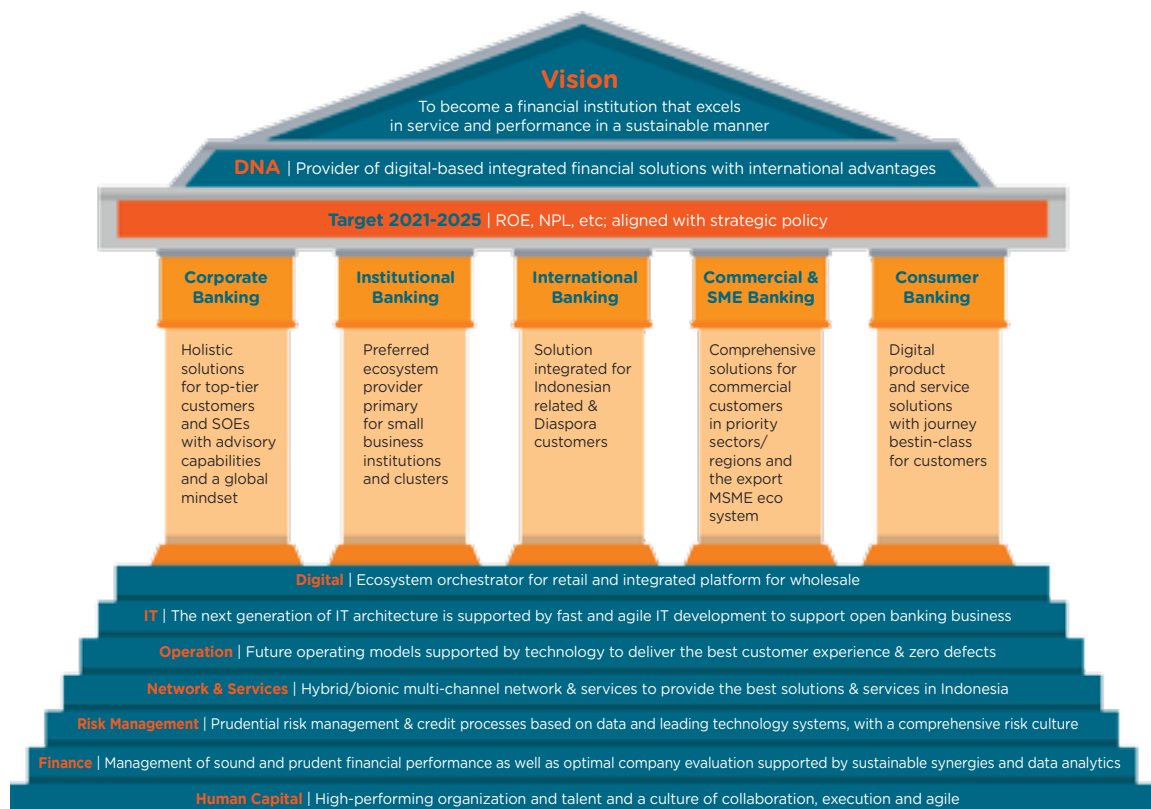
The banking industry still has free liquidity, as reflected in the relatively low banking Loan to Deposit Ratio (LDR). As of December 2021, the Bank's LDR stood at 77.13%, slightly lower than 78.93% in September 2021. The banking LDR trend has decreased since December 2020's position of 82.25% due to high growth in deposits while at the same time credit growth is low.



STRATEGIC POLICIES IN 2021

Many companies, including BNI, responded to the impact of the COVID-19 pandemic by making adjustments or fine-tuning their strategic directions. BNI reviewed the previous Corporate Plan as it considered the strategic direction and financial targets for 2021-2023 were no longer relevant as a reference for BNI's future business, so BNI instigated adjustments following the changes in external conditions. During this Corporate Plan review, BNI also considered the fundamental conditions that may affect the direction of its future strategies and targets, such as changes in the Indonesian banking landscape, the Ministry of SOEs' direction, and changes in digital trends. BNI also paid attention to several internal conditions that required improvements in the future.

Taking into account these conditions, BNI prepared a Revised Corporate Plan for 2019-2023 (until 2025) with a strategic direction as shown in the picture below:



To achieve the above targets, strategies were drawn up on 5 (five) business pillars, supported by 7 (seven) enablers. Each business pillar and enabler has an initiative strategy to be developed and implemented starting in 2021 to support each pillar and enabler achievement strategy. The 7 (seven) strategic policies carried out by BNI in 2021 in line with the 2019-2023 BNI Corporate Plan Revision included:

1. Improving loan quality through improved risk management

BNI is striving to improve the risk culture for all BNI Hi-Movers through end-to-end transformation of the loan process, loan restructuring, Remedial & Recovery process optimization, and employee capability improvement.

2. Improving digital capability to meet customer needs

BNI is developing innovations and digital-based solutions supported by increasing data capabilities, partnerships through the use of API Management, blockchain platforms, and business process re-engineering.

3. Increasing sustainable business expansion

BNI is striving to increase loan expansion in the Top Tier industries, and being selective in priority economic sectors, supply chains, and strong MSMEs.

4. Increasing Fee Based Income and Current Account Saving Account (CASA) through increased transactions

BNI is strengthening CASA by offering total solutions and optimizing accounts as well as increasing business transactions by developing a business ecosystem, cross selling, and optimizing other channels.

5. Optimizing network and international business by strengthening partnership cooperation

BNI is striving to increase the Overseas Branch Offices (KCLN) role and productivity, and expand partnerships to support international business development.

6. Optimizing Subsidiary Contribution

BNI is strengthening the business groups' synergy to support the Subsidiaries in achieving a market leaders position in each industry.

7. Optimizing Human Capital (HC) to support the Bank's business

Optimizing talent management and increasing employee capabilities related to loan processes, industry skills, global & digital mindset, and risk culture.

To support the strategic direction in the Revised BNI 2019-2023 Corporate Plan and the 2021 Strategic Policy during the COVID-19 pandemic, BNI encourages the BNI Corporate Transformation Program as part of management's efforts to improve and innovate business processes so that they are able to overcome the challenges faced in the banking industry.

Several of the BNI Corporate Transformation Program initiatives already running in 2021, included:



The 3 derivative programs of BNI Corporate Transformation can be explained as follows:

› Credit quality improvement

The COVID-19 pandemic has indirectly caused debtors to experience cash flow disruptions which have an impact on difficulties in paying obligations banks, so that credit quality deteriorates. Management takes this very seriously, so there is a need for policies and business processes to accelerate and improve credit quality. One of BNI's efforts to maintain the resilience of debtor business is credit quality management. BNI makes efforts to maintain credit quality by forming a Loan at Risk Management Optimization Team (LaR) which aims to focus on the management process, decisions, action plans and monitoring of LaR debtors. This team also acts as a liaison between Business as Usual (BaU) that focuses on managing and maintaining good debt, and Remedial Recovery (RR) that focuses on repairing non-performing loans or bad debt.

Through the LaR Management Optimization Team, BNI's credit quality has been successfully maintained and improved. By December 2021, BNI's Gross NPL ratio improved from 4.3% at the end of 2020, to 3.7%, an decrease by of 0.6%. The same was seen in the LaR ratio (incl. COVID-19) decreased by 5.4% (YoY) from 28.7% in December 2020 to 23.3% in December 2021. With the improvement in credit quality, BNI also recorded a 17.0% decrease in allowance for loss in value.

› SME Exporter Hub (BNI Xpora)

To drive the wheels of the Indonesian economy, the MSME businesses play an important role in influencing and controlling the national economic conditions. More than 99% of businesses in the Indonesian economy are driven by MSMEs and they contribute 60.3% to state revenue and employ 97% of the people.

On the other side, BNI received directives from the Ministry of SOEs to support expansion into international markets. To date, the MSME business has contributed 14.4% to export transactions and has great potential for further development.

The SME Exporter Hub is BNI's effort to help MSMEs expand their market and gain access to global markets. This is in line with the Ministry of SOEs' aspiration for BNI to focus on expanding into the global market by helping local entrepreneurs penetrate international markets.

Through BNI Xpora, BNI assists by providing integrated financial and non-financial solutions to MSMEs through 3 stages, namely:

- **Go Productive**

BNI provides solutions to increase MSME productivity through collaboration with start-ups to provide business management applications and digital financial reporting, collaboration with agencies and institutions in mentoring, training to increase MSME capabilities.

- **Go Digital**

BNI facilitates MSMEs to utilize digital technology with non-cash and advisory transaction solutions through a multi-channel approach with the support of an integrated digital platform and digital activation in the form of telecommunication services and network connectivity.

- **Go Global**

To penetrate the global market, BNI provides solutions for MSME assistance and development, special advisory, access to international buyers by strengthening the role of its Overseas Branch Offices (KCLN). One of the ways is by partnering with global e-commerce, trade clubs, and business matchmaking to bring together MSME customers with buyers and suppliers.

By the end of 2021, BNI had established 7 (seven) Hubs in several cities, Jakarta, Bandung, Solo, Surabaya, Medan, Denpasar, and Makassar to capture the market potential of the MSME segment that has a business orientation towards the international market. The BNI Xpora ecosystem development has been enthusiastically received by businesses that are now recommending BNI Xpora services to other businesses. This positive signal impacted business performance with an increase in export credit in the MSME segment by Rp2.5 trillion, an increase in low-cost funds (CASA) by Rp2.2 trillion, and an increase in trade finance by Rp2.3 trillion.

› Capital Management - Additional Tier 1

Capital management is one of the important themes for strengthening BNI's operations and business. Reflecting on the performance conditions in early 2021, BNI's capital (especially tier 1 capital) was less supportive in conducting business expansion. BNI's low core capital ratio low core capital ratio was due to lower capital increased compared to Risk Weighted Assets (RWA) growth.

Several rating agencies pay special attention to BNI's capital, which is considered to have the potential for a rating downgrade if BNI's capital is not strengthened. In general, the rating agencies stated that BNI's capital condition was at a limit that allowed the rating agencies to make corrections to BNI's rating.

Management took a strategic step by establishing a strategy for strengthening Tier 1 capital which was carried out through Additional Tier 1 carried out by BNI with the issuance of a Tier 1 equivalent instrument, namely the Additional Tier 1 perpetual bond, which was successfully executed in the third quarter of 2021.

BNI became the first bank in Indonesia to strengthen capital through Additional Tier 1 Investors responded positively and enthusiastically to BNI's Additional Tier 1 product, as reflected by demand that exceeded supply (oversubscribed 2.7 times). In addition, BNI also managed to set a re-bid price with a yield of 4.3%. Additional Tier 1 BNI has an impact on the increase in Tier 1 BNI CAR by 140 bps to 17.8% in the third quarter of 2021.

BNI INTEREST RATE

The BNI interest rates for raising and disbursing funds in Rupiah currency in 2021 and its comparison with 2020 is as follows:

	BASIC LOAN INTEREST RATE BASED ON LOAN SEGMENTATION				FUND RAISING INTEREST RATE (%)
	CORPORATE LOANS (%)	RETAIL LOANS (%)	CONSUMER LOANS		
			KPR (%)	NON KPR (%)	
2021					
March	8.00	8.25	7.25	8.75	3.25
June	8.00	8.25	7.25	8.75	2.85
September	8.00	8.25	7.25	8.75	2.85
December	8.00	8.25	7.25	8.75	2.50
2020					
March	9.85	9.85	10.20	12.00	4.38
June	9.85	9.85	10.20	12.00	4.38
September	9.80	9.80	10.15	11.95	3.50
December	9.80	9.80	10.00	11.70	3.25

BNI PERFORMANCE GROWTH IN 2021

With all the strategies and policies that have been implemented throughout 2021, BNI has shown a performance that continues to strengthen. BNI's total assets in 2021 will increase by 14.9%. This moderation in asset growth was mainly influenced by the increase in loans, which increased by 5.3% from Rp553.1 trillion in 2020 to Rp582.4 trillion in 2021. Meanwhile, other productive assets in the form of government bonds increased by 32.4% from Rp84.2 trillion in 2020 to Rp111.4 trillion in 2021, and Placements with other banks and Bank Indonesia also experienced a significant increase, which was 64.4% or equivalent to Rp36.1 trillion, from Rp56.1 trillion in 2020 to Rp92.3 trillion in 2021.

BNI's liabilities in 2021 grew by 15.0% to Rp838.3 trillion compared to 2020. The increase in liabilities was mainly due to an increase in customer deposits or TPF, and subordinated securities. BNI's TPF grew by 15.5% YoY to Rp729.2 trillion following the increase in CASA that grew by 16.9% YoY to Rp506.4 trillion. This customer deposit growth helped support the Bank's core lending business. At the same time, subordinated securities increased to Rp15.8 trillion in 2021 following the issuance of BNI Tier 2 Capital Bond 2021 and BNI Additional Tier 1 Capital Bond 2021 as part of BNI's general strategy to strengthen its complementary capital (Tier 2) and additional core capital. (Additional Tier 1). This action helped strengthen BNI's business expansion and optimized the long-term funding composition.

The transformation efforts carried out by management followed by good business management have a positive impact on BNI's performance. In 2021, BNI's net profit amounted to Rp10.9 trillion, an increase of 232.2% compared to the previous year. This was mainly due to the growth in Net Interest Income (NII), which increased by 12.4% YoY, as well as operating income other than interest, which also grew positively by 23.2% YoY. In addition, the increase in BNI's profit cannot be separated from BNI's efforts to implement an efficiency strategy, so that costs can be reduced and pricing adjustments, reflected in Interest Expense falling significantly by 34.9% YoY.

ACHIEVEMENT OF TARGETS IN 2021

BNI's target achievements can be seen in the realization of the Bank's Business Plan (RBB). When compiling the 2021-2023 RBB, and its revision, which were submitted to OJK as the regulator, BNI used various macro and micro assumptions, including global and national economic growth, inflation rates, Rupiah exchange rates, BI-7 Days Reverse reference Repo Rate (BI-7DRRR), as well as the growth in the Bank's loans and deposits.

In 2021, BNI revised its 2021-2023 RBB as part of management's strategic response to the impact of the COVID-19 pandemic and the extraordinary and unpredictable conditions it brought. This situation had never happened before and had a significant impact on economic activities. The Bank still faced major challenges

in 2021 as the recovery process from the global economic impact due to COVID-19 was predicted to continue into the first quarter of 2022.

After a strategic risk remapping due to the impact of the COVID-19 pandemic, in 2021 BNI increased its fund collection to successfully exceed its targets for raising current, savings, and deposit account funds.

Meanwhile, lending was relatively similar to the previously set target, and still above the previous year's total loan disbursements. The success in achieving this business expansion target had a positive impact on the profitability target, where the realization of net profit in 2021 of Rp10.7 trillion (Bank Only) was able to exceed the target of Rp9.4 trillion. In line with net profit, several profitability indicators also showed a good trend, such as Return On Assets (ROA) and Return On Equity (ROE), which have also relatively exceeded the target.

OBSTACLES, CHALLENGES, AND SOLUTIONS

In 2021, the Bank's had 2 (two) major challenges, a short-term challenge from the global economic recovery process due to COVID-19 expected to continue beyond the first quarter of 2022, and changes in people's behavior that require the Bank to deliver digital capabilities as these types of transactions are increasing exponentially, mainly due to the PPKM restrictions throughout Indonesia. To face these various opportunities and challenges, BNI quickly anticipates these challenges by making continuous improvements, especially to meet customer needs that lead to digital-based transactions. In the RBB that has been prepared and submitted by BNI to regulators, BNI has adapted to be able to take advantage of opportunities and challenges into business potential through continuous internal improvement of BNI and meeting the expectations of key stakeholders.

At a national level, the COVID-19 pandemic has had a negative impact on many economic sectors such as tourism, manufacturing, property, construction and others. A vaccination program has been in place since early 2021, and it is hoped that Indonesia can achieve herd immunity by mid- 2022, so as to encourage Indonesia's economic recovery for the better.

BUSINESS PROSPECTS FOR 2022

The economic prospects for 2022 are very dependent on the world's commitment to immediately carry out economic recovery in all countries. The presence of the Omicron variant of the COVID-19 virus that began to spread at the end of 2021 is overshadowing and increasing the tension of economic uncertainty again.

In the World Economic Outlook report released by the IMF in January 2022, the economic growth of the Advanced Economy Countries in 2022 is projected at 3.9%, then the United States economy is projected to grow 4.0%, followed by Japan is also estimated to grow by 3.3%, and Emerging & Developing Countries economy is projected to grow by 4.8%. ASEAN-5 and China's economic growth is projected 2022 at 5.6% and 4.8%, respectively, and the Eurozone economy is estimated at 3.9%. Overall, the world economy is projected to grow by 4.4%, a decline from 5.9% in 2021.

Another factor that will affect the global economy in 2022 is the Fed's tapering off policy. In November 2021, the United States Central Bank officially announced a policy to reducing security purchases (tapering) starting in mid-November 2021. The Fed stated that this was only a preliminary plan and might change depending on development conditions and the US economic outlook. This will certainly have an impact and weaken the Rupiah exchange rate against the US Dollar.

The various conditions above, which have been accompanied by an energy crisis since 2021, which could trigger high inflation, as well as an expected increase in interest rates, are risk factors for global uncertainty in 2022. Nevertheless, the world is optimistic that there will be an accelerated recovery from the pandemic. COVID-19 in 2022 along with the rapid progress of community vaccinations, increased community mobility and economic activity returns to normal.

The Indonesian Government is committed to continuing the economic recovery whilst improving the quality of public health at the same time. One of them is by accelerating the vaccination program for the people of Indonesia. The acceleration of the vaccination program is continuing, and also the National Economic Recovery (PEN) program policy continues to be pushed, together with social activity restriction policies to cope with the spread of COVID-19, especially the new Omicron variant. Most institutions are optimistic that the Indonesian economy in 2022 will strengthen in the range of 4.7% to 6.5%.

The following institutions predict Indonesia's economic growth in 2022 to grow 4.7% to 6.5% as follows:

INSTITUTION	2021	2022	2023
Governance (KSSK - January, 2022)	3.7	5.2	
Bank Indonesia (Statement - November, 2021)	3.2 - 4.0	4.7-5.5	
IMF (January, 2022)	3.3	5.6	6.0
World Bank (December, 2021)	3.7	5.2	5.1
OECD (May, 2021)	4.7	5.1	n/a
Oxford Economics (June, 2021)	4.7	6.5	5.3
BNI (September, 2021)	3.7 - 4.5	5.0 - 5.5	5.3 - 6.1

The downward trend in banking interest rates will continue until 2022 at a limited pace. Supported by loose banking liquidity conditions in line with the momentum brought by the national economic recovery and forecasts of rising global interest rates. In response to the predicted increasing Fed Funds Rate (FFR) interest rate trend, Bank Indonesia's policy in 2022 is to be pro-stability while still supporting pro-growth.

Although uncertain conditions still loom over the global and domestic economy, the banking industry is optimistic there will be accelerated economic recovery in 2022, given the strong national economic fundamentals, the fast and effective policy synergies from the Government and the Authorities supported by the House of Representatives (DPR), and the Government and community success in handling and controlling the COVID-19 pandemic. The Bank's loan growth in 2022 is projected to be in the range of 7%-9%, with a growth in deposits of 6%-7%.

In the 2022 RBB, BNI set realistic performance projections with a growth rate adjusted to the challenging economic recovery situation due to the COVID-19 pandemic. In 2022, BNI's loan disbursements are projected to grow progressively compared to the previous year, which in turn will provide an impetus for increasing the Bank's profitability.

In September 2021, BNI Securities Pte. Ltd. ("BSPL") operations officially started at the Monetary Authority of Singapore ("MAS"), providing encouragement for BNI's securities services to carry out their capital market service activities in Singapore, in the fixed income brokerage, equity brokerage and underwriting businesses. BSPL will focus on helping the BNI Group and BNI's customers to gain access to global investors.

IMPORTANT CHANGES IN THE BANK AND THE BANK BUSINESS GROUP

In 2021, to establish Holding Bank Syariah Indonesia (BSI) by the Government of Indonesia, PT Bank BNI Syariah, one of BNI's Subsidiaries where BNI was the majority shareholder, on February 1, 2021 together with PT Bank Syariah Mandiri and PT Bank BRI Syariah Tbk, merged to form PT Bank Syariah Indonesia Tbk ("BSI"). BNI owns 24.9% of BSI's shares and acts as its controlling shareholder. With the merger, BSI has become the largest sharia entity in Indonesia, and will play a role in developing the sharia economy as a source of inclusive economic growth, with great potential for the sharia industry in Indonesia and globally.

SERVICE NETWORK DEVELOPMENT

The BNI service network is part of the banking services provided to customers. To handle situations affected by the COVID-19 pandemic, BNI Service and Network development in 2021 included optimizing the office network (outlets), electronic networks, BNI Agen46 and other process improvements. Strengthening the outlets' sales management also became one of BNI's strategies to increase solution-based productivity for customers, and as a result the Product Holding Ratio (PHR) improved, and an ecosystem of customer transactions (closed loop transactions) was created.

In 2021 BNI closed 10 Medium Credit Centers (SKM) as part of a consolidation strategy into Commercial Business Centers (SBK) to focus on credit quality and healthy medium business expansion. In addition to the SBK conversion in 2021, BNI also optimized the Small Credit Centers (SKC) towards a new business strategy

to make them SME Business Centers (SBE) that can more optimally work on the small credit segment and business potential.

In line with BNI's aspiration to serve customers with integrated solutions, especially for overseas customers, a policy was adopted to focus on Indonesia-related businesses. One of the strategies undertaken was to add BNI service points overseas by establishing Representative Offices. In 2021 BNI was in the process of establishing Representative Offices in Amsterdam, the Netherlands, and Los Angeles, United States. Going forward, BNI will continue its overseas network development strategy to several other countries, in Asia and Australia.

By the end of 2021, BNI's office network consisted of 17 Region Offices, 195 Branch Offices, 1,971 Sub-Branch Offices, 23 Commercial Business Centers, 27 SME Business Centers, 12 Consumer Credit Processing Centers, 130 DigiCS, 10 Digital Branches, 16,385 ATM/CRM, and 157,632 BNI Agen46. This BNI office network is spread across 34 provinces in Indonesia and reaches 448 cities/districts or 87% of cities/districts in Indonesia. In line with the BNI Transformation Program, in 2021 a consolidation and rationalization strategy of 97 outlets while still taking into account the existing business potential. This was also part of BNI's strategy and efforts to continue to strengthen BNI's e-channel services and encourage a shift of customer transactions to BNI's e-Channel services.

In addition to its operational offices and functional offices network, banking services are provided to the public through Laku Pandai Services, Digital Financial Services (LKD) and e-Payment Services, and BNI continues to optimize the existence and role of BNI Agen46. By the end of 2021, the number of BNI Agen46 had reached 157,632 spread across 34 Provinces and 499 Cities/Regencies or 97% of the Cities/Regencies in Indonesia.

In the context to support SOE synergy to continue to provide transaction convenience, especially for bank customers who are members of the State Bank Association (Himbara), in 2021 BNI also converted 10,910 BNI ATM units to Red and White ATMs (Link). The increasing number of BNI ATMs spread throughout Indonesia will further improve and facilitate service banking transaction services for both BNI customers and other bank customers who are members of the ATM joint, ATM Link, ATM Global Master Card International and the ATM Prima networks.

In addition to ATM services, BNI also provides convenience to customers and prospective customers who want to open an account by through BNI DigiCS self-service, a Digital Customer Service Machine placed in several strategic locations, both inbranch and off-branch with the number to date is 130 machines.

To make it easier for customers to withdraw deposits at the Teller, BNI has implemented 182 Teller Cash Recyclers (T-Care) in 92 BNI outlets, where T-Care customers can make their cash deposits faster.

HUMAN CAPITAL MANAGEMENT

To cope with the banking industry competition and the COVID-19 pandemic, reliable human capital that can face challenges is an obligation and is key to the Bank's success. For this reason, BNI carries out HR management by continuously innovating and developing the capabilities of its employees so that they are always ready to adapt according to the changing situation of an increasingly fast business.

BNI's Human Capital, through Highly Engaged Employees and Highly Productive Employees, helps BNI realize its vision, to become a financial institution that excels in service and performance in a sustainable manner. To ensure BNI employees are engaged and productive, Human Capital plays an intervention role in the HC Architecture policies.

In 2021, improvements were made to improve the system thinking HC Architecture to form the basis for BNI's HC management support the realization of BNI's vision to become a Financial Institution with Excellence in Services and Performance in a Sustainable manner. The changes included adding the People Vision aspect as BNI's vision in managing HC and the End-to-End BNI Human Capital Framework based on the Employee Life Cycle.

End-to-End BNI Human Capital Framework is a comprehensive human capital management framework based on the employee life cycle, while still being based on the Human Capital Architecture with EVP as the estuary. This framework was established to show that BNI's human capital management policy covers the employee from pre-employment through to post-employment.

There are 3 main components in the framework.

1. Talent Life Cycle, like a ferris wheel symbolizing the employee life cycle starting from talent attraction, talent acquisition, culture, performance, career & development, rewards, retention, to talent separation;
2. Business Partner, like a stick showing the role as a business partner bringing Human Capital policies to each of their managed units as part of their role as a strategic partner;
3. Leadership, describing the force that drives the ferris wheel, showing that each leader is a Human Capital Leader who assures the human resource management policies.



For the ongoing COVID-19 in 2021, BNI continues to instigate measures to anticipate the spread of the COVID-19 virus, including digitizing the human capital management process by launching Digi HC 2.0, an improvement on the previous Digi HC application.

All BNI employees, hereinafter referred to as “BNI Hi-Mover”, use DigiHC as a “personal assistant” who can record daily activities, ranging from attendance, daily health surveys, work plans with daily realization, financial information to obtain the latest BNI information. In addition, BNI continues to ensure the health of its employees through a number of activities.

Continuing the success of the previous year’s programs and activities, BNI has strengthened supporting infrastructure programs and activities related to the spread of COVID-19 including employees Work From Home (WFH), Split Operations, and shifts or work times. BNI continues to update its operational guidelines and policies to anticipate the development of the COVID-19 pandemic, especially related to the health risks of employees. In addition, BNI continues to provide support on the “New Normal” through the New Way of Working or new living habits at work during the COVID-19 pandemic, including vaccinations, periodic COVID-19 tests, monitoring of employee daily health self-checking through the Digi-HC system, providing preventive and curative care assistance for employees affected by COVID-19 both, as well as providing a halfway house as a place for self-isolation.

In line with the Company’s people vision to build the country’s best talents and the best work culture through world-class HC management as a strategic partner for BNI’s growth, one of the strategies implemented is in the Talent Management System improvements. This aims to ensure the availability of a sustainable agile, competent and competitive Company talent pipeline and leaders that is digitally and globally oriented.

When developing employee capabilities, BNI Corporate University follows a Capability Development Strategy that focuses on Running the Bank by Enhancing Current Capabilities, Change the Bank through Job Shifting and Develop Future Capabilities strategies and Transform the Bank through Global & Digital Mindset strategies.

BNI continues to make improvements to its learning programs for all employees, which includes reskilling and up-skilling programs both in improving credit quality, increasing risk and digital culture and IT capability, data analytics, and leadership skills aimed at supporting implementation achievement strategic human capital policy.

Also, in an effort to increase employee competencies during the COVID-19 pandemic, in 2021 BNI developed technology-based tools to support employee productivity such as Digital Human Capital (Digi-HC), BNI CorpuTV, and BNI Smarter, as a one stop learning solution for BNI employees.

INFORMATION TECHNOLOGY OPTIMIZATION

BNI continues to grow and transform to strengthen its capabilities as a digital bank capable of competing in the industrial era 4.0. For the face of the ever-evolving digital era, the digitalization strategies have consistently supported BNI's business growth by expanding market access and operational efficiencies.

For developing its Information Technology (IT), BNI focuses on policies and strategic initiatives to improve business processes, system availability, IT development for digital enablers, infrastructure, communication networks and the Bank's digital product services in line with the developments in the banking industry. IT development is also aimed at system and network infrastructure refreshment, to support the increase in transactions and strengthen the Information Security capabilities.

One of the IT strategic policies carried out in 2021 was a role in realizing BNI's strategic policies through vertical alignment, and support the business/functional teams initiatives through horizontal alignment. Direct support carried out included strategic initiatives to increase digital capabilities, optimizing networks and international business solutions, as well as developing the IT HC competencies. The horizontal alignment support for other strategic policies was carried out by fulfilling IT's business alignment, preparing the IT architecture, as well as developing IT and digital solutions based on initiatives from business units and functional units. Organizational development and strengthening was also carried out to make IT more optimal, especially to support increased digital capabilities to meet customer needs and increase CASA & Fee Based Income through transaction growth.

As well as providing ongoing business support, BNI's IT capabilities were readied to support future business, including the initiation and continuous development of technology-based initiatives, as well as optimizing business processes through robotic automation. IT is expected to provide optimal support for efficient and customer-oriented business development, and collaboration with digital ecosystems.

In 2021, BNI launched a new version of BNI Mobile Banking, with a superior feature called Digital Loan that is BNI customers can apply for loans online. BNI Mobile Banking also provides several other features such as Cardless

Withdrawal, Quick Response (QR), Investment, Life Goals, My Credit Card, e-Wallet, and International Remittance. The launch of the new version of BNI Mobile Banking will provide added value for customers, especially in terms of their experience using BNI banking services through mobile phone applications.

DEVELOPMENT OF BANK GOVERNANCE IMPLEMENTATION

With its status as a public company and a state-owned banking company, BNI is highly obligated to carry out operational and business management in compliance with prevailing laws and regulations, as outlined in the Good Corporate Governance (GCG) implementation. The GCG principles are based on 5 (five) basic principles: transparency, accountability, responsibility, independence, and fairness, as references for responsible decision making, avoiding conflicts of interest, optimizing performance, and increasing accountability.

To improve the quality of its GCG implementation, BNI Management continues to strive to create, develop and improve itself in line with the GCG principles. In 2021, BNI received several appreciations from outside parties for its GCG implementation including:

- Award as "The Most Trusted" Company from The Indonesia Institute for Corporate Governance (IICG);
- "Very Good" predicate in implementing GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standards from the Indonesia Institute for Corporate Directorship (IICD);
- 2nd place in The Best Indonesia GCG Award VI-2021 in the Public Company - Bank Buku IV category organized by Economic Review.

One important step taken in 2021 was to strengthen BNI's GCG management by changing the GCG management policy, from previously being under 1 (one) division to being under the supervision of 2 (two) divisions or work units, namely the Compliance Division and Corporate Secretary. This was done so that GCG management will be more effective, both individually and in an integrated manner.

For the GCG principles and practices to achieve its ultimate goal, which is to become part of the values and culture, BNI felt it important to disseminate GCG to all BNI Hi-Movers. BNI periodically conducts GCG socialization to employees and all stakeholders, either

through appeals, meetings, Sharing Sessions, webinars, delivery of modules/materials, training, signing of integrity pacts, and installation of outdoor media and publications in mass media. It is hoped that this GCG socialization will provide an understanding and awareness in all stakeholders, especially BNI Hi-Movers, to follow business ethics within BNI.

In particular, management emphasizes integrity as the main key to implementing GCG principles and practices. Management is highly committed to continue cultivating integrity as an inseparable part of developing HC competencies and capacities. Only by achieving integrity will the BNI organization achieve its vision.

COMMITTEES UNDER THE BOARD OF DIRECTORS PERFORMANCE ASSESSMENT

In carrying out its management duties, and to create operational effectiveness and efficiency, the Board of Directors has established supporting organs in accordance with BNI's business needs and regulatory provisions, including:

- Credit Committee;
- Credit and Business Policy Committee;
- Product Committee;
- Asset & Liability Committee (ALCO);
- Human Capital Committee;
- Performance Management Committee;
- Risk Management and Anti Fraud Committee;
- Technology Management Committee;
- Integrated Risk Management Committee.

During 2021, The Board of Directors considers that the performance of the Committees under the Board of Directors has carried out their respective functions well and is in accordance with the objectives of their formation. This is based on the fulfillment of each Committee's duties in accordance with the Committee Charter, their competence and skills, and attendance level at Committee meetings.

ENCOURAGING ESG ADOPTION

BNI understands that the Bank's performance progress and success depends on any environmental and social impacts arising from the activities carried out. The event or activity impact, or consequences have become key factors that BNI takes into account in all of its operational and business schemes. These factors include any consequences or impacts that may occur, as well as those stakeholders who may be impacted by BNI's banking activities.

In 2021, BNI has formed an ESG Sub Committee under the Risk Management & Anti Fraud Committee. The posture of the ESG Sub-Committee involving top management reflects BNI's strong commitment to encouraging ESG implementation by involving its leaders. The ESG Sub-Committee is placed under the Risk Management & Anti-Fraud Committee as part of the management's strategic policy to integrate the impact of sustainable finance risks with the previously mapped banking business risks.

The ESG Sub-Committee main duties include (1) Developing Environmental, Social & Governance (ESG) Management Policies and Strategies and their changes, (2) Identifying potential ESG risks that impact both BNI and BNI stakeholders, (3) Monitoring the Sustainable Finance Strategy implementation, (4) Monitoring, evaluating and providing recommendations on the BNI ESG Assessment results, (5) Evaluating the ESG strategy implementation in all BNI business lines. The existence of the ESG Sub-Committee is the foundation for sustainable governance that will provide added value for BNI.

For BNI, sustainability is part of the Bank's commitment to realizing its vision and mission, and to creating a better future for all stakeholders. With the ESG Sub-Committee, will support BNI's efforts to achieve Sustainability are reflected in its Sustainable Finance and support for achieving the Sustainable Development Goals (SDG).

BOARD OF DIRECTORS' STRUCTURE AND COMPOSITION IN 2021

During 2021 there were no changes to the Board of Directors' Structure and Composition, and it remained the same as December 31, 2020.

BNI's Board of Directors' Structure as of December 31, 2021

NAME	POSITION	BASIS FOR APPOINTMENT	EFFECTIVE DATE ^{*)}
Royke Tumilaar	President Director	EGMS decision dated September 2, 2020	November 19, 2020
Adi Sulistyowati	Vice President Director	AGMS decision dated March 17, 2015 was appointed as Director of Institutional Relations until the end of his term of office, then reappointed as Managing Director Services and Networks through Annual GMS resolution dated February 20, 2020. Through an Extraordinary GMS decision dated September 2, 2020, his duties were transferred to Vice President Director	November 6, 2020
Corina Leyla Karnalies	Managing Director Consumer Business	AGMS decision dated February 20, 2020	June 30, 2020
Novita Widya Anggraini	Managing Director Finance	EGMS decision dated September 2, 2020	November 19, 2020
Y.B. Hariantono	Managing Director Information Technology and Operations	AGMS decision dated February 20, 2020	August 14, 2020
Bob Tyasika Ananta	Managing Director Human Capital and Compliance	AGMS decision dated February 20, 2020	May 22, 2020
Silvano Winston Rumanitir	Managing Director Corporate Banking	EGMS decision dated September 2, 2020	December 1, 2020
David Pirzada	Managing Director Risk Management	EGMS decision dated September 2, 2020	December 1, 2020
Sis Apik Wijayanto	Managing Director Institutional Relations	AGMS decision dated February 20, 2020	June 30, 2020
Ronny Venir	Managing Director Services and Network	EGMS decision dated September 2, 2020	November 6, 2020
Muhammad Iqbal	Managing Director MSME Business	EGMS decision dated September 2, 2020	November 19, 2020
Henry Panjaitan	Managing Director Treasury and International	EGMS decision dated September 2, 2020	November 13, 2020

^{*)} The Board of Directors became effective after obtaining OJK 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 the Main Parties of Financial Services Institutions.

FINAL WORD

For all the success recorded in 2021, please allow the Board of Directors to express its gratitude to God Almighty, as well as thank all shareholders and investors for the trust that has been given. We would also like to show its respect and gratitude to the Board of Commissioners for the direction and strategic partnership in managing BNI's operations and business. Likewise to regulators, customers, suppliers, and business partners, the Board

of Directors would like to thank you for the cooperation that has been created.

To all BNI Hi-Movers, the Board of Directors expresses its highest appreciation for the dedication shown. These achievements will form the basis for BNI to optimize its future potential and achieve the best and most excellent, and sustainable, performance in the future.

Jakarta, February 21, 2022

On behalf of PT Bank Negara Indonesia (Persero) Tbk. Board of Directors



Royke Tumilaar
President Director

Board of Directors



1 Royke Tumilaar
President Director

2 Adi Sulistyowati
Vice President Director

3 Novita Widya Anggraini
Managing Director Finance

4 David Pirzada
Managing Director Risk
Management

5 Henry Panjaitan
Managing Director Treasury and
International

6 Corina Leyla Karnalies
Managing Director Consumer
Business

7 Muhammad Iqbal
Managing Director MSME Business

8 Y.B. Hariantono
Managing Director Information
Technology and Operations

9 Bob Tyasika Ananta
Managing Director Human Capital and
Compliance

10 Sis Apik Wijayanto
Managing Director Institutional Relations

11 Silvano Winston Rumantir
Managing Director Corporate Banking

12 Ronny Venir
Managing Director Services and Network



Statement Letter of Members of the Board of Directors and Board of Commissioners Responsibility for the 2021 Annual Report of PT Bank Negara Indonesia (Persero) Tbk

We, the undersigned, state that all information contained in the 2021 Annual Report of PT Bank Negara Indonesia (Persero) Tbk is presented in its entirety, and we take full responsibility for the correctness of the contents in this Annual Report.

This statement is hereby made in all truthfulness.

Jakarta, February 21, 2022
Board of Commissioners



Agus Dermawan Wintarto Martowardojo
Commissioner/Independent Commissioner



Pradjoto
Vice President Commissioner/
Independent Commissioner



Sigit Widyawan
Independent Commissioner



Asmawi Syam
Independent Commissioner



Iman Sugema
Independent Commissioner



Septian Hario Seto
Independent Commissioner



Erwin Rijanto Slamet
Independent Commissioner



Askolani
Commissioner



Ratih Nurdianti
Commissioner



Susyanto
Commissioner

We, the undersigned, state that all information contained in the 2021 Annual Report of PT Bank Negara Indonesia (Persero) Tbk is presented in its entirety, and we take full responsibility for the correctness of the contents in this Annual Report.

This statement is hereby made in all truthfulness.

Jakarta, February 21, 2022

Board of Directors



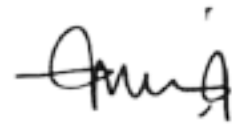
Royke Tumilaar
President Director



Adi Sulistyowati
Vice President Director



Corina Leyla Karnalies
Managing Director Consumer Banking



Novita Widya Anggraini
Managing Director Finance



Y.B. Hariantono
Managing Director Information
Technology and Operation



Bob Tyasika Ananta
Managing Director Human Capital
and Compliance



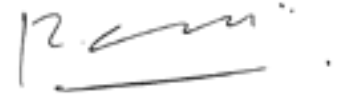
Silvano Winston Rumantir
Managing Director
Corporate Banking



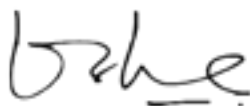
David Pirzada
Managing Director
Risk Management



Sis Apik Wijayanto
Managing Director
Institutional Relation



Ronny Venir
Managing Director Network
and Services



Muhammad Iqbal
Managing Director Micro, Small &
Medium Enterprise (MSME)



Henry Panjaitan
Managing Director Treasury
and International Banking



Marcus GIDEON



Champions don't show up to get everything they want; they show up to give everything they have.

- Matsuna Dhiwayo

Company Profile

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Company Identity



COMPANY NAME

PT Bank Negara Indonesia (Persero) Tbk

NICKNAME

BNI

DOMICILE

Jakarta

BUSINESS ACTIVITY

Banking business in accordance with the Articles of Association No. 23, dated April 20, 2021



BUSINESS SEGMENTS

- Business Banking Cooperative, Medium and Small
- Consumer Banking
- International Banking and Treasury

DATE OF ESTABLISHMENT

July 5, 1946



LEGAL BASIS OF ESTABLISHMENT

- Government Regulation in lieu of Law No. 2 of 1946
- Republic of Indonesia National Gazette No. 70 of 1968
- Law No. 17 of 1968
- Government Regulation No. 19 of 1992 (Adjustment to BNI Legal Form)

CHANGE OF NAME

- Based on Law No. 17 of 1968 concerning Bank Negara Indonesia 1946 stipulates the name "Bank Negara Indonesia 1946";
- Based on Government Regulation No. 19 of 1992 concerning the Adjustment of the Legal form of Bank Negara Indonesia 1946 to become a Limited Liability Company (Persero) hence the name change to "Company Company (Persero) PT Bank Negara Indonesia";
- Based on the Decree of the Minister of Justice No. C2-8290 HT.01.04.th.96 dated August 6, 1996, name change to "Company Company (Persero) PT Bank Negara Indonesia abbreviated PT Bank Negara Indonesia (Persero) Tbk."



TOTAL ASSETS

Rp964.84 trillion



AUTHORIZED CAPITAL

Rp15,000,000,000,000

ISSUED AND FULLY PAID CAPITAL

Rp9,054,806,974,125



LISTING DATE ON INDONESIA STOCK EXCHANGE

October 28, 1996

TICKER CODE

BBNI



SHARE OWNERSHIP

Republic of Indonesia 60%
Public 40%

* In accordance with POJK No. 12/POJK.03/2021 the status of Sub-Branch Offices consists of 1,097 Sub-Branch Offices, 563 Cash Offices, 113 Payment Points, and 198 O-Branches in accordance with the Classification



NUMBER OF EMPLOYEES

2020: 27,202 people
2021: 27,177 people

AGEN46

152,742 (2020)
157,632 (2021)



SUBSIDIARIES

PT BNI Multifinance
PT BNI Sekuritas and its Subsidiary
PT BNI Life Insurance
BNI Remittance Ltd.



OFFICE NETWORK

- 1 Head Office
- 17 Regional Offices
- 195 Branch Offices
- 4 Subsidiaries
- 1,971 Sub-Branch Offices *
- 16,385 ATM/CRM (Include 10 ATM/CRM Overseas)
- 130 DigiCS
- 9 Networks in Overseas Branch Offices and 10 ATM

HEAD OFFICE ADDRESS

Grha BNI
Jl. Jenderal Sudirman Kav. 1
Jakarta 10220
Telephone: (62-21) 251 1946
I-Telex: 765185 BNI DLN IA
Fax: (62-21) 251 1214
E-mail: bni@bni.co.id
PO Box 1946



WEBSITE

Website: www.bni.co.id

INVESTOR RELATIONS

Investor Relations Division
Grha BNI, Lt. 24
Jl. Jenderal Sudirman Kav. 1
Jakarta 10220
Telephone: (62-21) 2511 946, 572 8449
E-mail : ir@bni.co.id



CALL CENTER

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

INFORMATION ACCESS

E-mail : bni@bni.co.id

Social Media:

Twitter : @BNI
Facebook : BNI
Instagram : @BNI46



GRATIFICATION & ANTI-BRIBERY COMPLAINTS


Compliance Information Management System (CIMS)
Portal at www.cims.bni.co.id.

WHISTLEBLOWING SYSTEM

Telephone : 021 - 57853377
Website : <http://bni-transparan.tipoffs.com.sg>
Email : bni-transparan@tipoffs.com.sg
Mail : BNI Transparan, P.O. BOX 2646, JKP 10026
SMS/Whatsapp: 0811-970-1946



Brief History of The Company



PT Bank Negara Indonesia (Persero) Tbk. Originally established in Indonesia as a central bank under the name of “Bank Negara Indonesia” based on Government regulation in Lieu of Law No. 2 of 1946 dated July 5, 1946. subsequently, pursuant to Law 17 in 1968, BNI became “Bank Negara Indonesia 1946”, with the status of a state-owned Commercial Bank. As a State-Owned Bank, BNI is assigned to improve the people’s economy and national economic development by running a commercial bank business by prioritizing the industrial sector.

Based on Government Regulation No. 19, 1992, dated April 29, 1992, BNI changed its legal status to a limited liability company (Persero). The change of legal status to a limited liability company, was stated in Deed No. 131, dated July 31, 1992, before Muhani Salim, S.H., and was published in the State Gazette of the Republic of Indonesia No. 73 dated September 11, 1992, Supplement No. 1A.

BNI was the first State Owned Bank to become a public company after listing its shares on the Jakarta Stock Exchange and the Surabaya Stock Exchange (now BEI) in 1996. To strengthen its financial structure and competitiveness in the national banking industry, BNI conducted a number of corporate actions, including being recapitalized by the Government in 1999, with a Government share divestment in 2007, and a limited public offering in 2010.

To fulfill the provisions of Law 40 of 2007 dated August 16, 2007 on Limited Liability Companies, BNI's Articles of Association were amended. The amendments were stated in Deed No. 46 dated June 13, 2008, made before Fathiah Helmi, S.H., notary in Jakarta, based on an Extraordinary General Meeting Shareholders decision dated May 28, 2008, which was approved by the Minister of Justice and Human Rights of the Republic of Indonesia, by Decree AHU-AH.01.02-50609 dated August 12, 2008 and published in the State Gazette of the Republic of Indonesia No. 103 dated December 23, 2008, Supplement No. 29015.

The amendments to BNI's Articles of Association included the realignment of the Articles of Association in accordance with Deed No. 45 dated April 25, 2017, made before Notary Fathiah Helmi, SH, which was approved by the Minister of Justice and Human Rights of the Republic of Indonesia, by decree No. AHU-0010821. AH.01.02 dated May 17, 2017.

The latest amendment to the BNI Articles of Association were included in Deed No. 23 dated April 20, 2021 made before Notary Fathiah Helmi, S.H., and approved in the Ministry of Law and Human Rights of the Republic of Indonesia Decree No. AHU-AH.01.03.0264697 dated April 26, 2021.

Currently, 60% of BNI's shares are owned by the Government of the Republic of Indonesia, while the remaining 40% are owned by the public, both individuals and institutions, domestic and foreign. To provide financial services in an integrated manner, BNI is supported by a number of subsidiaries, namely PT BNI Multifinance, PT BNI Sekuritas and Subsidiaries, PT BNI Life Insurance and BNI Remittance Ltd. BNI also offers deposit and loan facilities for the corporate, medium, and small segments. A number of its best products and services have been adapted to meet the needs of customers from childhood, through adolescence and adulthood, until retirement. Currently BNI is listed as the 4th largest national bank in Indonesia, in terms of total assets, total loans and total third party funds.

CHANGE OF NAME

BNI was originally named Bank Negara Indonesia and then changed to Bank Negara Indonesia 1946. The change was effective on December 18, 1968 based on Law No. 17 of 1968 concerning Bank Negara Indonesia 1946.

Furthermore, BNI underwent an adjustment to its legal form from the original name Bank Negara Indonesia 1946 to a Limited Liability Company (Persero) effective April 29, 1992, and changed its company status from previously a Public Company became a Public Company which was effective on November 25, 1996, and the name became PT Bank Negara Indonesia (Persero) Tbk.

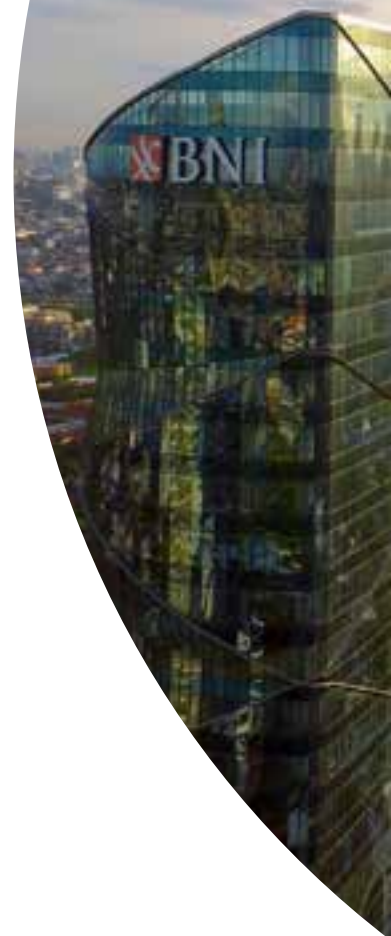
Company Brand



The Slogan “serving the Country, the Pride of the Nation” is the philosophy and vision of the Bank to give high impact that can be felt by all of Indonesian people.

As the first 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 strengthens the corporate signature as a state-owned bank that has been in operation for 75 years. The colour 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.

As a comprehensive and trusted digital financial institution, BNI will continue to provide digital innovation experience, both in terms of corporate and consumer banking, for people throughout the country. In 2019 BNI established a Value Proposition to be one of the most profitable financial institutions in Indonesia and sharpened it to become a digital-based integrated financial solutions provider with international advantages in 2021.



Lines of Business

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

Based on its latest Articles of Association, as stipulated in the Article 3 Deed No. 23, dated April 20, 2021 BNI was established with the purpose and objectives to carry out banking business activities. In order to achieve its purpose and objectives, BNI conducts the following main and supporting activities:

BUSINESS ACTIVITIES BASED ON THE LAST ARTICLES OF ASSOCIATION	BNI'S BUSINESS ACTIVITIES	
	MAIN BUSINESS ACTIVITIES	
	ALREADY IMPLEMENTED	NOT YET IMPLEMENTED
Collecting funds from the public in the form of savings, current deposits, time deposits, savings deposits, or other equivalent forms.	√	
Providing credit.	√	
Issuing debt instruments.	√	
Buying, selling, or guaranteeing, at their own risk or for the interests and on the order of customers, (money orders, debt securities/ other trade paper, treasury bills, government guarantee letters, Bank Indonesia certificates, bonds, fixed maturity trade securities, and other fixed maturity securities instruments).	√	
Transferring money either for its own needs or the needs of customers.	√	
Placing, lending or borrowing with other banks, by using mail, telecommunication facilities and notes, checks or other facilities.	√	
Receiving payments from securities billing and performing calculations with or among third parties.	√	
Facilitating a secure place for goods and securities.	√	
Performing escrow activities for another party based on a contract.	√	
Performing funds placements from a customer to other customers in the form of securities that are not listed on a stock exchange.	√	
Conducting financing and/or other activities including activities based on sharia principles, in accordance with the provisions stipulated by competent authorities.	√	
Performing activities in factoring, credit card business and trustee services.	√	
Conducting foreign currencies activities by fulfilling the conditions set by competent authorities.	√	
Performing equity activities in banks or other companies in the financial sector.	√	
Conducting temporary capital participation activities to overcome any consequence of loan failure, including financing failure activities based on sharia principles provided they withdraw their investments in accordance with the provisions stipulated by the competent authorities.	√	
Acting as a Pension Fund Founder and management in accordance with the relevant laws and regulations.	√	



BUSINESS ACTIVITIES BASED ON THE LAST ARTICLES OF ASSOCIATION	BNI'S BUSINESS ACTIVITIES	
	MAIN BUSINESS ACTIVITIES	
	ALREADY IMPLEMENTED	NOT YET IMPLEMENTED
Performing activities in financial services, commercial banking, investment banking and other such services.	√	
SUPPORTING BUSINESS ACTIVITIES	ALREADY IMPLEMENTED	NOT YET IMPLEMENTED
Perform other activities commonly performed by banks insofar as they do not conflict with the laws and regulations.	√	



Product and Services

BNI's business activities include savings products, loan products, and other services as described below:

CONSUMER RETAIL



Savings

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

Loans

- BNI Griya
- BNI Griya Multiguna
- BNI FLPP/SSB/BP2BT
- BNI Fleksi
- BNI Fleksi Pensiun
- BNI Instan



Credit Card

• Regular Credit Card

- » BNI Visa Silver
- » BNI Mastercard Silver
- » BNI Visa Gold
- » BNI Mastercard Gold
- » BNI JCB Gold

• Premium Credit Card

- » BNI Style Titanium
- » BNI Visa Platinum
- » BNI American Express Business Card
- » BNI JCB Precious
- » BNI Mastercard World
- » BNI Visa Signature
- » BNI Visa Infinite

• Co-Branding Credit Card

- » BNI-LOTTE Mart
- » BNI-Garuda
- » BNI-Pertamina
- » BNI-Telkomsel
- » BNI-Bank bjb
- » BNI-Bank DKI
- » BNI-Jd.id

• Affinity Credit Card

- » Affinity Universitas Credit Card
- » Affinity Ikatan Alumni Credit Card
- » Community Affinity Credit Card (Association of Indonesian Golf Course Owners, The Djakarta Auto, Harley Owner Group, World Wild Foundation and others)

• Corporate Credit Card

- » BNI Visa Corporate Card Gold
- » BNI Visa Corporate Card Platinum
- » BNI Virtual Card Number

• Private Label Credit Card

- » BNI Travelling Card
- » BNI Gasoline Card
- » BNI Health Card

• BNI Cash Card



CONSUMER RETAIL

Emerald Service

- BNI Emerald Service

Savings

- Emerald Saving

Investment products

- Money Market Mutual Funds
- Fixed Income Mutual Funds
- Mixed Mutual Funds
- Shares Mutual Funds
- Protected Mutual Funds
- Retail Government Bonds (ORI, SR, SBR, ST)
- Secondary Market Government Securities (FR, PBS, Indon, Indois)
- Corporate Bonds
- Depo Swap
- Market Linked Dual Currency Investment
- Stock Brokerage Referrals
- Foreign Exchange

Debit Card

- Regular Debit Card
 - » Silver Debit Card
 - » Gold Debit Card
- Premium Debit Card
 - » Platinum Debit Card
- Co-Brand Debit Card
 - » Garuda Debit Card
 - » Citilink Debit Card
 - » Lotte Grosir Debit Card
 - » Indogrosir Debit Card
- Affinity Debit Card
 - » Affinity Universitas Debit Card
 - » Affinity Ikatan Alumni Debit Card
 - » Affinity Pegawai/Organisasi/Komunitas Debit Card
- BNI Emerald Debit Card

Digital Banking

- BNI Mobile Banking
- BNI QRIS
- BNI SMS Banking
- BNI Internet Banking
- BNI Phone Banking
- BNI O-Branch
- BNI Debit Online
- BNI TapCash
- BNI Agen46
- BNI EDC
- BNI EDC Mini ATM
- BNI iPay
- BNI SmartPay
- BNI API Digital Services
- BNI Digital Account Opening (DAO)
- BNI E-Form Pre-Employment Card Program
- BNI Direct Debit
- BNI ATM Regular
- BNI ATM Non Cash
- BNI ATM Cash Deposit
- BNI ATM Drive Thru

Services

- Domestic Money Transfers
- International Money Transfers
- Safe Deposit Box
- Collections
- BNI Bank Certificates
- Traveller's Cheques
- Foreign Bank Notes

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



BUSINESS BANKING



Funding

- BNI Current Account
- Company Time Deposits
- Single Currency

Lending

- Working Capital Loans (KMK)
- Investment Loans (KI)
- Bank Guarantee (GB)
- Stand-by LC (SBLC)
- Domestic Documentary Letter of Credit (SKBDN)
- Onshore Loans
- Offshore Loans
- Import Letter of Credit (LC) Limit
- Export Loans
- Import Loans
- Two Step Loans (TSL)
- Syndicated Loans
- Counter Guarantee Loans
- Transactional Loans
- Treasury Line
- Government or Government Institutions Loans
- Cash Collateral Credit (CCC)
- Supply Chain Financing
- Financial Institutions Loans (KKLK)
- People's Business Loans (KUR)
- Primary Cooperative Loans
- Food and Energy Security Loans (KKP-E)
- Plasma Core Partnership Pattern Investment Loans
- Loan Revitalization Program Plantation-Partnership Pattern

Digital Banking

- BNIDirect Cash Management
- BNIDirect Mobile
- Financial Supply Chain Management
- E-Bank Guarantee
- API Corporate Banking

Services

- Wholesale Solutions
 - » Cash Management: BNIDirect (Payment Management, Collection Management, Liquidity Management, Information Management dan Transfer Management)
 - » Billing Payment
 - » Virtual Account
 - » e-Collection
 - » ECOSmart
 - » Autopayment
 - » Edupatrol
 - » e-PBB
 - » Notional Pooling
 - » BNI Trade Online
 - » Smart Commerce Pay
- 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
- Bank Guarantee
 - » Big Bond
 - » Advance Payment Bond
 - » Performance Bond (Performance Bond, Maintenance Bond/Retention Bond, Guarantee from Payment Bank)
 - » Custom Bond





TREASURY & INTERNASIONAL



Trade Finance Product

- Import LC Issuance
 - » Sight LC
 - » Usance LC
 - » Back to Back LC (BBLC)
 - » Transferable Letter of Credit
- Export LC Negotiation
- Inward Documentary Collection
- Outward Documentary Collection
- Shipping Guarantee
- Trust Receipt
- Advances Under Collection Bills
- Open Account Financing
- Bills Discounting
- LC Refinancing
- Standby Letters of Credit

Loan Products

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

Retail Services Products

- BNI Current Account in SGD, HKD, CNY, JPY, KRW & USD
- BNI Fixed Deposit in SGD, HKD, CNY, JPY, KRW & USD
- BNI Saving Account in SGD, HKD, CNY, JPY, KRW, & 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
- Trust Service

Financial Institution Products

- Bank Guarantee based on Counter Guarantee
- Confirm LC/SKBDN
- Nostro Account
- Billateral Trade Financing
- Risk Participation and Forfaiting
- Custodian Services
- Bankers Acceptance

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



Operational Area Map

As of December 31, 2021, BNI has 1 (one) Head Office, 17 Regional Offices, 9 (nine) Overseas Branch Offices and 2,228 office networks comprising Branch Offices, Sub-Branch Offices, and Business Center. The 9 (nine) overseas office networks, consists of 6 (six) Overseas Branch Offices, 1 (one) Sub-branch, and 2 (two) Remittance Branches in 6 (six) countries. The BNI Office Network focuses on providing services and business solutions as well as facilitating BNI domestic and overseas customer transactions. By taking an active role in managing and encouraging business development in the Corporate, Commercial, Small and Consumer segments, BNI's office network is supported by competent and dedicated HC. For easier, faster and closer access to BNI services, currently BNI has 157,632 BNI Agen46 as a branchless banking network to support public financial literacy and inclusion. Details of the Office network and BNI Agen46 per region are as follows:

W01 (Medan)

Coverage : North Sumatra

13 Branch Offices
105 Sub-Branch Offices:
1 Commercial Business Center
2 SME Business Centers
1 Consumer Credit Processing Center
913 ATM/CRM
7,389 BNI Agen46

W02 (Padang)

Coverage: West Sumatra, Riau, and Riau Islands

13 Branch Offices
131 Sub-Branch Offices:
3 Commercial Business Centers
1 SME Business Center
1 Consumer Credit Processing Center
1,135 ATM/CRM
9,164 BNI Agen46

W09 (Banjarmasin)

Coverage: West Kalimantan, Central Kalimantan, South Kalimantan, East Kalimantan, and North Kalimantan

21 Branch Offices
152 Sub-Branch Offices:
2 Commercial Business Centers
1 SME Business Center
1 Consumer Credit Processing Center
1,561 ATM/CRM
8,867 BNI Agen46

W03 (Palembang)

Coverage: Jambi, South Sumatra, Bengkulu, Lampung, and Bangka Belitung

15 Branch Offices
126 Sub-Branch Offices:
2 Commercial Business Centers
1 SME Business Center
1 Consumer Credit Processing Center
1,110 ATM/CRM
12,009 BNI Agen46

Jakarta Area

» W10 (Jakarta Senayan) Coverage : Central Jakarta, South Jakarta

7 Branch Offices
133 Sub-Branch Offices:
3 Commercial Business Centers
2 SME Business Centers
913 ATM/CRM
3,259 BNI Agen46

» W12 (Jakarta Kota) Coverage: North Jakarta and West Jakarta

6 Branch Offices
115 Sub-Branch Offices:
1 Commercial Business Center
4 SME Business Centers
1 Consumer Credit Processing Center
788 ATM/CRM
5,673 BNI Agen46

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

9 Branch Offices
135 Sub-Branch Offices:
1 Commercial Business Center
2 SME Business Centers
1,801 ATM/CRM
9,171 BNI Agen46

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

8 Branch Offices
128 Sub-Branch Offices:
2 Commercial Business Centers
3 SME Business Centers
1,430 ATM/CRM
7,812 BNI Agen46

W04 (Bandung)

Coverage: West Java

15 Branch Offices
141 Sub-Branch Offices:
1 Commercial Business Center
2 SME Business Centers
1 Consumer Credit Processing Center
1,507 ATM/CRM
13,583 BNI Agen46

W17 (Yogyakarta) Coverage: Yogyakarta and Lower Central Java

15 Branch Offices
135 Sub-Branch Offices:
1 Commercial Business Center
2 SME Business Centers
1 Consumer Credit Processing Center
1,224 ATM/CRM
12,656 BNI Agen46

W05 (Semarang)

Coverage : Upper Central Java

11 Branch Offices
95 Sub-Branch Offices:
1 Commercial Business Center
1 SME Business Center
1 Consumer Credit Processing Center
887 ATM/CRM
12,659 BNI Agen46

Overseas Office Network



W08 (Denpasar)

Coverage: Bali, West Nusa Tenggara and East Nusa Tenggara

9 Branch Offices
109 Sub-Branch Offices:
1 Commercial Business Center
1 SME Business Center
1 Consumer Credit Processing Center
1,133 ATM/CRM
7,646 BNI Agen46

W07 (Makassar)

Coverage: West Sulawesi, Southeast Sulawesi, South Sulawesi and Maluku

11 Branch Offices
120 Sub-Branch Offices:
1 Commercial Business Center
1 SME Business Center
1 Consumer Credit Processing Center
1,133 ATM/CRM
7,446 BNI Agen46

W11 (Manado)

Coverage : North Sulawesi, Gorontalo, Central Sulawesi and North Maluku

11 Branch Offices
67 Sub-Branch Offices:
1 Consumer Credit Processing Center
600 ATM
6,273 BNI Agen46

BNI NETWORK SUMMARY

- 1 Head Office
- 17 Regional Offices
- 195 Branch Office
- 1,971 Sub-Branch Office*
- 23 Commercial Business Centers
- 27 SME Business Centers
- 12 Consumer Credit Processing Centers
- 130 DigiCS
- 10 Digital Branch
- 16,383 ATM
- 157,632 BNI Agen46

W06

Coverage : Upper East Java

12 Branch Offices
143 Sub-Branch Offices:
3 Commercial Business Centers
4 SME Business Centers
1 Consumer Credit Processing Center
1,364 ATM/CRM
11,860 BNI Agen46

W06 (Surabaya)

Coverage : Central East Java

14 Branch Offices
94 Sub-Branch Offices:
1,106 ATM/CRM
18,039 BNI Agen46

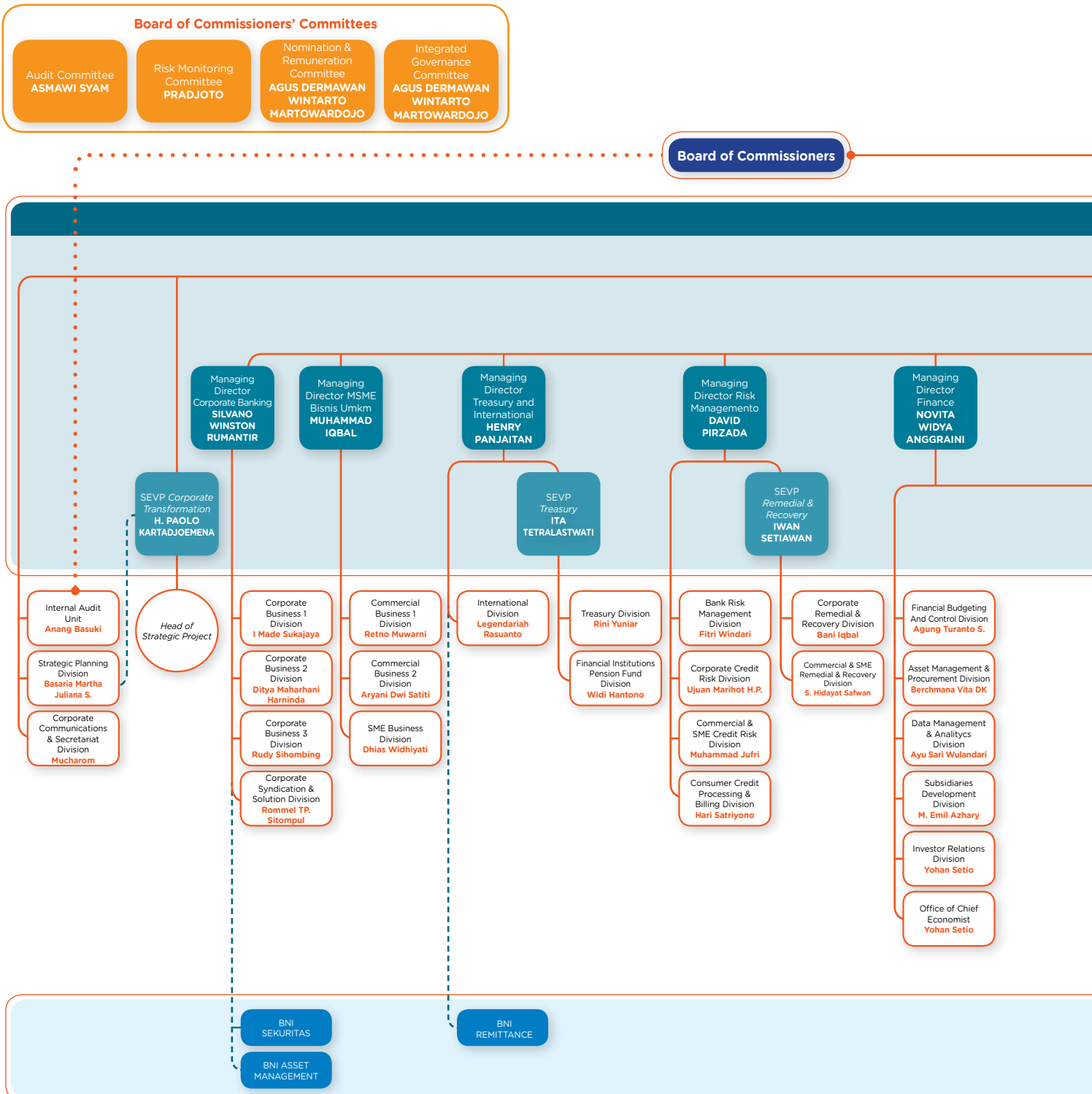
W16 (Papua)

Coverage: Papua and West Papua

5 Branch Offices
42 Sub-Branch Offices:
272 ATM/CRM
3,740 BNI Agen46

Organization Structure

As the Company's business develops, and in order to meet customer needs and answer the Bank's business challenges, Bank BNI changed the organizational structure through the Board of Directors' Decree No. KP/347/DIR/R dated July 30, 2021.



General Meeting of Shareholders (GMS)

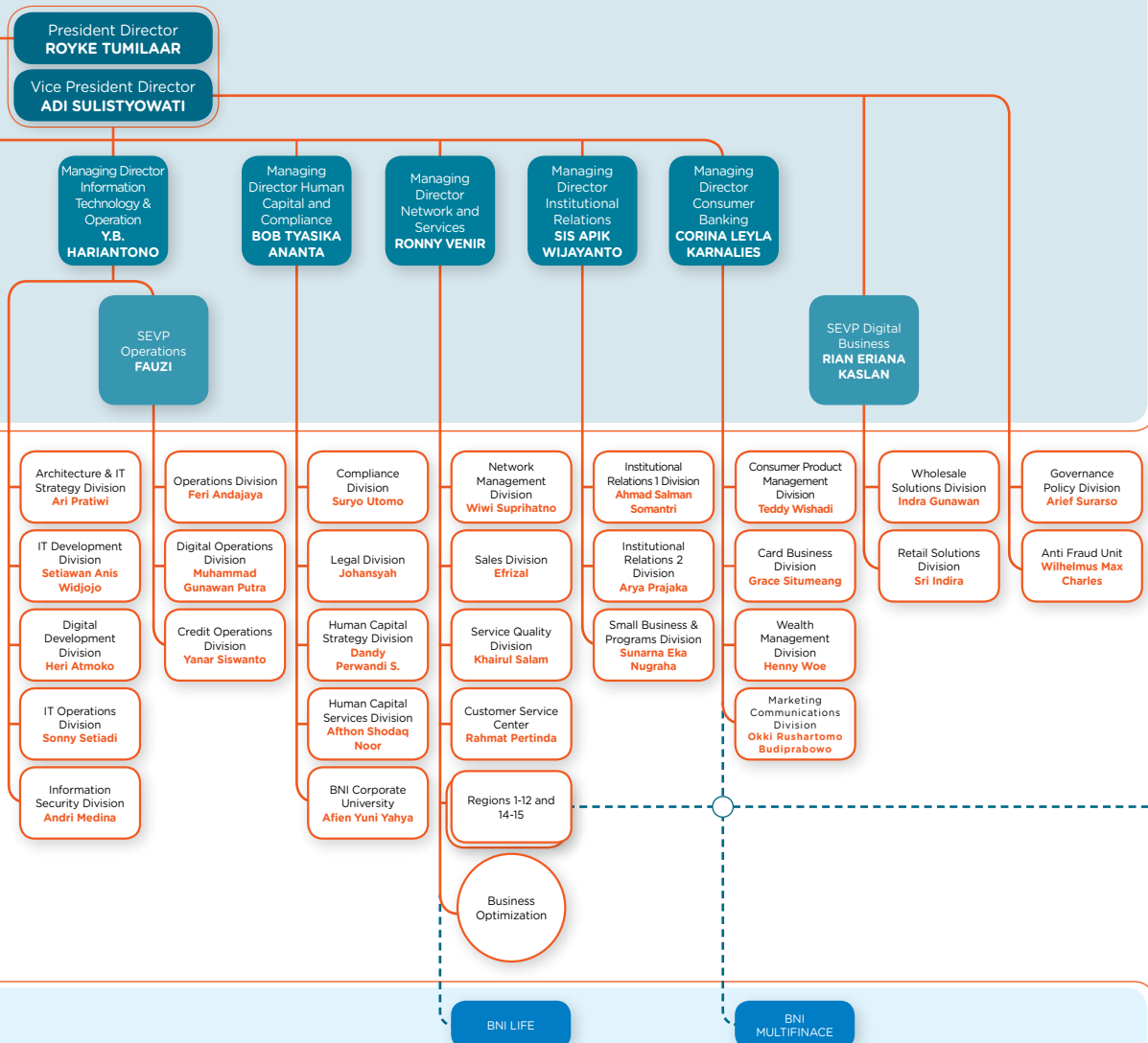
Description:

- Supervision line
- - - Coordination line
- Line of communication & delivery of information
- Board of Commissioners
- Committee
- Directors
- SEVP
- Division
- Functional Officer
- Subsidiary Company
- Subsidiary BNI Securities

Board of Directors' Committees



Board of Directors & SEVP



Vision, Mission and Corporate Culture

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

BNI's Vision and Mission are prepared by considering all stakeholders including the Board of Commissioners, Management, subsidiary companies, representatives at all employees levels, the communities, as well as financial industry experts through several surveys, interviews, and joint discussions. BNI's vision and mission are stated in the Long-Term Plan (revised 2019-2023 corporate plan) after approval by the Board of Commissioners No. DK/116 dated November 29, 2021 and BNI's Medium Term plan (2022-2024 Bank Business Plan/RBB) after approval by the Board of Commissioners No. DK/111 dated November 29, 2021.

Every year, BNI's Vision and Mission are reviewed to check on its suitability with the latest BNI conditions. In 2021, BNI restated the Vision to reflect BNI's goal to continuously deliver the best services and business solutions compared to its competitors. BNI restated its Vision in line with BNI's goal to continuously provide the best services and business solutions compared to its competitors. BNI also restated its Mission so that it is tailored to the future business direction focus, namely digital and international. BNI's Vision and Mission is as follows:



VISION

“To become a Financial Institution with Sustainable Service and Performance Excellence”

VISION EXPLANATION

1. Financial Institution

- Technological developments in the digital era and changes in customer preferences have prompted the 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.
- Increasingly complex customer needs for financial services, for banking transactions, investment, insurance, and alternative financing besides credit.
- The policy issued by the regulator (OJK) 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

- Excellent service and a positive customer experience will add value for customers when choosing a financial institution.
- 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

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

4. Sustainability

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



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 partners.**
3. **Increasing the investment value for investors.**
4. **Creating the best conditions for employees as a place of pride for work and achievement.**
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:

- a. Investors;
- b. Customers (including global business customers);
- c. Employees;
- d. Society;
- e. Government

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 transaction through digital solution services.

2. Strengthening international services to support the needs from our global business partners, as follows:

- 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, as follows:

- 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, as follows:

- 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. Provide 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, as follows:

- 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, as follows:

- 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.

CORPORATE CULTURE

BNI's Working Culture, known as "AKHLAK", is the behavioral guide for BNI Hi-Movers

AKHLAK

AMANAH KOMPETEN HARMONIS
LOYAL ADAPTIF KOLABORATIF

CORE VALUES

Trustworthy
Competent
Harmonious
Loyal
Adaptive
Colaborative

BEHAVIORAL GUIDELINES

1. Keeping promises and commitments
2. Be responsible with the duties, decisions made, and actions taken
3. Upholding moral and ethical values
4. Improving self-competence to respond to ever-changing challenges
5. Helping others to learn
6. Accomplishing duties with highest quality
7. Respect everyone regardless of their background
8. Likes to help others
9. Building conducive work environment
10. Maintaining reputation of fellow employees, leaders, SOE, and the State
11. Willing to sacrifice to achieve a greater goal
12. Obeying the leader as long as not against the law and ethics
13. Promptly adjusting oneself to be better
14. Continuously making improvements
15. Be proactive
16. Providing opportunities for various parties to contribute
17. Be open in working together to generate added values
18. Mobilizing the use of various resources for common goals

CORPORATE CULTURE SOCIALIZATION AND INTERNALIZATION

APPLICATION OF AKHLAK

In 2020, BNI implemented AKHLAK Core Values (Trustworthy, Competent, Harmonious, Loyal, Adaptive) as the work culture value for BNI Hi-Movers. The AKHLAK internalizing process continues to be carried out, by screening a series of AKHLAK webinar programs created in collaboration with BNI Corporate University, by creating socialization materials such as videos, infographics, and posters, as well as creating #BISASAPA, Binnova, and other programs to strengthen the AKHLAK core values.

In 2021, AKHLAK internalization and socialization to all Hi-Movers was carried out, as follows:

INTERNALIZATION AND SOCIALIZATION STEPS

DESCRIPTION

Internalization process (2020-present)

- Internalizing content through social media & ODP & ADP learning materials
- Signing the Integrity Pact, Integrity Story, Fraud Socialization, Gratification Webinar by the KPK Director



INTERNALIZATION AND SOCIALIZATION STEPS

Implementation of AKHLAK series webinar by BNI Corpu

DESCRIPTION

An AKHLAK SERIES & Program webinars aligned with AKHLAK values



Leadership Measurement

Measurement of morals as a component of behavior that has been implemented for all employees

AKHLAK
AMANAH KOMPETEN HARMONIS
LOYAL ADAPTIF KOLABORATIF

CORE VALUES

Trustworthy

Competent

Harmonious

Loyal

Adaptive

Colaborative

BEHAVIORAL GUIDELINES

19. Keeping promises and commitments
20. Be responsible with the duties, decisions made, and actions taken
21. Upholding moral and ethical values
22. Improving self-competence to respond to ever-changing challenges
23. Helping others to learn
24. Accomplishing duties with highest quality
25. Respect everyone regardless of their background
26. Likes to help others
27. Building conducive work environment
28. Maintaining reputation of fellow employees, leaders, SOE, and the State
29. Willing to sacrifice to achieve a greater goal
30. Obeying the leader as long as not against the law and ethics
31. Promptly adjusting oneself to be better
32. Continuously making improvements
33. Be proactive
34. Providing opportunities for various parties to contribute
35. Be open in working together to generate added values
36. Mobilizing the use of various resources for common goals

INTERNALIZATION AND SOCIALIZATION STEPS

AKHLAK Education

AKHLAK E-learning is mandatory for employees



AKHLAK Wide Campaign

Publications to increase employee awareness of AKHLAK in all BNI Media



Celebrating 1 year of AKHLAK

Celebration of 1 year of AKHLAK focused on awarding AKHLAK Role Models at the leadership level as "Leader as a Role Model AKHLAK", and in this event, all employees participated in an AKHLAK video competition to increase their inculcation, and motivate the spirit of AKHLAK core values in employees.



Membership in Associations

At the end of 2021, the Bank's membership of associations or organizations is shown in the table below.

ASSOCIATION/ ORGANIZATION NAME	ASSOCIATION/ ORGANIZATION SCOPE	MEMBERSHIP ROLE
Asosiasi Fintech Indonesia	National	Member
Asosiasi Sistem Pembayaran	National	Member
Himpunan Bank Milik Negara (HIMBARA)	National	<ul style="list-style-type: none"> Coordinator for Legal Studies and Development Member
Lembaga Alternatif Penyelesaian Sengketa (LAPS SJK)	National	<ul style="list-style-type: none"> Supervisory Member representing HIMBARA Member
Forum Hukum Badan Usaha Milik Negara (FORKUM BUMN)	National	Chief Executive Officer III for Legal Consultation
Indonesia Foreign Exchange Market Committee (IFEMC)	National	Member of the Legal and Compliance Working Group
Indonesia Council for Small Business/ International Council for Small Business	National Corporate Member	International
Association Cambiste International (ACI) - Indonesia	National	Treasurer 3, Sie Member
Indonesia Foreign Exchange Market Committee (IFEMC)	National	IFEMC Secretary and Member of the Derivative Working Group, Money Market Working Group, Ad-hoc CCP
Perhimpunan Pedagang Surat Utang Negara (HIMDASUN)	National	Head of Sharia Section
Global CCU (Council of Corporate Universities)	International	Winner of the Best Corporate University Gold Award in the Branding & Durability category
European Foundation of Management Development (EFMD)	International	<ul style="list-style-type: none"> Winner of CLIP Accreditation (Corporate Learning Improvement Process) EFMD Member Member of CLIP steering committee
IFLI (Indonesia Finance Learning Institute) - Learning Institute BUMN Sektor Jasa Keuangan	National	BNI Corporate University: <ul style="list-style-type: none"> Retail & International School Coordinator People Coordinator PIC for Drafting MoU
IFRI (Indonesia Finance Research Institute) - Research Institute BUMN Sektor Jasa Keuangan	National	Strategic Planning Division: IFRI Coordinator
Forum Human Capital Indonesia (FHCI)	National	Director of Human Capital and Compliance as Manager-Sub-Sector of Leadership and Talent Development: Coordinator of Competency Development
Perhimpunan Bank Swasta Nasional	National	Cyber Security Working Committee Member
Asosiasi Forensik Digital Indonesia (AFDI)	National	Member
ISACA	International	Member
ISC2	International	Member
Perhimpunan Kasir Bank Se-Jabodetabek (Perkaja)	National	Perkaja Chair
ASWISFTINDO	National	Audit Commission Manager
Forum Komunikasi Direktur Kepatuhan Perbankan (FKDP)	National	Manager
Forum Humas BUMN	National	Corporate Secretary BNI as Deputy Chair of the Forum Humas BUMN

Board of Commissioners' Profiles



**Agus Dermawan Wintarto
Martowardojo**

**President Commissioner/Independent
Commissioner**

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Jakarta, January 24, 1956

65 years old as of December 31, 2021

Education

Bachelor's degree in Economics from Universitas Indonesia in 1984

Certification

- Credit Training held by Bank Of America in Jakarta in 1984
- Operation Management Workshop held by Bank Of America in Jakarta in 1985
- Credit Decisioner Seminar held by Bank Of America in Jakarta in 1986
- Foreign Exchange and Exposure Management Course held by Bank of America in Jakarta in 1986
- Jakarta Credit Seminar held by Citibank in Jakarta in 1987
- Niaga Intermediate Supervisory Development II organized by Bank Niaga in Jakarta in 1988
- Credit Risk Management II, held by Citibank in Jakarta in 1989
- Niaga Advance Supervisory Development held by Bank Niaga in Jakarta in 1990
- Small and Medium Business Credit Workshop organized by The Jakarta Initiative in Bogor in 1999
- Training in banking from the Institute of Banking and Finance in Singapore in 1990 and 1991
- Citibank's Asia Pacific Strategic Leadership Seminar in Jakarta in 2000
- Credit Risk Management organized by the Institute of Banking Finance in Singapore in 1990
- Managing Problem Loans organized by the Institute of Banking Finance in Singapore in 1991
- Project Finance Training Course organized by The Euromoney Institute of Finance in Singapore in 1992
- Strategic Bank Marketing organized by the Banking Finance Institute in Singapore in 1992
- Advance Commercial Bank Lending Program Management organized by the State University Institute of New York in the USA in 1992
- Applied Corporate Finance in Asia organized by The Euromoney Institute of Finance in Singapore in 1992
- Asian Financial Institution Merger and Acquisitions Conference held by JP Morgan in Hong Kong in 2000
- Strategies for Emerging Market Banks to Become World Class Performers organized by McKinsey & Co in London in 2001
- Leading Change and Organizational Renewal held by Stanford University California in 2001
- Risk Management Certification Executive Program from BI-IRPA in Amsterdam in 2004
- Changing the Game: Negotiating and Competitive Decision Making from Harvard Business School in Boston USA in 2005
- The Strategic Thinking & Management for Competitive Advantage from Wharton Executive Education from Philadelphia USA in 2008
- Achieving Breakthrough Service: Leveraging Employee & Customer Satisfaction for Profit and Growth from Harvard Business School in Boston USA in 2009
- Risk Management Certification level 5 organized by the Banking Professional e Banking Professional Certification Institute (LSPP) in 2020

Work Experience

- International Loan Officer, Bank of America NT & SA (1984-1986)
- Assistance Vice President Business & Risk Management Division Head, Corporate Banking Group Bank Niaga (1986-1991)
- Area II East Java-Bali Vice President, Corporate Banking Head Surabaya Bank Niaga Niaga (1991-1992)
- Area II East Java-Bali Vice President, Regional Commercial Banking Head Area II Surabaya Bank Niaga (1993)
- Vice President Corporate Banking Group Head Bank Niaga (1993-1994)
- Deputy CEO Maharani Holding (1994-1995)
- President Director PT Bank Bumiputera (1995-1998)
- President Director PT Bank Ekspor Impor Indonesia (Persero) (1998-1999)
- Managing Director Risk Management and Credit Restructuring PT Bank Mandiri (Persero) (1999-2000)
- Managing Director Retail Banking and Operation Coordinator PT Bank Mandiri (Persero) (2000-2001)
- Managing Director Human Resources and Support Services PT Bank Mandiri (Persero) (2001-2002)
- Advisor to Chairman BPPN (2002)
- President Director PT Bank Permata Tbk (2002-2005)
- President Director PT Bank Mandiri (Persero) Tbk (2005-2010)
- Minister of Finance Ministry of Finance RI (2010-2013)
- Bank Indonesia Governor (2013-2018)
- PT AKR Corprindo Tbk (2019)
- President Commissioner PT Sarana Multi Infrastruktur (Persero) (2019)
- President Commissioner PT Tokopedia (2019-present)
- President Commissioner/Independent Commissioner PT Bank Negara Indonesia (Persero) Tbk (2020- present)

Legal Basis of Appointment

Appointed for the first time as President Commissioner/ Independent Commissioner of BNI at the Annual General Meeting of Shareholders (AGMS) on February 20, 2020, based on the Annual General Meeting of Shareholders Decree No. 21 dated February 20, 2020 and received approval from the Financial Services Authority (OJK) on 17 June 17, 2020.

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

President Commissioner of Tokopedia (2019-present)

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report





Pradjoto

Vice President Commissioner/Independent Commissioner

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Bandung, March 7, 1953
68 years old as of December 31, 2021

Education

- Bachelor's degree in Law from Universitas Indonesia in 1981
- Master's degree in Economics from University of Kyoto in 1988

Certification

- Training for Capital Market Legal Consultants held by Lembaga Manajemen Keuangan dan Akuntansi (LMKA), Jakarta in 1997
- Course for Advocate held by Lembaga Manajemen Keuangan dan Akuntansi (LMKA), Jakarta in 2005
- The Executive Risk Management Refresher Program held by Risk Management Certification Agency (BSMR) in London in 2008
- Annual Senior Management Risk Summit 2012 held by Banking Professional Certification Institute (LSPP) and Banker Association for Risk Management (BARA) in Singapore in 2012
- Risk Management Certification Refreshment Program held by Banker Association for Risk Management (BARA) in Moscow in 2014
- Level 2 Risk Management Certification held by Banking Professional Certification Institute (LSPP) in 2020
- Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48 2020" BARA Seminar held by BARA in Jakarta on August 5, 2021

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 Sub-Commission E of the National Law Commission of the Republic of Indonesia (2000-2001)
- 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)
- 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)
- Vice President Commissioner/Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2020-saat ini)

Legal Basis of Appointment

Appointed for the second time as Vice President Commissioner/Independent Commissioner of BNI at the Annual General Meeting of Shareholders (AGMS) on February 20, 2020 based on the Deed of the Annual General Meeting of Shareholders No. 21 dated February 20, 2020 and received approval from the Financial Services Authority (OJK) on June 17, 2020.

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

No concurrent position at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Sigit Widyawan****Independent Commissioner****Nationality**

Indonesian citizen

Domicile

Solo

Place, Date of Birth, Age

Wonogiri, July 14, 1965

56 years old as of December 31, 2021

Education

- Bachelor's degree in Economics from Universitas Negeri Sebelas Maret in 1988
- Master's degree in Accounting from Universitas Indonesia in 2001

Certification

- International Enterprise Risk Management Benchmark in Spain from CRMS Indonesia in Barcelona in 2015
- Become an effective and responsible Commissioner held by PT Inti Message in Jakarta, in 2015
- Realizing large, strong, and agile SOEs in value creation held by the Ministry of SOEs in Jakarta, in 2015
- ECIIA Conference 2016 Stockholm & Copenhagen on site learning held by Indonesia Internal Auditors Association in Stockholm & Copenhagen in 2016
- Risk & Governance Summit 2016 held by OJK in Denpasar in 2016
- Expand Leadership Program for BOD/BOC held by CLDI in Denpasar in 2017
- Level 1 and Level 2 Risk Management Certification held by Banking Professional Certification Institute (LSPP) in 2018

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)

Legal Basis of Appointment

Appointed for the first time as Independent Commissioner of BNI at the Annual General Meeting of Shareholders (AGMS) in March 20, 2018, based on Deed of the AGMS No. 37 dated March 20, 2018, and approval of the OJK on September 7, 2018.

Term of Office

Until the closing of the 2023 Annual GMS (First Period)

Concurrent Positions

No concurrent position at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Asmawi Syam

Independent Commissioner

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Ujung Pandang, August 16, 1955
66 years old as of December 31, 2021

Education

- Bachelor's degree in Economics from Universitas Hasanuddin in 1979
- Master's degree in Management from Universitas Padjadjaran in 2003

Certification

- Course in Foreign Exchange and International Trade held by Lembaga Pengembangan Perbankan Indonesia (LPPI), Jakarta, 1999
- School for Bank Staff and Leaders (SespiBank) held by Institut Bankir Indonesia (IBI), Jakarta, 2000
- Asset and Liability Management, Credit Risk Management & International Banking from Bank Brussel Lambert, Brussel, in 2000
- World Congress on IT Information, Adelaide, Australia, in 2002
- Strategic Leadership by Mastercard International, Bangkok, in 2003
- Card and Payment held by European Financial Management Marketing (EFMA), Paris, in 2004
- 'SOE Restructuring & Performance Improvement' held by Ministry of SOE, Jakarta, in 2007
- 4th World Islamic Economic Forum Foundation, Kuwait, in 2008
- 'From State Owned Enterprise to World Class Competitors - Creative Innovative and State Owned Firms' held by Asian Institute of Management Philippines, the Philippines, in 2009
- Level 5 Risk Management Certification from Banking Professional Certification Institute (LSPP), Jakarta, in 2011
- Financial Lecture by Bisnis Indonesia, Jakarta, in 2012
- Risk Management Certification Refreshment Program from Banker Association for Risk Management (BARa), London, in 2013
- Executive International Conference on "Key Risk Management Challenges 2014" organized by BARa, Moscow
- Enhancing the Power of Enterprise Risk Management In Creating A Sound Bank and Financial Risk Integration organized by BARa, Stockholm, in 2016
- Executive Leadership Program organized by the Ministry of SOE, Jakarta, in 2017
- Key Risk Management Challenges in 2018: Credit Quality, Active Credit Portfolio Management & Stress Testing and Also Credit Scoring held by BARa, Jakarta, 2018
- Insurance Award 2018 Prospects & Challenges of the Insurance Industry 2019: The Future of Surety Bond & Unit Link Business organized from InfoBank in Jakarta in 2018
- Expand Leadership Program for BOD/BOC organized by Corporate Leadership Development Institute (CLDI), Jakarta, in 2019
- Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48/2020" BARa Seminar organized by BARa in Jakarta on August 5, 2021

Work Experience

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

Legal Basis of Appointment

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 by OJK on June 17, 2020.

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

No concurrent position at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Septian Hario Seto****Independent Commissioner****Nationality**

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Jakarta, September 17, 1984

37 years old as of December 31, 2021

Education

- Bachelor's degree in Accounting from Universitas Indonesia in 2006
- Post-Graduate degree in International Finance from SKEMA Business School in 2008

Certification

- Barcelona Macroeconomic Summer School organized CREI-Pampeu Fabra University, Barcelona, in 2015
- Economic Course Training organized by JICA, Japan, in 2015.
- Level 1 and Level 2 Risk Management Certifications issued by Banking Professional Certification Institute (LSPP) in 2020

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-present)
- Independent Commissioner, PT Bank Negara Indonesia (Persero), Tbk (2020-present)

Legal Basis of Appointment

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 OJK on August 14, 2020

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

Deputy for Investment and Mining Coordination at the Coordinating Ministry for Maritime Affairs and Investment (2020-present)

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Iman Sugema

Independent Commissioner

Indonesian citizen

Domicile

Bogor

Place, Date of Birth, Age

Kuningan, May 2, 1964

57 years old as of December 31, 2021

Education

- Bachelor's degree in Agribusiness from Institut Pertanian Bogor in 1987
- Master's degree in Economics from University of New England in 1992
- Ph.D in Economics from Australian National University in 2000

Certification

- Level 1 Risk Management Certification held by Banking Professional Certification Institute (LSPP), Jakarta, in 2016
- Level 2 Risk Management Certification held by Banking Professional Certification Institute (LSPP), Jakarta, in 2016
- ERMA Bali International Conference for Enterprise Risk Management held by Enterprise Risk Management Academy (ERMA), Denpasar, in 2016
- Governance Risk Management Compliance organized by Center for Risk Management Studies (CRMS), Auckland & Wellington - New Zealand, in 2017
- Executive Risk Management Refresher Program held by Lembaga Pengembangan Perbankan Indonesia held in Madrid, Milan, Nice & Barcelona, in 2019
- Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48 2020" BARa Seminar organized by BARa in Jakarta on August 5, 2021

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)

Legal Basis of Appointment

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 OJK on August 14, 2020

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

Senior Lecturer at Institut Pertanian Bogor (1990-present)

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Askolani

Commissioner

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Palembang, June 11, 1966

55 years old as of December 31, 2021

Education

- Bachelor's degree in Economics from Universitas Sriwijaya Palembang (1990)
- Magister of Art in Economics and Banking from University of Colorado, Denver, USA (1999)

Certification

- Economic Institute short course organized by Economic Institute, USA, in 1998
- Balance of Payment organized by CIDA-Bappenas, Jakarta, in 2000
- Indonesia's Fiscal Sustainability and its Implication on Monetary organized by JICA-Bank Indonesia, Jakarta, in 2001
- Public Finance from IMF, USA, in 2001
- Introduction to Financial Market in Indonesia from AUSAID, Jakarta, in 2002
- Interest Rate Markets & Risk Management from AUSAID, Jakarta, in 2003
- Macroeconomic Management & Fiscal Issues organized by IMF, Singapore, in 2004
- Health Sector Reform & Sustainable Financing organized by the World Bank, USA, in 2007
- Developing Cluster & National Competitiveness from Lee Kwan Yew School of Public Policy, Singapore, in 2008
- The 9th Indonesia Regional Science Association International Conference organized by IRSA & Universitas Sriwijaya di Palembang, in 2008
- The Oxford High Performance Leadership Programme organized by Said Business School, University of Oxford London, in 2012
- Financial Global Challenges for Better Economic Growth in 2017 & Managing Compliance Risk While Controlling Cost from IBI & LSPP, Jakarta, in 2016
- Key Risk Management Challenges in 2019: Credit Quality, Active Credit Portfolio Management & Stress Testing and Also Credit Scoring" organized by Bankers Association for Risk Management (BARa), Batam, in 2018
- Level 1 Risk Management Certification issued by Banking Professional Certification Institute (LSPP) in 2019

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 PNPB Policy, Central Budget Policy, at, Ministry of Finance Fiscal Policy Agency Keuangan (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 at PT Pertamina Gas (2012-2013)
- Commissioner, PT Angkasa Pura I (Persero) (2013-2014)
- Commissioner, PT Bank Mandiri (Persero) Tbk (2014-2019)
- Director General of Budget, Directorate General of Budget, the Ministry of Finance (2013-present)
- Director General of Customs and Excise Directorate, General Customs and Excise, Ministry of Finance (2021- present)
- Commissioner, PT Bank Negara Indonesia (Persero), Tbk (2019-present)

Legal Basis of Appointment

Appointed as Commissioner in the EGMS on August 30, 2019, based on Deed of the EGMS No. 55 dated August 30, 2019, and obtained OJK approval on December 20, 2019

Term of Office

August 30, 2019 until the closing of the 2024 Annual GMS (First Period)

Concurrent Positions

Director General of Customs and Excise Directorate, General Customs and Excise, Ministry of Finance (2021-present)

Affiliated Relationships

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

BBNI Share Ownership

244,205 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Ratih Nurdianti

Commissioner

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Gresik, February 2, 1961

60 years old as of December 31, 2021

Education

- Bachelor's degree in Constitutional law from Universitas Jember (1985)
- Master of Laws in Commercial Law from University of Canterbury, New Zealand (2002)

Certification

- Legal Education and Training for Task Managers at the Ministry of Finance held by the Finance Education and Training Agency at the Ministry of Finance organized by the Ministry of Finance Finance Education and Training Agency (1988)
- General Administration Education and Training (ADUM) Class VIII held by the Ministry of State Secretary in Jakarta in 1998
- Training on Commercial Laws held by University of New South Wales, Sydney, in 1998
- Legal Document Retrieval System Training held by University of Melbourne, Melbourne, in 2005
- Training on Public Finance Management: Multi years Economic Development Strategy for ASEAN Countries organized by KOICA, Seoul, in 2012
- Risk Management in Management of Institutions held by Expertindo Training Consultant, Semarang, in 2018
- Level 1 Risk Management Certification issued by Banking Professional Certification Institute (LSPP) in 2019

Work Experience

- Head of Industrial & Trade Section, PUU Bureau of Economics and Industry (2004-2006)
- Head of Industrial, Trade and Business Section, Bureau of Economics and Industry (2006-2009)
- Bureau Head, Economics and Industry, Deputy to the Cabinet Secretary in Legal (2009-2011)
- Assistant to the Deputy of Industry, Small and Medium Enterprise, Trade and Labour (2011-2013)
- Deputy, Economic Affairs, Cabinet Secretary (2013-2015)
- Deputy, Maritime Affairs, Cabinet Secretary (2015-2017)
- Deputy Cabinet Secretary (2017-present)
- Commissioner, PT Bank Negara Indonesia (Persero), Tbk (2019-present)

Legal Basis of Appointment

Appointed as Commissioner in the GMS on May 13, 2019, based on Deed of the GMS No. 23 dated May 13, 2019, and obtained OJK approval on March 16, 2020

Term of Office

Until the closing of the 2024 Annual GMS (First Period)

Concurrent Positions

Deputy Cabinet Secretary (2017-present)

Affiliated Relationships

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

BBNI Share Ownership

299,000 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Susyanto****Commissioner****Nationality**

Indonesian citizen

Domicile

Bogor

Place, Date of Birth, AgeTulungagung, May 4, 1962,
59 years old as of December 31, 2021**Education**

- Bachelor's degree in Law, Universitas Kediri (1986)
- Post-Graduate degree, STIE IBLAM, Jakarta (2001)

Certification

- Energy Planning organized by University of Technology Sydney, Sydney, in 1997
- Management Training organized by Japan Cooperation Center Petroleum, Tokyo, in 1999
- Negotiating Drafting International Contract organized by International Chamber of Commerce, France, in 2001
- International Petroleum Fiscal System & PSC organized by The Conference Inc., Dubai, in 2004
- Financial Management Education and Training held by BIDS Consultant, Jakarta, in 2011
- Leadership, Critical thinking and Innovation: Igniting Creativity for Workplace Excellence held by British Training ICM, France, in 2013
- Public and Private Collaboration in Corruption Prevention held by Collaboration, Jakarta, in 2017
- Risk Management in Management of Institutions held by Expertindo Training Consultant, Semarang, in 2018
- Leadership Development Programme from NUS Business School Executive Education, Singapore, in 2018
- Level 1 Risk Management Certification issued by Banking Professional Certification Institute (LSPP) in 2020

Work Experience

- Head of Sub-section, Legal Documentation, Directorate General of Oil and Gas (1998-1999)
- Head of Sub-Section, Draft Bill Formulation, Directorate General of Oil and Gas (1999-2001)
- Head of Sub-division Considerations of the Directorate General of Oil and Gas Directorate General of Oil and Gas (2001-2006)
- Head of Section, Legal and Laws, Directorate General of Oil and Gas (2006-2010)
- Head of Center for State Asset Management, Secretariat General at Ministry of Energy and Mineral Resources (2010-2011)
- Bureau Head, Legal and Public Relations, Secretariat General at Ministry of Energy and Mineral Resources (2011-2013)
- Bureau Head, Legal, Secretariat General at Ministry of Energy and Mineral Resources (2013-2015)
- Secretary to the Directorate General of Oil and Gas (2015-2018)
- Head of Center for State Asset Management, Secretariat General at Ministry of Energy and Mineral Resources (2018-2020)
- Secretary to the Ministry of State Owned Enterprises (2020-present)
- Commissioner, PT Bank Negara Indonesia (Persero), Tbk (2020-present)

Legal Basis of Appointment

Appointed for the first time as 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 OJK approval on July 27, 2020.

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

Secretary of the Ministry of State-Owned Enterprises (2020-present)

Affiliated Relationships

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

BBNI Share Ownership

156,959 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Erwin Rijanto Slamet

Commissioner

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Yogyakarta, August 18, 1958,
63 years old as of December 31, 2021

Education

- Bachelor's degree in Economics from Universitas Gadjah Mada (1983)
- Postgraduate Master of Science degree in Economics from University of Illinois, USA (1989)

Certification

- The Financial System Reform: Meeting IV held by BIS & Expansion in Madrid, in 2013
- FSB Standing Committee on Supervisory and Regulatory Cooperation Meeting held by FSB in New York in 2014
- The Australian Prudential Regulation Authority (APRA) Short Study held by APRA in Australia in 2014
- The 50th Conference and High-Level Seminar of the Governors of the South East Asian Central Banks (SEACEN) and 34th Meeting of the SEACEN Board of Governors held by the Bank of Papua New Guinea in Port Moresby in 2014
- FSB Standing Committee on Supervisory and Regulatory Cooperation (SRC) Meeting held by FSB in New York, USA in 2015
- FSB Standing Committee on Supervisory Regulatory and Cooperation (SRC) meeting held by The Financial Stability Board (FSB) in Hong Kong in 2016
- Executives' Meeting of East Asia-Pacific Central Banks (EMEAP) held by Bank Indonesia in Bali, in 2016
- Financial Stability Board (FSB) Regional Consultative Group (RCG) for Asia held by Bank Negara Malaysia in Kuala Lumpur in 2016
- 12th Asia-Pacific High-level Meeting on Banking Supervision held by Bank Negara Malaysia in Kuala Lumpur in 2017
- FSB Regional Consultative Group for Asia Discusses Financial Stability Issues held by the Bank of Thailand in Bangkok in 2017
- 13th Asia-Pacific High Level Meeting on Banking Supervision held by FSI, BCBS, EMEAP WGBS, the Monetary Authority of Singapore in Singapore in 2018
- The Financial Stability Board (FSB) Regional Consultative Group (RCG) for Asia Discusses Management of Capital Flows, Stress Tests, Cyber Security, the use of FinTech to Promote Financial Inclusion and Access to Trade Finance held by the Reserve Bank of Australia & FSB RCG in Sydney in 2018
- 14th Asia Pacific High Level Meeting on Banking Supervision held by The Financial Stability Institute (FSI), BCBS, the Executives' Meeting of East Asia-Pacific Central Banks Working Group on Banking Supervision (EMEAP WGBS), the Reserve Bank of Australia (RBA) and the Australian Prudential Regulation Authority (APRA) in Sydney in 2018
- The Basel Committee on Banking Supervision (BCBS) Meeting held by the Basel Committee on Banking Supervision (BCBS) in Tokyo in 2019

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, Bank Indonesia Financial System Surveillance Department (2013-2015)
- Executive Director, 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, Bank Indonesia (2015-2020)
- President Commissioner, Lintasarta (2021-present)
- Independent Commissioner, PT Bank Negara Indonesia (Persero) Tbk (2021-present)

Legal Basis of Appointment

Appointed for the first time as Commissioner of BNI in the Annual General Meeting of Shareholders (AGMS) on March 29, 2021, based on Deed of the AGMS No. 14 dated March 29, 2021, and obtained OJK approval on August 6, 2021.

Term of Office

Until the closing of the 2025 Annual GMS (First Period)

Concurrent Positions

-

Affiliated Relationships

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

BBNI Share Ownership

-

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



2021
Performance



Management
Report



Company
Profile



Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



Good Corporate
Governance



Social & Environmental
Responsibility



ESG
Commitment



Financial
Statements



Board of Directors' Profiles



Royke Tumilaar

President Director

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Manado, March 21, 1964

57 years old as of December 31, 2021

Education

- Bachelor of Economics in Management from Universitas Trisakti in 1987
- Master of Business Administration in Finance from University of Technology, Sydney, Australia in 1999

Certification

Level 5 Risk Management Certification issued by Banker Association for Risk Management (BARa) in 2021

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)
- 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)

Legal Basis of Appointment

Appointed as President Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolutions No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-376/PB.12/2020 dated November 19, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

163,584 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Adi Sulistyowati****Vice President Director****Nationality**

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Purbalingga, June 11, 1967

54 years old as of December 31, 2021

Education

Bachelor of Economics in Management from Universitas Krisnadwipayana in 1993

Certification

Level 5 Risk Management Certification issued by Banker Association for Risk Management (BARA) in 2021

Work Experience

- Marketing Manager BNI Menteng Main Branch Office PT Bank Negara Indonesia (Persero) Tbk (1994-1997)
- Marketing Manager of BNI Institutional Funds Division of Institutional Relations and Division of Financial Services and Institutional Funds PT Bank Negara Indonesia (Persero) Tbk (1997-2005)
- AVP Marketing and Sales BNI Financial Services Division and Institutional Funds PT Bank Negara Indonesia (Persero) Tbk (2005-2009)
- VP Marketing and Sales BNI Division of Financial Services and Institutional Funds PT Bank Negara Indonesia (Persero) Tbk (2009-2010)
- Jakarta Senayan Regional Leader
- Head of Network Management Division of PT Bank Negara Indonesia (Persero) Tbk (2012-2015)
- Network and Service Director of PT Bank Negara Indonesia (Persero) Tbk (2015-2016)
- Director of Banking Institutional & Transactional Relations PT Bank Negara Indonesia (Persero) Tbk (2016-2018)
- Director of Institutional Relations of PT Bank Negara Indonesia (Persero) Tbk (2018-2020)
- Director of Services and Networks of PT Bank Negara Indonesia (Persero) Tbk (2020)
- Deputy President Director of PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

First appointed as Director of BNI on March 17, 2015, based on Deed of GMS Resolutions No. 53 dated May 27, 2015, with OJK approval through Letter No. SR-92/D.03/2015 dated May 22, 2015, and subsequently appointed as Vice President Director in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolution No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-361/PB.12/2020 dated November 5, 2020

Term of Office

2020-2025 (Second Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

1,007,373 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Novita Widya Anggraini

Managing Director Finance

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Klaten, November 16, 1976

45 years old as of December 31, 2021

Education

Bachelor of Economics in Accounting from Universitas Islam Indonesia in 2000

Certification

Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2020

Award

The Best CFO in Cost Efficiency & Productivity Program - Bisnis Indonesia (2021)

Work Experience

- Started her career at PT Bank Mandiri (Persero) Tbk as SR PS Reporting Regulatory (2004)
- Team Leader, Statutory Reporting, PT Bank Mandiri (Persero) Tbk (2009)
- Division Head Financial Reporting, PT Bank Mandiri (Persero) Tbk (2013)
- Division 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)
- Managing Director, Finance, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolutions No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-376/PB.12/2020 dated November 19, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

139,046 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**David Pirzada****Managing Director Risk Management****Nationality**

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Palembang, March 3, 1968

53 years old as of December 31, 2021

Education

- Bachelor's degree in Electrical Engineering from Northeastern University, Boston, Massachusetts, USA in 1990
- Master of Business Administration in Business Management from New Hampshire College, Manchester, USA, in 1992

Certification

Level 5 Risk Management Competence Certification issued by Bankers Association for Risk Management (BARa) in 2020

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)
- Managing Director, Risk Management, PT Bank Negara Indonesia (Persero) Tbk (2020- Present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolutions No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-386/PB.12/2020 dated 30 November 30, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

139,046 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Henry Panjaitan

Managing Director Treasury & International

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Jakarta, July 7, 1969

52 years old as of December 31, 2021

Education

- Bachelor of Economics in Management from Universitas Padjadjaran in 1991
- Master of Commerce in Banking from University of New South Wales in 2002
- Master of Management in Financial Management from Universitas Indonesia in 2003

Certification

Level 5 Risk Management Competency Certification issued by Banking Professional Certification Institute (LSPP) in 2020

Work Experience

- Started his career as Credit Analyst for Medium Segment I Regional Office 10, PT Bank Negara Indonesia (Persero) Tbk (1993)
- Credit Analyst for Small Segment, Gambir Branch, PT Bank Negara Indonesia (Persero) Tbk (1993)
- Manager, Marketing, Gambir Branch, PT Bank Negara Indonesia (Persero) Tbk (1994)
- Credit Analyst, Regional Office 10, PT Bank Negara Indonesia (Persero) Tbk (1996)
- Analyst for Loss Loan Settlement, Special Credit Division, PT Bank Negara Indonesia (Persero) Tbk (1998)
- Manager, Technology Issue Controller, Information Technology Division, PT Bank Negara Indonesia (Persero) Tbk (1999)
- Manager, Advisory & Securities, Investment & Financial Services Division, PT Bank Negara Indonesia (Persero) Tbk (2003)
- Manager, Credit Analyst, Corporate II Division, PT Bank Negara Indonesia (Persero) Tbk (2004)
- Manager, Business Marketing, Corporate II Division, PT Bank Negara Indonesia (Persero) Tbk (2005)
- Relationship Manager, Corporate Division, PT Bank Negara Indonesia (Persero) Tbk (2005)
- Personal Assistant to the BoD, Corporate Communication & Secretarial Division, PT Bank Negara Indonesia (Persero) Tbk (2007)
- Team Leader, Trade Finance, International Division, PT Bank Negara Indonesia (Persero) Tbk (2009)
- Deputy GM, Operations, Hong Kong Branch, PT Bank Negara Indonesia (Persero) Tbk (2009)
- General Manager, Hong Kong Branch, PT Bank Negara Indonesia (Persero) Tbk (2010)
- Head of Business & Banking, Jakarta Senayan Regional Office, PT Bank Negara Indonesia (Persero) Tbk (2015)
- Division Head, BIN, PT Bank Negara Indonesia (Persero) Tbk (2016)
- Division Head, INT, PT Bank Negara Indonesia (Persero) Tbk (2017)
- Regional Head, Jakarta BSD, PT Bank Negara Indonesia (Persero) Tbk (2019)
- Regional Head, Jakarta Senayan, PT Bank Negara Indonesia (Persero) Tbk (2020)
- Managing Director, Treasury and International, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolutions No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-370/PB.12/2020 dated November 11, 2020.

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

149,890 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Corina Leyla Karnalies****Managing Director Consumer Banking****Nationality**

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, AgePadang Panjang, October 11, 1968
53 years old as of December 31, 2021**Education**Bachelor's degree in Physics from Universitas
Indonesia in 1992**Certification**Level 5 Risk Management Certification issued by Risk
Management Certification Agency (BSMR) in 2020**Work Experience**

- Senior Collector/Leader Citibank (1995)
- Collection Head, Standard Chartered Bank (1997)
- Credit Department Manager, Bank Universal (2000)
- Deputy Card Management, Bank Universal (2003)
- Operation Credit Card Division Head, Bank Permata (2003)
- Credit Support & Risk Management Division Head, Bank Niaga (2005)
- Retail Collection & Recovery Group Head, Bank Niaga (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)
- Managing Director, Consumer Business, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in 2019 AGMS of PT Bank Negara Indonesia (Persero) Tbk on February 20, 2020, based on Deed of GMS Resolutions No. 2 dated September 2, 2020, with OJK approval through Letter No. SR-171/PB.12/2020 dated June 25, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

365,041 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Muhammad Iqbal

Managing Director Micro, Small & Medium Enterprise (MSME)

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Pekanbaru, September 12, 1973
48 years old as of December 31, 2021

Education

- Bachelor's degree in Industrial Technology from Institut Teknologi Bandung in 1996
- Master's degree In General Management from IPMI in 2005
- Master of Business Administration in Management from Monash University, Australia in 2006

Certification

Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2020

Work Experience

- Business Analyst, Coca-Cola Amatil Indonesia (1997)
- Senior Consultant, Accenture (1998)
- Marketing Planning & Analysis Manager, Bentoel Prima (2002)
- General Manager, Business Insight Planning & Development, Charoen Pokphand (2003)
- Assistant Vice President, Head of Co-Brand Products, Citibank Indonesia (2005)
- Senior Vice President, Cards Segment & Product, HSBC Indonesia (2007)
- Senior Vice President, Consumer Credit Policy & Portfolio Management (2009)
- Project Manager, Team Task Force Consumer & Retail Business Risk, PT Bank Negara Indonesia (Persero) Tbk (2011)
- Division Head, Consumer & Retail Business Risk, PT Bank Negara Indonesia (Persero) Tbk (2012)
- Division Head, Consumer Product Management, PT Bank Negara Indonesia (Persero) Tbk (2015)
- Head of Consumer Banking Business, PT Bank Muamalat (Persero) Tbk (2016)
- Senior Vice President, Group Head Retail Product & Transaction Risk, PT Bank Mandiri (Persero) Tbk (2016)
- Senior Vice President, Group Head Small Medium Enterprise & Micro Risk, PT Bank Mandiri (Persero) Tbk (2017)
- Senior Vice President, Group Head Small Medium Enterprise Banking, PT Bank Mandiri (Persero) Tbk (2020)
- Managing Director, MSME Business, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolutions No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-376/PB.12/2020 dated November 19, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

139,046 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

**Y.B. Hariantono****Managing Director Information Technology & Operation****Nationality**

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Malang, October 2, 1966

55 years old as of December 31, 2021

Education

Bachelor's degree in Electrical Engineering from Institut Teknologi Sepuluh November in 1990

Certification

Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2020

Work Experience

- Junior System Programmer, Bank Bali (1991)
- Data Center Manager, Bank Bali (1992)
- Mainframe & Central Support Manager, Bank Bali (1994)
- GM System & Networking, Bank Bali (1997)
- GM IT Operation & Support, Bank Bali (1999)
- GM Application Development Head (2000)
- Vice President, Group Head IT, Bank Bali (2000)
- Coordinator, IT Integration, Integration Team for the Merger of 5 Banks, Bank Permata (2002)
- SVP, IT Head, Bank Permata (2003)
- SVP, Consumer Credit Underwriting, Bank Permata (2006)
- SVP, IT Head, Bank Permata (2007)
- EVP, Head Special Project, Bank Permata (2008)
- EVP, Network Head, Bank Permata (2008)
- EVP, IT Head, BII - Maybank (2010)
- Director, Information Technology, Bank Mega (2014)
- Head of Information Technology, Bank BTPN (2019)
- Managing Director, Information Technology & Operations, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2019 AGMS of PT Bank Negara Indonesia (Persero) Tbk on February 20, 2020, based on Deed of GMS Resolutions No. 2 dated September 2, 2020, with OJK approval through Letter No. SR-242/PB.12/2020 dated August 11, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

364,997 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Bob Tyasika Ananta

Managing Director Human Capital and Compliance

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Surakarta, May 26, 1963

58 years old as of December 31, 2021

Education

- Bachelor's degree in Accounting from Universitas Gadjah Mada in 1986
- Master of Finance from University of Oregon, USA in 1989

Certification

- Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2021
- Level 3 Banking Compliance Certification issued by the Communication Forum for Banking Compliance Director (FKDKP) & Banking Professional Certification Agency (LSPP) in 2021

Work Experience

- Started his career with di BNI in 1996
- General Manager, BNI Hong Kong Branch (2008-2010)
- Division Head, International (2010-2011)
- Division Head, Strategic Planning (2011-2015)
- Managing Director, Information Technology & Operations, PT Bank Negara Indonesia (Persero) Tbk (March 2015-December 2015)
- Managing Director, Planning & Operational, PT Bank Negara Indonesia (Persero) Tbk (January 2016 – March 2018)
- Managing Director, Risk management, PT Bank Negara Indonesia (Persero) Tbk (2018-2019)
- Managing Director, Treasury & International, PT Bank Negara Indonesia (Persero) Tbk (2019)
- Managing Director, Human Capital & Compliance, PT Bank Negara Indonesia (Persero) (2020-present)

Legal Basis of Appointment

First appointed as Director of BNI on March 17, 2015, based on Deed of GMS Resolutions No. 67 dated April 21, 2015, with OJK approval on the Fit and Proper Test through Letter No. SR-64/D.03/2015 dated April 16, 2015, and subsequently re-appointed as Director of BNI in the 2019 AGMS of PT Bank Negara Indonesia (Persero) Tbk on February 20, 2020, based on Deed of GMS Resolution No. 2 dated September 2, 2020, with OJK approval through Letter No. SR-133/PB.12/2020 dated May 20, 2020.

Term of Office

2020-2025 (Second Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

1,088,761 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Sis Apik Wijayanto

Managing Director Institutional Relation

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Blitar, December 28, 1961

60 years old as of December 31, 2021

Education

- Bachelor's degree in Commercial Administration from Universitas Brawijaya in 1988
- Master's degree in Management from Universitas Airlangga in 2007
- Doctor of Administrative Sciences from Universitas Brawijaya in 2021

Certification

Level 5 Risk Management Competency Certification issued by the National Professional Certification Agency (BNSP) in 2021

Work Experience

- Staf I, Surabaya Kaliasin Branch, PT Bank Rakyat Indonesia (Persero) Tbk (1990)
- Staf II, Jakarta Kebayoran Baru Branch, PT Bank Rakyat Indonesia (Persero) Tbk (1992)
- Marketing and Lending Officer, Kediri Branch, PT Bank Rakyat Indonesia (Persero) Tbk (1994)
- Branch Head, Mamuju Branch, PT Bank Rakyat Indonesia (Persero) Tbk (1997)
- Branch Head, Kendari Branch, PT Bank Rakyat Indonesia (Persero) Tbk (1999)
- Branch Head, Lumajang Branch, PT Bank Rakyat Indonesia (Persero) Tbk (2002)
- Branch Head, Kediri Branch, PT Bank Rakyat Indonesia (Persero) Tbk (2005)
- Branch Head, Jakarta Veteran Branch, PT Bank Rakyat Indonesia (Persero) Tbk (2007)
- Deputy Regional Head, Padang, PT Bank Rakyat Indonesia (Persero) Tbk (2008)
- Deputy Regional Head, Pekanbaru, PT Bank Rakyat Indonesia (Persero) Tbk (2009)
- Deputy Regional Head, Yogyakarta, PT Bank Rakyat Indonesia (Persero) Tbk (2010)
- Head of Special Branch, PT Bank Rakyat Indonesia (Persero) Tbk (2012)
- Regional Head, Banjarmasin, PT Bank Rakyat Indonesia (Persero) Tbk (2014)
- Regional Head, Jakarta 2, PT Bank Rakyat Indonesia (Persero) Tbk (2014)
- Director, Funding & Distribution, Bank Tabungan Negara (2015)
- Director, Consumer, PT Bank Rakyat Indonesia (Persero) Tbk (2016)
- Director, Institutional & SOE Relations, PT Bank Rakyat Indonesia (Persero) Tbk (2017)
- Managing Director, Institutional Relations, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2019 AGMS of PT Bank Negara Indonesia (Persero) Tbk on February 20, 2020, based on Deed of GMS Resolution No. 2 dated September 2, 2020, with OJK approval through Letter No. SR-171/PB.12/2020 dated June 25, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

454,997 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Silvano Winston Rumantir

Managing Director Corporate Banking

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Soroako, September 14, 1978

43 years old as of December 31, 2021

Education

- Bachelor of Art from University of Oregon, USA in 1999
- Master's degree in Finance from Royal Melbourne Institute of Technology, Australia in 2001

Certification

Level 5 Risk Management Certification issued by Banking Professional Certification Institute (LSPP) in 2020

Work Experience

- Graduate Program Analyst, ANZ Melbourne (2001)
- Senior Analyst, Bank & Country Risk Management, ANZ Melbourne (2002)
- Manager, Structured Export Finance Australia, ANZ Sydney (2004)
- Senior Manager, Structured Export Finance Asia Pacific, ANZ Singapore (2005)
- Associate Director Project & Export Finance Asia Pacific HSBC Hong Kong (2006)
- Director & Head of Debt Capital Market Indonesia HSBC Indonesia (2010)
- President Director, PT Deutsche Securities Indonesia (2013)
- Director, Corporate Finance Indonesia Coverage, Deutsche Bank Singapore (2015)
- President Director, PT Mandiri Sekuritas (2016-2019)
- Senior Executive Vice President, Corporate Banking, PT Bank Mandiri (Persero) Tbk (2019)
- Director, Finance and Strategy, PT Bank Mandiri (Persero) Tbk (2019)
- Managing Director, Corporate Banking, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolution No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-386/PB.12/2020 dated November 30, 2020

Term of Office

22020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

139,046 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Ronny Venir

Managing Director Network and Services

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Padang, April 4, 1967

54 years old as of December 31, 2021

Education

- Bachelor's degree in Animal Husbandry from Universitas Padjadjaran in 1993
- Master's degree in Agribusiness from Institut Pertanian Bogor in 2000

Certification

Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2021

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 & Small 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)
- Managing Director, Network & Services, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as Director of BNI in the 2020 EGMS of PT Bank Negara Indonesia (Persero) Tbk on September 2, 2020, based on Deed of GMS Resolution No. 7 dated January 11, 2021, with OJK approval through Letter No. SR-361/PB.12/2020 dated November 5, 2020

Term of Office

2020-2025 (First Period)

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

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

BBNI Share Ownership

172,746 shares

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report

Senior Executive Vice President Profiles



Iwan Setiawan

SEVP Remedial Recovery

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Bandung, September 26, 1968
53 years old as of December 31, 2021

Education

Bachelor's degree in Law from Universitas Padjadjaran (1992)

Certification

Level 4 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2018

Work Experience

- Head of Regional Remedial & Recovery, Bandung (2011)
- Deputy General Manager, Corporate Remedial & Recovery Division (2012)
- General Manager, Corporate Remedial & Recovery Division (2017)
- Senior Executive Vice President Recomedial & Recovery PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as SEVP Remedial & Recovery based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk. No. KP/428/DIR/R dated December 22, 2020

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

No affiliations with members of the Board of Directors and Board of Commissioners, or with the controlling and ultimate shareholder

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



H. Paolo Kartadjoemena

SEVP Corporate Transformation

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Philippines, June 20, 1979
42 years old as of December 31, 2021

Education

Bachelor's degree in Economics from Harvard University (2002)

Certification

Level 4 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2021

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, PT Royal Mandiri (2017)
- Chief Executive Officer, PT Royal Lestari Utama (2018)
- Senior Executive Vice President & Chief Transformation Officer, PT Bank Mandiri (Persero) Tbk. (2020)
- Senior Executive Vice President - Corporate Transformation, PT Bank Negara Indonesia (Persero)Tbk. (2020-present)

Legal Basis of Appointment

Appointed as SEVP Corporate Transformation based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk. No. KP/382/DIR/R dated November 17, 2020

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

No affiliations with members of the Board of Directors and Board of Commissioners, or with the controlling and ultimate shareholder

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Fauzi

SEVP Operational

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Bonjol, May 5, 1967

54 years old as of December 31, 2021

Education

Bachelor of Economics degree from Universitas Andalas

Certification

Level 4 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2021

Work Experience

- General Manager of Banking Operation Division (2014)
- Head of Region Bandung (2016)
- General Manager of Channel Management Division (2018)
- General Manager of Internal Audit (2019)
- Senior Executive Vice President Operasional PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

Appointed as SEVP Operational based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk. No. KP/056/DIR/R dated February 16, 2020

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

No affiliations with members of the Board of Directors and Board of Commissioners, or with the controlling and ultimate shareholder

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Ita Tetralastwati

SEVP Treasury

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Tegal, May 21, 1970

51 years old as of December 31, 2021

Education

Bachelor's degree in Economics from Universitas Gadjah Mada (1996)

Certification

Level 4 Risk Management Certification issued by Banker Association for Risk Management (BARA) in 2021

Work Experience

- Money Market Dealer, PT Bank Pembangunan Indonesia (1998)
- Cash & Liquidity Dealer, PT Bank Mandiri (1999)
- Fixed Income Dealer, PT Bank Mandiri (2007)
- Money Market Dealer, PT Bank Mandiri (2008)
- Chief Dealer, Treasury Cash & Liquidity Management, PT Bank Mandiri (2009)
- Vice President, Treasury Interest Rate Trading (2011)
- Vice President, Treasury FX Trading, PT Bank Mandiri (2015)
- Non Executive Director, Bank Mandiri Europe Limited (2018)
- Senior Vice President, Market Risk, PT Bank Mandiri (2016)
- Senior Vice President, Market & Operational Risk, PT Bank Mandiri (2020)
- Senior Executive Vice President, Treasury, PT Bank Negara Indonesia (Persero) Tbk (2020-present)

Legal Basis of Appointment

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

No concurrent positions at BNI or other institutions

Affiliated Relationships

No affiliations with members of the Board of Directors and Board of Commissioners, or with the controlling and ultimate shareholder

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Rian Eriana Kaslan

SEVP Digital Business

Nationality

Indonesian citizen

Domicile

Jakarta

Place, Date of Birth, Age

Jakarta, April 16, 1976
45 years old as of December 31, 2021

Education

- Bachelor of Arts in Business Administration, Clark University, USA, (1999)
- Master of Business Administration in International Management and Marketing, Boston University, USA, (2006)

Certification

Level 5 Risk Management Certification issued by Risk Management Certification Agency (BSMR) in 2021

Work Experience

- Bank of New York Mellon, Boston, USA, (1999-2006)
- Commonwealth Bank Indonesia, Jakarta, final position as Executive Vice President, Head of Digital Strategy & Delivery, (2006-2021)
- Senior Executive Vice President Digital Business, PT. Bank Negara Indonesia (Persero) Tbk, (2021-present)

Legal Basis of Appointment

Appointed as SEVP Digital Business based on Decision of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk. No. KP/340/DIR/R dated July 28, 2020

Concurrent Positions

No concurrent positions at BNI or other institutions

Affiliated Relationships

No affiliations with members of the Board of Directors and Board of Commissioners, or with the controlling and ultimate shareholder

Training in 2021

Data presented in the section on Education/Training for Board of Commissioners, Board of Directors, Committees, Corporate Secretary, and Internal Audit Unit, in the Company Profile chapter in this Annual Report



Executive Officers Profile

DIVISION HEAD



Anang Basuki

Head of Internal Audit Unit

Currently 52 years old. Holds a Bachelor's degree in Accountancy from Universitas Gadjah Mada. Appointed as Head of the Internal Audit Unit based on Board of Directors' Decree No. KP/057/SAI/R dated February 16, 2021.



Basaria Martha Juliana S.

Head of Strategic Planning Division

Currently 51 years old. Holds a Master of Business degree from University of Victoria, Melbourne, Australia. Appointed as Head of Strategic Planning Division based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Mucharom

**Head of Communications Division/
Corporate Secretary**

Currently 52 years old. Holds a Master's degree in Management in International Business from Universitas Gadjah Mada. Appointed as Head of Communications Division/Corporate Secretary based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Arief Surarso

Head of Policy Governance Division

Currently 53 years old. Holds a Master's degree in Economic Management from Universitas Gadjah Mada. Appointed as Head of the Policy Governance Division based on Board of Directors' Decree No. KP/268/DIR/R dated July 5, 2019.



Wilhelmus Max Charles

Head of Anti Fraud Division

Currently 46 years old. Holds a Bachelor's degree in Management from Universitas Gunadarma. Appointed as Head of Anti Fraud Division based on Decree No. KP/933/HCT/1/R dated July 1, 2021.



Sri Indira

Head of Retail Solutions Division

Currently 51 years old. Holds a Master's degree in Management from Universitas Gadjah Mada. Appointed as Head of Retail Solutions Division based on Decree No. KP/511/HCT/1/R dated May 4, 2021.



Rommel TP. Sitompul

**Head of Syndication & Corporate
Solutions Division**

Currently 51 years old. Holds a Master's degree in Marketing Management from Universitas Persada Indonesia YAI. Appointed as Head of the Syndication & Corporate Solutions Division based on Board of Directors' Decree No. KP/324/DIR/R on September 2, 2020.



I Made Sukajaya

**Head of Corporate Business Division
1**

Currently 53 years old. Holds a Master's degree in Financial Management from Universitas Persada Indonesia YAI. Appointed as Head of Corporate Business Division 1 based on Decree No. KP/199/DIR/R dated July 3, 2020.



Ditya Maharhani Harninda

**Head of Corporate Business Division
2**

Currently 40 years old. Meraih gelar Master of Commerce dari University of New South Wales. Appointed as Head of Corporate Business Division 2 based on Board of Directors' Decree No. KP/357/DIR/R dated August 9, 2021.

**Rudy Sihombing****Head of Corporate Business Division 3**

Currently 49 years old. Holds an MBA degree from Louis University, Missouri, USA. Appointed as Head of Corporate Business Division 3 based on Decree No. KP/487/HCT/1/R dated May 04, 2021.

**Indra Gunawan****Head of Wholesale Solutions Division**

Currently 45 years old. Holds a Master's degree in Management and Business from Institut Pertanian Bogor. Appointed as Head of Wholesale Solutions Division based on Board of Directors' Decree KP/488/DIR/R dated October 27, 2021.

**Ahmad Salman Somantri****Head of Institutional Relations Division 1**

Currently 53 years old. Holds a Bachelor's degree in State Administration from Universitas Padjajaran. Appointed as Head of Institutional Relations Division 1 based on Board of Directors' Decree No. KP/345/DIR/R dated July 29, 2021.

**Arya Prajaka****Head of Institutional Relations Division 2**

Currently 54 years old. Holds a Masters degree in Marketing Management from Universitas Airlangga. Appointed as Head of Institutional Relations Division 2 based on Board of Directors' Decree No. KP/345/DIR/R dated July 29, 2021.

**Retno Murwani****Head of Commercial Business Division 1**

Currently 54 years old. Holds a Bachelor's degree in Social Sciences from Universitas Gadjah Mada. Appointed as Head of Commercial Business Division 1 based on Decree No. KP/538/HCT/1/R dated May 4, 2021.

**Aryani Dwi Satiti****Head of Commercial Business Division 2**

Currently 49 years old. Holds a Master's degree in Management from Universitas Gadjah Mada. Appointed as Head of Commercial Business Division 2 based on Decree No. KP/490/HCT/1/R dated May 4, 2021.

**Dhias Widhiyati****Head of SME Business Division**

Currently 51 years old. Holds a Master's degree in Management from Universitas Gadjah Mada. Appointed as Head of SME Business Division based on Decree No. KP/499/HCT/1/R dated May 4, 2021.

**Sunarna Eka Nugraha****Head of Small Business & Program Division**

Currently 53 years old. Holds a Bachelor's degree in Fisheries from Universitas Diponegoro. Appointed as Head of Small Business & Program Division based on Board of Directors' Decree No. KP/488/DIR/R dated October 27, 2021.

**Wiwi Suprihatno****Head of Network Management Division**

Currently 50 years old. Holds a Master's degree in Law Science from Universitas Krisnadwipayana. Appointed as Head of Network Management Division based on Board of Directors' Decree No. KP/199/DIR/R dated July 3, 2020.

**Khairul Salam****Head of Service Quality Division.**

Currently 48 years old. Holds a Bachelor's degree in Informatics Management from STMIK YPTK Padang. Appointed as Head of Service Quality Division based on Decree No. KP/077/HCE/1/R dated September 29, 2021.

**Rahmat Pertinda****Head of Customer Service Center Division**

Currently 49 years old. Holds a Master's degree in Law from Universitas Trisakti. Appointed as Head of Customer Service Center Division (BNI Contact Center) based on Board of Directors' Decree No. KP/276/DIR/R dated June 23, 2021.

**Efrizal****Head of Sales Division**

Currently 51 years old. Holds a Master's degree in Marketing from Universitas Negeri Padang. Appointed as Head of Sales Division based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Teddy Wishadi

Head of Consumer Product Management Division

Currently 50 years old. Holds a Master's degree in Computer Science from Universitas Indonesia. Appointed as Head of Consumer Product Management Division based on Board of Directors' Decree No. KP/199/DIR/R dated July 3, 2020.



Grace Situmeang

Head of Business Card Division

Currently 48 years old. Holds a Bachelor's degree in International Relations from Universitas Indonesia. Appointed as Head of Business Card Division based on BOD Decree No. KP/358/DIR/R dated October 22, 2020.



Henny Woe

Head of Wealth Management Division

Currently 46 years old. Holds a Bachelor's degree in Accountancy from Universitas Tarumanegara. Appointed as Head of Wealth Management Division based on Board of Directors' Decree No. KP/346/DIR/R dated October 9, 2020.



Okki Rushartomo Budiprabowo

Head of Marketing Communication Division

Currently 41 years old. Holds a Bachelor's degree in Industrial Engineering from Institut Teknologi Bandung. Appointed as Head of Marketing Communication Division based on Board of Directors' Decree No. KP/358/DIR/R dated October 22, 2020.



Legendariah Bur Rasuanto

Head of International Banking Division

Currently 51 years old. Holds a Master's degree in Management from Universitas Indonesia. Appointed as Head of International Banking Division based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Rini Yuniar

Head of Treasury Division

Currently 50 years old. Holds a Master's degree in Accountancy from Universitas Gadjah Mada. Appointed as Head of Treasury Division based on Board of Directors' Decree No. KP/577/DIR/R dated December 07, 2020.



Fitri Windari

Head of Bank Risk Management Division (Act)

Currently 51 years old. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Acting Head of Bank Risk Management Division based on Board of Directors' Decree No. KP/285/DIR/R dated June 25, 2021.



Ujuan Marihot H.P.

Head of Corporate Credit Risk Division

Currently 46 years old. Holds a Master's degree in Science degree from University of Wolverhampton, United Kingdom. Appointed as Head of Corporate Credit Risk Division based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Muhammad Jufri

Head of Commercial & SME Credit Risk Division

Currently 46 years old. Holds a Master's degree in Finance Management from Universitas Trisakti. Appointed as Head of Commercial & SME Credit Risk Division based on Board of Directors' Decree No. KP/261/DIR/R dated July 3, 2019.



Hari Satriyono

Head of Consumer Loan Processing and Collection Division

Currently 51 years old. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Consumer Loan Processing and Collection Division based on Board of Directors' Decree No. KP/044/DIR/R dated January 23, 2020.



Bani Iqbal

Head of Corporate Remedial & Recovery Division

Currently 41 years old. Holds a Master's degree in Agribusiness from Institut Pertanian Bogor. Appointed as Head of Corporate Remedial & Recovery Division based on Board of Directors' Decree No. KP/524/HCT/1/R dated May 4, 2021.



S. Hidayat Safwan

Head of Commercial & SME Credit Remedial & Recovery Division

Currently 53 years old. Holds a Master's degree in Business Administration from STIA LAN RI. Appointed as Head of Commercial & SME Credit Remedial & Recovery Division based on Board of Directors' Decree No. KP/092/DIR/R dated March 1, 2021.

**Agung Turanto S.**

Head of Financial Budgeting and Control Division

Currently 43 years old. Holds a Master's degree in Agribusiness from Universitas Gadjah Mada. Appointed as Head of Financial Budgeting & Control Division based on Board of Directors' Decree No. KP/041/DIR/R dated February 22, 2020.

**Yohan Setio**

Head of Investor Relations Division Act. Chief of Economist

Currently 36 years old. Holds a Master's degree in Business Administration from University of Cambridge in England. Appointed as Head of Investor Relations Division and Pgs Chief of Economist based on Board of Directors' Decree No. KP/408/DIR/R dated September 3, 2021.

**Berchmana Vita DK**

Head of Assets & Procurement Management Division

Currently 54 years old. Holds a Master's degree in Small and Medium Industries from Institut Pertanian Bogor. Appointed as Head of Assets & Procurement Management Division based on Board of Directors' Decree No. KP/345/DIR/R dated July 29, 2021.

**Ayu Sari Wulandari**

Head of Data & Analytics Management Division

Currently 52 years old. Holds a Doctorate in Leadership & Policy Innovation from Universitas Gadjah Mada. Appointed as Head of Data & Analytics Management Division based on Board of Directors' Decree No. KP/081/DIR/R dated February 22, 2021.

**M. Emil Azhary**

Head of Subsidiary Development Division

Currently 43 years old. Holds a Master of Business Administration from Northeastern University in Boston, Massachusetts, USA. Appointed as Head of Subsidiary Development Division based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.

**Widi Hantono**

Head of Financial Institution Pension Fund Division

Currently 53 years old. Holds a Master's degree in Management from Universitas Timbul Nusantara. Appointed as Head of Financial Institution Pension Fund Division based on Decree No. KP/510/HCT/1/R dated May 4, 2021.

**Heri Atmoko**

Head of Digital Development Division

Currently 43 years old. Holds a Master's degree in Information Systems Management from Universitas Budi Luhur, Jakarta. Appointed as Head of Digital Development Division based on Board of Directors' Decree No. KP/345/DIR/R dated July 29, 2021.

**Setiawan Anis Widjojo**

Head of IT Development Division

Currently 50 years old, graduate in Electrical Engineering from Universitas Gadjah Mada and holds a Master's degree in Internal Auditing from Universitas Gadjah Mada. Appointed as Head of IT Development Division based on Board of Directors' Decree No. KP/357/DIR/R dated August 9, 2021.

**Ari Pratiwi**

Head of Information Technology Strategy & Architecture Division

Currently 48 years old. Holds a Doctorate in Economics Science from Universitas Trisakti. Appointed as Head of Information Technology Strategy & Architecture Division based on Decree No. KP/360/DIR/R dated August 12, 2021.

**Sonny Setiadi**

Head of Information Technology Operational Division (Act)

Currently 49 years old. Holds a Master's degree in Banking from Institute Keuangan Perbankan. Appointed as Head of Information Technology Operational Division based on Board of Directors' Decree No. KP/079/DIR/R dated February 17, 2021.

**Feri Andajaya**

Head of Operational Division

Currently 54 years old. Holds a Master's degree in Business Administration & Technology from Institut Teknologi Bandung. Appointed as Head of Operational Division based on Board of Directors' Decree No. KP/041/DIR/R dated January 22, 2020.

**Muhammad Gunawan Putra**

Head of Digital Operational Division

Currently 51 years old. Holds a Master Business Administration in Strategic Management from Universitas Gadjah Mada (UGM). Appointed as Head of Digital Operational Division based on Board of Directors' Decree No. KP/488/DIR/R dated October 27, 2021.



Yanar Siswanto

Head of Credit Operational Division
(previously named Credit Administration Division)

Currently 52 years old. Holds a Master's degree in Agribusiness from Institut Pertanian Bogor. Appointed as Head of Credit Operational Division based on Decree No. KP/484/HCT/1/R dated May 4, 2021.



Andri Medina

Head of Information Security Division

Currently 50 years old. Holds a Master's degree in Computer Science from Universitas Indonesia. Appointed as Head of Information Security Division based on Decree No. KP/514/HCT/1/R dated May 4, 2021.



Suryo Utomo

Head of Compliance Division

Currently 50 years old. Holds a Master of Science degree in Accounting from Universitas Diponegoro. Appointed as Head of Compliance Division based on Board of Directors' Decree No. KP/318/DIR/R dated August 7, 2019.



Johansyah

Head of Legal Division

Currently 40 years old. Holds a Bachelor's degree in Law from Universitas Hasanuddin. Appointed as Head of Legal Division based on Board of Directors' Decree No. KP/342/DIR/R dated October 12, 2018.



Dandy Perwandi S.

Head of Human Capital Strategy Division

Currently 51 years old. Holds a Master's degree in Finance/Banking from University of Monash. Appointed as Head of Human Capital Strategy Division based on Board of Directors' Decree No. KP/420/DIR/R dated September 15, 2021.



Afthon Shodaq Noor

Head of Human Capital Services Division

Currently 50 years old. 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/420/DIR/R dated September 15, 2021.



Afien Yuni Yahya

Head of BNI Corporate University Division

Currently 53 years old. Holds a Master's degree in Professional Path Management from Universitas Indonesia. Appointed as Head of BNI Corporate University Division based on Board of Directors' Decree No. KP/081/DIR/R dated February 22, 2021.

HEAD OF REGIONAL OFFICE



Martinus Matondang

Head of Regional Office 01

Currently 50 years old. Holds a Bachelor of Economics degree in Development from Universitas Bung Hatta. Appointed as Head of Regional Office 01 based on Board of Directors' Decree No. KP/268/DIR/R dated July 5, 2019.



Faizal Arief Setiawan

Head of Regional Office 02

Currently 51 years old. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Regional Office 02 based on Board of Directors' Decree No. KP/092/DIR/R dated March 1, 2021.



Agung Kurniawan

Head of Regional Office 03

Currently 51 years old. Holds a Master's degree in Agribusiness Management from Institut Pertanian Bogor. Appointed as Head of Regional Office 03 based on Board of Directors' Decree No. KP/488/DIR/R dated October 27, 2021.



Edy Awaludin

Head of Regional Office 04

Currently 53 years old. Holds a Master's degree in Agribusiness Management from Institut Pertanian Bogor. Appointed as Head of Regional Office 04 based on Board of Directors' Decree No. KP/358/DIR/R dated October 22, 2020.



Bambang Setyatmojo

Head of Regional Office 05

Currently 52 years old. Holds a Master's degree in Agribusiness Management from Universitas Gadjah Mada. Appointed as Head of Regional Office 05 based on Board of Directors' Decree No. KP/488/DIR/R dated October 27, 2021.



Roy Wahyu Maulana

Head of Regional Office 06 (Act)

Currently 51 years old. Holds a Bachelor's degree in Economics from Universitas Kristen Indonesia. Appointed as Acting Head of Regional Office 06 based on Board of Directors' Decree No. KP/497/DIR/R dated November 03, 2021.



Hadi Santoso

Head of Regional Office 07

Currently 50 years old. Holds a Master's degree in Management from Universitas Andalas Padang. Appointed as Head of Regional Office 07 based on Board of Directors' Decree No. KP/226/DIR/R dated July 16, 2020.



I Gusti Nyoman Dharma Putra

Head of Regional Office 08

Currently 50 years old. Holds a Master's degree in Management from Universitas Pendidikan Nasional Denpasar. Appointed as Head of Regional Office 08 based on Board of Directors' Decree No. KP/226/DIR/R dated July 16, 2020.



Mahrauz Purnaditya

Head of Regional Office 09

Currently 51 years old. Holds a Master's degree in Agribusiness Management from Institut Pertanian Bogor. Appointed as Head of Regional Office 09 based on Board of Directors' Decree No. KP/041/DIR/R dated January 22, 2020.



Eko Setiawan

Head of Regional Office 10

Currently 50 years old. Holds a Master's degree in Finance from Universitas Gadjah Mada. Appointed as Head of Regional Office 10 based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Irwan Eka Putra

Head of Regional Office 11

Currently 45 years old. Holds a Master's degree in Construction Management from South Bank London. Appointed as Head of Regional Office 11 based on Board of Directors' Decree No. KP/420/DIR/R dated September 15, 2021.



Muhammad Arafat

Head of Regional Office 12

Currently 51 years old. Holds a Master's degree in Management from Universitas Hasanuddin. Appointed as Head of Regional Office 12 based on Board of Directors' Decree No. KP/041/DIR/R dated January 22, 2020.



Eko Setyo Nugroho

Head of Regional Office 14

Currently 52 years old. Holds a Master's degree in Technology Business Administration from Institut Teknologi Bandung. Appointed as Head of Regional Office 14 based on Board of Directors' Decree No. KP/428/DIR/R dated December 22, 2020.



Koko Prawira Butar Butar

Head of Regional Office 15

Currently 41 years old. Holds a Master's degree in Economic Development from Universitas Sumatera Utara. Appointed as Head of Regional Office 15 based on Board of Directors' Decree No. KP/20/DIR/R dated September 15, 2021.



Ariyanto Soewondo Geni

Head of Regional Office 16

Currently 54 years old. Holds a Master's degree in Law from Universitas Indonesia. Appointed as Head of Regional Office 16 based on Board of Directors' Decree No. KP/488/DIR/R dated October 27, 2021.



Moh. Hisyam

Head of Regional Office 17

Currently 54 years old. Holds a Master's degree in Economics from Universitas Jenderal Soedirman. Appointed as Head of Regional Office 17 based on Board of Directors' Decree No. KP/261/DIR/R dated July 3, 2019.



Beby Lolita Indriani

Head of Regional Office 18

Currently 54 years old. Holds a Master's degree in Banking Management from Universitas Padjadjaran. Appointed as Head of Regional Office 18 based on Board of Directors' Decree No. KP/041/DIR/R dated January 22, 2020.



Number of Employees

Total Employees Based on Position Level

(people)

POSITION LEVEL	2021			2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
≥ Senior Vice President*	65	25	90	58	16	74
Vice President	168	47	215	165	43	208
Assistant Vice President	878	395	1,273	813	356	1,169
Manager	1,962	1,347	3,309	1,929	1,289	3,218
Assistant Manager	5,270	5,521	10,791	5,122	5,354	10,476
Assistant	4,681	6,789	11,470	4,971	7,039	12,010
Basic Employee	29	-	29	47	-	47
Total			27,177			27,202

Notes

* Consists of: Senior Vice President, Executive Vice President and Senior Executive Vice President

Total Employees Based on Education Level

(people)

EDUCATION LEVEL	2021			2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
Doctorate Degree	6	4	10	7	4	11
Master's Degree	1,598	1,104	2,702	1,581	1,076	2,657
Bachelor's Degree	10,384	11,674	22,058	10,297	11,549	21,846
Academic	635	1,335	1,970	717	1,463	2,180
Primary – Senior High School	430	7	437	503	5	508
Total			27,177			27,202

Total Employees Based on Employment Status

(people)

EMPLOYMENT STATUS	2021			2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
Permanent	12,211	12,960	25,171	12,241	12,860	25,101
Contract	581	942	1,523	693	1,021	1,714
Trainee	261	222	483	171	216	387
Total			27,177			27,202

Total Employees Based on Age Range

(people)

AGE RANGE	2021			2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
>50 Years	1,531	877	2,408	1,711	946	2,657
>45-50 Years	1,277	1,084	2,361	1,322	1,118	2,440
>40-45 Years	2,203	1,955	4,158	2,306	2,025	4,331
>35-40 Years	1,186	1,090	2,276	1,198	1,098	2,296
>30-35 Years	3,334	4,270	7,604	3,458	4,529	7,987
>25-30 Years	2,734	3,671	6,405	2,615	3,570	6,185
≤25 Years	788	1,177	1,965	495	811	1,306
Total			27,177			27,202

Total Employees Based on Generation

(people)

GENERATION	2021			2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
Baby Boomer	-	2	2	1	-	1
Gen X	5,011	3,914	8,925	5,357	4,116	9,473
Gen Y	6,736	8,273	15,009	6,874	8,576	15,450
Gen Z	1,306	1,935	3,241	873	1,405	2,278
Total			27,177			27,202

EMPLOYEE COMPETENCY DEVELOPMENT

COMPETENCY DEVELOPMENT POLICY

The Bank is fully aware that human capital are an important asset for improving the Bank's performance so it must be managed and developed continuously. The Bank is committed to developing human capital to achieve high integrity, competence with international standards, high productivity, and customer service orientation.

Therefore, the Company provides training and competency development in all aspects of the Company's operations in a planned and sustainable manner by upholding the provision of equal opportunities to all levels of the organization irrespective of gender.

During 2021, the Company held training and development programs organized by internal and external parties. The Bank trained 27,583 employees, or 99.12%, with a total training participation of 777,921, or an average of 28.60 times for each employee receiving training, with all training and competency development costs borne by the Bank.

TOTAL EMPLOYEES	NUMBER OF TRAINING HOURS (IN HOURS)	TRAINING HOURS PER EMPLOYEE	NUMBER OF TRAINING PARTICIPANTS	NUMBER OF TRAINED EMPLOYEES* (PEOPLE)
27,203	2,137,642	77.50	777,921	27,583

*including 620 terminated employees

The following shows the top 5 (five) training and competency development followed by each position level.

Competency Development Based on Position Level and Gender Equality in 2021

NO.	POSITION LEVEL	TYPE OF TRAINING	TRAINING PURPOSE	NUMBER OF PARTICIPANTS *		
				L	P	TOTAL
1	Vice President	Regional Leaders Refreshment – Premises, ATM, EDC, and Digital Operations	Refreshment of competency in managing and solving problems related to premises, ATM, EDC and digital operation	92	18	110
		Regional Leaders Refreshment - Legal & Legal Case Litigation	Refreshment on increasing competency in resolving disputes through legal litigation and understanding all matters related to Law	46	9	55
		Regional Leaders Refreshment - Handling Media in a Crisis	Refreshment on media handling in a company in crisis situation, so that as not to hamper operations and not have the potential to create a negative image	45	9	55
		Regional Leader Refreshment - Decision Making	Refreshment related to decision-making competency in effectively solving problems	23	6	29
		Smart City for Leaders	Briefing on how to fully understand the smart city concept	20	4	24
2	Assistant Vice President	Operational Risk	Increased competency in managing Operational Risk, including identifying, measuring, and monitoring operational risk, and assessing and mitigating operational risk	163	20	183
		Smart City for Leaders	Briefing on how to understand the concept of a smart city as a whole.	158	41	199
		Risk Management Certification Level 3	Increasing competency and expertise in the field of risk management	119	43	162
		Execution Discipline Culture Brevet	Refreshment to increase employee competency in planning and execution	109	30	139
		Refreshment Operational Risk Deputy Branch Manager	Refreshment of competency in managing Operational Risk, including identifying, measuring, and monitoring operational risk, and assessing and mitigating operational risk within the scope of Branch Managers	93	67	160
3	Manager	International Banking Literacy Program	Provision and improvement of competencies related to operations in international banking, including international trade and correspondent banking transactions	768	562	1.330
		Risk Management Certification Level 2	Increasing competence and expertise in the field of risk management	261	169	430
		Risk Management Refreshment	Refreshment to increase competency and expertise in the field of risk management	235	179	414
		Refreshment of Execution Discipline Culture	Refreshment to increase employee competency	218	127	345
		Refreshment Operational Risk Deputy Branch Manager	Refreshment of competency for managing Operational Risk, including identifying, measuring, and monitoring operational risk, and assessing and mitigating operational risk within the scope of Branch Managers	162	45	207

Competency Development Based on Position Level and Gender Equality in 2021

NO.	POSITION LEVEL	TYPE OF TRAINING	TRAINING PURPOSE	NUMBER OF PARTICIPANTS *		
				L	P	TOTAL
4	Assistant Manager	Risk Management Certification Level 1	Increase competency and expertise in the field of risk management	924	875	1.799
		International Banking Literacy Program - Beginner Level	Provision and improvement of competencies related to operations in international banking, including international trade and correspondent banking transactions	709	758	1.467
		Leadership Program for Supervisor	Provision for supervisors for increasing their motivation and confidence of their own abilities as well as the ability to think creatively and innovatively. Increase togetherness and mutual trust in one unit	591	563	1.154
		Refreshment of Execution Discipline Culture	Refreshment to increase employee competency in planning and execution	253	191	444
		Cash Management	Increase competency in understanding the concept of cash and liquidity and fund flow instruments as well as understanding the functions and features of cash management applications	213	256	469
5	Assistant	Refreshment Consumer Collection	Refreshment related to participant competency in managing consumer collections and running billing tools effectively to increase productivity	625	407	1.032
		International Banking Literacy Program - Beginner Level	Provision and improvement of competencies related to operations in international banking, including international trade and correspondent banking transactions	295	244	539
		Assistant Branchless Banking	Providing assistance to assistants on the fulfillment of competencies as branchless banking (ABB) assistants in terms of use of facilities and infrastructure as well as business as usual (BAU)	274	42	316
		Standard Credit Brevet	Provision on standard credit competencies to standard credit assistants regarding credit and its relation to standard credit	266	171	437
		Refreshment Customer Data Quality Improvement	Refreshment on the understanding of improving the quality of customer data and its relevance to improving service quality	195	1.312	1.507

Competency Development Based on Position Level and Gender Equality in 2021

NO.	POSITION LEVEL	TYPE OF TRAINING	TRAINING PURPOSE	NUMBER OF PARTICIPANTS *		
				L	P	TOTAL
	Basic Employee	Anti Fraud Awareness	Provision for employees on assisting the company in an effort to improve the ability of employees to understand and detect and prevent fraud in the workplace so as to assist the company in maintaining its assets and reputation.	26	0	26
		Anti-Money Laundering : Branches and Centers, Unit Division	Provision to employees, especially in the Compliance, Front Office and other operational Supporting Units, of the Standards for Implementing Anti-Money Laundering and Terrorism Financing programs, to ensure the policies and procedures are in accordance with the APU and PPT program development	35	0	35
		Work Culture: Core Value AKHLAK	Provision for all employees on understanding and using the AKHLAK values as a reference in daily activities.	26	0	26
		Good Corporate Governance	Increasing understanding of the basic concepts of Good Corporate Governance (GCG) and how to implement GCG in the company in an effective and targeted manner	26	0	26
		Gratification and Anti-Bribery	Provision of understanding gratification and anti-bribery practices in daily operational activities and how to report them	26	0	26

*Top 5 Types of Training at each Position level based on the number of learning/training target learners

COST OF COMPETENCY DEVELOPMENT

Education and Training Costs in 2021 were Rp180,680 billion or 9.91% less than 2020, due to optimizing digital learning and implementing hybrid classes during the pandemic. With this more efficient budget, the number of training participants rose by 19.60% to 777,921.

DESCRIPTION	2021 (RP MILLION)	2020 (RP MILLION)	INCREASE /DECREASE (RP MILLION)	INCREASE /DECREASE (%)
Education and Training	180,680	200,553	(19,872)	(9.91)

Shareholder Composition

COMPANY SHAREHOLDERS

Composition of Company Shareholders as of December 31, 2021

NO	INVESTOR	NUMBER OF INVESTORS	NUMBER OF SHARES	% OWNERSHIP
Domestic Investors				
1	Government of Republic of Indonesia	1	11,189,193,875	60
2	Indonesian Individuals	113,237	952,428,026	5.10722
3	Cooperatives	9	993,195	0.00533
4	Foundations	25	99,262,184	0.53228
5	Pension Funds	150	971,331,559	5.20859
6	Insurance	107	569,851,239	3.05572
7	Banks	8	29,649,298	0.15899
8	Limited Liability Companies	260	78,709,406	0.42206
9	Mutual Funds	326	960,948,898	5.15291
Sub Total		114,123	14,852,367,680	79.6431
Foreign Investors				
1	Foreign Individuals	256	24,556,546	0.13168
2	Foreign Business Enterprises	892	3,771,732,232	20.22522
Sub Total		1,148	3,796,288,778	20.3569
Total		115,271	18,648,656,458	100

20 LARGEST SHAREHOLDERS

20 Largest BNI Shareholders Composition as of December 31, 2021

NO	INVESTOR	SHARES	%	STATUS	LOCATION
1	Negara Republik Indonesia	11,189,193,875	60.00	Republic of Indonesia	Jakarta
2	BPJS Ketenagakerjaan - Program JHT	534,391,368	2.87	Local Company	Jakarta
3	BNYM RE BNYMLB RE EMPLOYEES PROVIDENTFD	269,139,953	1.44	Foreign Business Enterprise	Malaysia
4	Winarno Tjajadi	230,000,000	1.23	Indonesian Individuals	Sidoarjo
5	Prudential Life Assurance	113,000,016	0.61	Local Company	Jakarta
6	BNYMSANV RE BNYMSANVLUX RE S/A ESPRING I	107,955,836	0.58	Foreign Business Enterprise	Luxembourg
7	Suwantara Gotama	107,850,000	0.58	Foreign Business Enterprise	Jakarta
8	JPMCB NA RE - VANGUARD EMERGING MARKETS	103,321,476	0.55	Foreign Business Enterprise	USA
9	JPMCB NA RE-VANGUARD TOTAL INTERNATIONAL	97,979,599	0.53	Foreign Business Enterprise	USA
10	CITIBANK NEW YORK S/A GOVERNMENT OF NORW	93,377,500	0.50	Foreign Business Enterprise	Norwegia

20 Largest BNI Shareholders Composition as of December 31, 2021

NO	INVESTOR	SHARES	%	STATUS	LOCATION
11	Taspen	90,970,500	0.49	Local Company	Jakarta
12	Taspen (Asuransi)	86,394,500	0.46	Local Company	Jakarta
13	Batavia Dana Saham	85,543,000	0.45	Local Company	Jakarta
14	AXA Mandiri Financial Services	81,899,100	0.44	Local Company	Jakarta
15	CITIBANK NEW YORK S/A GOVERNMENT OF NORW	79,000,000	0.42	Foreign Business Enterprise	Norwegia
16	BPJS Ketenagakerjaan - Program JP	75,923,700	0.41	Local Company	Jakarta
17	Fund Factsheet Schroder Dana Prestasi Plus	73,327,731	0.39	Local Company	Jakarta
18	JPMBLSAA AIF CLT RE-STICHTING DEPOSITARY	66,316,029	0.36	Foreign Business Enterprise	Netherlands
19	iShares Core MSCI Total International Stock ETF ETF	64,349,000	0.34	Foreign Business Enterprise	US
20	Mercer QIF Fund plc	64,015,000	0.34	Foreign Business Enterprise	Irlandia

BNI SHAREHOLDERS WITH 5% OR OVER OWNERSHIP COMPOSITION

Share ownership that reaches 5% or more of the issued and fully paid shares is as follows:

NO	INVESTOR	STATUS	NUMBER OF SHARES (SHARES)	% OWNERSHIP
1	Republic of Indonesia	Republic of Indonesia	11,189,193,875	60.0

BNI SHAREHOLDERS WITH BELOW 5% OWNERSHIP COMPOSITION

The composition of the Company's shareholders with less than 5% Ownership as of December 31, 2021 is as follows:

NO	INVESTOR	STATUS	NUMBER OF SHARES (SHARES)	PRESENTASE KEPEMILIKAN% % OWNERSHIP
Domestic Investors				
1	Insurance	103	569,850,980	3.06
2	Limited Liability Companies	231	78,707,766	0.42
3	Foundations	25	99,262,184	0.53
4	Banks	7	29,649,255	0.16
5	Cooperatives	8	993,165	0.00
6	Financial Institutions	-	-	-
7	Other Business Enterprises	-	-	-
Sub Total		374	778,463,350	4.17
Overseas Investors				
1	Foreign Business Enterprises	885	3,771,731,885	20.23
2	Foreign Individuals	247	24,556,201	0.13
Sub Total		1,132	3,796,288,086	20.36
Total		1,506	4,574,751,436	24.53

Majority/Controlling Shareholder Information Up to Name of Ultimate Owner

The majority/controlling shareholder of the Bank is the Republic of Indonesia, represented by the Government of the Republic of Indonesia/Ministry of State-Owned Enterprises (SOE) of the Republic of Indonesia, with ownership of 60.00% or 11,189,193,875 shares. The Government of the Republic of Indonesia is also the name of the ultimate owner of the Company

SHAREHOLDER	ADDRESS	NUMBER OF SHARES (SHARES)	OWNERSHIP (%)
Republic of Indonesia, represented by the Ministry of State-Owned Enterprises (SOE)	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	11,189,193,875	60.00



List of Subsidiaries and/or Associated Entities

NAME	LINE OF BUSINESS	SHARE OWNERSHIP (%)	YEAR OF ESTABLISHMENT	OPERATIONAL STATUS	TOTAL ASSETS 2021 (RP-MILLION)	DOMICILE
PT BNI Multifinance	Financing	99.99	1983	Operating	1,241,245	Jakarta
PT BNI Sekuritas and Subsidiaries	Brokerage and Underwriter including securities trading, acting as a guarantor and investment advisor	75.00	1995	Operating	1,655,831	Jakarta
PT BNI Life Insurance	Life Insurance Services	60.00	1996	Operating	22,769,205	Jakarta
BNI Remittance Ltd.	Remittance Services	100.00	1996	Operating	20,071	Hong Kong

PT BNI MULTIFINANCE

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 is a cooperation between PT Bank Negara Indonesia (Persero) Tbk. (BNI) and American Express Leasing Corporation (AMEX). The Company'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.

BNI Multifinance commenced its commercial operations in 1983, engaging in funding Investments, Working Capital, Multipurpose and Operating Leases. Its business activities are supported by reliable human resources, numbered 127 persons as of December 31, 2021, and operates 7 (seven) branch offices in Medan, Lampung, Bogor, Semarang, Surakarta, Yogyakarta and Surabaya as well as points of sales in Bandung. The head office is located at BNI

Life Insurance Building, 5th Floor, Jalan Aipda KS. Tubun No. 67, Jakarta.

The PT BNI Multifinance Board of Commissioners and Board of Directors composition based on deed No. 43 dated September 13, 2021 is as follows:

BOARD OF COMMISSIONERS

President Commissioner/ Independent Commissioner	Rosa de Lima Dwi Mutiari
Commissioner	Wiwi Suprihatno

BOARD OF DIRECTORS

President Director	Hasan Gazali Pulungan
Director	Linda Saragih
Director	Antonius Anung Fajar Nugroho

PT BNI SEKURITAS

BNI Sekuritas was established based on notarial deed No. 22 on April 12, 1995 in Jakarta. This deed was amended by deed No. 39 by the same notary dated May 3, 1995. As per the Company's Articles of Association, BNI Sekuritas' business activities include securities trading, acting as securities broker, securities underwriter, mutual fund selling agent, investment management company, custodianship and other activities as determined or approved by the authorized agencies. BNI Sekuritas obtained a license as a securities broker, underwriter of stocks and investment manager from the Chairman of Bapepam-LK through decree No. KEP-19/PM/1995, No. KEP-020/PM/1995 dated August 8, 1995 and No. KEP-07/PM-MI/1995 dated October 23, 1995, which were transferred to PT BNI Asset Management by decree No. Kep-480/BL/2009 dated December 31, 2009.

To implement the independence function of investment managers based on Bapepam-LK No. V.D.11, an annex to the Chairman of Bapepam-LK decree No. Kep-480/BL/2009 dated December 31, 2009 on Investment Manager Guidelines, the Company completed the separation/division of business (spin-off) of the business operations division for investment management by forming a new group called PT BNI Asset Management with 99.99% ownership by BNI Sekuritas based on the Establishment Deed No. 50 dated March 28, 2011 drawn up before Fathiah Helmi, S.H., Notary in Jakarta.

In mid 2011, the BNI Sekuritas ownership structure was strengthened by the joining of a strategic investor, namely SBI Securities Co. Ltd., Japan to co-own shares in BNI Sekuritas, so the current composition of BNI Sekuritas share ownership is 75% owned by PT Bank Negara Indonesia (Persero) Tbk. and 25% owned by SBI Securities Co. Ltd. In 2014, the ownership of SBI Securities Co. Ltd was transferred to SBI Financial Services Co., Ltd so the ownership of BNI Sekuritas is BNI (75%) SBI Financial Services Co. Ltd (25%). BNI Sekuritas is registered with the Financial Services Authority (OJK), as an securities underwriter, securities broker, and mutual fund selling agent.

As part of BNIS' journey to become a global securities company, on September 8, 2021, a BNIS subsidiary, BNI Securities Pte. Ltd. ("BSPL") received approval from the Monetary Authority of Singapore ("MAS") with license number CMS 101132. With the BSPL operating license, BNI Sekuritas will be able to carry out capital market service activities in Singapore, both in the business of fixed income brokerage, equity brokerage and underwriting through BSPL. Furthermore, BSPL will focus on helping the BNI Group and BNI customers to gain access to global investors. The BSPL Singapore operations also strengthens Bank BNI's position as a global bank that provides banking and capital market services. BSPL is located at 30 Cecil Street #17-08 Prudential Tower Singapore (049712), in the same building as Bank BNI Singapore Branch Office.

Throughout 2020, BNI Sekuritas business operations were conducted by 371 professional employees as of December 31, 2021 who provided services to customers through 45 branch offices. PT BNI Sekuritas Head Office is located at Sudirman Plaza Indofood Tower, 16th Floor, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia

The PT BNI Sekuritas Board of Commissioners and Board of Directors composition based on a EGMS Resolution dated December 29, 2021, and is as follow:

BOARD OF COMMISSIONERS

President Commissioner & Independent	Boyke Wibowo Mukiyat
Commissioner	Yoshihiro Ishiwata
Commissioner	I Made Sukajaya *

BOARD OF DIRECTORS

President Director	Agung Prabowo
Director	Reza Benito Zahar
Director	Putu Bagus Kresna
Director	Nieko Kusuma *
Director	Vera Ongyono *
Director	Yoga Mulia *

*) still waiting for fit & proper test

PT BNI LIFE 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 amounted to Rp4.2 trillion with a 40% ownership interest in BNI Life, which was realized in September 2014.

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 offers various insurance products such as life, health, education, investment, pension and sharia insurance. BNI Life’s business operations are supported by competent human resources in the insurance sector. Currently BNI Life has 771 employees with competencies that continue to be developed to provide the best service to customers.

To conduct its business, as of December 31, 2022 BNI Life Insurance operates 5 (five) service point offices at:

Jakarta/Menara BNI Pejompongan, Jl. Pejompongan Raya No. 5; Bandung/Jl. Burangrang No.38, Lengkon; Denpasar/Jl. Diponegoro No. 122; Semarang/Rukan Pemuda Mas Blok A1-A2 Lantai 2, DP Mall, Jalan Pemuda No.150; Surabaya/Gedung Graha Pangeran Lt. XI, Jl. Achmad Yani No. 286. BNI Life’s head office is located at Centennial Tower Lt. 9, Jl. Gatot Subroto Kav. 24-25, Jakarta Selatan.

The PT BNI Life Insurance Board of Commissioners and Board of Directors composition, based on the GMS minutes deeds No. 65 dated July 29, 2021 and No.1 dated October 1, 2021 is as follows:

BOARD OF COMMISSIONERS

President/Independent Commissioner	Parikesit Suprpto
Commissioner	Iwan Abdi
Commissioner	Kazuhiko Arai
Independent Commissioner	Alwi Abdurrahman Shihab
Independent Commissioner	Henry Cratein Suryanaga

BOARD OF DIRECTORS

President Director	Shadiq Akasya
Director of Finance	Eben Eser Nainggolan
Director	Naoto Oda
Director	Hiroshi Ono

SHARIA SUPERVISORY BOARD

Chairman	Ir. Agus Haryadi, AAALJ, FIIS, ASAI
Member	Prof. Dr. H. Utang Ranuwijaya, MA
Member	Hj. Siti Haniatunnisa, LLB, MH

BNI REMITTANCE

BNI Remittance Limited (BNI Remittance) is a BNI subsidiary established on November 19, 1996, based on Certificate of Incorporation No. 574748 under the name of "High Motivation Company", changed its name to BNI Nakertrans Ltd in 1997. To further optimize its business activities in accordance with the rules of the local authorities, after a comprehensive business assessment, it was decided to separate the BNI Nakertrans Ltd management from BNI Hong Kong as well as change the name to BNI Remittance Limited, in 2009.

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 Keswick Main Office in Hong Kong Island, Tsuen Wan Branch Office and Yuen Long Branch Office in the New Territories and Hung Hom Branch Office in Kowloon. BNI Remittance Central Office is located at Flat/RM5 on G/F, Nos 1-7 Keswick Street, Causeway Bay, Hong Kong.

Besides providing services through these outlets, BNI Remittance cooperates with BNI in its financial inclusion program, providing financial access through the widest possible digital services for Indonesian Migrant Workers (PMI) in Hong Kong. At the end of 2021, there were an additional 2 (two) BNI ATM machines bringing the total in Hong Kong to 8 (eight) BNI ATM machines enabling customers to more freely 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, credit/ticket purchases and bill payments. Since mid-2017, BNI Mobile Banking services can be activated directly from Hong Kong to further strengthen its digital services.

The BNI Remittance Board of Directors composition is based on The Companies Ordinance (Chapter 32) Ordinary Resolution of BNI Remittance Limited, Company No. 0574748 dated October 19, 2020 as follows:

BOARD OF DIRECTORS

Director	Indra Kusuma Suyatno
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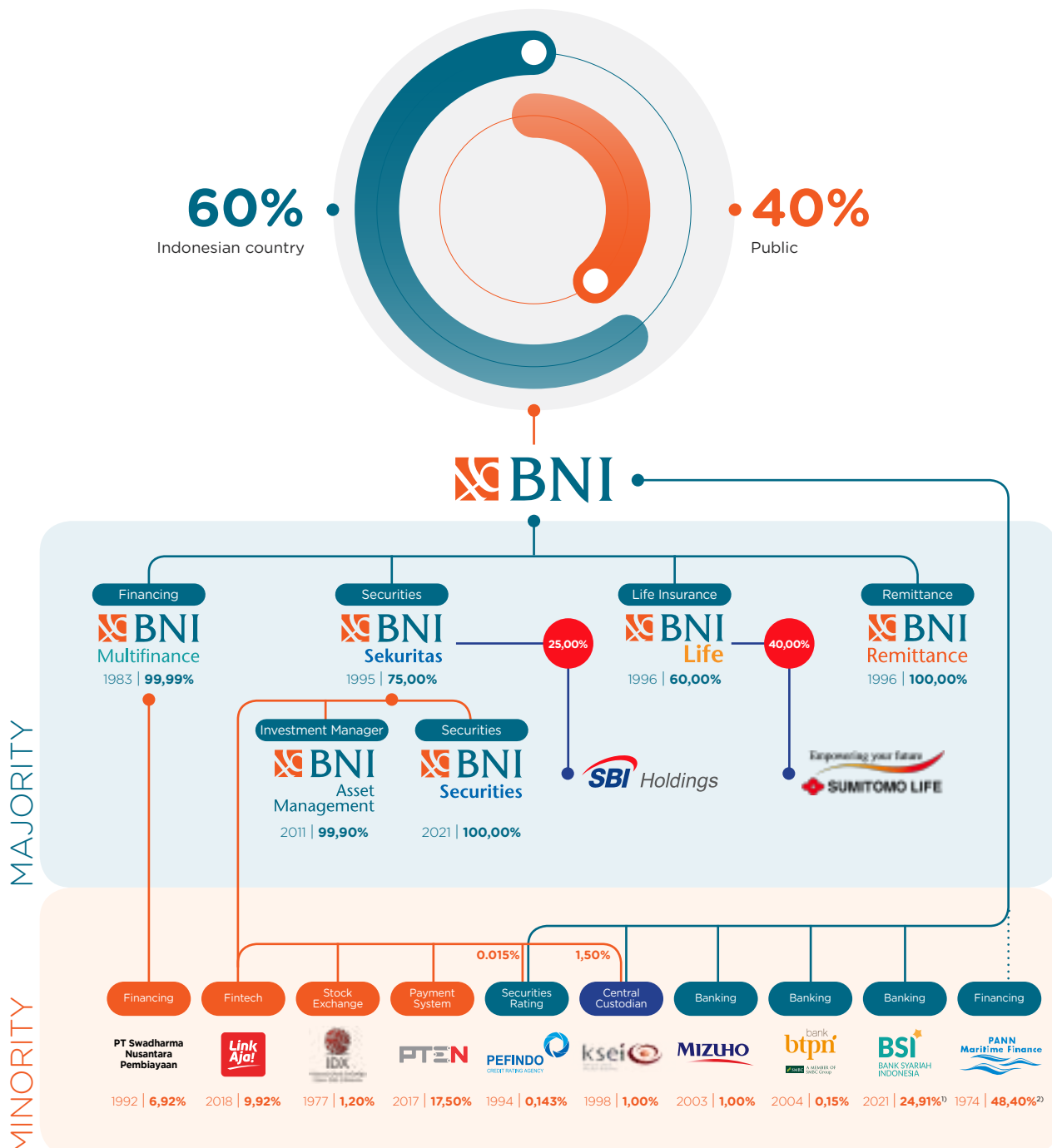
ENTITIES' SUBSIDIARIES

NAME	BUSINESS FIELD	SHAREHOLDING	DATE AND YEAR OF ESTABLISHMENT	OPERATIONAL STATUS	TOTAL ASSETS 2021 (RP-MILLION)	DOMICILE
PT BNI Asset Management	Investment Manager	99.9% (through PT BNI Sekuritas)	2011	Already in operation	165,055	Jakarta
BNI Securities Pte. Ltd.	Brokerage Services, Underwriting, and Advisory Activities in the Capital Market	100.0% (through PT BNI Sekuritas)	2021	Already in operation	22,186	Singapura

SUBSIDIARIES

NAME	BUSINESS FIELD	SHAREHOLDING	DOMICILE
PT Bank Syariah Indonesia Tbk	Banking	24.9% (Joint ownership of BNI and PT BNI Life Insurance)	Jakarta
PT Bank Mizuho Indonesia	Banking	1.0%	Jakarta
PT Bank BTPN Tbk	Banking	0.2%	Jakarta
PT Bursa Efek Indonesia	Stock Exchange Services	1.2% (through PT BNI Sekuritas)	Jakarta
PT Kustodian Sentral Efek Indonesia	Central Custodian	2.5% (Joint ownership of BNI and PT BNI Sekuritas)	Jakarta
PT Pemeringkat Efek Indonesia	Securities Rating	0.2% (Joint ownership of BNI and PT BNI Sekuritas)	Jakarta
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	Payment System	17.5% (through PT BNI Sekuritas)	Jakarta
PT Fintek Karya Nusantara	Fintech	9.9% (through PT BNI Sekuritas)	Jakarta
PT PANN Pembiayaan Maritim	Financing	48.4%	Jakarta
PT Swadharma Nusantara Pembiayaan	Financing	6.92% (through PT BNI Multifinance)	Jakarta

BNI Group Structure



*In 2021, Bank BNI Syariah officially merged with 2 other Sharia Banks to become Bank Syariah Indonesia

**Participation in PT PANN Maritime Financing by BNI in the form of Temporary Participation conducted in 2017

To date, BNI does not have any joint ventures, or Special Purpose Vehicles (SPV).

Share Issuance Chronology

Initial Public offering

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 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 November 25, 1996.

Limited Public offering I

On June 30, 1999, BNI conducted a Limited Public Offering I for the issuance of Pre-emptive Rights (HMETD) totaling 151,904,480,000 Series C shares with a par value of Rp25 (full amount) per share. Each holder of 1 (one) old share has the right to buy 35 new shares at a price of Rp347.58 (full amount) per share. From this public offering, BNI increased its share capital by 683,916,500 Series C shares which were issued to the general public on July 21, 1999 and listed on the Jakarta Stock Exchange and Surabaya Stock Exchange (now IDX). BNI also issued 151,220,563,500 Series C shares to the Government of Indonesia on April 7, 2000 and June 30, 2000 through a recapitalization program based on Government Regulation No. 52 of 1999.

Recapitalization

On March 30, 2000, the Minister 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 an 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 up to 1,992,253,110 new Class C shares through Limited Public Offering II with a par value per share of Rp375 (full amount).

Each owner of 20 old shares whose name was registered in the BNI Shareholders List as of August 9, 2007 at 16.00 WIB was entitled to 1 (one) pre-emptive rights where each right entitled the owner to buy a new share at a 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 with Rp195,280 shares issuance costs. 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 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 par value per share of Rp375 (full amount), with an offer price of Rp3,100 per Preemptive Right that could be traded inside and outside the Indonesia Stock Exchange (IDX) from December 10, 2010 to December 16, 2010, taking into account the applicable provisions in the capital market sector. From the LPO III, BNI obtained Rp1,265,519 additional share capital, net after deducting the issuance of shares amounting to Rp8,950,869 million.

Names of Stock Exchanges where the Company's shares are listed

All BNI shares are listed on the Indonesia Stock Exchange.

BNI Share Issuance Chronology

DATE	DESCRIPTION	SHARES	NOMINAL VALUE	OFFERING PRICE	NUMBER OF SHARES
Prior to IPO	-	-	-	-	-
November 1996	Initial Public Offering (IPO)	Seri-A	@Rp500	-	1
		Seri-B	@Rp500	850	4,340,127,999
		Total Capital issued and paid			4,340,128,000
June 1999	Rights Issue (1:35)	Seri-A	@Rp500	-	1
		Seri-B	@Rp500	850	4,340,127,999
		Seri-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	Seri-A	@Rp500	-	1
		Seri-B	@Rp500	850	4,340,127,999
		Seri-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	Seri-A	@Rp500	-	1
		Seri-B	@Rp500	850	4,340,127,999
		Seri-C	@Rp25	347,58	194,885,183,000
		Total Capital issued and paid			199,225,311,000
December 2003	Reverse Stock Split (15:1)	Seri-A	@Rp7,500	-	1
		Seri-B	@Rp7,500	12,750	289,341,866
		Seri-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)	Seri-A	@Rp7,500	-	1
		Seri-B	@Rp7,500	12,750	289,341,866
		Seri-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	Seri-A	@Rp7,500	-	1
		Seri-B	@Rp7,500	12,750	289,341,866
		Seri-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)	Seri-A	@Rp7,500	-	1
		Seri-B	@Rp7,500	12,750	289,341,866
		Seri-C	@Rp375	3,100	18,359,314,591
		Total Capital issued and paid			18,648,656,458

Bond Issuance Chronology

BNI has issued several bonds denominated in Rupiah and foreign currency to support its business growth, strengthen its capital with sufficient sources of funds, and good tenor distribution. The bonds include BNI Global Bonds in 2012, followed by the issuance of BNI Sustainable Bonds in 2017 which realized funds of Rp3 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 US\$500,000,000 (full amount) and US\$600,000,000 (full amount), respectively.

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. These 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 100.00%.

Registration of Sustainable Bonds 2017

On June 22, 2017, BNI obtained an effective statement from OJK 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 Rp3,000,000,000.000 (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 2 Capital Bonds, which were listed on the Singapore Exchange (SGX Listing) with a principal amount of USD500,000,000.00 (full amount) 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 and 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 USD600,000,000.00 (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 I 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 and 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.

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 Exchange.

BNI Bond Issuance Chronology

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	NUMBER OF BONDS
Global Bond	April 27, 2012	-	5 Years	USD	500.000.000
Shelf Registration Bonds I BNI Phase I Year 2017	July 11, 2017	June 22, 2017	5 Years	IDR	3.000.000.000.000
BNI Tier II Capital Bond 2021	March 30, 2021	March 30, 2021	5 Years	USD	500.000.000
BNI Additional Tier I Capital Bond 2021	September 24, 2021	September 24, 2021	Perpetual, Non Callable 5,5 tahun	USD	600.000.000

BOND INTEREST PAYMENT CHRONOLOGY

Global Bond has an annual interest rate of 4.125% of the principal amount of the loan. This 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.

Chronology of Interest Payment of Global Bond

INTEREST NO.	DATE OF 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



	OFFER PRICE	MATURITY DATE	INTEREST RATE	PAYMENT STATUS	RATING		TRUSTEE
					2021	2020	
	98.89	April 27, 2017	4.125% p.a	Paid	-	-	HSBC
	100.00	July 11, 2022	8.00% p.a	Not Yet Paid	idAAA (Pefindo)	idAAA (Pefindo)	PT BRI (Persero)
	100.00	March 30, 2026	3.75%	Not Yet Paid	BB (Fitch) Ba2 (Moody's)	-	HSBC Corp Ltd.
	100.00	March 24, 2027	4.3%	Not Yet Paid	Ba3 (Moody's)	-	HSBC Corp Ltd.

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 Interest Payment of Sustainable Bond

INTEREST NO.	DATE OF 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
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	January 11, 2022	8%	Not Yet Paid
19	April 11, 2022	8%	Not Yet Paid
20	July 11, 2022	8%	Not Yet 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.

Chronology of Interest Payment of Sustainable Bond

INTEREST NO.	DATE OF INTEREST PAYMENT	INTEREST (%)	PAYMENT STATUS
1	September 30, 2021	3.75%	Paid
2	March 30, 2022	3.75%	Not Yet Paid
3	September 30, 2023	3.75%	Not Yet Paid
4	March 30, 2023	3.75%	Not Yet Paid
5	September 30, 2024	3.75%	Not Yet Paid
6	March 30, 2024	3.75%	Not Yet Paid
7	September 30, 2025	3.75%	Not Yet Paid
8	March 30, 2025	3.75%	Not Yet Paid
9	September 30, 2026	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 on March 24, 2022 and ending on March 24, 2027, and is paid every 6 months with the following schedule:

Chronology of Interest Payment of Sustainable Bond

INTEREST NO.	DATE OF INTEREST PAYMENT	INTEREST (%)	PAYMENT STATUS
1	March 24, 2022	4.3%	Not Yet Paid
2	September 24, 2023	4.3%	Not Yet Paid
3	March 24, 2023	4.3%	Not Yet Paid
4	September 24, 2024	4.3%	Not Yet Paid
5	March 24, 2024	4.3%	Not Yet Paid
6	September 24, 2025	4.3%	Not Yet Paid
7	March 24, 2025	4.3%	Not Yet Paid
8	September 24, 2026	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

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 Rp100 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 July 5, 2021 to July 1, 2022. in their letter No. RC-701/PEF-DIR/V11/2021 dated July 5, 2021, with a rating of idAAA (Triple A Stable Outlook) for Shelf-Registered Bonds I Phase I Year 2017, and No. RC-700/PEF-DIRN2/2021 dated July 5, 2021 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.

BNI Medium Term Notes (MTN) Issuance Chronology

DESCRIPTION	DATE OF ISSUE	EFFECTIVE DATE	TENOR	CURRENCY	BOND AMOUNT	BID PRICE	DUE DATE	INTEREST RATE	PAYMENT STATUS	RATING		TRUSTEE
										2021	2020	
Subordinated MTN I 2018	August 10, 2018	August 10, 2018	5 years	Rp	100,000,000,000	100.00%	August 10, 2023	8.00%	Not Yet Paid	idAA (Pefindo)	idAA (Pefindo)	PT Bank Rakyat Indonesia (Persero)

MTN Interest Payment Chronology

INTEREST PAYMENT	MTN INTEREST PAYMENT DATE	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
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%	Not Yet Paid
15	May 10, 2022	8%	Not Yet Paid
16	August 10, 2022	8%	Not Yet Paid
17	November 10, 2022	8%	Not Yet Paid
18	February 10, 2023	8%	Not Yet Paid
19	May 10, 2023	8%	Not Yet Paid
20	August 10, 2023	8%	Not Yet Paid

Chronology of Issuance and/or Listing of Other Securities

In 2016, BNI made an NCD offering in two stages with the realization of the issuance of Rp5.22 trillion consisting of several series. In 2017, BNI again issued an NCD with the realization of the issuance of Rp2.7 trillion. In 2019 bni issued NCD in three stages with the realization of the issuance of Rp4.34 trillion consisting of several series.

The Arrangers of the BNI 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 is a Bank strategy to increase Rupiah liquidity.

In 2020, BNI issued scripless Negotiable Certificate of Deposit (NCD) in four series as follows:

1. Rupiah NCD BNI I Year 2020 Series A with an emission of Rp400 billion;
2. Rupiah NCD BNI I Year 2020 Series B with an emission of Rp580 billion;
3. Rupiah NCD BNI I Year 2020 Series C with an emission of Rp50 billion;
4. Rupiah NCD BNI I Year 2020 Series D with an emission of Rp360 billion.

The Arrangers of the BNI NCD issuance were BNI Sekuritas, Danareksa Sekuritas, Mandiri Sekuritas, and BCA Sekuritas, PT Indonesian Central Securities Depository (KSEI) acted as a Paying Agent. The issuance of the NCD is a Bank strategy to increase Rupiah liquidity.

In addition, BNI also issued USD Global Certificate of Deposit (CD) through its New York Foreign Branch Office (KCLN) in January 2020. BNI, through KCLN New York, became the first Indonesian Bank to issue CDs in USD terms as a short-term investment product for the global market. The Arranger selected for this CD issuance was DBS Bank, Citibank as Issuing & Paying agent (IPA), and there were also 11 (eleven) dealers for this issuance, namely: Citibank, Credit Suisse, BNP Paribas, DBS, HSBC, Mizuho, MUFG, SMBC Nikko, ANZ, UOB and Credit Agricole.

NAME OF EXCHANGE IN WHICH THE COMPANY NCD IS LISTED

All BNI NCDs have been listed on the Indonesia Stock Exchange (IDX).

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE (MILLION)	MATURITY DATE	DISCOUNT	PAYMENT STATUS	RATING		TRUSTEE
									2021	2020	
NCD BNI Year 2016											
NCD Phase I Series A	June 16, 2016	-	6 months	IDR	390,000	December 16, 2016	7.00%	Paid	-	-	-
NCD Phase I Series B		-	9 months		20,000	March 16, 2017	7.20%	Paid	-	-	-
NCD Phase I Series C		-	370 days		42,000	June 23, 2017	7.55%	Paid	-	-	-

Description	Issue Date	Effective Date	Tenor	Currency	Value (Million)	Maturity Date	Discount	Payment Status	Rating		Trustee
									2021	2020	
NCD Phase I Series D	June 16, 2016	-	18 months	Rp	415,000	December 15, 2017	7.75%	Paid	-	-	-
NCD Phase I Series E		-	24 months		1,231,000	June 15, 2018	8.25%	Paid	-	-	-
NCD Phase I Series F		-	36 months		925,000	June 14, 2019	8.40%	Paid	-	-	-
NCD Phase II Series A	September 27, 2016	-	370 days		225,000	October 2, 2017	7.20%	Paid	-	-	-
NCD Phase II Series B		-	18 months		390,000	March 26, 2018	7.60%	Paid	-	-	-
NCD Phase II Series C		-	24 months		770,000	September 26, 2018	7.90%	Paid	-	-	-
NCD Phase II Series D		-	36 months		815,000	September 26, 2019	8.10%	Paid	-	-	-
NCD BNI Year 2017											
NCD BNI Year 2017 Series A	March 10, 2017	-	370 days	Rp	2,195,000	March 15, 2018	7.55%	Paid	-	-	-
NCD BNI Year 2017 Series B		-	18 months		350,000	September 3, 2018	7.90%	Paid	-	-	-
NCD BNI Year 2017 Series C		-	24 months		150,000	February 28, 2019	8.05%	Paid	-	-	-
NCD BNI Year 2017 Series D		-	36 months		5,000	February 24, 2020	8.35%	Paid	-	-	-
NCD BNI Year 2019											
NCD BNI I Year 2019 Series A	March 28, 2019	-	3 months	Rp	60,000	July 2, 2019	7.30%	Paid	-	-	-
NCD BNI I Year 2019 Series B		-	6 months		140,000	September 24, 2019	7.58%	Paid	-	-	-
NCD BNI I Year 2019 Series C		-	9 months		150,000	December 20, 2019	7.68%	Paid	-	-	-
NCD BNI I Year 2019 Series D		-	370 days		60,000	April 01, 2020	7.77%	Paid	-	-	-
NCD BNI I Year 2019 Series A	June 28, 2019	-	3 months	Rp	110,000	September 27, 2019	7.17%	Paid	-	-	-
NCD BNI I Year 2019 Series B		-	6 months		150,000	December 20, 2019	7.50%	Paid	-	-	-
NCD BNI I Year 2019 Series C		-	9 months		100,000	March 20, 2020	7.59%	Paid	-	-	-
NCD BNI I 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 months	Rp	430,000	January 03, 2020	6.306%	Paid	-	-	-
NCD BNI III Year 2019 Series B		-	6 months		250,000	April 1, 2020	6.50%	Paid	-	-	-
NCD BNI III Year 2019 Series C		-	9 months		50,000	July 1, 2020	6.599%	Paid	-	-	-
NCD BNI III Year 2019 Series D	September 25, 2019	-	372 days	Rp	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	-	-	-

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE (MILLION)	MATURITY DATE	DISCOUNT	PAYMENT STATUS	RATING		TRUSTEE
									2021	2020	
NCD BNI Year 2020											
NCD BNI I Year 2020 Series A	May 12,2020	-	3 months	Rp	400,000	August 10, 2020	5.40%	Paid	-	-	-
NCD BNI I Year 2020 Series B		-	6 months		580,000	November 09,2020	5.60%	Paid	-	-	-
NCD BNI I Year 2020 Series C		-	9 months		50,000	February 08,2021	5.70%	Paid	-	-	-
NCD BNI I Year 2020 Series D		-	360 days		360,000	May 07,2021	5.80%	Paid	-	-	-

Other Securities Issuance Chronology - Global Certificate of Deposit

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE (MILLION)	MATURITY DATE	DISCOUNT DATE	PAYMENT STATUS	RATING		TRUSTEE
									2021	2020	
Global CD BNI year 2020											
Zero Coupon (without interest)											
CD BNI January 2020 USD CD - Mizuho	January 13, 2020	January 17, 2020	188 days	USD	4,000,000	July 23, 2020	2.35%	Paid	-	-	-
CD BNI January 2020 USD CD - Mizuho	January 13, 2020	January 17, 2020	273 days	USD	4,000,000	October 16, 2020	2.40%	Paid	-	-	-
CD BNI January 2020 USD CD - Mizuho	January 22, 2020	January 30, 2020	182 days	USD	2,000,000	July 30, 2020	2.35%	Paid	-	-	-
CD BNI January 2020 USD CD - Mizuho	January 22, 2020	January 30, 2020	274 days	USD	2,000,000	October 30, 2020	2.40%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	January 28, 2020	February 04, 2020	184 days	USD	6,000,000	August 06, 2020	2.35%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	January 28, 2020	February 04, 2020	353 days	USD	2,000,000	January 22, 2021	2.50%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	February 04, 2020	February 11, 2020	184 days	USD	9,800,000	August 13, 2020	2.40%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	February 04, 2020	February 11, 2020	353 days	USD	4,700,000	January 29, 2021	2.55%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	February 05, 2020	February 12, 2020	90 days	USD	9,100,000	May 12, 2020	2.40%	Lunas	-	-	-
CD BNI February 2020 USD CD -MUFG	February 5, 2020	February 12, 2020	182 days	USD	35,000,000	August 12, 2020	2.40%	Paid	-	-	-

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE (MILLION)	MATURITY DATE	DISCOUNT DATE	PAYMENT STATUS	RATING		TRUSTEE
									2021	2020	
CD BNI February 2020 USD CD - BNP Paribas	February 12, 2020	February 19, 2020	182 days	USD	4,100,000	August 19, 2020	2.40%	Paid	-	-	-
CD BNI February 2020 USD CD - BNP Paribas	February 12, 2020	February 19, 2020	355 days	USD	1,500,000	February 08, 2021	2.50%	Paid	-	-	-
CD BNI February 2020 USD CD - MUFG	February 14, 2020	February 21, 2020	355 days	USD	5,000,000	February 10, 2021	2.55%	Paid	-	-	-
CD BNI February 2020 USD CD - Mizuho	February 14, 2020	February 21, 2020	355 days	USD	4,800,000	February 10, 2021	2.55%	Paid	-	-	-
CD BNI March 2020 USD CD - BNP Paribas	March 03, 2020	March 10, 2020	184 days	USD	4,800,000	September 10, 2020	1.75%	Paid	-	-	-
CD BNI March 2020 USD CD - 288 days MUFG	March 10, 2020	17 March 2020	184 hari	USD	4,000,000	September 17, 2020	1.40%	Paid	-	-	-
CD BNI March 2020 USD CD - Mizuho	March 17, 2020	March 20, 2020	288 days	USD	4,400,000	September 24, 2020	1.45%	Paid	-	-	-
CD BNI July 2020 USD CD - MUFG	July 09, 2020	July 15, 2020	184 days	USD	15,000,000	January 15, 2020	1.15%	Paid	-	-	-
CD BNI July 2020 USD CD - MUFG	July 09, 2020	July 14, 2020	184 days	USD	23,200,000	January 14, 2020	1.15%	Paid	-	-	-
CD BNI July 2020 USD CD - MUFG	July 09, 2020	July 15, 2020	184 days	USD	135,000,000	January 15, 2020	1.20%	Paid	-	-	-
CD BNI August 2020 USD CD - MUFG	August 25, 2020	August 28, 2020	92 days	USD	12,700,000	November 28, 2020	0.90%	Paid	-	-	-
CD BNI November 2020 USD CD - MUFG	November 09, 2020	November 17, 2020	181 days	USD	25,000,000	May 17, 2021	0.95%	Paid	-	-	-
CD BNI November 2020 USD CD - MUFG	November 17, 2020	November 20, 2020	188 days	USD	18,000,000	May 27, 2021	0.95%	Paid	-	-	-
CD BNI November 2020 USD CD - MUFG	November 17, 2020	November 20, 2020	188 days	USD	25,000,000	May 27, 2021	0.95%	Paid	-	-	-
CD BNI January 2021 USD CD - MUFG	January 21, 2021	January 28, 2022	355 days	USD	50,000,000	January 18, 2022	1.10%	Paid	-	-	-

DESCRIPTION	ISSUE DATE	EFFECTIVE DATE	TENOR	CURRENCY	VALUE (MILLION)	MATURITY DATE	DISCOUNT DATE	PAYMENT STATUS	RATING		TRUSTEE
									2021	2020	
Fixed Coupon (dengan bunga)											
CD BNI January 2020 USD CD - MUFG	January 21, 2020	January 28, 2020	91 days	USD	28,000,000	April 28, 2020	2.30%	Paid	-	-	-
CD BNI February 2020 USD CD - MUFG	February 03, 2020	February 10, 2020	274 days	USD	74,200,000	November 10, 2020	2.33%	Paid	-	-	-
CD BNI March 2020 USD CD - MUFG	March 03, 2020	March 10, 2020	92 days	USD	72,600,000	June 10, 2020	1.68%	Paid	-	-	-
CD BNI June 2020 USD CD - HSBC	June 09, 2020	June 17, 2020	91 days	USD	122,600,000	September 16, 2020	1.68%	Paid	-	-	-
CD BNI September 2020 USD CD - Credit Agricole	September 01, 2020	September 10, 2020	91 days	USD	138,000,000	December 10, 2020	0.75%	Paid	-	-	-
CD BNI November 2020 USD CD - Credit Agricole	November 06, 2020	November 13, 2020	91 days	USD	32,200,000	February 12, 2021	0.69%	Paid	-	-	-
CD BNI September 2020 USD CD - Mizuho	December 03, 2020	December 10, 2020	90 days	USD	50,000,000	March 10, 2021	0.695%	Paid	-	-	-

Institutions and/or Supporting Professions

CAPITAL MARKET SUPPORTING INSTITUTIONS AND/OR PROFESSIONS

List of Capital Market Supporting Institutions and Professionals

PUBLIC ACCOUNTING FIRMS	Purwantono, Sungkoro & Surja
	Address : Indonesia Stock Exchange Building Tower 2, 7th Floor Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190, Indonesia
	Tel : (62-21) 52895000
	Fax : (62-21) 52894100
	Website : www.ey.com/id
	Public Accounting Tanudiredja, Wibisana, Rintis & Rekan (firma anggota jaringan global PwC)
	Address : 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
	Types and Forms of Services: Audit of Financial Statements for Fiscal Year 2021 in accordance with Financial Accounting Standards (SAK) in Indonesia
	Fee : 14,525,000,000
	Assignment Period : January 1-December 31, 2021
TRADING AND STOCK LISTING	PT Bursa Efek Indonesia
	Address : 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
	Email : listing@idx.co.id
	Singapore Exchange Regulation Pte. Ltd.
	Address : 11 North Buona Vista Drive, #06-07 The Metropolis Tower 2, Singapore
	Tel : +65 6236 8888
	Website : sgx.com
LEGAL CONSULTANT	Ginting & Reksodiputro
	Address : The Energy Building, 15th Floor SCBD Lot 11A, Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190
	Website : www.allenoverly.com/en-gb/global/global_coverage/asia_pacific/indonesia
	Hadiputranto, Hadinoto & Partners
	Address : Pacific Century Place, Lv 35 SCBD Lot 10, Jl Jend. Sudirman Kav 52-53 12190 Jakarta, Indonesia
	Website : www.hhp.co.id/en
SECURITIES ADMINISTRATION BUREAU	PT Datindo Entrycom
	Address : Jl. Hayam Wuruk No. 28, Jakarta 10120
	Tel : (62-21) 3508077
	Website : www.datindo.com
	Email : corporatesecretary@datindo.com

List of Capital Market Supporting Institutions and Professionals

SECURITIES RATING AGENCIES

Standard & Poor's

Address : 30 Cecil Street Prudential Tower 17th Floor Singapore 049712
Tel : (65) 6438 2881
Website : www.standardandpoors.com

Moody's Singapore Pte Ltd

Address : 50 Raffles Place #23-06 Singapore Land Tower 048623
Tel : (65) 6398 8300
Fax : (65) 6398 8301
Website : www.moody's.com

PT Fitch Ratings Indonesia

Address : Prudential Tower Lt. 20
Jl. Jenderal Sudirman Kav. 79 Jakarta Selatan 12910
Tel : (62-21) 5795 7755
Fax : (62-21) 5795 7750
Website : www.fitchratings.com

PT Pemeringkat Efek Indonesia (Pefindo)

Address : Panin Tower - Senayan City, 17th Floor Jl. Asia Afrika Lot.19
Jakarta 10270, Indonesia
Tel : (62-21) 7278 2380
Fax : (62-21) 7278 2370
Website : www.pefindo.com

CUSTODIAN

PT Kustodian Sentral Efek Indonesia

Address : Gedung Bursa Efek Indonesia, Tower 1, Lantai 5
Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190, Indonesia
Tel : (62-21) 5152855
Fax : (62-21) 52991199
Website : www.ksei.co.id
Email : helpdesk@ksei.co.id

TRUSTEE

PT Bank Rakyat Indonesia (Persero) Tbk.

Address : Divisi Investment Services Gedung BRI II Lt. 30
Jl. Jend. Sudirman Kav. 44-46 Jakarta 10210, Indonesia
Tel : (62-21) 5758144
Fax : (62-21) 5752444

The Hongkong and Shanghai Banking Corporation Limited

Address : Issuer Services, Hong Kong Office: L30 HSBC Main Building,
1 Queen's Road Central, Hong Kong
Tel : +85 21 2822 4427
Fax : +85 213478 9198

NOTARY

Fathiah Helmi, S.H.

Address : Graha Irama Lantai 6-C
Jl. HR Rasuna Said Kav 1-2 Bl X-1 Kuningan Timur
Setia Budi, Jakarta 12950
Tel : (021) 529 07304, (021) 529 07305
(021) 529 07306
Fax : (021) 526 1136
Email : fhchozie@gmail.com

Awards and Certification

AWARDS

International Awards



**Best Corporate Treasury
Sales and Structuring
Team**

2021
Alpha Southeast Asia



**Best FX Bank For
Structured Hedging
Solutions and Proprietary
Trading Ideas**

2021
Alpha Southeast Asia



Best Trade Finance Bank

2021
Alpha Southeast Asia



**Best Banking API
Solution**

2021
Alpha Southeast Asia



**Best Cash Management
Solution & Best Liquidity
Management Solution**

2021
Alpha Southeast Asia



**The Best Total Number
of Cards in Circulation in
Indonesia 2020**

2021
JCB Indonesia Awards
2021-Presented by JCB
International



**The 3rd Best of
Issuing Sales Volume
in Southeast Asian
Countries 2020**

2021
JCB Indonesia Awards
2021-Presented by JCB
International



**Great Performing Brand
in Social Media**

2021
Majalah Marketing/Top
Social Media Award 2021
Category Credit Card



**The Best E-Commerce
Spends Portfolio**

2021
MasterCard



**The Best Telco Co-Brand
in Credit Card**

2021
MasterCard



STP Awards 2020

2021
BNY Mellon



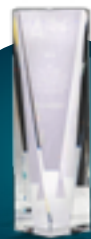
**Consulate Award - In
Recognition of its
Contribution to Support
Indonesia SMEs Export to
Hong Kong**

2021
The Consulate General of
The Republic of Indonesia in
Hong Kong



**Best Cash Management
Bank - Southeast Asia**

2021
Corporate Treasurer
Awards 2021



**Indonesia Best Service
(Domestic Banks)**

2021
Asiamoney Award 2021



**BNI Has Been Granted
Gold Rank**

2021
Asia Sustainability
Reporting Rating 2021



**Indonesia Market Leader
Overall**

2021
Euromoney Cash
Management 2021



Indonesia Market Leader

2021
Asiamoney Award 2021



**Gold Award Best
Corporate University -
Branding & Durability**

2021
Global CCU (Council of
Corporate Universities)



**Indonesia Market Leader
(Domestic Banks)**

2021
Asiamoney Award 2021

National Award



**Marketeers OMNI
BRANDS of the Year
2021**

2021
Marketeers



**Most Creative Credit
Card Acquisition
Campaign**

2021
Mastercard



**BNI Credit Card sebagai
Top Mobile Application
Based on Installed,
Rating Application, and
User Experiences**

2021
Top Mobile Application
Award 2021 from Infobrand
and Trans Co Indonesia



**The Best Government
Bank in Service
Excellence 2021**

2021
Majalah Infobank and
Marketing Research
Indonesia (MRI)



**1st Best Mobile
Banking-Sertifikat
Awarding BSEA 2021**

2021
Ranked #1 in Mobile
Banking from Infobank &
MRI Magazine



**1st Best Phone Banking-
Sertifikat Awarding BSEA
2021**

2021
Ranked #1 in Phone
Banking from Infobank &
MRI Magazine



**1st Best Call Center-
Sertifikat Awarding BSEA
2021**

2021
Ranked #1 Call Center from
Infobank & MRI Magazine



**1st Best CRM-Sertifikat
Awarding BSEA 2021**

2021
#1 CRM from Infobank &
MRI Magazine



**1st Best Overall Contact
Center-Sertifikat
Awarding BSEA 2021**

2021
Ranked #1 Overall Contact
Center from Infobank & MRI
Magazine



**2nd Best Digital Branch-
Sertifikat Awarding BSEA
2021**

2021
Ranked #2 Digital Branch
from Infobank & MRI
Magazine



2nd Best Overall Digital Channel-Sertifikat Awarding BSEA 2021

2021

Ranked #2 Overall Digital Channel from Infobank & MRI Magazine



3rd Best Opening Account Via Web-Sertifikat Awarding BSEA 2021

2021

Rank #3 Opening Account Via Website from Infobank & MRI Magazine



3rd Best Overall E-Banking-Sertifikat Awarding BSEA 2021

2021

Rank #3 Overall E-Banking from Infobank & MRI Magazine



4th Best Overall Plus Digital-Sertifikat Awarding BSEA 2021

2021

Rank #4 Overall Plus Digital from Infobank & MRI Magazine



Diamond Grade in the Regular Banking category as a bank that always provides the best service to customers

2021

Carre Center for Customer Satisfaction and Loyalty (CCSL)



Indonesia Most Trusted Companies Award 2021 atas Penilaian Implementasi GCG 2020

2021

The Indonesian Institute for Corporate Governance (IICG)



Financial Integrity Rating on Money Laundering and Terrorist Financing tahun 2021

2021

Financial Transaction Reports and Analysis Center (PPATK)



SimPel/SimPel iB Award 2021 Implementation of the best SimPel/SimPel iB 2021 in the State-owned Bank Category

2021

Financial Services Authority (OJK)



Bank Indonesia Appreciation "There were no findings of over and under variances in rupiah currency processing in 2021"

2021

Bank Indonesia



Bank Indonesia Appreciation "There were no findings of counterfeit money in the management of rupiah currency in 2021"

2021

Bank Indonesia



MURI Record for the first mass People's Business Loan Contracts (KUR) record through Laku Pandai Agents (750 BNI Agen46)

2021

Indonesian World Record Museum (MURI)



Best KUR Distributor in the Commercial Bank Category

2021

Republic of Indonesia Coordinating Ministry for Economic Affairs



2021
Performance



Management
Report



Company
Profile



Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



Good Corporate
Governance



Social & Environmental
Responsibility



ESG
Commitment



Financial
Statements



2nd The Best Indonesia GCG Award – VI – 2021 Cateogri Public Company – Bank Buku IV – State Owned Enterprises Company

2021
Economic Review



The Most Committed in Enhancing Individual Competencies

2021
PPM Manajemen



DUDI (Dunia Usaha Dunia Industri) Award 2021

2021
Kementerian Pendidikan, Kebudayaan, Riset, dan Teknologi (Kemendikbudristek) RI – Direktorat Jenderal Pendidikan Vokasi



Mitra Industri – ICCN Pre Summit 2021

2021
Indonesia Career Center Network



The Best Learning and Development Strategy (International Trade & Corporate Banking)

2021
Human Capital & Performance Award



Best MSME Supporting Bank for BUKU 3 and 4 Banks

2021
Bank Indonesia



Best Affluent Volume and Issuance Growth Debit Card

2021
Mastercard Award



The Most Innovative Priority Banking In Pandemic

2021
CNBC Indonesia Awards 2021



Best Debit Card Supporting Governance (Tabungan Pra Kerja)

2021
PT Mastercard Indonesia



TOP DIGITAL Implementation 2021 #Level Stars 5

2021
Majalah ItWorks



Service of The Year

2021
Marketeers Editor's Choice Award

Sertifikasi



ISO 9001:2015 Quality Management System Certification for 13 Operational Division Services (RTGS Services, Remittances, Bank Guarantees, Credit Clearing, Debit Card Production and Distribution, Credit Administration, State Financial Transactions, Custody and Cash Centers for Jabodetabek Area, Debit Clearing, Cash Management Foreign Exchange, Trustee and Treasury Transaction Settlement Services).

- **National Certification Body: KAN**
- **International Certification Body: UKAS**

2021



ISO 9001:2015 - Provision of in house training and e-learning/digital learning

PT SGS Indonesia National Certification Body

2017-2023



BNI Bank Job Training Institute Accreditation:

- **Securities Administration**
- **Cash Management**
- **Fund Transfer Management**

Job Training Institute Accreditation Institute

2021-2026



CLIP Accreditation (Corporate Learning Improvement Process)

European Foundation of Management Development (EFMD)

2019-2022



ISO 9001:2015 Certification for Quality Management System in Trade Processing Services

SAI Global Assurance

January 10, 2024

Names and Addresses of Subsidiaries, Entities Subsidiaries, Associated Entities, Overseas Branch Offices and Foreign Representative Offices and Regional Offices

SUBSIDIARIES

PT BNI Multifinance

Gedung BNI Life Insurance Lantai 5
Jl. Aipda K.S. Tubun No. 67 Petamburan, Jakarta Pusat 10260
Hotline : (021) 290 22555
Fax : (021) 290 22146
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
Email : bnisec@bnisekuritas.co.id
Website : www.bnisekuritas.co.id

PT BNI Life Insurance

Centennial Tower 9th Floor
Jl. Gatot Subroto Kav. 24-25 No. 1 Jakarta 12930
Tel : (021) 2953 9999
Fax : (021) 2953 9998
Website : www.bni-life.co.id
Email : customer-care@bni-life.co.id
Customer Care : (021) 5021 7626
SMS Center : 0811117626

BNI Remittance

BNI Remittance Limited Flat/RM5 on GF,
Nos 1-7 Keswick Street, Causeway Bay Hong Kong
Tel : +852 28908082
Fax : +852 28908182

ENTITIES SUBSIDIARIES

PT BNI Asset Management

Centennial Tower, 19th Floor
Jl. Gatot Subroto Kav 24 & 25 Jakarta 12930

BNI Securities Pte. Ltd.

30 Cecil Street #17-01/08
Prudential Tower Singapura 049712

ASSOCIATED ENTITIES

PT Bank Syariah Indonesia

Gedung The Tower, Jl. Gatot Subroto No. 27 Kelurahan Karet
Semanggi, Kecamatan Setiabudi, Jakarta Selatan 12930
Tel : (021) 30405999
Fax : (021) 30421888
Email : contactus@bankbsi.co.id
Website : www.bankbsi.co.id/

PT Kustodian Sentral Efek Indonesia ("KSEI")

Gedung Bursa Efek Indonesia Tower 1, Lt.5
Jl. Jend. Sudirman Kav. 52-53, Jakarta, 12190
Tel : (62-21) 515 2855
Fax : (62-21) 5299 1199
Call Center : (62-21) 0800 186 5734
Website : www.ksei.co.id

PT Pemeringkat Efek Indonesia

Panin Tower - Senayan City, 17th Floor
Jl. Asia Afrika Lot.19 Jakarta 10270, Indonesia
Tel : (62-21) 7278 2380
Fax : (62-21) 7278 2370
Website : www.pefindo.com

PT Bank Mizuho Indonesia

Menara Astra Lantai 53, Jl. Jend. Sudirman No.Kav. 5-6,
Karet Tengsin, Tanahabang, Jakarta Pusat, 10220
Website : www.mizuhobank.co.id

PT Bank Tabungan Pensiunan Nasional Tbk (BTPN)

Menara BTPN Lantai 35-37,
Jl. Dr. Ide Anak Agung Gde Agung Kav. 5.5-5.6, Kuningan Timur
Jakarta Selatan 12190
Tel : (62-21) 30026200
Email : info@btpn.com
Website : <http://www.btpn.com>

PT Fintek Karya Nusantara

Treasury Tower, 31st Floor, SCBD Lot. 28,
Jl. Jenderal Sudirman, South Jakarta

PT Bursa Efek Indonesia

Gedung Bursa Efek Indonesia, Tower 1, Lantai 6
Jl. Jend. Sudirman Kav 52-53 Jakarta Selatan 12190, Indonesia

PT Penyelesaian Transaksi Elektronik Nasional (PTEN)

Graha Mandiri Lantai 12A Jl Imam Bonjol No. 61 Menteng,
Jakarta Pusat

OVERSEAS BRANCH AND REPRESENTATIVES OFFICES AND REGIONAL OFFICES

OVERSEAS BRANCH OFFICES

Singapore Branch

30 Cecil Street #01-01 & #17-01/08 Prudential Tower
Singapore 049712
Tel : +65 6225 7755
Fax : +65 6225 4757

Hong Kong Branch

G/F Far East Finance Center, 16 Harcourt Road Central
Hong Kong
Tel : +852 25299871, 28618600
Fax : +852 28656500

KANTOR CABANG LUAR NEGERI**Tokyo Branch**

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

London Branch

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

OVERSEAS BRANCH OFFICES**New York Branch**

One Exchange Plaza 5th Floor Broadway New York
NY. 10006 USA
Tel : +1 212 943 4750
Fax : +1 212 344 5723

Seoul Branch

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 OFFICE**Osaka Sub-Branch**

Tatsuno Honmachi Building 3F, 3-5-2 Honmachi Chuo-ku Osaka, 541-0053, Japan
Tel : +81 6 4963 2186
Fax : +81 6 4963 2486

REMITTANCE CENTER**Lucky Plaza**

#02-02, 304 Orchard Road
Singapore 238863
Tel : +65 6838 1545

City Plaza

#01-100/101, 810 Geylang Road Singapore 409286
Tel : +65 6745 1946

REGIONAL OFFICES**Regional Office 01**

Jl. Pemuda No. 12, Lantai 4
Medan 20151
Tel : (061) 4567110, 4567002
Fax : (061) 4567105, 4515754

Regional Office 02

Jl. Dobi No. 1, Lantai 3
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 Lt. 3-4
Surabaya 60292
Tel : (031) 8292820 - 26
Fax : (031) 8292805, 8292841

Regional Office 07

Jl. Jend. Sudirman No. 1 Lt.3 Makassar 90115
Tel : (0411) 3620355-56, 3621926
Fax : (0411) 3619562, 3625395

Regional Office 08

Jl. Raya Puputan Renon No. 27 - Lantai 2, 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 Jakarta Pusat 10210
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,
Lt.7 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

Jl. Lada No.1 Lt.2 Jakarta 11110
Tel : (021) 2601177
Fax : (021) 2601165

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

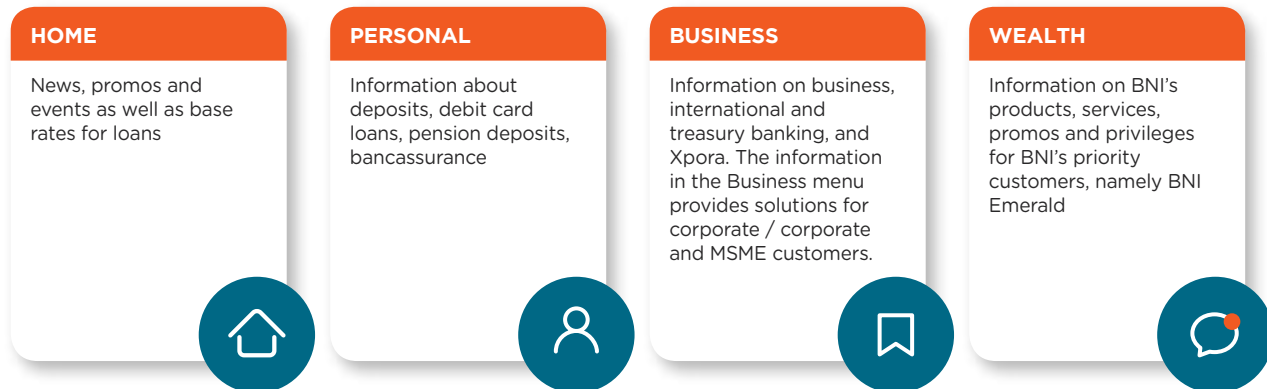
Jl. Jend. Basuki Rahmat No.75 - 77 Malang 65179
Tel : (0341) 3611945-47
Fax : (0341) 324565, 354767

Information Available on the Website



BNI has a corporate website, <https://www.bni.co.id/> which can be accessed easily by the general public. The website was created by observing OJK Regulation No. 8/POJK.04/2015 concerning Issuers or Public Company Websites containing important information including shareholder information, Code of Ethics, General Meeting of Shareholders (GMS), Financial Statements separate from Annual Reports, Profiles of the Board of Commissioners and Board of Directors, and the Charters of the Board of Commissioners, Board of Directors, committees, and Internal Audit Unit. Specifically regarding the GMS, the information presented on the Bank's website includes the agenda discussed at the GMS, summary of the GMS minutes, and information on important dates, namely the GMS announcement date, the GMS invitation date, the GMS date, and the date the summary of the GMS minutes was announced. The BNI website can also be displayed in Indonesian and English.

Detailed information on the Bank's website contains the following:



Company

1. The BNI website contains current, and up-to-date information open to the general public.
2. General information disclosed on the BNI website includes:
 - a. Name, address and contact of the head office and/or representative office of the Issuer or Public Company; including telephone numbers, facsimile numbers, and electronic mail address;
 - b. Brief history of Issuers or Public Companies
 - c. Issuer or Public Company organizational structure
 - d. Company Awards;
 - e. Structure of ownership of Issuers or public companies, including:
 - A description of the names of shareholders and their percentage ownership at the end of each month;
 - Information regarding the majority and controlling shareholder of the Issuer or Public Company, either directly or indirectly, to the individual owners, in the form of schematics or diagrams; and
 - Names of subsidiaries, associated companies, joint venture companies where the Issuer or Public Company has joint control of the entity, together with the percentage of share ownership, line of business, and operating status of the companies.
 - f. Profiles of the Board of Directors, Board of Commissioners, Committees, and Corporate Secretary including:
 - Photos;
 - Names;
 - Position history, including concurrent positions;
 - Educational background;
 - Affiliation of members of the Board of Directors and Board of Commissioners with members of the Board of Directors and/or other members of the Board of Commissioners as well as shareholders.
 - g. Names and addresses of:
 - Public Accountant who audited the financial statements of Issuers or Public Companies in the current year.
 - Securities Rating
 - Trustees
 - Securities administration Bureau
 - h. Articles of Association
3. Financiers or Investors Information disclosed on the BNI website includes:
 - a. Public Offering Prospectus;
 - b. Annual report, for the last 5 (five) fiscal years; and
 - c. Financial Information, including:
 - Annual financial reports, for the last 5 (five) fiscal years;
 - Quarterly financial reports, for the last 5 (five) fiscal years;
 - Monthly financial reports, for the last 5 (five) fiscal years;
 - Semi-annual financial reports 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 community development partnership program report for the last 5 (five) years;



- Corporate presentations in the form of presentation files, audio and video for the last 5 (five) years.
 - Summary of important financial data, in the form of comparisons for the last 5 (five) fiscal years; including:
 - › Revenue;
 - › Gross profit;
 - › Profit (loss);
 - › Total profit (loss) attributable to owners of the parent entity and non-controlling interests;
 - › Total comprehensive profit (loss);
 - › Earnings (loss) per share;
 - › Total assets;
 - › Total liabilities;
 - › Total equity;
 - › Profit (loss) to total assets ratio;
 - › Profit (loss) to equity ratio;
 - › Profit (loss) to income ratio;
 - › Current ratio;
 - › Liability to equity ratio;
 - › Liabilities to total assets ratio; and
 - › Other information and financial ratios relevant to the company and its type of industry.
 - d. GMS information, including:
 - Announcements and Summons;
 - Agenda material discussed in the GMS;
 - Summary of GMS Minutes.
 - e. Stock information, including:
 - Number of shares outstanding;
 - Bonus shares;
 - Chronology of share listing;
 - Stock prices.
 - f. Information on bonds and/or sukuk, including:
 - Value of outstanding bonds/funds/or sukuk;
 - Bonds and/or sukuk rating results;
 - Maturity dates; and
 - Bond interest rates and/or sukuk yields.
 - g. Dividend information.
 - h. Information for financiers or investors, public media, and/or analysts.
 - i. Information related to corporate actions taken by Issuers or Public Companies and actions taken by other parties against Issuers or Public Companies, including:
 - Affiliated Transactions and Certain Conflict of Interest Transactions;
 - Distribution of Bonus Shares;
 - Shares Buyback by Issuers or Public Companies in a potential crisis market condition; and
 - Share ownership program by members of the Board of Directors, members of the Board of Commissioners, and employees of Issuers or Public Companies or other controlling parties; and
 - j. Material Information or Facts other than those disclosed in the Financial Services Authority Regulations.
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 any temporary Corporate Secretary, as well as supporting information;
 - c. Internal Audit Unit Charter;
 - d. Code of Ethics;
 - e. Committee work guidelines;
 - f. Company's Articles of Association;
 - g. Whistle Blowing System (WBS) reporting;
 - h. Appointment and dismissal of members of the Audit Committee;
 - i. Risk management policy;
 - j. Violation reporting system mechanism policy;
 - k. Anti-corruption policy;
 - l. Policy regarding supplier selection and creditor rights;
 - m. Policy on improving vendor capabilities;
 - n. Integrated Governance and Governance reports.
5. Corporate Social Responsibility Information disclosed on the BNI website includes:
- a. Information on BNI's corporate social responsibility including policies, types of programs, and costs incurred by Issuers or Public Companies in the sustainability report.
 - b. Policies, types of programs, and costs as referred to in letter "a", related to the following aspects:
 - Environment;
 - Labor, health and safety practices;
 - Social and community development; and
 - Product and/or service responsibilities, together with supporting information.

E-BANKING

Contains information regarding BNI ATM, BNI SMS Banking, BNI Internet Banking, BNI Mobile Banking, BNI Phone Banking, O-Branch, Agen46, TapCash, Debit Online, UniqueQu, BNI IPay and BNI Smartpay.

CONTACT

Contains information regarding Branch Office Locations, Global Networks and BNI Contacts.

Education and/or Training for the Board of Commissioners, Board of Directors, Committees, and Internal Audit Unit

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
BOARD OF COMMISSIONERS					
Agus Dermawan Wintarto Martowardojo President Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Pradjoto Vice President Commissioner Independent Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	For Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48 2020"	Seminar	Jakarta	August 5, 2021	BNI Corporate University
3	BNI Sharing Session: Indonesia Economic Outlook	Sharing Session	Jakarta	August 27, 2021	BNI Corporate University
4	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Sigit Widyawan Independent Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	BNI Sharing Session: Indonesia Economic Outlook	Sharing Session	Jakarta	August 27, 2021	BNI Corporate University
3	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Asmawi Syam Independent Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	For Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48 2020"	Seminar	Jakarta	August 5, 2021	BNI Corporate University
3	BNI Sharing Session: Indonesia Economic Outlook	Sharing Session	Jakarta	August 27, 2021	BNI Corporate University
4	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
Imam Sugema Independent Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	For Successful Completion of Refresher Program "Loan COVID Restructuring After Implementation of POJK 48 2020"	Seminar	Jakarta	August 5, 2021	BNI Corporate University
3	BNI Sharing Session: Indonesia Economic Outlook	Sharing Session	Jakarta	August 27, 2021	BNI Corporate University
4	Sosialisasi Pencegahan Korupsi di Sektor Perbankan	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Septian Hario Seto Independent Commissioner					
1	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Erwin Rijanto Slamet Independent Commissioner					
1	Risk Management Certification Level 1	Training	Jakarta	April 28, 2021	Risk Management Certification Body
2	Risk Management Certification Level 2	Training	Jakarta	May 3, 2021	Risk Management Certification Body
Askolani Commissioner					
1	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Ratih Nurdianti Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	Sosialisasi Pencegahan Korupsi di Sektor Perbankan	Seminar	Jakarta	September 21, 2021	BNI Corporate University
Susyanto Commissioner					
1	Digital Mindset for Leaders Series	Seminar	Jakarta	August 4, 2021	BNI Corporate University
2	BNI Sharing Session: Indonesia Economic Outlook	Sharing Session	Jakarta	August 27, 2021	BNI Corporate University
3	Corruption Prevention in the Banking Sector Socialization	Seminar	Jakarta	September 21, 2021	BNI Corporate University
BOARD OF DIRECTORS					
Royke Tumilaar President Director					
1	Investor Daily Summit	Economic	On-Line	July 13, 2021	Investor Daily
2	CEO Talks - BUMN	Human Capital	On-Line	July 21, 2021	BUMN Institute
3	Optimism for National Economic Recovery	Economic	On-Line	August 06, 2021	CNBC
4	New Future Export of Indonesia	Entrepreneurship	On-Line	September 29, 2021	Sekolah Ekspor Indonesia
5	Trade Expo Indonesia -36 Digital Edition	Economic	Jakarta	October 21, 2021	Kementerian Perdagangan
6	e-World Marketing Summit 2021	Marketing	On-Line	06 November 2021	Kotler Impact Inc.
7	Young BUMN Podcast	Leadership	Jakarta	November 18, 2021	Rakyat Merdeka
8	Berita Satu Economic Outlook	Economic	Jakarta	November 22, 2021	Berita Satu News
9	National Leadership Meeting by the Chamber of Commerce and Industry (Kadin)	Entrepreneurship	Denpasar	December 03, 2021	Kadin

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
Adi Sulistyowati Vice President Director					
1	Webinar Launching and Review of "AKHLAK UNTUK NEGERI" Books	Seminar	Jakarta	January 6, 2021	Ministry of SOEs
2	Speaker at the Semarang IKM Estri Book launch	Seminar	Jakarta	January 6, 2021	Pemkot Semarang
3	Socialization of Regulatory Reform of Bank Indonesia Payment System Regulations	Seminar	Jakarta	January 15, 2021	Bank Indonesia
4	Webinar on Countering Radicalism in State-Owned Enterprises	Seminar	Jakarta	January 20, 2021	Ministry of SOEs
5	Forum Governance, Risk & Compliance	Seminar	Jakarta	February 3, 2021	PT Bank Negara Indonesia (Persero), Tbk
6	Webinar Potential collaboration of agricultural ecosystems	Seminar	Jakarta	February 4, 2021	PT Bank Negara Indonesia (Persero), Tbk
7	BNI Corporate Banking Summit 2021	Seminar	Jakarta	April 9, 2021	PT Bank Negara Indonesia (Persero), Tbk
8	Workshop on Alignment for Establishment of Anti-Fraud Unit	Seminar	Jakarta	April 12, 2021	PT Bank Negara Indonesia (Persero), Tbk
9	Opening speech - Inauguration of the BNI Seoul Office as a bridge for Indonesian exporters with trade businesses and buyers in South Korea	Seminar	Jakarta	April 16, 2021	PT Bank Negara Indonesia (Persero), Tbk
10	National Webinar - Business with Integrity	Seminar	Jakarta	April 28, 2021	Komisi Pemberantasan Korupsi (KPK)
11	Webinar on Digitalization Policy in Indonesia's Financial Services Sector: Its Effect on Access to Finance and Cyber Security	Seminar	Jakarta	May 7, 2021	Indonesia Banking School
12	Webinar Resource Person for Integrity Enforcement in the Loan Process	Seminar	Jakarta	May 10, 2021	Bank Negara Indonesia (Persero), Tbk
13	Webinar "Leadership Transformation in Digital Era : Digital Leadership	Seminar	Jakarta	June 6, 2021	Bank Indonesia
14	Webinar on Governance, Risk & Compliance Implementation in the Digital Age: Strategy and Action	Seminar	Jakarta	June 6, 2021	Otoritas Jasa Keuangan
15	Webinar - Increasing the Effectiveness of the National Economic Recovery Program	Seminar	Jakarta	June 6, 2021	Lembaga Pengembangan Perbankan Indonesia (LPPI)
16	Webinar Digital Mindset for Leaders Series #1	Seminar	Jakarta	June 7, 2021	PT Bank Negara Indonesia (Persero), Tbk
17	Webinar Erick Thohir Greeting: "Fast Break Towards the Golden Generation of BUMN"	Seminar	Jakarta	June 14, 2021	Ministry of SOEs
18	Talkshow leader - Talk from Young BUMN	Talkshow	Jakarta	June 25, 2021	Ministry of SOEs
19	Webinar Reviewing Agile Online Loans and Crypto Currencies to be Prudent and Proportional with the OJK Board of Commissioners	Seminar	Jakarta	July 1, 2021	PT Bank Negara Indonesia (Persero), Tbk
20	Entrepreneurship Webinar for PMI Empowerment with Minister of Tourism and Creative Economy Sandiaga Uno	Seminar	Jakarta	July 4, 2021	PT Bank Negara Indonesia (Persero), Tbk
21	Discussing the Current Banking Conditions with Regulators and the Minister of Finance	Seminar	Jakarta	July 9, 2021	Indonesian Bankers Association (IBI)
22	Risk Management Certification Refresher Program - ADAPTING & SUSTAINING INDONESIA	Workshop	Jakarta	14 Juli 2021	Risk Management Certification Body - I Indonesian Risk Professionals Association

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
23	BANKING IN THE ERA OF NEW NORMAL	Seminar	Jakarta	23 Juli 2021	PT Bank Negara Indonesia (Persero), Tbk
24	COVID-19:	Seminar	Jakarta	28 Juli 2021	PT Bank Negara Indonesia (Persero), Tbk
25	Webinar Series Digital Mindset for Leaders Series #2	Seminar	Jakarta	August 4, 2021	PT Bank Negara Indonesia (Persero), Tbk
26	Socialization of the BUMN Leadership and Management Institute (BLMI) Program	Seminar	Jakarta	August 6, 2021	Ministry of SOEs
27	Opening Speech Health Ecosystem Webinar	Seminar	Jakarta	August 13, 2021	PT Bank Negara Indonesia (Persero), Tbk
28	Opening Speech Webinar Health Ecosystem, Utilization of Technology in Digitizing the Relationship between Hospitals and their Value Chain	Seminar	Jakarta	August 26, 2021	PT Bank Negara Indonesia (Persero), Tbk
29	Undangan Online BNI Sharing Session - Indonesia Economic Outlook	Seminar	Jakarta	August 27, 2021	PT Bank Negara Indonesia (Persero), Tbk
30	Socialization of Prevention of Corruption in the Banking Sector	Seminar	Jakarta	September 21, 2021	PT Bank Negara Indonesia (Persero), Tbk & Komisi Pemberantasan Korupsi (KPK)
31	Opening Speaker at the bookwarung community event	Seminar	Jakarta	September 25, 2021	PT Buku Usaha Digital
32	Smart City Training Opening Speech	Seminar	Jakarta	September 15, 2021	PT Bank Negara Indonesia (Persero), Tbk & Komisi Pemberantasan Korupsi (KPK)
33	Forum Governance, Risk & Compliance	Seminar	Jakarta	September 24, 2021	PT Bank Negara Indonesia (Persero), Tbk
34	Webinar Future Community Service Towards Society 5.0	Seminar	Jakarta	September 29, 2021	PT Bank Negara Indonesia (Persero), Tbk
35	Opening Speech Rakernas SP 2021	Workshop	Bogor	October 6, 2021	PT Bank Negara Indonesia (Persero), Tbk
36	Workshop BNI Fast Forward 2030	Workshop	Denpasar	October 18-19, 2021	PT Bank Negara Indonesia (Persero), Tbk
37	Webinar on Banking Transformation in the Digital Era	Seminar	Jakarta	October 22, 2021	Otoritas Jasa Keuangan
38	Webinar "Sharia Digital Ecosystem to Improve Islamic Economic Literacy"	Seminar	Jakarta	October 22, 2021	Indonesia Banking School
39	SP Academy Podcast Resource Person (BNI Workers Union)	Seminar	Jakarta	October 25, 2021	Serikat Pekerja PT Bank Negara Indonesia (Persero), Tbk
40	Webinar Launching Banking Digital Transformation Blueprint	Seminar	Jakarta	October 26, 2021	Otoritas Jasa Keuangan
41	Digital Sector Workshop	Workshop	Jogja	October 28, 2021	PT Bank Negara Indonesia (Persero), Tbk
42	Opening Speech Observing the 2020 Corporate Governance Perception Index (CGPI) Program	Seminar	Jakarta	November 3, 2021	The Indonesian Institute for Corporate Governance
43	Webinar Sustainable Banking "Empowering Local SME to go Global"	Workshop	Jakarta	November 6, 2021	Kotler Impact, EWS Summit
44	Resource Person for 46 Anniversary Cyclist Talkshow Healthy living with Gowes	Seminar	Jakarta	November 22, 2021	PT Bank Negara Indonesia (Persero), Tbk
45	Resource Person for the Anti-Fraud Unit's Inhouse Training	Seminar	Jakarta	November 24, 2021	PT Bank Negara Indonesia (Persero), Tbk
46	Socialization of Policies and Arrangements for the Implementation of BI Fast	Seminar	Jakarta	November 25, 2021	Bank Indonesia

NO	NAME OF TRAINING/WORKSHOP/CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
47	Workshop IT	Seminar	Malang	November 27, 2021	PT Bank Negara Indonesia (Persero), Tbk
48	Bank Indonesia 6th International Leadership Seminar in 2021	Seminar	Jakarta	November 29, 2021	Bank Indonesia
49	Media Handling for Managing the Company's Reputation Risk	Workshop	Yogyakarta	December 3, 2021	Otoritas Jasa keuangan
50	Market Outlook 2022 BNIAM "Indonesia Gears Up Toward Sharp Economic Recovery"	Seminar	Jakarta	December 9, 2021	BNI Asset Management
51	Socialization of the Harmonization of Tax Regulations	Seminar	Jakarta	December 12, 2021	Kementerian Keuangan DJP
Novita Widya Anggraini Managing Director Finance					
1	BNI Multi Finance Discussion Forum	Virtual	Jakarta	February 22, 2021	BNI MF
2	Digital Mindset for Leader with Armand Wahyudi Hartono (Vice President Director of BCA)	Virtual	Jakarta	June 7, 2021	BNI
3	Onboarding Directorship Program (National Insights, Effective Leaders and AKHLAK-based Transformation)	Virtual	Jakarta	June 9, 2021	Ministry of SOEs
4	Onboarding Directorship Program (Formulating Impactful Value Creation Strategy)	Virtual	Jakarta	June 16, 2021	Ministry of SOEs
5	Onboarding Directorship Program (Maximizing Shareholder's Value)	Virtual	Jakarta	June 23, 2021	Ministry of SOEs
6	Onboarding Directorship Program (Ensuring Business Sustainability through GCG and Corporate Law & Compliance)	Virtual	Jakarta	June 30, 2021	Ministry of SOEs
7	Onboarding Directorship Program (Managing Harmonious Relationship with Stakeholder)	Virtual	Jakarta	July 7, 2021	Ministry of SOEs
8	Onboarding Directorship Program (Driving Innovation through Digital Transformation)	Virtual	Jakarta	July 14, 2021	Ministry of SOEs
9	Onboarding Directorship Program (Leaders Role in Human Capital Management)	Virtual	Jakarta	July 21, 2021	Ministry of SOEs
10	BUMN Executive Onboarding Simulation	Virtual	Jakarta	July 23, 2021	Ministry of SOEs
11	Digital Mindset for Leaders with Hasnul Suhaimi (Commissioner of Petrosea, Ex CEO of PT XL Axiata)	Virtual	Jakarta	August 4, 2021	BNI
12	MIS Workshop Ministry SOE - Anaplan	Virtual	Jakarta	August 25, 2021	Ministry of SOEs
13	BNI Sharing Session (Macroeconomics-Indonesia Economic Outlook) by Destry Damayanti (Senior Deputy Governor of Bank Indonesia)	Virtual	Jakarta	August 27, 2021	BNI
14	Workshop BNI Fast Forward 2030	FGD	Bali	October 18-19, 2021	BNI
15	TIOP Sector Workshop 2021 (Speed, Execution & Quality Excellence)	Virtual	Virtual	November 26, 2021	BNI
16	KU Sector Workshop (Reimagining Collaborative Vision for Financial Excellence)	FGD	Yogyakarta	November 26, 2021	BNI

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
David Pirzada Managing Director Risk Management					
1	Workshop: BNI Corporate Banking Summit 2021	Workshop	Bandung	April 9, 2021	BNI
2	Resource Person: Operational Risk Training Event for BNI Regional Heads	Training	Bali	June 3-5, 2021	BNI
3	Webinar: Socialization of Corruption Prevention in the Banking Sector	Webinar	Jakarta	September 21, 2021	BNI Corpu
4	FGD "Readiness and Obstacles to be Faced in Implementing LIBOR Discontinuity at BNI"	FGD	Semarang	October 13-15, 2021	Otoritas Jasa Keuangan
5	Workshop: BNI Strategic Collaboration Meeting 2021:	Workshop	Bali	28-30 Oktober 2021	BNI
6	Webinar: Opening and Online Panel Discussion at the DKI Jakarta KADIN RAPIMPROV II/2021 Event	Webinar	Jakarta	November 22, 2021	KADIN DKI Jakarta
7	Webinar: BNI's Mitigation Strategy for Facing Extreme Weather (La Nina) - FRO 3	Webinar	Jakarta	November 24, 2021	BNI Corpu
8	FGD "Building New Optimism to Accelerate National Economic Recovery"	FGD	Jakarta	November 26, 2021	Otoritas Jasa Keuangan
9	FGD Resource Person "Development of a Green Economic Ecosystem in Indonesia to Support the Economic Recovery Agenda for the G20 President"	FGD	Jakarta	November 29, 2021	Otoritas Jasa Keuangan
10	Live on CNBC Indonesia "Go Digital Bank Without Cyber Attack Guidelines, Is It Safe?"	Talkshow	Jakarta	November 30, 2021	CNBC Indonesia
11	FGD "Public Discussion on Green Taxonomy Draft"	FGD	Bandung	December 9-11, 2021	Otoritas Jasa Keuangan
Henry Panjaitan Managing Director Treasury & International					
1	Resource Person: Theme: BNI's Steps to Expand International Banking Services during a Pandemic	Webinar	Jakarta	April 8, 2021	CNBC
2	Opening Speech BNI Go Global - Reshaping Your Global Mindset Webinar	Webinar	Jakarta	June 18, 2021	PT Bank Negara Indonesia (Persero), Tbk
3	Opening Speech BNI Treasury Webinar - Theme Cryptocurrency Explained	Webinar	Jakarta	June 30, 2021	PT Bank Negara Indonesia (Persero), Tbk
4	Speakers Launching Buku Pintar Hedging (PLN & BNI) Webinar	Webinar	Jakarta	July 12, 2021	PT Bank Negara Indonesia (Persero), Tbk & PT PLN (Persero)
5	Speaker for "UK SME's Business Summit" theme "UMKM Go Global Bersama BNI"	Webinar	Jakarta	July 29, 2021	CNBC
6	Opening Speech Grand Launching BNIFX & Talkshow "The Future of Digital Transaction Platform for Corporate Clients"	Webinar	Jakarta	August 23, 2021	PT Bank Negara Indonesia (Persero), Tbk & PT PLN (Persero)
7	Webinar Dissemination of Corruption Prevention in the Banking Sector	Webinar	Jakarta	September 21, 2021	Otoritas Jasa Keuangan
8	Speaker at the 2021 National Export Conference "New Future Exports for Indonesia"	Webinar	Jakarta	October 01, 2021	Arrbey Consulting
9	Resource Person for Virtual Press Conference Trade Expo Indonesian Digital Edition 2021	Webinar	Jakarta	October 19, 2021	PT Debindomulti Adhiswasti

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
Corina Leyla Karnalies Managing Director Consumer Business					
1	"Money Talk power lunch"	sharing session	Jakarta	January 14, 2021	CNBC
2	Socialization of regulator PBI Payment system reform	sharing session	Jakarta	January 15, 2021	Bank Negara Indonesia
3	Public Expose BNI FY	sharing session	Jakarta	January 29, 2021	Bank Negara Indonesia
4	Workshop Marketing Plan	Workshop	Jakarta	February 10, 2021	Bank Negara Indonesia
5	Webinar Forum Multifinance Discussion	Webinar	Jakarta	February 22, 2021	BNI Multifinance
6	Digital Mindset for Leader	Webinar	Jakarta	June 7, 2021	BNI Corporate University
7	Current Banking Conditions with regulators and the Minister of Finance	sharing session	Jakarta	July 9, 2021	Ikatan Bank Indonesia
8	Socialization of corruption prevention in the banking sector	sharing session	Jakarta	August 9, 2021	BNI Corporate University
9	CEO Talk BNI: "People First : the Key Aspect toward BUMN go Global"	Webinar	Jakarta	July 23, 2021	BNI Corporate University
10	1 Year of Akhlak	Webinar	Jakarta	July 29, 2021	BNI Corporate University
11	Digital Mindset For Leader #2 for BOC and BOD	Webinar	Jakarta	August 4, 2021	BNI Corporate University
12	Workshop on the Consumer Sector for Finalization of the 2022 RBB	Workshop	Jakarta	August 25, 2021	Bank Negara Indonesia
13	Indonesia Economic Outlook with Destry Damayanti (Senior Deputy Governor of Bank Indonesia)	sharing session	Jakarta	August 27, 2021	Bank Indonesia
14	BNI Fleksi Pensiun webinar event	Webinar	Jakarta	September 17, 21	BNI Corporate University
15	Winning The Market Share Of Industries and Collaboration Between Business Banking And Consumer	Workshop	Yogyakarta	October 08-09 2021	Bank Negara Indonesia
16	The Future Of banking - How Bank Stay Relevant	Workshop	Bali	October 18-19, 2021	Bank Negara Indonesia
17	Kick Off Campus Financial Ecosystem	sharing session	Jakarta	October 28, 2021	Bank Indonesia
18	Providing Total Financial Solution Through Optimum Collaboration	Workshop	Bali	October 29 - 30, 2021	Bank Negara Indonesia
19	E-World Marketing Summit 2021	Webinar	Jakarta	November 06, 2021	Kloter Impact
20	Speed, Execution & Quality Excellence	Workshop	Yogyakarta	November 26-27, 2021	Bank Negara Indonesia
21	Webinar BNI Emerald Market Outlook event and launch of Manulife Asia Pacific offshore equity product	Webinar	Jakarta	December 3, 2021	BNI Corporate University
22	Sharing Session on the Voluntary Disclosure Program (PPS)	sharing session	Jakarta	December 17, 2021	BNI Corporate University
23	KPR Securitization Sharing Session with BNI	sharing session	Jakarta	December 24, 2021	PT Sarana Multigriya Financial

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
Muhamad Iqbal Managing Director MSME Business					
1	Speaker at Bandung Region Business Meeting	Workshop	Bandung	February 6, 2021	BNI
2	Workshop on Acceleration of National Economic Recovery - Stakeholders Meeting	Seminar	Bali	April 9, 2021	OJK
3	Participant in "Ceremonial 1 year AKHLAK"	Seminar	Jakarta - Online	July 29, 2021	Ministry of SOEs
4	Speaker at Artajasa Webinar "How to Maximize Indonesia SME Ecosystem"	Seminar	Jakarta - Online	July 28, 2021	Artajasa
5	Resource person at : Webinar "Series 10 Banking with the theme National Banking Industry & IKNB Support for MSMEs in the Digital Economy era"	Seminar	Jakarta - Online	July 23, 2021	Perbanas
6	Participants in the IBI Conversation: Current Banking Conditions with Regulators and the Minister of Finance	Seminar	Jakarta - Online	July 9, 2021	IBI (Ikatan Bank Indonesia)
7	Webinar Speaker : Jump Higher with Xpora	Seminar	Jakarta - Online	July 1, 2021	BCV
8	Participant in the Webinar Series Digital Mindset for Leaders #2 for BOC and BOD	Seminar	Jakarta - Online	August 4, 2021	BCV
9	Participant at BBI Launching Topic: Proudly Launched Made in Indonesia	Seminar	Jakarta - Online	August 26, 2021	Kementerian Koordinator Bidang Kemaritiman dan Investasi (kemenkomarvest)
10	Participant in BNI Sharing Session Topic - Indonesia Economic Outlook	Workshop	Jakarta - Online	August 27, 2021	Bank Indonesia
11	Participant at the Social Media Workshop by Rans	Workshop	Jakarta - Online	September 3, 2021	Rans Entertainment
12	Resource person at: BNI Support for Digitizing MSME Financing	Seminar	Jakarta - Online	September 18, 2021	OJK
13	Participant in the KPK Webinar: Anti-Fraud Socialization	Seminar	Jakarta - Online	September 21, 2021	KPK
14	Participant in the Batch-3 BUMN Onboarding Directorship Program (ODP)	Mentoring	Jakarta - Online	October 1, 2021	Ministry of SOEs
15	Workshop Participant: KUD Board of Directors and SEVP	Workshop	Bali	October 19, 2021	BNI
16	Participant at the 36th Trade Expo Indonesia Opening Ceremony Launch	Konfrensi	Pullman Hotel - Jakarta	October 21, 2021	Kemendag
17	Workshop of KM and KP Directorate Sector	Workshop	Bali	October 28 - 31, 2021	BNI
18	Participant in "MSME Financing Book Launch"	Seminar	Jakarta	November 11, 2021	Kemenkop
Y.B. Hariantono Managing Director IT and Operations					
1	Invitation as Soft Launching Sandbox 2.0 Speaker	Interviewees	Jakarta	March 5, 2021	Bank Indonesia
2	Speakers for Cloud Computing Indonesia Conference 2021	Interviewees	Jakarta	March 16, 2021	ITS
3	Katadata Webinar Speaker - Indonesia Data & Economic Conference 2021	Interviewees	Jakarta	March 24, 2021	Dkatadata.co.id
4	CNBC "Program VIP Forum Digital Bank	Dialog	Jakarta	April 8, 2021	CNBC
5	Speaker at the 2021 Indonesian Digital Financial Economy Festival (FEKDI) Acara	Interviewees	Jakarta	April 8, 2021	Bank Indonesia

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6	BNI Corporate Banking Summit 2021 "Breakthrough to Excellence, Strengthening Foundation to Leap Higher"	Webinar	Jakarta	April 9, 2021	Director of Corporate Banking
7	Webinar Speaker "Digital Banking Strategy for National Economic Recovery"	Interviewees	Jakarta	May 27, 2021	Warta ekonomi.co.id
8	Infobank Guest Speaker Hybrid Forum "Winning The Competition in Digital Economic Era"	Interviewees	Jakarta	June 3, 2021	Infobank
9	Operational Risk Management Training for Regional Leaders	Workshop	Denpasar	June 3-5 2021	BNI Division JAL
10	Webinar Digital Mindset for Leader	Webinar	Jakarta	June 7, 2021	BNI Corpu
11	Launching Digisales Application and Webinar "Dissecting Future Digital Sales Potential"	Webinar	Jakarta	July 2, 2021	BNI Corpu
12	Webinar Cyber Security (raising awareness of the importance of IT security management)	Webinar	Jakarta	August 3, 2021	BNI Corpu
13	Webinar Digital Mindset for Leader Series	Webinar	Jakarta	August 4, 2021	BNI Corpu
14	Resource person for Infobank virtual seminar a Leading Digital Economy with Payment Transformation	Interviewees	Jakarta	August 4, 2021	Infobank
15	BNI Sharing Session Online Invitation - Indonesia Economic Outlook	Webinar	Jakarta	August 27, 2021	BNI Corpu
16	Webinar Speaker "Digitalization of Payment Systems in Indonesia"	Interviewees	Jakarta	September 03 2021	Univertsitas Indonesia
17	Speaker "The Role of Digital Banking Services in a Pandemic Period"	Interviewees	Jakarta	September 07 2021	Inabanks
18	Resource persons at the "IBM Partner Solution Summit 2021 - Accelerating Your Future Digital Transformation"	Interviewees	Jakarta	September 08 2021	PT IBM Indonesia
19	Workshop BNI Fast Forward 2030	Workshop	Denpasar	October 16-19, 2021	BNI Division REN
20	Resource Person for Bisnis Indonesia Webinar "The Urgency to Use Cloud in Accelerating Banking Transformation"	Interviewees	Jakarta	October 28, 2021	Bisnis Indonesia
21	Workshop BNI Innovation - Fast - Action	Workshop	Yogyakarta	October 28-29, 2021	BNI Division RTL
22	Resource persons at the Webinar Launching e-Book Guide to Digital Transformation of Banks in Indonesia	Interviewees	Jakarta	November 05, 2021	Intellectual Business Community
23	Information Technology Development Division (MTI) Workshop	Workshop	Jakarta	November 18, 2021	BNI Division MTI
24	Resource person for the 2021 Indonesia Digital Conference "Digital Leap: Innovation and Acceleration"	Interviewees	Jakarta	November 24, 2021	Indonesia Digital Conference (IDC)
25	Workshop Sekt IT & Operations Sector Workshop or TI & Operasional	Workshop	Malang	November 26-27, 2021	BNI Divisi STI
26	Webinar Fintech Talk	Webinar	Jakarta	December 09, 2021	AFTECH
27	Dialogue with CNBC Indonesia TV	Dialog	Jakarta	December 09, 2021	CNBC

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Bob Tyasika Ananta Managing Director Human Capital & Compliance					
1	Webinar Launching & Reviewing of "AKHLAK UNTUK NEGERI" Book	Seminar	Jakarta	January 6, 2021	Kementerian BUMN
2	Annual Coordination Meeting and Directions from the President of Indonesia Regarding ML and TF in 2021	Seminar	Jakarta	January 14, 2021	Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK)
3	Socialization of Regulatory Reform in Bank Indonesia Payment System Regulations	Seminar	Jakarta	January 15, 2021	Bank Indonesia
4	Webinar on Countering Radicalism in State-Owned Enterprises	Seminar	Jakarta	January 20, 2021	Ministry of SOEs
5	Webinar Launching the Implementation of goAML Reporting Application	Seminar	Jakarta	February 1, 2021	Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK)
6	Forum Governance, Risk & Compliance	Seminar	Jakarta	February 3, 2021	PT Bank Negara Indonesia (Persero), Tbk
7	Socialization of SOE Global Shared Service	Seminar	Jakarta	February 10, 2021	Ministry of SOEs
8	Socialization of Updating Talent Pool of SOE Directors	Seminar	Jakarta	February 17, 2021	Ministry of SOEs
9	Webinar "Improvement in Life Harmony and Law Enforcement in Indonesia Today and in the Future"	Seminar	Jakarta	March 10, 2021	PT Bank Negara Indonesia (Persero), Tbk & Kepolisian Negara Republik Indonesia
10	Legal Protection Webinar for Capital Market Investors	Seminar	Jakarta	March 16, 2021	Pengurus Pusat Ikatan Hakim Indonesia (PPIHI)
11	Webinar on the Effectiveness of the Board of Commissioners' Supervision in Maintaining Bank Compliance Towards the Era of Principle Based Regulations	Seminar	Jakarta	March 25, 2021	Banking Compliance Director Communication Forum (FKDKP)
12	Webinars on Digitalization to Drive Efficiency, as well as Interconnection and Interoperability	Seminar	Jakarta	April 6, 2021	Festival Ekonomi Keuangan Digital Indonesia (FEKDI)
13	DINAS (National Export Movement Dialogue) Targets Friendly Country Exports	Seminar	Jakarta	April 6, 2021	Tribun Network
14	Forum Human Capital Summit 2021 "Solving Scarcity of Leaders To Face The Era Of VUCA"	Seminar	Jakarta	April 8, 2021	Forum Human Capital Indonesia (FHCI)
15	BNI Corporate Banking Summit 2021	Seminar	Jakarta	April 9, 2021	PT Bank Negara Indonesia (Persero), Tbk
16	Appreciation & Motivation Program for Learning Resources	Seminar	Jakarta	April 12, 2021	PT Bank Negara Indonesia (Persero), Tbk
17	Resource Person Interview and Discussion with Harvard Business Publishing regarding the Development of the Executive Management Program (EMP) Module	Seminar	Jakarta	April 14, 2021	PT Bank Negara Indonesia (Persero), Tbk & Harvard Business Publishing
18	National Webinar on Business Integrity	Seminar	Jakarta	April 28, 2021	Komisi Pemberantasan Korupsi (KPK)
19	Webinar Cyber Crime Typology & Cross Border Money Laundering	Seminar	Jakarta	April 29, 2021	Banking Compliance Director Communication Forum (FKDKP)
20	Policy Webinar on Digitalization in Indonesia's Financial Services Sector: Its Effect on Access to Finance and Cyber Security	Seminar	Jakarta	May 7, 2021	Indonesia Banking School
21	Webinar Resource Person for Integrity Enforcement in the Loan Process	Seminar	Jakarta	May 10, 2021	PT Bank Negara Indonesia (Persero), Tbk

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22	Webinar "Leadership Transformation in Digital Era : Digital Leadership	Seminar	Jakarta	June 6, 2021	Bank Indonesia
23	Webinar on Implementation of Governance, Risk & Compliance in the Digital Age: Strategy and Action	Seminar	Jakarta	June 6, 2021	Otoritas Jasa Keuangan
24	Webinar on Increasing the Effectiveness of the National Economic Recovery Program	Seminar	Jakarta	June 6, 2021	Lembaga Pengembangan Perbankan Indonesia (LPPI)
25	Webinar Digital Mindset for Leader Series #1	Seminar	Jakarta	June 7, 2021	PT Bank Negara Indonesia (Persero), Tbk
26	Webinar Erick Thohir Greeting: "Fast Break Towards the Golden Generation of BUMN"	Seminar	Jakarta	June 14, 2021	Ministry of SOEs
27	Webinar Opening Speech "Reviewing Agile Online Loans and Cryptocurrencies To Be Prudent and Proportionate"	Seminar	Jakarta	July 1, 2021	PT Bank Negara Indonesia (Persero), Tbk & Otoritas Jasa Keuangan (OJK)
28	Discussion on the Current Banking Conditions with Regulators and the Minister of Finance	Seminar	Jakarta	July 9, 2021	Ikatan Bankir Indonesia (IBI)
29	Risk Management Certification Refresher Program - ADAPTING & SUSTAINING INDONESIA	Workshop	Jakarta	July 14, 2021	Badan Sertifikasi Manajemen Risiko - Indonesian Risk Professionals Association
30	BANKING IN THE ERA OF NEW NORMAL	Seminar	Jakarta	July 16, 2021	PT Bank Negara Indonesia (Persero), Tbk
31	Resource Person for National Webinar & SSCC Launching "Improving MSME Competitiveness Towards Sustainable Development Goals (SDGs) in the New Normal Era"	Seminar	Jakarta	July 22, 2021	Sekolah Tinggi Ilmu Ekonomi Indonesia (STIE Indonesia)
32	Webinar CEO Talk BNI: "People First: The Key Aspect toward BUMN Go Global"	Seminar	Jakarta	July 23, 2021	PT Bank Negara Indonesia (Persero), Tbk
33	Socialization of the Information Exchange Platform for the Prevention and Eradication of TPPT in Indonesia	Seminar	Jakarta	August 2, 2021	PPATK (Pusat Pelaporan Dan Analisis Transaksi Keuangan)
34	SP Academy Podcast Resource Person (BNI Workers Union)	Seminar	Jakarta	August 2, 2021	Serikat Pekerja PT Bank Negara Indonesia (Persero), Tbk
35	Webinar Series Digital Mindset for Leader Series #2	Seminar	Jakarta	August 4, 2021	PT Bank Negara Indonesia (Persero), Tbk
36	Socialization on the BUMN Leadership and Management Institute (BLMI) Program	Seminar	Jakarta	August 6, 2021	Ministry of SOEs
37	Webinar STRATEGY OF SHARIA FINANCIAL AND BANKING DIGITALIZATION TO INCREASE INDONESIAN COMMUNITY FINANCIAL INCLUSION	Seminar	Jakarta	August 13, 2021	Indonesia Banking School
38	Webinar "Personal Data Protection Arrangement Plan to Balance the Rapid Development of Digital Technology in the Financial Services Sector"	Seminar	Jakarta	August 20, 2021	Indonesia Banking School
39	Online Invitation BNI Sharing Session - Indonesia Economic Outlook	Seminar	Jakarta	August 27, 2021	PT Bank Negara Indonesia (Persero), Tbk
40	Socialization on the Optimization of Implementation of the Employment Social Security Program in BUMN	Seminar	Jakarta	August 31, 2021	Ministry of SOEs

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41	Speaker at the Merdeka Campus Webinar Series : National Onboarding Internship Merdeka 2021	Seminar	Jakarta	September 3, 2021	PT Bank Negara Indonesia (Persero), Tbk
42	Socialization of the Minister of SOEs Circular Letter concerning the New Customary Order in the SOE Group and Installation of the QR Code PeduliProtect	Seminar	Jakarta	September 20, 2021	Ministry of SOEs
43	Moderator in Socialization of Corruption Prevention in the Banking Sector	Seminar	Jakarta	September 21, 2021	PT Bank Negara Indonesia (Persero), Tbk & Komisi Pemberantasan Korupsi (KPK)
44	Workshop and Certification Test for Banking Compliance Level 3	Workshop	Jakarta	September 23-24, 2021	Banking Compliance Director Communication Forum (FKDKP) & Banking Professional Certification Institute (LSPP)
45	Sustainable Sharing (SISHA) FHCI: Industrial Peace Challenges: Maintaining Productivity in a Pandemic Period	Seminar	Jakarta	September 29, 2021	Forum Human Capital Indonesia (FHCI)
46	Webinar "Strategi Pencegahan dan Deteksi Fraud di Perbankan Melalui Integrasi Fraud Early Warning System"	Seminar	Jakarta	October 12, 2021	Kejaksaan Agung Republik Indonesia
47	Workshop BNI Fast Forward 2030	Workshop	Denpasar	October 18-19, 2021	PT Bank Negara Indonesia (Persero), Tbk
48	Webinar on Banking Transformation in the Digital Era	Seminar	Jakarta	October 22, 2021	Otoritas Jasa Keuangan
49	Webinar "Sharia Digital Ecosystem to Improve Islamic Economic Literacy"	Seminar	Jakarta	October 22, 2021	Indonesia Banking School
50	Webinar Launching Digital Banking Transformation Blueprint	Seminar	Jakarta	October 26, 2021	Otoritas Jasa Keuangan
51	Bank Readiness to Fulfill Data Quality Targets for Integrated Commercial Bank Reports (LBUT)	Seminar	Jakarta	November 1, 2021	Bank Indonesia
52	Observation Stages in the 2020 Corporate Governance Perception Index (CGPI) Program	Seminar	Jakarta	November 3, 2021	The Indonesian Institute for Corporate Governance
53	Socialization of Human Capital Information System & BUMN Dashboard	Seminar	Jakarta	November 5, 2021	Forum Human Capital Indonesia (FHCI)
54	The 3rd Indonesia Human Capital Summit 2021	Seminar	Jakarta	November 16, 2021	Forum Human Capital Indonesia (FHCI)
55	Socialization of the Minister of SOE Regulations No. PER-11/MBU/07/2021 and PER-13/MBU/09/2021	Seminar	Jakarta	November 19, 2021	Ministry of SOEs
56	Resource Person for the Anti-Fraud Unit's Inhouse Training	Seminar	Jakarta	November 24, 2021	PT Bank Negara Indonesia (Persero), Tbk
57	Socialization of Policies and Arrangements for the Implementation of BI Fast	Seminar	Jakarta	November 25, 2021	Bank Indonesia
58	Bank Indonesia 6th International Leadership Seminar in 2021	Seminar	Jakarta	November 29, 2021	Bank Indonesia
59	Visiting Lecturer at Universitas Gadjah Mada Corporate Finance in Practice	Seminar	Jakarta	November 30, 2021	Universitas Gadjah Mada
60	CGPI Indonesia Trusted Companies Award "Building Company Resilience in the Context of GCG"	Conference	Jakarta	December 8, 2021	The Indonesian Institute for Corporate Governance
61	Market Outlook 2022 BNIAM "Indonesia Gears Up Toward Sharp Economic Recovery"	Seminar	Jakarta	December 9, 2021	BNI Asset Management

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Sis Apik Wijayanto Managing Director Institutional Relations					
1	Webinar: Building optimism after the Covid-19 Pandemic "Directions for monetary policy, macro-prudential, & payment systems to optimize the national economic recovery program"	Webinar	Jakarta	January 22, 2021	Bank Indonesia in collaboration with infobank
2	Webinar Resource person for "Investment and MSMEs as Economic Levers in the Pandemic Period" with the Minister of BPKM (Bahlil Lahadalia)	Talkshow	Jakarta	February 18, 2021	PT BNI
3	Webinar Resource Person : "National Economic Recovery Through Increasing MSME Resilience: Can Business Pass It?"	Talkshow	Jakarta	February 26, 2021	Info Bank
4	Invitation to Virtual Graduation Ceremony as CWMA (Certified Wealth Managers Association) Advisory Board	Webinar	Jakarta	March 2, 2021	CWMA (Certified Wealth Managers Association)
5	Webinar Resource Person for "MSME Empowerment by Recording Financial Statements"	Talkshow	BNI Corporate University	March 3, 2021	BNI Corpu
6	Resource Person for Panel Discussion "One Year Pre-Employment Card Program"	Panel Discussion	Jakarta	March 18, 2021	Kartu Prakerja
7	Webinar Communication Forum Director of Banking Compliance	Webinar	Jakarta	March 25, 2021	Board of Directors Communication Forum
8	Webinar "Solving Scarcity Of Leader to Face The Era Of Vuca"	Webinar	Jakarta	April 8, 2021	Indonesian Bankers Association
9	Webinar I.S.E.I Jakarta	Webinar	Jakarta	April 8, 2021	ISEI Jakarta
10	Webinar Resource Person for "Creativepreneur Conference 2021"	Talkshow	Jakarta	April 9, 2021	Bangga Buatan Indonesia
11	Webinar Resource Person: "The Hope of SMEs to Dominate the International Market"	Talkshow	Jakarta	June 30, 2021	Koran Sindo
12	Webinar "Capital and Partnership for Indonesian Porang Farmers"	Webinar	Jakarta	July 30, 2021	Indonesian Ministry of Agriculture
13	Webinar Series Digital Mindset for leader #2	Webinar	Jakarta	August 04, 2021	BCV
14	Webinar Resource Person: Synergy to Build and Strengthen the Nation Synergy of SOEs Ansor: "Strengthening MSME Friends of Ansor through the Pertashop Program"	Talkshow	Jakarta	August 11, 2021	BCV and Divisi BSP
15	Live on CNBC Indonesia "Strengthening the Transactional Banking Business Ecosystem & BNI's Role in Helping Economic Awakening	Talkshow	Jakarta	August 25, 2021	CNBC Indonesia
16	Webinar "Macroeconomics - Economic Outlook"	Webinar	Jakarta	August 27, 2021	BCV
17	XXI ISEI Congress Webinar "The Role of ISEI in Strengthening Synergies to Accelerate National Economic Recovery in the Digital Era"	Webinar	Jakarta	August 31, 2021	ISEI Jakarta
18	Virtual Seminar: "State Capital Equalization (PMN) between Social and Financial Interests"	Webinar	Jakarta	September 2, 2021	LPPI
19	Resource Person: Socialization of People's Business Credit (KUR) to ITB Alumni	Sosialisasi	Jakarta	September 8, 2021	The Coordinating Ministry for Economic Affairs of the Republic of Indonesia in collaboration with PP IA-ITB

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20	Webinar: Socialization on Corruption Prevention in the Banking Sector	Webinar	Jakarta	September 21, 2021	BNI Corpu
21	Talkshow on BNI Techship expo activities with the STI division	Talkshow	Jakarta	October 26, 2021	STI Division
22	Resource person for Capacity Building events in order to build enthusiasm, cooperation, collaboration, and solidarity of high-ranking officials and Directors of the Public Service Agency (BLU)	Seminar	Green Forest Hotel Bogor	November 4, 2021	Kementerian Koperasi dan UKM RI
23	Webinar Day 1: The 3rd Indonesia Human Capital Summit 2021	Webinar	Jakarta	November 16, 2021	BNI Corpu
Silvano Winston Rumantir Managing Director Corporate Banking					
1	Discussion on the latest Banking Conditions with Regulators and the Minister of Finance	FGD	Jakarta	July 9, 2021	Indonesian Bankers Association
2	A Year's Reflection on AKHLAK BUMN and the AKHLAK Awards	Webinar	Jakarta	July 15, 2021	Act Consulting International
3	CEO Talk BNI: "People First: The Key Aspect toward BUMN Go Global"	Webinar	Jakarta	July 23, 2021	BNI Corporate University
4	Explore BUMN "Not Good at Cage	Webinar	Jakarta	July 29, 2021	Bisnis Indonesia
5	UK SME's Business Summit 2021	Webinar	Jakarta	July 29, 2021	BNI Corporate University
6	1 Year AKHLAK	Webinar	Jakarta	July 29, 2021	BNI Corporate University
7	Digital Mindset for Leader #2	Webinar	Jakarta	August 4, 2021	BNI Corporate University
Ronny Venir Managing Director Services And Network					
1	Digital Mindset for Leaders with Armand Wahyudi Hartono (Deputy President Director of BCA)	Workshop	Virtual	June 7, 2021	BNI
2	Workshop - Operational Risk Management for Regional Heads	Workshop	Bali	June 3-5, 2021	BNI
3	Webinar - The Role of BNI Agen46 in Financial Literacy and Inclusion and the Benefits in the Community	Webinar	Virtual	June 25, 2021	BNI
4	Sharing Session & Sales Championship Award 2021	Sharing Session	Virtual	July 28, 2021	BNI
5	Digital Mindset for Leaders with Hasnul Suhaimi (Commissioner of Petrosea, Ex CEO of PT XL Axiata)	Webinar	Virtual	August 4, 2021	BNI
6	BARa Risk Forum "Loan Covid Restructuring after Implementation of POJK 48 2020	Refreshment	Virtual	August 5, 2021	BARa
7	Workshop BNI Fast Forward 2030	Workshop	Bali	October 18-19, 2021	BNI

AUDIT COMMITTEE

The competency development/training of the Audit Committee can be seen in the Board of Commissioners competency development

RISK MONITORING COMMITTEE

The competency development/training of the Risk Monitoring Committee can be seen in the Board of Commissioners competency development.

NOMINATION AND REMUNERATION COMMITTEE

The competency development/training of the Nomination and Remuneration Committee can be seen in the Board of Commissioners competency development.

NO	NAME OF TRAINING/WORKSHOP/CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	DATE	ORGANIZER
INTEGRATED GOVERNANCE COMMITTEE					
The competency development/training of the Integrated Governance Committee can be seen in the Board of Commissioners competency development.					
CORPORATE SECRETARY					
1	Internalization of Akhlak for Senior C-1 Leaders	Seminar	Online	March 05, 2021	PT Bank Negara Indonesia (Persero) Tbk
2	POJK No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions	Seminar	Online	March 25, 2021	Indonesia Corporate Secretary Association (ICSA)
3	Internalization of Akhlak for Senior C-1 Leaders	Seminar	Online	April 19, 2021	PT Bank Negara Indonesia (Persero) Tbk
4	Duties and Functions for the Board of Directors, Board of Commissioners, Nomination and Remuneration Committee, Audit Committee, and Corporate Secretary	Seminar	Online	April 30, 2021	ICSA
5	In-depth study of POJK No.15/POJK.04/2020 concerning the Plan and Organizing of the Public Company GMS and POJK No.16/POJK.04/2020 concerning the Electronic Implementation of the Public Company GMS	Seminar	Online	May 27, 2021	ICSA
6	POJK No. 03/POJK.04/2021 concerning Implementation of Activities in the Capital Market Sector	Seminar	Online	June 23, 2021	ICSA
7	Deepening the Implementation of POJK 15/POJK.04/2020 & POJK 16/POJK.04/2020 and Implementation of the e-Proxy Module & e-Voting Module in the eASY.KSEI Application	Seminar	Online	July 1, 2021	Asosiasi Emiten Indonesia (AEI)
8	Exploring POJK 17/POJK.04/2020 concerning Material Transactions and Changes in Business Activities	Seminar	Online	July 22, 2021	ICSA
9	Socialization of OJK Regulation No. 3/Pojk.04/2021 concerning Implementation of Activities in the Capital Market Sector (POJK in Lieu of PP No. 45/1995)	Seminar	Online	August 12, 2021	AEI
10	Preparation of Annual Report & Sustainability Report by Issuers and Public Companies	Seminar	Online	November 03, 2021	ICSA
INTERNAL AUDIT UNIT					
1	Regular Auditor Annual Training	Annual Training	Online	January-February 2021	SAI
1	Dedicated Auditor Annual Training	Annual Training	Online	January-February 2021	SAI
2	Webinar "Audit Report Writing: Bring Your Report to Management's Attention"	Online Workshop	Online	March 2021	IAIB
3	Webinar "Digital Banking: The Basic, Environment, and Challenges's"	Online Workshop	Online	April 2021	IAIB
4	Workshop "Audit Internal dan Audit Forensik"	Online Workshop	Online	April 2021	Lemiknas
	Webinar "Digital Banking: The Basic, Environment, and Challenges's"	Online Workshop	Online	April 2021	IAIB
5	Workshop "Audit Internal and Audit Forensik"	Online Workshop	Online	April 2021	Lemiknas

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6	Public Training "Urgency and Implementation of Financial Audits and State Losses Audits and Tax Audits in BUMN/BUMD & Private Ministries as well as GCG as Strategic and Concrete Steps in Preventing Corruption"	Online Workshop	Online	September 2021	BCV
7	IIA Conference "Internal Audit for The Future - Emerging from the Crisis"	Online Workshop	Online	October 2021	IIA Indonesia
8	Seminar "Risk Forum: Asset Liability Management in Uncharted New Normal - Strategy & Optimization"	Online Workshop	Online	October 2021	BARA
9	Online Course for Risk Management Certification lv. 1 to 3	Certification Training Programs	Online	September-December 2021	SMR/LSPP
10	Online Course for Bank Internal Audit Certification lv. 1 to 2	Certification Training Programs	Online	September-December 2021	IAIB
11	Coaching Clinic CIA (Certified Information System Auditor) Certification	Certification Training Programs	Online	November 2021	IIA Indonesia
12	Online Training ISO 9001 : 2015	Certification Training Programs	Online	September-November 2021	SGS
13	Mandatory e-Learning Gratification & Anti-Bribery Anti-Fraud Awareness Anti Money Laundering Work Culture Good Corporate Governance Risk Culture Sustainability Finance	In House Online Training	Online	January-December 2021	BCV

CREDIT COMMITTEE

The competency development/training of the Credit Committee can be seen in the Board of Directors competency development.

CREDIT POLICY & BUSINESS COMMITTEE

The competency development/training of the Credit Policy & Business Committee can be seen in the Board of Directors competency development.

PRODUCT COMMITTEE

The competency development/training of the Product Committee can be seen in the Board of Directors competency development.

ASSET & LIABILITY COMMITTEE

The competency development/training of the Asset & Liability Committee can be seen in the Board of Directors competency development.

HUMAN CAPITAL COMMITTEE

The competency development/training of the Human Capital Committee can be seen in the Board of Directors competency development.

PERFORMANCE MANAGEMENT COMMITTEE

The competency development/training of the Performance Management Committee can be seen in the Board of Directors competency development.

RISK MANAGEMENT & ANTI FRAUD COMMITTEE

The competency development/training of the Risk Management & Anti Fraud Committee can be seen in the Board of Directors competency development.

TECHNOLOGY MANAGEMENT COMMITTEE

The competency development/training of the Technology Management Committee can be seen in the Board of Directors competency development.

INTEGRATED RISK MANAGEMENT COMMITTEE

The competency development/training of the Integrated Risk Management Committee can be seen in the Board of Directors competency development.

SENIOR EXECUTIVE VICE PRESIDENT COMPETENCY DEVELOPMENT

NO	NAME OF TRAINING/WORKSHOP/CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	EXECUTION DATE	ORGANIZER
Iwan Setiawan SEVP Remedial & Recovery					
1	Webinar Multifinance Company Discussion Forum	Webinar	Online	February 22, 2021	BNI
2	National Consolidation of BNI Workers Union	Workshop	Jakarta	April 10, 2021	DPP SP
3	CEO Talk BUMN Institute	Webinar	Online	June 17, 2021	BSI
4	53rd LPPI Seminar: Towards a Digital Bank: The Battle between Big Banks and Small Digital Companies	Seminar	Jakarta	July 15, 2021	LPPI
5	CEO Talk BNI People First : The Key Aspect toward BUMN Go Global	Webinar	Online	July 23, 2021	BNI
6	Invitation for Webinar Series Digital Mindset for Leader #2 for BOC and BOD	Webinar	Online	August 04, 2021	BNI
7	BNI Sharing Session - Indonesia Economic Outlook	Seminar	Jakarta	August 27, 2021	BNI
8	Socialization of Corruption Prevention in the Banking Sector	Seminar	Jakarta	September 21, 2021	BNI
9	KPK FGD related to the deepening of Corruption Issues related to New and Renewable Energy (EBT) in Preparation for the 2022 ACWG Indonesia G20 Presidency	FGD	Jakarta	October 08, 2021	KPK
10	Workshop BNI Fast Forward 2030	Workshop	Bali	October 18, 2021	BNI
11	National Seminar on the Bankruptcy Law Dynamics in Indonesia	Seminar	Bandung	October 25, 2021	UNPAD
12	MSME Sector Workshop "Striving For The Best Through The Hard Time"	Workshop	Bali	October 28, 2021	BNI
13	E-World Marketing Summit 2021 with the Sustainable Banking theme "Empowering Local SME to go Global"	Seminar	Jakarta	November 06, 2021	Kotler Impact
14	The 3rd Indonesia Human Capital Summit 2021	Seminar	Jakarta	November 16, 2021	BNI
15	OJK invitation; Interactive Dialogue with the theme "Building New Optimism to Accelerate the National Economic Recovery"	Workshop	Jakarta	November 26, 2021	OJK
16	Workshop Project Enablement & Alignment Wave II	Workshop	Jakarta	December 09, 2021	BNI
H. Paolo Kartadjoemena SEVP Corporate Transformation					
1	Mandiri Investment Forum (Macro Day)	Seminar	Jakarta	February 03 2021	Mandiri Sekuritas
2	Webinar Multifinance Company Discussion Forum	Webinar	Online	February 22, 2021	BNI
3	Corporate Banking Summit 2021	Workshop	Bandung	April 09, 2021	BNI
4	National Consolidation of BNI Workers Union	Workshop	Jakarta	April 10, 2021	DPP SP
5	Resource Person Interview and Discussion with Harvard Business Publishing on the Development of the Executive Management Program (EMP) Module	Workshop	Jakarta	April 14, 2021	BNI
6	BSMR Level IV	Pelatihan	Jakarta	June 04 2021	BSMR and GARP
7	CEO Talk BUMN Institute	Webinar	Online	June 17, 2021	BSI

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	EXECUTION DATE	ORGANIZER
8	53rd LPPI Seminar: Towards a Digital Bank: The Battle between Big Banks and Small Digital Companies	Seminar	Jakarta	July 15, 2021	LPPI
9	CEO Talk BNI	Webinar	Online	July 23, 2021	BNI
10	Invitation for Webinar Series Digital Mindset for Leader #2 for BOC and BOD	Webinar	Online	August 04, 2021	BNI
11	Speaker at the Kick Off Action Learning Project (ALP) in the Executive Management Program (EMP)	Seminar	Jakarta	August 12, 2021	BNI
12	Expert Sharing BNI	Seminar	Jakarta	August 12, 2021	BNI
13	BNI Sharing Session - Indonesia Economic Outlook	Seminar	Jakarta	August 27, 2021	BNI
14	Socialization of Corruption Prevention in the Banking Sector	Seminar	Jakarta	September 21, 2021	BNI
15	KPK FGD related to the deepening of Corruption Issues related to New and Renewable Energy (EBT) in Preparation for the 2022 ACWG Indonesia G20 Presidency	FGD	Jakarta	October 08, 2021	KPK
16	Workshop BNI Fast Forward 2030	Workshop	Bali	October 18, 2021	BNI
17	2021 CGPI Observations	Workshop	Jakarta	November 03, 2021	BNI
18	E-World Marketing Summit 2021 with the Sustainable Banking theme "Empowering Local SME to go Global"	Seminar	Jakarta	November 6, 2021	Kotler Impact
19	2021 Corporate Action Workshop	Workshop	Jakarta	November 13, 2021	BNI
20	Chair and Co-Chair Training	Training	Bali	November 16, 2021	KEMLU
21	OJK invitation; Interactive Dialogue with the theme "Building New Optimism to Accelerate the National Economic Recovery"	Workshop	Jakarta	November 26, 2021	OJK
22	Workshop Project Enablement & Alignment Wave II	Workshop	Jakarta	December 09, 2021	BNI
23	B20 INDONESIA 2022; Indonesia Capacity Building for TF Chairs, Deputy Chairs, and Policy Manager	Workshop	Jakarta	December 15, 2021	Kadin Indonesia
Fauzi SEVP Operations					
1	Corporate Banking Summit 2021	Workshop	Bandung	April 09, 2021	BNI
2	National Consolidation of BNI Workers Union	Workshop	Jakarta	April 10, 2021	DPP SP
3	BSMR Level IV	Training	Jakarta	June 04 2021	BSMR and GARP
4	CEO Talk BUMN Institute	Webinar	Online	June 17, 2021	BSI
5	53rd LPPI Seminar: Towards a Digital Bank: The Battle between Big Banks and Small Digital Companies	Seminar	Jakarta	July 15, 2021	LPPI
6	CEO Talk BNI	Webinar	Online	July 23, 2021	BNI
7	Invitation for Webinar Series Digital Mindset for Leader #2 for BOC and BOD	Webinar	Online	August 4, 2021	BNI
8	Speaker of the Kick Off Action Learning Project (ALP) in the Executive Management Program (EMP)	Seminar	Jakarta	August 12, 2021	BNI
9	Expert Sharing BNI	Seminar	Jakarta	August 12, 2021	BNI

NO	NAME OF TRAINING/WORKSHOP/CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	EXECUTION DATE	ORGANIZER
10	BNI Sharing Session - Indonesia Economic Outlook	Seminar	Jakarta	August 27, 2021	BNI
11	Socialization of Corruption Prevention in the Banking Sector	Seminar	Jakarta	September 21, 2021	BNI
12	KPK FGD related to the deepening of Corruption Issues related to New and Renewable Energy (EBT) in Preparation for the 2022 ACWG Indonesia G20 Presidency	FGD	Jakarta	October 08, 2021	KPK
13	E-World Marketing Summit 2021 with the Sustainable Banking theme "Empowering Local SME to go Global"	Seminar	Jakarta	November 06, 2021	Kotler Impact
14	IT & Operations Sector Workshop 2021	Workshop	Malang	November 26, 2021	BNI
15	Workshop Sektor TI & Operasional 2021	Workshop	Malang	November 26, 2021	BNI
Ita Tetralastwati SEVP Treasury					
1	Mandiri Investment Forum 2021	FGD	Jakarta	February 03 2021	Mandiri
2	Sertifikasi Tresuri 2021	Pelatihan	Jakarta	February 08, 2021	LSPP
3	Mandiri Investment Market Outlook 2021	FGD	Jakarta	March 10, 2021	Mandiri
4	Webinar: Implementation of Central Counterparty for Derivative Transactions of Interest Rates and Over the Counter Exchange Rates	Workshop/ Seminar	Online	April 29, 2021	KPEI
5	Webinar: Digital Mindset for Leader	Workshop/ Seminar	Online	June 07, 2021	BNI
6	Webinar: Crypto Currency	Workshop/ Seminar	Online	June 30, 2021	BNI
7	Webinar: Launching of Smart Books on Hedging (BNI & PLN)	Workshop/ Seminar	Online	July 12, 2021	BNI
8	Towards a Digital Bank, The Battle between Big Banks and Small Digital Companies	Workshop/ Seminar	Online	July 15, 2021	LPPI
9	Webinar Series: Digital Mindset For Leader#2 untuk BOC dan BOD	Workshop/ Seminar	Online	August 04, 2021	BNI
10	Refreshment: Covid Loan Restructuring After Implementation of POJK 48 2020	Pelatihan	Jakarta	August 5, 2021	BARa
11	Webinar: Local Currency Settlement	Workshop/ Seminar	Online	August 5, 2021	LPPI
12	Overnight Index Swap (OIS) Transactions	Workshop/ Seminar	Online	August 20, 2021	BNI
13	Webinar: Grand Launching BNIFX & Talkshow 'The Future of Digital Transcation Platform of Corporate Clients	Workshop/ Seminar	Online	August 23, 2021	BNI
14	Webinar BNI Sharing Session: Macroeconomics - Indonesia Economic Outlook	Workshop/ Seminar	Online	August 27, 2021	BNI
15	KPK Webinar: Socialization of Corruption Prevention in the Banking Sector	Workshop/ Seminar	Online	September 21, 2021	BNI
16	Managing Cyber Risk in the Digital Industry	Workshop/ Seminar	Online	September 23, 2021	LPPI
17	Webinar: Local Currency Settlement	Workshop/ Seminar	Online	October 06, 2021	BI
18	Webinar: BNI readiness to face the LIBOR discontinuity	Workshop/ Seminar	Online	November 10, 2021	BNI
19	Treasury Transaction Limit	Workshop	Jakarta	November 24, 2021	BNI
20	Webinar: LCS IDR-RMB	Workshop/ Seminar	Online	November 24, 2021	Mandiri

NO	NAME OF TRAINING/WORKSHOP/ CONFERENCE/SEMINAR	TYPE OF EDUCATION	PLACE	EXECUTION DATE	ORGANIZER
Rian Eriana Kaslan SEVP Bisnis Digital					
1	Webinar Health Ecosystem	Seminar	Online	August 8, 2021	BNI
2	BNI Sharing Session : "Macroeconomics - Indonesia Economic Outlook"	Seminar	Online	August 27, 2021	BNI
3	Workshop Sosial Media Rans Entertainment	Workshop	Online	September 3, 2021	Rans Entertainment
4	Speaker at the Press Conference #DatamuRahasiamu Campaign Launching	Workshop	Online	September 8, 2021	Janius PR Squad
5	Socialization of Corruption Prevention in the Banking Sector by the chairman of the Corruption Eradication Commission: Firli Bahuri	Seminar	Online	September 21, 2021	BNI
6	Opening Speech of BukuWarung Community Event	Workshop	Online	September 25, 2021	BukuWarung
7	AWSOMEDAY Conference Virtual	Workshop	Online	September 30, 2021	Amazone
8	OJK Virtual Innovation Day 2021	Seminar	Online	October 12, 2021	OJK
9	Speaker for Indonesia Career Excellence 2021 in London UK Virtual (Unleashing Indonesia's Digital Economy Post Covid-19)	Seminar	London	October 15, 2021	Indonesia Career Excellence 2021
10	Workshop for Directors and SEVP	Workshop	Bali	October 18, 2021	BNI
11	E-World Marketing Summit 2021 with the Sustainable Banking theme "Empowering Local SME to go Global"	Workshop	Online	November 6, 2021	Kotler Impact
12	to IDIC International Webinar - The Rise of Digital Banking and the Future of Deposit Insurance System	Workshop	Online	November 10, 2021	IDIC Internasional
13	Panelist at the Fintech Summit (Knowing More About Fintech: Synergy between Industry and Government in Creating a Responsible Fintech Industry"	Workshop	Online	November 11, 2021	Fintech Indonesia
14	Resource Person for Kompas 100 CEO Forum Series "Digital Infrastructure for SME's Role on Economic Recovery	Workshop	Online	November 16, 2021	Kompas
15	Win The Market 2022	Workshop	Online	November 19, 2021	DIVISI WHS - BNI
16	Pembicara Webinar Warta Ekonomi tema : Open Banking : Babak Baru Kompetisi Layanan Keuangan dan Ekonomi Digital	Workshop	Jakarta	30 November 2021	Warta Ekonomi
17	Speaker on the Role of the Banking Sector in Supporting Digitalization	Seminar	Jakarta	December 11, 2021	BPHMJ-EP Universitas Trisakti
18	Health Ecosystem Webinar	Seminar	Online	August 8, 2021	BNI



Greysia POLII

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Concentration and mental toughness are the winning margin.

- Bill Russell



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Economy and Industry Overview



Optimism for a strengthening in the global and domestic economy in 2022 was reflected in various projections by institutions amid uncertainty due to the new variant of the COVID-19 virus, the world energy crisis that triggered rising inflation, as well as concerns about an aggressive increase in global interest rates.

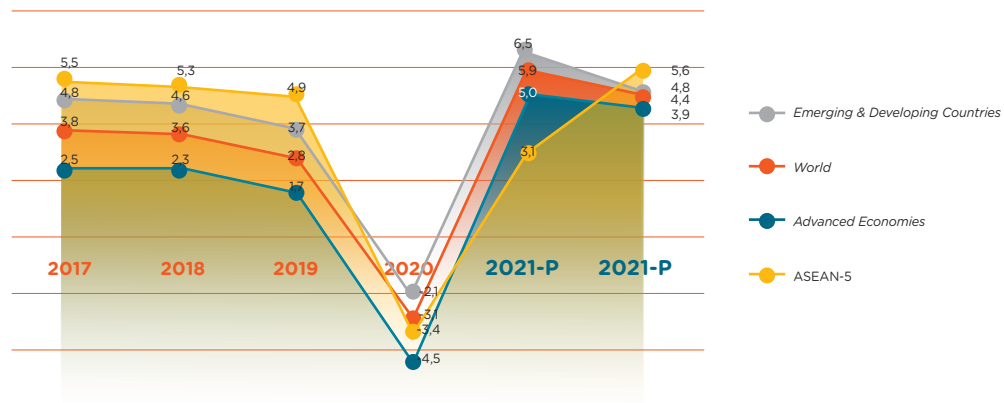
Global Economy

The economy during the COVID-19 pandemic began with health problems and then spread to all parts of life, both social and economical. The rapid spread of COVID-19 cases dragged the global economy to the brink of recession in 2020. To improve this situation, many countries simultaneously introduced health and economic recovery programs, including social restriction policies, population vaccination programs, fiscal budget stimulus, monetary stimulus by lowering interest rates and quantitative easing policies, and relaxing policies in the financial sector, and others.

Prior to the surge in COVID-19 Delta variant cases, the world was very optimistic about a global economic recovery in 2021. The rapid progress of the vaccination program, especially in Indonesia's trading partner countries in the Q4 2020, led to an increase in community mobility and an easing of normal economic activities. In Q2 2021, there was an economic recovery in countries with largest GDP (Gross Domestic Product), such as: China's economy grew positively by 7.9%, the United States economy grew by 12.2%, the European Zone grew by 14.3% and Japan grew by 7.5%. The Indonesian economy also grew by 7.07% in Q2 2021.

The momentum for global economic recovery in the first half of 2021 was restrained by an explosion of COVID-19 Delta variant cases. In the period between October 2020 to early April 2021, the trend of increasing new cases of this variant was mainly seen in Europe and North America. Cases then started to emerge in Asia (India) and this had a significant effect on the increase in new cases in the period after June 22, 2021, not only in Asia but also in North America and Europe. Many countries again started to implement restrictions on community mobility/lockdowns.

The impact of this surge in the Delta variant cases led to economic growth in major countries in Q3 2021 falling compared to Q2 2021. In Q3 2021, China's economic growth slowed to 4.9%, the United States 4.9%, the European Zone 3.9% and Japan grew by 1.2%.



The International Monetary Funds (IMF), in their October 2021 report revised down the global economic projection from the previous release in July 2021 from 6% down to 5.9%, while the global economic projection for 2022 remained at 4.4% dari perkiraan sebelumnya.

In 2021, the projected economic growth for the Advanced Economy Countries will be 5.0%, lower than the IMF's projection in July 2021 of 5.6%, but still much higher than the economic growth in 2020 of negative 4.5%. The ASEAN-5 economy is estimated to grow by 3.1% lower than the previous forecast of 4.3%, but still higher than the realized growth in 2020 of negative 3.4%. The US economy is projected to grow 5.6%, down from the previous projection of 7%, but well above the realized economic growth in 2020 of negative 3.5%. China forecast for economic growth in 2021 declined from 8.1% down to 8%, but still higher than the economic growth in 2020 of 2.3%. Japan revised down its 2021 economic growth forecast from 2.8% to 1.6% although it is still far above the 2020 growth of negative 4.8%.

Meanwhile, the IMF raised its 2021 economic growth projection, especially in Emerging & Developing Countries from 6.3% to 7.2%, against the economic growth in 2020 of negative 2.1%. The Eurozone economy was estimated to grow from 4.6% to 5.2%, well above the economic growth in 2020 of negative 6.6%.

Global Economic Growth: Realization 2020 and Projection 2021-2022

GROUP/COUNTRY	2020 REALIZATION	JANUARY 2021 PROJECTION (%)		OCTOBER 2021 PROJECTION (%)		JULY 2021 PROJECTION	
		(%)	2022-P	2021-P	2022-P	2021-P	2022-P
World	-3.1	5.9	4.4	5.9	4.9	6.0	4.9
Advanced Economy Countries	-4.5	5.0	3.9	5.2	4.5	5.6	4.4
Emerging & Developing Countries	-2.1	6.5	4.8	6.4	5.1	6.3	5.2
ASEAN-5	-3.4	3.1	5.6	2.9	5.8	4.3	3.4
Indonesia	-2.07	3.3	5.6	3.2	5.9	3.9	3.2
Amerika Serikat/USA	-3.5	5.6	4.0	6.0	5.2	5.0	5.7
Euro Area	-6.6	5.2	3.9	5.0	4.3	4.6	0.0
Jepang/Japan	-4.8	1.6	3.3	2.4	3.2	2.8	2.2
Tiongkok/China	2.3	8.1	4.8	8.2	5.6	8.1	8.1

Source: IMF, World Economic Outlook, release October 2021

Berdasarkan laporan World Economic Outlook yang dirilis IMF pada Januari 2022, di tahun 2022 pertumbuhan ekonomi Advanced Economy Countries diproyeksikan sebesar 3,9%, perekonomian Amerika Serikat diproyeksikan tumbuh 4,0%, Jepang juga diperkirakan tumbuh sebesar 3,3%, sedangkan perekonomian Emerging & Developing Countries diproyeksikan tumbuh sebesar 4,8%. Pertumbuhan ekonomi ASEAN-5 dan Tiongkok diproyeksikan masing-masing sebesar 5,6% dan 4,8%, serta ekonomi Zona Eropa diperkirakan sebesar 3,9%. Secara keseluruhan, perekonomian dunia diproyeksikan sebesar 4,4%, mengalami penurunan dari periode yang sama di tahun 2021F sebesar 5,9%.

After the Delta variant spread was controlled, the world was again shocked by an emerging new COVID-19 virus variant called Omicron. In early November 2021, laboratory technicians at Lancet Laboratories, Pretoria, South Africa, discovered an unusual feature in the samples they were testing for the coronavirus. This discovery coincided with a surge in positive cases of COVID-19 in a number of regions in South Africa. In Gauteng Province, where Johannesburg, South Africa is located, less than 1% of residents tested positive in early November 2021, but the figure rose to 6% in a matter of two weeks. The emergence of the Omicron variant has raised global economic uncertainty.

The acceleration of global economic recovery was also overshadowed by the energy crisis, especially in China, India and Europe. The increase in demand after the recovery of community activities and economic activities that exceeded the availability of production/supply capacity triggered a surge in oil prices followed by increases in global coal and CPO prices. World oil

prices touched their highest level of USD83.6 per barrel in October 2021, far above the December 2020 price of USD48.6 per barrel. Likewise, coal prices reached a peak level in September 2021 at USD203.9 per metric ton from the December 2020 position of USD79.3 per metric ton. The world CPO price reached its highest level in November 2021 at USD1,348 per metric ton from USD1,016 per metric ton in December 2020.

Another issue that affected the global economy in 2022 was the Fed's tapering off policy. At the FOMC (Federal Open Market Committee) meeting, Wednesday November 3, 2021 The FED officially announced a tapering policy starting mid November 2021 for USD15B (USD10B US Treasury and USD5B Mortgage Backed Securities) every month until mid-2022, or for at least 8 months (current position USD80B treasury, USD40B Mortgage Backed Securities). The FED stated that this was only a preliminary plan and may change depending on developments and the US economic outlook. The Fed's statement was proven, when on December 15, 2021 the FOMC meeting decided to accelerate the tapering by 2 times from the previous USD35B.

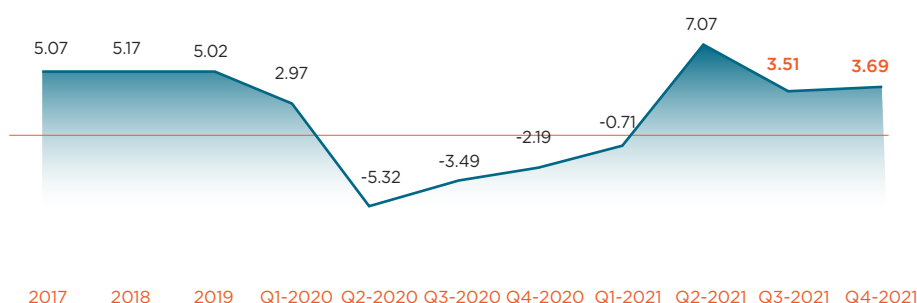
The Fed is committed to other accommodative policies. The Fed said it would be more patient before raising interest rates, but would take steps if needed to control inflation. Analysts predict that the Fed's benchmark interest rate increase will only occur in the second semester of 2022 or after the completion of the tapering process in mid-2022, however, the Fed's statement that

US inflation is not transitory (US inflation in November 2021 was 6.8%), raises speculation the Fed will raise interest rates sooner than expected. At the FOMC meeting on December 15, 2021, the majority of Fed members projected a 3 times increase in the Fed Funds Rate (FFR) in 2022 to 1%, then 3 more increases in 2023 to 1.75%.

The recovery of community and economic activity due to COVID-19 to reach pre-COVID-19 activity levels was predicted to continue until the end of 2022. World concerns over the spike in the third wave of COVID-19 cases due to a new virus variant, the Fed's tapering off policy, and the US and China economies not yet solidifying, an energy crisis that can trigger high inflation and the forecast for an increase in interest rates are all risk factors for global uncertainty in 2022. Nevertheless, the world is optimistic that there will be a global economic recovery acceleration in 2022, thanks to the rapid progress in vaccinations, increasing community mobility and economic activity returning to normal.

Indonesian Economy Situation

Indonesian Economic Growth
(yoy)



The surge in the spread of the COVID-19 Delta variant virus and the Emergency PPKM/Level 4 policy in July 3, 2021, also hampered the national economic recovery. On an annual basis (year on year), the Indonesian economy in Q3 2021 grew by 3.69% (yoy), lower than the growth in Q2 2021 of 7.07% (yoy), but still higher than the economic growth in the Q1 2021 (-0.71% and 3.51% YoY).

Based on the quarter to quarter period, Indonesia's economic growth was also recorded getting a slowdown from the third quarter of 2021 by 1.55% to 1.06% in the fourth quarter of 2021.

The largest business sector contribution in 2021 is still dominated by 3 business fields, namely: Processing Industry (19.25%), Agriculture, Forestry and Fisheries (13.3%) and Trade (13%).

Based on annual growth (yoy), the Health Services and Social Activities business sector became the sector with the highest growth at 10.46% followed by Information and Communication (6.81%), Electricity and Gas Procurement (5.55%), and Utilities Procurement (4.97%).

Meanwhile, the business sectors with the lowest growth year on year included: Government Administration, Defense and Mandatory Social Security at -3.3% and Education Services at -0.11%.

In the fourth quarter of 2021, the highest quarter to quarter growth was in the Government Administration business field, which grew 22.2%, while the lowest was in the Agriculture, Forestry and Fisheries business field, which was negative 19.46%.

In terms of expenditure, Indonesia's GDP in the Q3 2021 was still supported by household consumption at 54.42%, and investments at 30.81% that together contributed 85.23% of Indonesia's GDP in Q3 2021.

All components of GDP Expenditure at the end of 2021 grew positively, continuing the positive performance achieved in the previous quarters. Indonesia's Export Component was able to grow exponentially at the level of 29.83% (YoY) and was the GDP Expenditure component with the highest growth rate after Import growth of 29.60% (YoY). The lowest growth, namely the Consumption component of Non-Profit Institutions Serving Households (LNPR) grew by 3.29% (YoY).

On a quarter to quarter basis in Q3 2021, Government Consumption became the component with the highest growth reaching 33.0% while goods and services imports experienced the lowest growth or contraction of -0.71%. The high growth in government consumption is the realization of the national economic recovery package to maintain the performance of the national economy due to the Delta virus variant.

Indonesia's GDP growth in 2021 by Island has various variations. Maluku and Papua islands grew by 10.9% (YoY) with a contribution of 2.49% GDP, followed by Sulawesi Island (5.67% YoY growth, 6.89% GDP share); Java Island (growth 3.66% YoY, share 5.789% GDP); and the islands of Sumatra and Kalimantan (3.18% YoY growth, 21.70% share and 8.25% GDP).

In October 2021, the Indonesian PMI Manufacturing Index recorded a record high during the 2020-2021 period, at 57.2, after previously contracting in July 2021 to an index level of 40.1 due to a spike in Delta cases. Meanwhile, during Q4 2021, there was a downward trend in the Manufacturing Index even though it was still in an expansion phase, after peaking in October 2021, then decreasing in November 2021 by 53.9 and December 2021 by 53.5.

The impact of the Delta variant was also responded to negatively by consumers as reflected in the Consumer Confidence Index (IKK) that entered a pessimistic phase in July, August and September 2021. However, in October and November 2021 the IKK re-entered the optimistic phase of 113.4 and 118.5 after the spread of the Delta variant virus started to be controlled.

The positive performance of Indonesia's exports exceeded imports resulted in Indonesia's trade balance showing a surplus since May 2020 in line with the recovery in demand from major trading partner countries, such as China, the US, Japan, India and Malaysia. However, the economic rebalancing conditions occurring in the Bamboo Curtain country should be watched, considering China's position as Indonesia's main export market with a share of 22% of Indonesia's total exports in November 2021. Indonesia's trade balance surplus could decrease, especially with the policy of temporarily stopping coal exports by the Government of Indonesia for the period January 1-31, 2022 in order to ensure the availability of domestic coal supply for PLTU (Steam Power Plants) and national industrial needs, in accordance with DMO (Domestic Market Obligation) provisions.

Investments in Indonesia continue to grow in line with the domestic economic recovery due to the pandemic. The Implementation of Emergency/Level 4 Community Activity Restrictions (PPKM) Policy in Q3 2021 had quite an impact on investment performance in the July-September 2021 period. In Q3 2021, Indonesia's investments reached Rp216.7 trillion, growing by 3.7% (yoy) or lower than investment growth in Q2 2021 of 16.2% (yoy). In the midst of the ongoing COVID-19 pandemic, Indonesia's investment realization throughout 2021 managed to reach Rp901.02 trillion, higher than the government's target of Rp900 trillion or grew 3.8% from the previous year.

Although overshadowed by uncertainty due to the new COVID-19 variant, energy scarcity, the upward trend in inflation rates and the possibility of an increase in global interest rates, many institutions are optimistic that the Indonesian economy in 2021 will grow positively in a projected range of 3.2% - 4.7%. and will strengthen further in 2022 in a range of 5.0% - 6.5%.

Indonesia's Economic Growth Estimates 2021-2022

INSTITUTION	2021	2022	2023
Government (BKF IR Report, July 2021)	3.7	5.2	
Bank Indonesia (Statement - July, 2021)	3.2 - 4.0	4.7 - 5.5	
IMF (October, 2021)	3.3	5.6	6.0
World Bank (June, 2021)	3.7	5.2	5.1
OECD (May, 2021)	4.7	5.1	n/a
Oxford Economics (June, 2021)	4.7	6.5	5.3
BNI (September, 2021)	3.7 - 4.5	5.0 - 5.5	5.3 - 6.1

Factors that support the optimism for the 2021-2022 economic recovery include:

1. Successful handling and controlling of the COVID-19 pandemic through the PPKM Level 1 to 4 program and the acceleration of the vaccination program. An estimated endemic occurrence in Indonesia in 2022 as 70% of the population will be vaccinated will encourage a national economic recovery acceleration;
2. Increasing community mobility and economic activities starting to return to normal;
3. The performance of Indonesia's manufacturing industry entering an expansion phase;
4. The global economic recovery mainly influenced by the COVID-19 pandemic control, and vaccinations of the population;
5. The recovery in global economic demand and rising commodity prices have boosted Indonesia's export performance, and they continue to improve and have even experienced a trade balance surplus since May 2020;
6. Structural reform efforts to increase investor confidence and ease of doing business to attract foreign investment;
7. Global Events in Indonesia in 2022, such as: G20 Summit Presidency, MotoGP, and others;
8. Support for counter cyclical fiscal policy, including the continuation of the National Economic Recovery (PEN) program as well as accommodative monetary and financial policies.

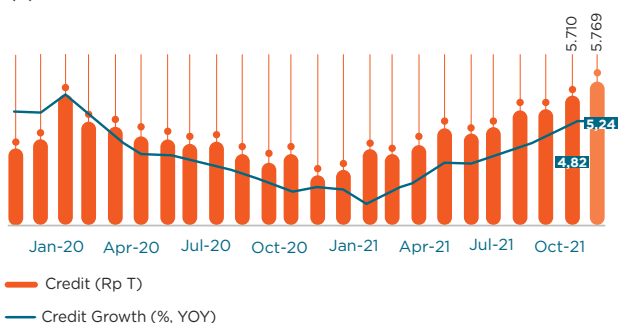
The optimism for strengthening Indonesia's economic recovery in 2021 and 2022 is also supported by Indonesia's economic fundamentals performance:

1. The upward trend in annual inflation is still maintained at Bank Indonesia in a target range of 3+1%. In December 2021 inflation stood at 1.87% (yoy), October 2021 at 1.6% (yoy), September 2021 at 1.6% (yoy) and August 2021 at 1.59% (yoy). The inflation rate in 2022 is still in the BI target range of 3+1%;
2. Indonesia's foreign exchange reserves in November 2021 stood at USD144.95 billion, an increase compared to USD135.9 billion in October 2021. The foreign exchange reserves is equivalent to financing 8 months of imports or 7.8 months of imports and servicing Government external debt (ULN);
3. Exchange rate fluctuations were relatively maintained with triple intervention efforts in the form of Rupiah intervention in the spot market, DNDF and bond purchases by Bank Indonesia. Throughout 2021 the Rupiah exchange rate per US Dollar was maintained in the range of Rp 14,000-15,000 per 1 USD;
4. The BI 7-Day Reverse Repo Rate (BI7DRR) stayed low at 3.50% or the same level since February 2021 to support the national economic recovery momentum. Bank Indonesia is looking to maintain the benchmark interest rate in the range of 3.5%-4% in 2022;
5. Performance in 2021 APBN realization was good. State revenue from taxation exceeded the target with Rp1,546.5 trillion or 107.1% of the 2021 APBN target. Likewise, the budget deficit has improved, at 4.65% of GDP or lower than the target of 5.70% of GDP, as well as the 2020 state budget deficit of 6.14% of GDP.

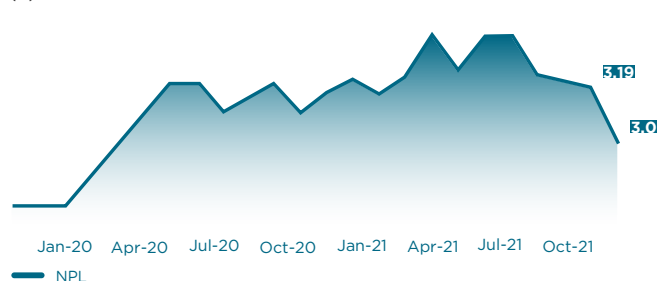
Banking Industry Overview

The global and domestic economic recovery as well as the optimism of economic players' expectations in 2021-2022 impacted the trend in bank loan growth on the downstream side.

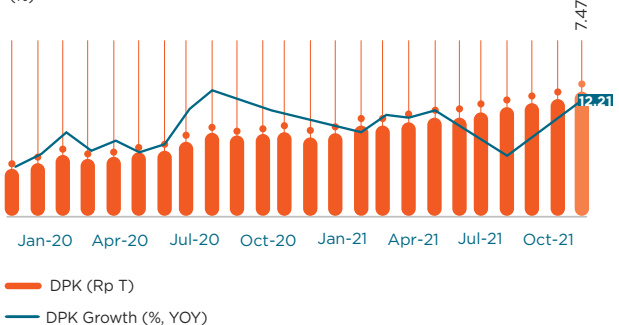
LOAN GROWTH (%)



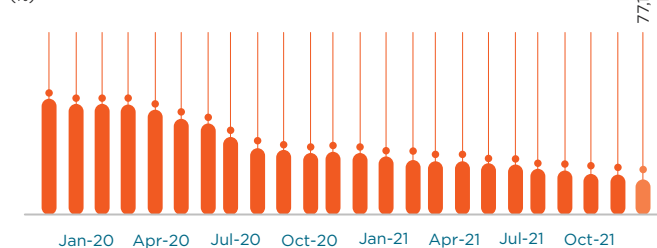
NON-PERFORMING LOAN (%)



DEPOSIT GROWTH (%)



LOAN TO DEPOSIT RATIO (%)



The growth of Banking Third Party Funds (DPK) is still relatively high in the midst of the pandemic. As of December 2021, banking deposit growth was 7.69% (yoy). This indicates an increase in the level of public confidence to invest their funds in other investments, such as in the capital market and property sector. Throughout 2021, the Indonesia Stock Exchange (IDX) recorded an increase in the Composite Stock Price Index (JCI) of 10.08 percent year to date (ytd), with a closing at the level of 6,581.48, compared to the same period last year of 5,735.46. The growth of the Real Estate sector in 2021 continues to experience an increasing trend. In the third quarter of 2021, the Real Estate sector grew by 3.94% or an increase compared to the growth in the first and second quarters of 2021, which were 0.94% and 2.82%, respectively.

Meanwhile, loan growth began to move positively in line with increased economic activities and the recovery of businesses' confidence in future economic conditions. As of September 2021 loan growth accelerated away from the contraction zone, growing by 5.24% (yoy) higher than loan growth in August (4.82% yoy) and July 2021 (3.24% yoy).

Loan quality (NPL) as of September 2021 was 3.0%, a slight improvement from 3.2% in August 2021. The Financial Services Authority (OJK) decided to extend the relaxation period for loan restructuring until March 31, 2023. This decision helped to maintain banking stability and the performance of debtors in COVID-19 restructuring, which has begun to improve.

The banking industry still has free liquidity. The Loan to Deposit Ratio (LDR) in September 2021 stood at 78.9%, lower than 79.1% in August 2021. The LDR trend has decreased from 93.4%, its position at the end of January 2020.

The downward trend in banking interest rates will continue until 2022 at a limited pace, supported by ample banking liquidity conditions in line with the national economic recovery momentum and projections of rising global interest rates. In response to the projected trend of increasing the Fed Funds Rate (FFR) interest rate, Bank Indonesia's policy in 2022 is projected to be pro-stability to support pro-growth.

Disbursements of sectoral loans in agriculture, hunting and forestry business fields; Fishery; Transportation, Warehousing & Communication; Construction; Provision of Accommodation & Food & Drink, as well as social, cultural and entertainment services still grew positively during the COVID-19 pandemic. On the other side, an increasing trend of loan risk should be watched out for, especially in the following sectors: Fisheries; Mining & Quarrying; Processing industry; Construction; Wholesale and Retail Trade; Provision of Accommodation & Food & Drink; and Real Estate, Rental Business & Corporate Services.

Although uncertainty still looms over the global and domestic economy, the banking industry is optimistic for an accelerated economic recovery in 2022 given the strong national economic fundamentals, the formulation of fast and effective policy synergies by the Government and Authorities supported by the DPR, as well as the Government and the community success in handling & controlling the COVID-19 pandemic. Bank Loan growth in 2022 is estimated to be in the range of 7-9%, with Deposit growth at the level of 6-7%.

Business Prospects

During the COVID-19 pandemic, several sectors/business fields were affected and experienced a downward trend in growth, however, there were also sectors that continued to grow positively during the COVID-19 pandemic.

Based on GDP data (YoY) according to business fields in 2020 and 2021, there are sectors that continue to grow during the pandemic, including: Agriculture, Forestry & Fisheries business fields; Water Supply, Waste Management, Waste & Recycling; Information & Communication; Financial Services & Insurance; Real Estate; Health Services & Social Activities; and Education Services.

Businesses experiencing contractions, especially in 2020, included: Mining & Quarrying business fields; Processing industry; Electricity and Gas Procurement; Construction; Transportation & Warehousing; Provision of Accommodation and Food and Drink; Company Services; and Other Services.

Along with the national and global economic recovery, several sectors experienced a positive rebound in 2021, such as: Mining & Quarrying business field; Processing industry; Electricity & Gas Procurement; Construction; Wholesale & Retail; and Financial Services & Insurance. The business field which is still experiencing a YoY contraction in 2021 is only experienced in Government Administration as deep as negative 0.33% (YoY). This shows that the government's policy direction is capable of navigating the previously corrected economy.



Strategic Policies In 2021

BNI 2019-2023 CORPORATE PLAN REVISION

The COVID-19 pandemic created extraordinary conditions that impacted all industrial sectors. These impacts included:

1. Economic downturn.

When the COVID-19 Pandemic hit most of the world's regions, several world institutions such as the World Bank, IMF, S&P, Fitch, revised their projections for global economic growth which were negatively corrected in 2020. In national conditions, the Indonesian economy also experienced a negative correction. The decline in the economy was the impact of an imbalance in economic demand and supply due to the lockdown policies in various regions of the world.

The economy has been improving since early 2021, supported by the mass vaccination program. With the vaccination program, it is hoped that the community will gain herd immunity to COVID-19, so that community mobility will return to normal.

2. Banking industry conditions

The economic downturn had an impact on the banking industry. One of the significant impacts was an increase in banking risk, especially loan risk (NPL). The increase in loan risk was followed by a decrease in the demand for bank loans. This was due to businesses experiencing difficulties due to decreased demand, as well as cash flow difficulties in paying loan installments due to non-current business ventures or even business closures.

The decline in demand for loans was inversely proportional to the condition of Third Party Funds (DPK) that increased due to a downward trend in public consumption. This resulted in a decrease in the Loan to Deposit Ratio (LDR) in the banking system, which resulted in a higher cost of funds (CoF) for banks. The increasing CoF followed by a decrease in loan demand resulted in pressure on banking NIM. This decline was also stimulated by a gradual reduction in interest rates that were projected to remain stable at around 3%.

The pressure on banking NIM, followed by an increase in credit risk, resulted in an increase in reserves for banking losses, resulted in a significant decline in banking profits in 2020.

3. Changes in people's behavior

Restrictions on community mobility, especially in Indonesia in the form of PSBB and PPKM to suppress the spread of COVID-19 caused community business activities to decline. This encouraged people to make behavioral changes. One of the most fundamental changes was the transaction behavior that changed from cash to cashless.

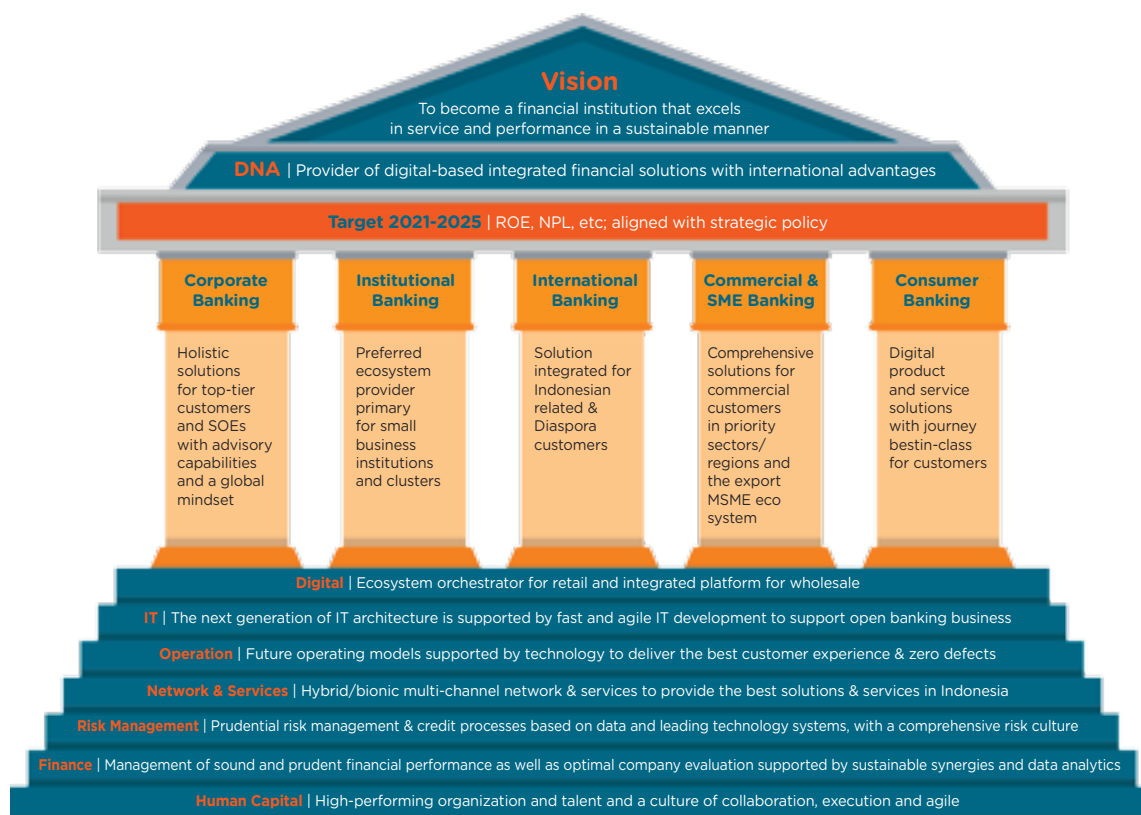
Through the "stay at home" policy, people were encouraged to transact business through digital channels. The increasing number of people who used digital channels encouraged a development of digital attackers who offered cashless transaction needs and solutions.

In addition, the consumer loan business trend was marked by increased distribution in Peer-to-Peer (P2P) lending.

A few companies responded to the impact of the COVID-19 pandemic by adjusting or fine-tuning their strategic directions, including BNI. BNI reviewed its previous Corporate Plan and determined that the strategic directions and financial targets for 2021-2023 were no longer relevant to BNI's future business, so BNI needed to adjust it to changes in external conditions.

In this Corporate Plan review, BNI also considered the fundamental conditions that will affect the direction of its strategy and goals going forward, such as changes in the Indonesian banking landscape, the direction of the Ministry of SOEs, and changes in digital trends. BNI also paid attention to several internal conditions that were a concern for future enhancements and improvements.

Taking into account these conditions, BNI prepared a Revised Corporate Plan 2019-2023 (until 2025) with the following strategic directions:



To achieve BNI's vision, a value proposition was set to be achieved in 2025, namely as a provider of digital-based integrated financial solutions with international advantages, with targets set until 2025 in line with the annual Strategic Policy. In achieving this target, a strategy was prepared for 5 (five) business pillars, supported by 7 (seven) enablers. Each business pillar and enabler had an initiative strategy to be developed and implemented starting in 2021 to support the achievement of the strategy for each pillar and enabler.

2021 Strategic Policies

Taking into account the external and internal conditions that occurred in 2020, and the future strategic directions and targets of BNI as stated in the Revised Corporate Plan of BNI 2019-2023, BNI's 7 (seven) strategic policies in 2021, included:

1. Improve **loan quality** through improved **risk management**
Improving risk culture for all BNI employees through end-to-end transformation of the loan process, credit restructuring, optimization of the Remedial & Recovery process, and increasing employee capabilities.
2. Improve **digital capability** in meeting customer needs
Developing digital-based innovations and solutions supported by increased data capabilities, partnerships through the use of API Management, blockchain platforms, and business process re-engineering.
3. Increase **business expansion** in a **sustainable** manner
Increasing expansion in priority economic sectors, selective industry, Top Tier clients, supply chain and strengthening MSMEs.
4. Increase **FBI and CASA** through increased **transactions**
Strengthening CASA by offering total solutions and optimizing accounts as well as increasing business transactions through developing a business ecosystem, cross selling, and optimizing other channels.
5. Optimization of network and **international business** by strengthening partnership cooperation
Increasing the role and productivity of Overseas Branch Offices (KCLN) and expanding partnerships to support international business development.

6. Optimization of **Subsidiary Contribution**

Strengthening the synergy of BNI Group to support the position of Subsidiaries in achieving market leaders in each industry.

7. Optimization of **HC** to support the bank's business
Optimizing talent management and increasing employee capabilities related to credit processes, industry skills, global & digital mindset, and risk culture.

Strategic Policy and Transformation

In an effort to support the strategic direction of the 2019-2023 BNI Corporate Plan Revision and 2021 Strategic Policy during the COVID-19 Pandemic, BNI needed to improve and innovate its business processes to answer several challenges faced in the banking industry through the BNI Corporate Transformation Program. Strategic initiatives in the BNI Corporate Transformation program were developed by BNI in response to these conditions, including:

1. Credit quality improvement

The COVID-19 pandemic has indirectly caused debtors to experience cash flow disruptions, which has created difficulties in them paying their obligations to the Bank, so the quality of bank loans deteriorated. Policies and business processes were needed to accelerate and improve the loan quality. One of BNI's efforts to maintain debtor business resilience was through loan quality management. To maintain loan quality, BNI established a LaR Management Optimization Team.

The LaR Management Optimization Team's focus was on the management processes, decisions, action plans and monitoring of LaR debtors. The LaR Management Optimization Team also acted as a liaison between Business as Usual (BaU), which focuses on managing and maintaining good debt, and Remedial Recovery (RR) that focuses on repairing non-performing loans or bad debt.

Through the implementation of the LaR Management Optimization team, BNI's credit quality was successfully maintained and improved. Until December 2021, BNI's Gross NPL ratio improved compared to the end of 2020, from 4.3% to 3.7% or improved by 0.5%. The same thing was seen in the LaR ratio (incl. Covid) which improved from 28.7% at the end of 2020 to 23.3% of total loans. With the improvement in credit quality, BNI established a 17.0% lower loss allowance compared to 2020.

2. SME Exporter Hub (BNI Xpora)

To move the wheels of the Indonesian economy, the MSME businesses play an important role in influencing and controlling the condition of the national economy. Almost all businesses in the Indonesian economy (>99%) are MSMEs and they contribute 60.3% of the state revenue and employment of 97%.

On the other side, BNI received directives from the Ministry of SOEs to support expansion into international markets. To date, the MSME businesses only contribute towards 14.4% of the export transactions, but has great potential for further development.

The SME Exporter Hub is BNI's effort in helping SMEs to expand their market and access to global markets. This is in accordance with the Ministry of SOEs aspiration for BNI to focus on expanding into the global market by helping local entrepreneurs penetrate the international markets.

Through BNI Xpora, BNI assists in providing integrated financial and non-financial solutions to MSMEs through 3 stages, namely:

- a. Go Productive
BNI provides solutions to increase MSME productivity by collaborating with start-ups to provide business management applications and digital financial reporting, and by collaborating with agencies and institutions in mentoring, training to improve MSME capabilities.
- b. Go Digital
BNI helps MSMEs use digital technology for non-cash and advisory transaction solutions through a multi-channel approach with integrated digital platform support & digital activation in the form of telecommunication services and network connectivity.
- c. Go Global
To penetrate the global market, BNI provides solutions for MSME assistance and development, special advisory, access to international buyers by strengthening the role of Overseas Branch Offices (KCLN). One way is by partnering with global e-commerce, tradeclub, and business matchmaking to bring together MSME as a supplier with the diaspora as a buyer.

To date, BNI has established 7 hubs in several cities, such as Jakarta, Bandung, Solo, Surabaya, Medan, Denpasar, and Makassar to capture the market potential of the MSME segment that has a business orientation to the international market. The BNI Xpora ecosystem development has received high enthusiasm from businesses that are recommending BNI Xpora services to other businesses. This positive signal had an impact on business performance with an increase in export credit in the MSME segment by Rp2.5 trillion, an increase in low-cost funds by Rp2.2 trillion and an increase in trade finance by Rp2.3 trillion.

3. Capital management - Additional Tier 1

Based on performance conditions in early 2021, BNI has capital (especially tier 1 capital) that is less supportive in conducting business expansion. BNI's low core capital ratio was caused by lower capital growth compared to RWA growth.

Several rating agencies were also concerned about the potential lowering of BNI's rating if BNI's capital was not strengthened. In general, rating agencies stated that BNI's capital condition was at a limit that allowed the rating agencies to correct BNI's rating.

Optimizing momentum in the global capital market, BNI strengthened its Tier 1 Capital through the issuance of Tier 1 equivalent securities, tier 1 equivalent, i.e. Additional Tier 1 perpetual bond in quarter 3 of 2021. This issuance was monumental as BNI was the first bank to issue this instrument in Indonesia.

Investors were very enthusiastic about BNI's Additional Tier 1 product, as reflected by demand that exceeds supply (2.7x oversubscribed). In addition, BNI also managed to set a re-bid price with a yield of 4.3%. The Additional Tier 1 BNI has increased BNI's Tier 1 CAR by 140 bps to 17.8% in Q3 2021.

Strategic initiatives in the BNI Corporate Transformation Program included quick win, mid term, long term, and enabler development. Strategic initiatives were possible to develop following the changes in business direction and external conditions and to continue previous strategic initiatives to achieve BNI's future goals, so the strategic initiatives became multi-year and continuous.

Operations Review per Business Segment

BNI conducts its business and activities in the banking sector in accordance with the Articles of Association as set forth in Deed No. 23, dated April 20, 2021. Its main activities include:

1. Raising funds from the public in the form of deposits such as demand deposits, time deposits, certificate of deposits, savings deposits, and/or other equivalent;
2. Disbursing loans;
3. Issuing debt instruments;
4. Buying, selling, or guaranteeing, at its own risk, as well as for the interest and the order of clients (money orders including bills accredited by the Company as a Bank whose validity period does not take longer than is customary in the trading of such documents);
5. Debt instruments and other trade paper whose validity period does not take longer than is customary in the trading of such documents;
6. State treasury paper and Government Guarantee Letters;
7. Bank Indonesia Certificates (SBI);
8. Bonds;
9. Futures Trading in accordance with the laws and regulations;
10. Other securities instruments with a maturity in accordance with the laws and regulations);
11. Transferring money, both for its own interest, or the interest of the customer;
12. Placing funds on, borrowing funds from, or lending funds to other banks, either by using mail, telecommunications facilities as well as with performance notes, checks, or other means;
13. Receiving payment for securities and performing calculations with or among third parties;
14. Providing a place to store goods and securities;
15. Conducting safekeeping for the interests of other parties pursuant to a contract;
16. Placing funds from customer with other customers in the form of securities that are not listed on a stock exchange;
17. Providing financing and/or performing other activities, including activities based on sharia principles, in accordance with the provisions stipulated by competent authorities;
18. Conducting factoring, credit card business and trusteeship;
19. Conducting foreign currency activities by complying with the provisions stipulated by the authorities;
20. Conducting equity participation in banks or other companies in the financial sector;
21. Conducting temporary capital investments to address the consequences of credit default, including financing defaults based on Islamic principles, subject to retracting ownership interests in accordance with the provisions stipulated by competent authorities;
22. Acting as a founder of the pension fund and pension fund manager in accordance with the provisions of the laws and regulations;
23. Conducting financial services, commercial banking, and other investment banking;
24. Performing other activities commonly conducted by a bank that are not contrary to legislation.

In addition to those key activities, BNI also performs business support activities to optimize available resources to support its core business activities, that are not contrary to legislation.

BNI's business segments are based on 2 (two) aspects, namely:

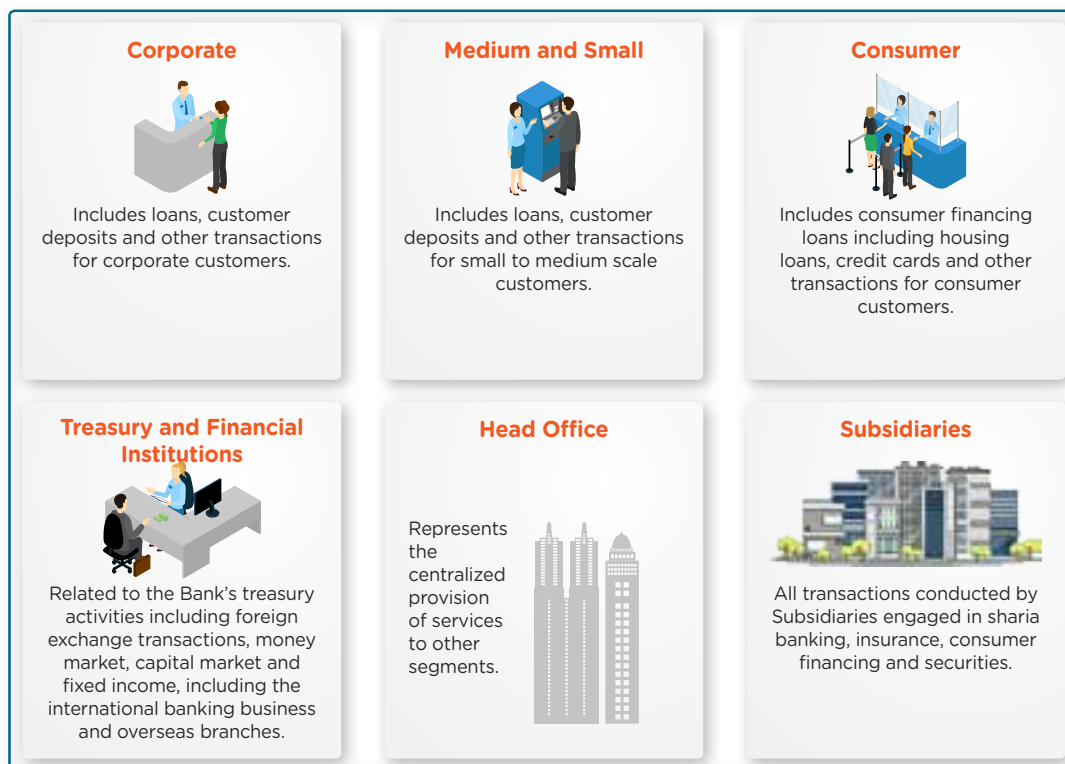
1. Operating segment based on main customer groups and products, which are divided into several segments, namely Corporate, Medium and Small, Consumer, Treasury and Financial Institutions, Head Office and Subsidiaries.
2. Geographic segment which describes the geographical distribution of BNI's business, divided into Indonesia, the United States, Europe, and Asia.

OPERATING SEGMENTS

The operating segment describes BNI's business segments based on main customer groups and products, divided into several segments, namely Corporate, Medium and Small, Consumer, Treasury and Financial Institutions, Head Office and Subsidiaries.

In determining segment results, certain asset and liability accounts and related income and costs are attributed to each segment based on management's internal reporting policies. Transactions between business segments are treated like third party transactions that are recorded in each segment and eliminated at the Bank level.

In summary, BNI's segment reporting is as follows.

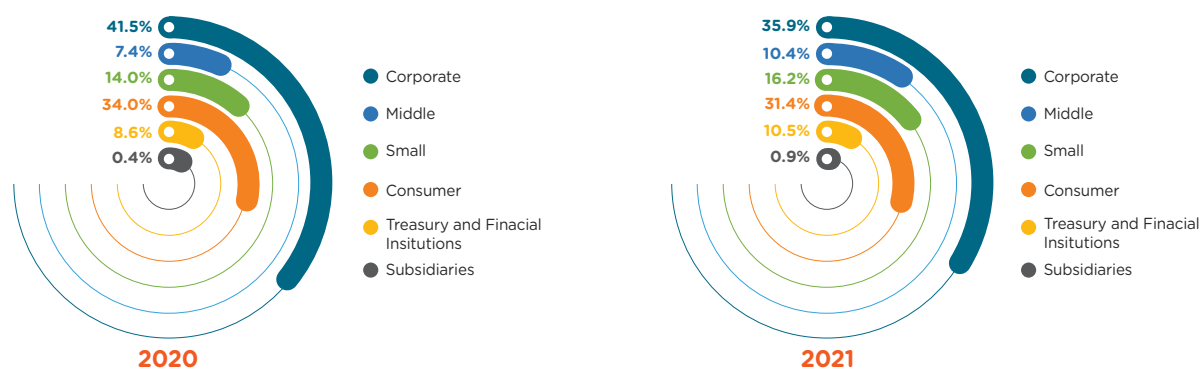


In order to provide an initial overview of the business of the operating segment, the following is the contribution per segment to interest income and net sharia income as well as BNI's total assets.

Interest Income and Sharia-Net by Segment

SEGMENT	2021		2020*		INCREASE (DECREASE)	
	TOTAL (RP-BILLION)	COMPOSITION (%)	TOTAL (RP-BILLION)	COMPOSITION (%)	NOMINAL (RP-BILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Corporate	13,731	35.9	14,114	41.5	(383)	(2.7)
Middle	3,977	10.4	2,521	7.4	1,456	57.8
Small	6,189	16.2	4,758	14.0	1,431	30.1
Consumer	12,001	31.4	11,559	34.0	442	3.8
Treasury and Financial Institutions	4,000	10.5	2,929	8.6	1,071	36.6
Head Office	-	0.0	-	0.0	-	0.0
Subsidiaries	371	0.9	153	0.4	218	142.5
Adjustment and Elimination	(2,022)	(5.3)	(1,993)	(5.9)	(29)	1.5
Total Interest Income and Sharia-Net	38,247	100.0	34,041	100.0	4,206	12.4

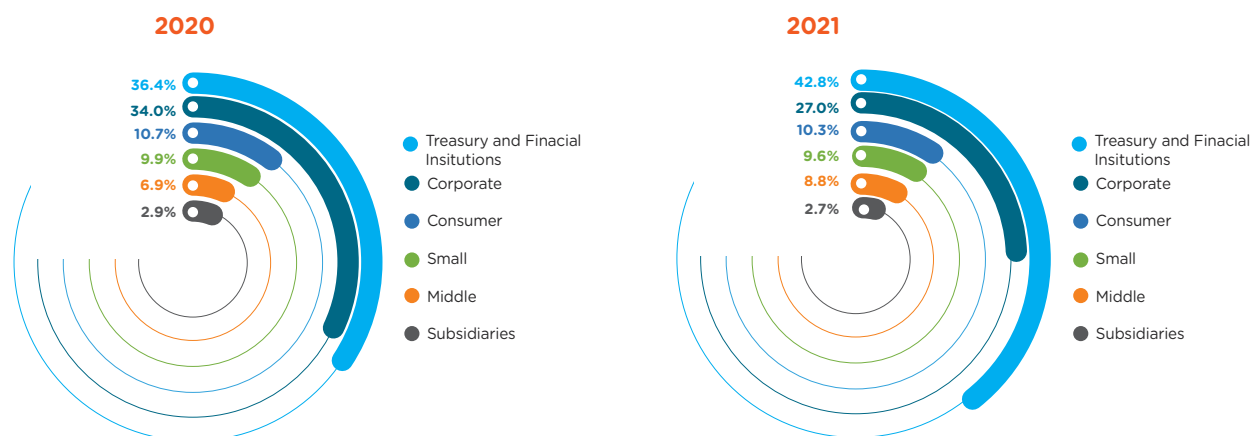
*On February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia in accordance with the Capital Market OJK approval letter No. S-289/D.04/2020 dated December 11, 2020, and OJK Banking letter no. 4/KDK.03/2021 dated January, 2021 so it is no longer consolidated into the BNI and Subsidiaries consolidated financial statements. In this regard, the interest income for subsidiaries in 2020 does not include BNI Syariah.



Segment Contribution to Bank Assets

SEGMENT	2021		2020*		INCREASE (DECREASE)	
	TOTAL (RP-BILLION)	COMPOSITION (%)	TOTAL (RP-BILLION)	COMPOSITION (%)	NOMINAL (RP-BILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Corporate	260,747	27.0	285,498	34.0	(24,751)	(8.7)
Middle	84,475	8.8	58,074	6.9	26,401	45.5
Small	92,840	9.6	82,739	9.9	10,101	12.2
Consumer	99,584	10.3	90,215	10.7	9,369	10.4
Treasury and Financial Institutions	412,545	42.8	306,014	36.4	106,531	34.8
Head Office	49,561	5.1	53,317	6.4	(3,756)	(7.0)
Subsidiaries	25,686	2.7	24,148	2.9	1,538	6.4
Adjustment and Elimination	(60,600)	(6.3)	(60,095)	(7.2)	(505)	0.8
Jumlah Aset	964,838	100.0	839,910	100.0	124,928	14.9

*On February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia in accordance with the Capital Market OJK approval letter No. S-289/D.04/2020 dated December 11, 2020, and OJK Banking letter no. 4/KDK.03/2021 dated January, 2021 so it is no longer consolidated into the BNI and Subsidiaries consolidated financial statements. In this regard, the interest income for subsidiaries in 2020 does not include BNI Syariah.



From the table and graph above, it can be seen that in 2021 the corporate segment contributed greatly to the Bank's interest income and sharia-net income, while the treasury and financial institutions segment contributed greatly to the Bank's total assets. The contribution per segment to the Bank's interest income and sharia-net income in 2021 was Rp38 trillion, an increase of 2.95% compared to Rp37 trillion in 2020, while the segment's contribution to bank assets in 2021 was Rp965 trillion, an increase of 14.9% compared to Rp840 trillion in 2020. The following describes the performance and achievements of each segment.

CORPORATE

Corporate Segment Business Activities

The Corporate Segment is derived from 3 (three) business activities, including loans disbursed, customer deposits, and other transactions for corporate customers, as follows:

1. Corporate Loans, namely credit facilities to corporate customers (and their business groups) with the maximum credit criteria above Rp500 billion and sales/turnover for 1 (one) year above Rp1.5 trillion. Special corporate customers such as Ministries/Institutions, State-Owned Enterprises (BUMN), companies national and large multinationals in Indonesia and their business groups (among others Forbes or LQ45) enter the corporate segmentation without considering the maximum credit or sales criteria;
2. Customer Deposits or Third Party Funds (TPF) Corporate Segment (Business Banking) are funds and transactions originating from corporate customers (non-individuals); divided based on 5 (five) sub-segments/classifications, namely BUMN, Private, Non-Bank Financial Institution (NBFI), Ministries/Agencies, and Universities.

The scope for Corporate TPF management is divided into 2 (two), namely:

- a. Manage and develop BNI's business in the Business Banking sector in the corporate segment;
- b. All end-to-end Business Banking customers' needs are the focus of the corporate segment TPF business on a B2B and B2C basis.
3. Other Transactions for Corporate Segment customers, with BNI's flagship product being Cash Management.

Corporate Segment Strategy in 2021

To develop business in the Corporate segment, in 2021 BNI's efforts included:

1. Corporate Credit Strategy

During the dynamic business conditions throughout 2021 due to the COVID-19 pandemic, BNI implemented several strategies and policies aimed at increasing lending in the Corporate Segment prudently, namely:

- a. Focusing on expansion of conglomerate top tier debtors in the leading industrial sectors;
- b. Synergize with all stakeholders to optimize value chain and transactional banking from the portfolio of existing debtors and new debtors so as to increase fee based income;
- c. Financing national Strategic Projects and supporting national Economic Recovery programs;

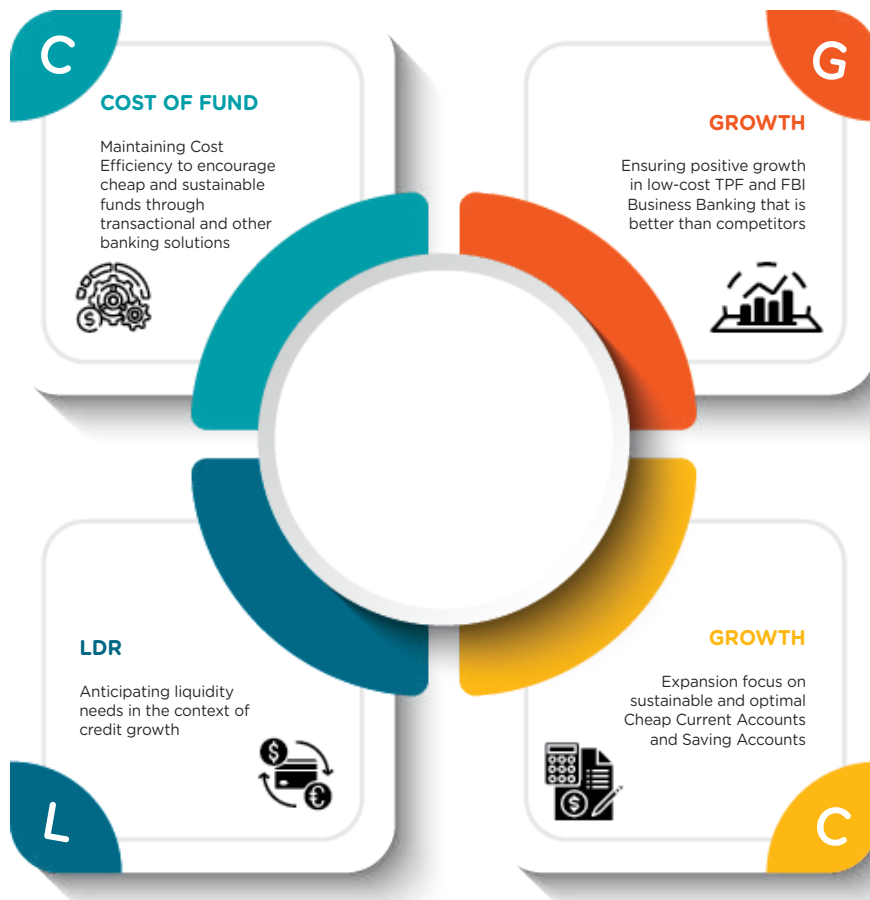
- d. Accelerating and perfecting the loan end to end process;
- e. Improving the quality of human resources to become expertise in leading sectors;
- f. Establishing a optimization of LaR management for maintaining and improving loan quality as well as developing other innovative solutions in handling non-performing loans.

2. Corporate Customer Deposit Strategy

As one of the strongest TPF franchises in the industry, BNI offers a variety of solutions to accommodate the customized and personalized needs of Business Banking customers, so as to achieve a sustainable growth of low-cost funds from current accounts. The solutions developed for wholesale customers included cash management, bank guarantees, trade, and supply chain financing. These solutions are not only intended for Corporate and Medium-sized customers, because in their implementation, BNI also focuses on providing end-to-end solutions, starting from probing and mapping the financial needs of the Corporation, to the consumer and retail needs of the Corporation, including including suppliers, clients and vendors, so as to create a unified solution for the entire ecosystem that will result in an inclusive business for BNI.

Related to its fundraising activities during the 2021 pandemic, BNI is entrusted by the Government to support the implementation of government programs, particularly in the context of accelerating recovery and economic transformation due to the impact of the COVID-19 pandemic. Thanks to its various solutions and services advantages, BNI was the only bank selected as an implementing bank for managing Government accounts for the Pre-Employment Card Fund, and as one of the payment partners for the Pre-Employment Card Program incentive funds with other e-wallet partners. With the advantages of its API-based transaction technology (Application Programming Interface), the account registration process by participants, distribution of incentives and reconciliation of all e-wallet partners of the Pre-Employment Card program ran effectively, efficiently and was auditable.

In an increasingly competitive 2021, BNI has mapped the business potential of prospective Corporate TPF customers. BNI's strategic policy for increasing CASA is through a business ecosystem with increased digital capabilities and new business models.



Furthermore, to bridge BNI's strategy to achieve an optimal funding structure, the initiatives carried out in 2021 included:

- a. Raising TPF by exploring of the APBN and Ministry funds.
 - i) Optimizing the flow of APBN for the program to handle the impact of COVID-19 & PE 2021;
 - ii) Optimizing TPF from the flow of goods and capital expenditures at Ministries/Institutions (K/L) with the largest ceiling;
 - iii) Optimizing TPF raising from Government social protection program funds;
 - iv) Encouraging K/L account efficiency through the K/L account restructuring program using Virtual Accounts;
 - v) Encouraging the purchase of K/L goods and services through the BNI-Ministry of Finance (Digipro) marketplace and Government credit cards;
 - vi) Capturing the flow of employee spending by optimizing payroll services and consumer products;
 - vii) Increasing savings through Government programs (Pre-Employment Cards, Banpres MSMEs, etc.).
- b. Exploring SOE and IKNB (non-bank Financial Industry) ecosystems by involving subsidiaries.
 - i) Optimizing Government stimulus program funds to SOEs;
 - ii) Optimizing the acquisition of the SOE subsidiaries and their subsidiaries ecosystem;
 - iii) Acquiring SOE partners through supply chain optimization;
 - iv) Synergizing with subsidiary companies (BNI Life, BNI Multifinance and BNI Sekuritas) to provide solutions for customers;
 - v) Increasing customer transactions through cash management and digitization;
 - vi) Increasing Payroll, consumer lending and providing solutions to the needs of managed customers' employees.
- c. Optimizing the education business by focusing on developing the financial and non-financial transaction capacity of the education ecosystem.
 - i) Increasing transactions in the campus environment through digitalization in the payment system;
 - ii) Improving services by providing a monitoring dashboard for reporting to customers;

- iii) Maintaining relationships with key persons in the education ecosystem (Rectors, Deans and other rectorate officials as well as the Ministry of Education and Culture officials);
- iv) Optimizing TPF collection from potential alumni association funds in education;
- v) Increasing Payroll and consumer products in the Higher Education academic community.

3. Other Transaction Strategies for Corporate Customers

With the BNI Cash Management product, customers can independently manage their corporate financial cash flow more regularly and monitored regularly online. BNI's Cash Management products include various functions and features, including: payment management for various payments such as taxes, billing and other payments, collection management such as virtual accounts and e-collections, liquidity management, and information management. BNIDirect is also equipped with BNI Trade Online to make it easier for customers to transact exports and imports online. All daily customer needs can be done anytime and anywhere, with a trusted and reliable system.

BNI platform that can be used by customers to perform Cash Management transactions, known as BNIDirect. BNIDirect is a platform in the form of a website and a mobile app which has been tested for safety and can be accessed use the internet from anywhere, anytime, through the address <https://bnidirectng.bni.co.id> or using the BNIDirect Mobile application which can downloaded via Appstore or Playstore.

In addition to BNIDirect, Corporate customers also often use various other digital products for transactions, such as the BNI Financial Supply Chain Management (BNI FSCM) portal for Supply Chain Financing transactions, e-Bank Guarantee for bank guarantee transactions, Notional Pooling, Smart Commerce Pay, as well as other digital products.

Corporate Loans Productivity

The Corporate segment productivity is reflected in the Corporate customer Loans, Deposits, and Other Transactions performance, as follows:

Corporate Credit Productivity

BNI's loan portfolio is well diversified in BNI's priority sectors. A list of economic and business sectors for the 10 (ten) largest individual and group debtors at the end of 2021 is as follows:

List of 10 (Ten) Largest Economic Sectors by Individual Debtors

ECONOMIC SECTOR	TOTAL (RP-MILLION)
Scheduled Air Freight	6,263,886
Government Administration, and Economic and Social Policy	6,093,425
Rice Domestic Trade	5,428,612
Electricity	4,029,987
Cigarette Industry	3,065,335
Basic Chemical Industry, Except Fertilizer	2,900,576
Electricity	1,759,546
Ship and Boat Building and Repair Industry	1,531,091
Transportation Support Services Except for Loading and Unloading Services and Warehousing	1,413,460
Other Financial Intermediaries (Non-Bank) Apart from Leasing	1,147,195

List of 10 (Ten) Largest Economic Sectors by Group Debtors

ECONOMIC SECTOR	TOTAL (RP-MILLION)
Other Civil Buildings: Highway Buildings	16,008,454
Palm Oil Plantation, Cement Industry, Telecommunications, Real Estate, Car Sales, Agriculture, F&B	15,753,550
Highway Building	11,947,296
Pulp, Paper and Cardboard/Paper Board Industry; Integrated Palm Oil Industry; Real Estate; Multifinance; Electricity;	11,308,388
Telecommunication Network	8,658,515
Coal Mining & Trading; Palm Oil plantations; Real Estate; Iron Ore & Iron Sand Mining	7,609,413
Electricity; Gas; Trading	6,910,310
Cement Industry; Palm Oil plantations; restaurants; Trading	6,844,188
Palm Oil plantations; Cooking Oil Industry from Crude Palm Oil; Real Estate	6,733,687
Real Estate; Large trade	6,193,194

In order to sharpen the business focus, in 2021 a re-segmentation policy will be implemented by migrating several corporate debtors to the commercial segment and dividing debtor management in 3 (three) Corporate Divisions based on the industrial sector. Based on the type of loans disbursed in 2021, the majority of corporate loans were disbursed as Working Capital Loans, which accounted for 65% of the total corporate loans, or Rp187 trillion, while the remaining 35% or Rp101 trillion were Investment Loans. Loan growth for the Corporate segment is presented in the following table:

Loan growth for the Corporate segment

PRODUCT	2021		2020*		INCREASE/DECREASE	
	TOTAL (RP- BILLION)	COMPOSITION (%)	TOTAL (RP- BILLION)	COMPOSITION (%)	NOMINAL (RP- BILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Investment Loan	100,521	35.0	119,864	43.2	(19,343)	(16.1)
Working Capital Loan	186,953	65.0	157,581	56.8	29,372	18.6
Total	287,474	100.0	277,445	100.0	10,029	3.6

*Restated according to the re-segmentation policy

Corporate Customer Deposits Productivity

Corporate segment customer deposits productivity is reflected in the growth of Third Party Funds (TPF) and the number of accounts, as shown below:

Total Corporate Segment Third Party Funds

PRODUCT	2021		2020*		INCREASE/DECREASE	
	TOTAL (RP- BILLION)	COMPOSITION (%)	TOTAL (RP- BILLION)	COMPOSITION (%)	NOMINAL (RP- BILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Current Accounts*	190,7	63.3	141,9	63.0	48,8	34.4
Non-Personal Deposit	110,4	36.7	83,2	37.0	27,2	32.7
Total	301,1	100.0	225,1	100.0	76,0	33.8

*Giro except KCLN

The increase in current accounts of Rp48.8 trillion was in line with the increase in customers who actively used BNI cash management, namely BNIDirect. BNI's cash management system innovations and developments in 2021 have made BNI the main bank for customers to save funds and transact sustainably. In addition, BNI is also the government's main choice in distributing social assistance to all Indonesian people, one of which is Pre-Employment, where BNI is the only bank that manages government accounts from Pre-Employment Card funds and as a payment partner for the Pre-Employment Card Program incentive funds. BNI also has smart city services, which are integrated solutions for governance and public services run by Regional Governments, placing BNI as the preferred partner of Regency/City Governments in managing finances and digitizing transparent, accountable, effective and efficient financial management. With the smart city program and other integrated solutions that use a holistic ecosystem approach, BNI is the first choice for customers to place their funds.

TPF in the Corporate Segment in 2021 reached Rp301.1 trillion, an increase of 33.8% compared to Rp 225.1 trillion the previous year. Current accounts increased by Rp48.8 trillion or 34.4% compared to 2020, due to the increase in customers who actively transact using BNI's cash management solution, BNIDirect. Various innovations and developments in BNI's cash management system in 2021 have made BNI the main bank for customers to deposit funds and transact sustainably. In addition, the growth of current accounts was also influenced by BNI's success in becoming the Government's main choice for the distribution of social assistance to all Indonesians, including: PKH Social Assistance (Program Keluarga Harapan) and Basic Food Social Assistance from the Ministry of Social Affairs, Presidential Assistance BPUM (distribution of Productive Micro Business Assistance) from the Ministry of Cooperatives and Small and Medium Enterprises, Pre-Employment from the Ministry of Manpower, BSU (Wage Subsidy Assistance) from the Ministry of Manpower, PIP (Smart Indonesia Program) from the Ministry of Education, Culture, Research and Technology, and PIP (Smart Indonesia Program) from the Ministry of Religion.

Number of Corporate Segment Accounts

PRODUCT	2021		2020		INCREASE (DECREASE)	
	TOTAL (ACCOUNT)	COMPOSITION (%)	TOTAL (ACCOUNT)	COMPOSITION (%)	NOMINAL (ACCOUNT)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Current Accounts*	269,770	96.6	225,981	96.0	43,789	19.4
Deposits	9,548	3.4	9,387	4.0	161	1.7
Total (UNIT REKENING)	279,318	100.0	235,368	100.0	43,950	18.7

The number of BNI Corporate Segment Accounts in 2021 reached 279,318 accounts, an increase of 18.7% or 43,950 account units compared to 2020.

Other Corporate Segment Transactions Productivity

Other Corporate segment Transactions Productivity is reflected in the number of BNI Cash Management unit accounts and the number of accounts, as shown below.

Number of Cash Management Accounts in the Corporate Segment

PRODUCT	2021 (ACCOUNT)	2020 (ACCOUNT)	INCREASE (DECREASE)	
			NOMINAL (ACCOUNT)	PERCENTAGE (%)
Cash Management	65,347	56,248	9,099	16.2

The COVID-19 pandemic situation increased the need for digital transactions and was one of the drivers of increasing cash management account units and transactions. In addition, there was a significant increase in accounts and transactions from fintech and e-commerce companies in line with BNI's strategy to become the partner of choice for fintech and e-commerce, including the Virtual Account e-collection service.

BNIDirect Transactions in the Corporate Segment

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Number of Transactions (millions of transactions)	76.7	53.7	23.0	42.8
Nominal Transactions (Rp-trillion)	2,197.7	2,026.2	171.5	8.5
Number of Users*	1,034	1,011	23	2.3

*The number of CM users and active transactions for corporations is calculated by Group

Of the total number of BNIDirect users of 73.5 thousand customers, 1,034 customers are segment customers corporation. The increase in the number and nominal of BNIDirect transactions is in line with the increase in the number of entities that use BNI cash management actively. This certainly increases both the number, volume and FBI of BNIDirect.

The increase in the number of transactions came from various innovations in BNI's various wholesale banking products and solutions to make it easier for Corporate customers to make transactions, as well as increasing the number of transactions and accounts with cash management, some of which are BNI Trade Online, Smart Commerce Pay, and ecosystem-based solutions.

Corporate Segment Profitability

Corporate segment income and profitability is presented as follows:

ACCOUNT	2021 (RP-MILLION)	2020 (RP-MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP-MILLION)	PERCENTAGE (%)
Interest income and sharia income - net*	13,731,006	14,113,782	(382,776)	(2.7)
Other operating income	3,655,255	3,325,486	329,769	9.9
Provision for impairment losses	(8,067,012)	(11,141,206)	(3,074,194)	(27.6)
Other operating expenses	(5,944,561)	(6,170,982)	(226,421)	(3.7)
Operating profit	3,374,688	127,080	3,247,608	2,555.6
Non-operating income (expenses) - net	(1,516)	(387)	(1,129)	291.7
Profit before tax	3,373,172	126,693	3,246,479	2,562.5
Total Assets	260,746,768	285,497,695	(24,750,927)	(8.7)
Total Liabilities	422,405,670	328,796,929	93,608,741	28.5

*Includes internal transfer pricing components between operating segments.

In 2021 the interest income and net sharia income in the corporate segment reached Rp13.73 trillion, a decrease of 2.7% compared to Rp14.11 trillion in 2020 due to the implementation of the re-segmentation policy so that debtors managed in the corporate segment migrated to the commercial segment. The operating profit in the Corporate segment increased significantly by 2,555.6% from Rp127 billion in 2020 to Rp3.4 trillion in 2021. Increased profitability was due to improved loan quality, increased other operating income, and efficiency in operating expenses carried out throughout 2021.

Corporate Segment Prospects and Strategies for 2022

2022 is projected to be a more conducive year for businesses in line with the national economic recovery from the impact of the COVID-19 pandemic. To optimize opportunities while anticipating increasingly competitive competition, BNI has mapped the business potential as business prospects for the Corporate segment as well as formulated strategic policies that focus on optimizing the business ecosystem through digital capabilities and new business models.

Corporate Credit Business Strategies

1. Increasing the credit expansion of the Corporate Segment with a focus on Top Tier Clients in priority sectors;
2. Increasing green lending in BNI's loan portfolio to support ESG initiatives;
3. Develop end-to-end transformation of the credit process to improve credit quality and enhance risk culture;
4. Optimizing the restructuring and improvement of the LaR portfolio through the Business as Usual (BAU) and non-BAU methods;
5. Increase cross selling and upselling by actively offering cross-segment products & Subsidiaries;
6. Providing financial solutions to customers through synergies with the Syndicated Loan Desk and BNI Securities Private Limited (BSPL);
7. Improve HR capabilities to understand market developments, risk culture, global banking, digital mindset, and advance analytics.

Corporate Customer Savings Business Strategies

1. Synergizing and collaborating with branches/KCLN to increase value chain and utilization as well as provide total solution and advisory;
2. Optimizing cross selling and Financial Supply Chain Management to increase the PHR (Product Holding Ratio) of new/Top Tier customers;
3. Improving services, solutions and integrated transaction enhancement programs according to the business needs of Corporate customers;
4. Optimizing the digital-based ecosystem to provide ease of transactions.

Corporate Customers Other Transactions Business Strategies

In 2022, BNI will still support the Government in distributing social assistance to the community, especially Government programs for accelerating the recovery and economic transformation due to the impact of the COVID-19 pandemic. BNI will also focus on 38 Diamond Clients by providing various special programs to optimize CASA, interest income, and FBI from these corporate customers. BNI will also optimize interest rate programs in the special Supply Chain Financing (SCF) scheme and reward programs for BNI branches and centers for the distribution of SCF transactions and Bank Guarantees. The Ecosystem approach remains one of BNI's advantages in working on its potential market share in 2022, which is expected to grow better than the previous year.

BNI will continue to make efforts to increase transactions, which has been strengthened by increasing digital capabilities to serve and meet the BNI corporate customers transaction needs. In 2022, BNI will continue to develop API solutions to make it easier for customers to make financial transactions by simply opening their respective financial systems.

BNI's supply chain financing will also one of the highlights of BNI's development in corporate transactions, where the Financial Supply Chain Management portal will come with various additional features to improve efficiency and customer experience in SCF transactions.

BNI will continue to develop safe and convenient online onboarding and customer acquisition mechanisms, as well as increase engagement through comprehensive programs and campaigns through online and digital media. Customer reliability and security in transactions will also a highlight of BNI's development, and will be achieved by increasing infrastructure capacity and carrying out ongoing maintenance. Advisory and solution development for the value chain and financial ecosystem from upstream to downstream will also be driven, accompanied by competitive pricing flexibility. This is inseparable from increasing collaboration and relationships with customers, business partners, billers and other stakeholders in supporting a mutually beneficial financial ecosystem.

MEDIUM AND SMALL

Medium and Small Segment Business Activities

The Medium Segment manages the provision of productive loans above Rp15 billion to Rp500 billion for individual customers and group customers. Meanwhile, BNI's Small Segment manages productive loans to individuals, corporate and business group customers, with a maximum loan limit of up to Rp15 billion.

Medium and Small Segment Strategy in 2021

Portfolio management of the Medium Segment starts from Rp15 billion to Rp500 billion for both entity and business group customers. In 2021 there will be an expansion of management into two areas, namely Large Commercial and Commercial with the division as follows:

1. Large Commercial manages portfolios ranging from Rp150 billion to Rp500 billion, centered in Jakarta. The existence of Large Commercial is intended to optimize business potential in this segment;
2. Commercial manages a portfolios ranging from Rp15 billion to Rp150 billion with locations spread across 23 Commercial Business Centers (SBK) located in 14 BNI Regional Offices throughout Indonesia. The Commercial Business Centers (SBK) manage not only productive loans, but also the derivative business potential of each of its customers. Based on this, the name of the unit was changed from "Medium Credit Center (SKM)" to "Commercial Business Center (SBK)".

During 2021 the Medium Segment focused on the main players in each priority sector as determined based on the business potential in each region. These included export-oriented MSME players through the BNI Xpora program, optimization of the Value Chain through financing to corporate partners from selected corporate customers of the Corporate Segment through several schemes such as Supply Chain Financing (SCF) and Distributor Financing (DF). Business expansion was carried out by maintaining and enhancing Credit Culture to create a healthy loan portfolio. The quality of the Medium Segment loan portfolio was achieved through by forming a team in 2020 to accelerate the improvement of Debtor Loan at Risk (LaR). This had an impact by improving Debtor Loan at Risk (LaR), which was decreasing and had implications on the bottom line.

In addition to the medium business segment above strategies and initiatives, other strategies were followed to ensure the expansion and management of loan facilities for the medium business segment as follows:

1. Determining the priority scale for each region as well as the acquisition guideline as a guide for credit managers for each priority sector;
2. Structuring business models and strengthening pipeline management;
3. Providing an Indicative offering letter program to target customers in leading ecosystems and export players;
4. Building the competency of Senior Relationship Managers (SRM) in 2 (two) to 3 (three) priority sectors (multi-specialist) through a combination of training, on the job training, internships at market leaders in each industry;
5. Improving the capability of loan management through deepening of the ultimate shareholder/sponsor of each proposal and understanding of the business model and risk mitigation for the target market sector;
6. Strengthening the account managers monitoring on the suitability of account strategy, account movement, account handover and account exposure;
7. Lesson learned in handling Loan at Risk (LaR) customers and improving credit quality.

For the Small Segment, during 2021 BNI focused on developing and implementing several key strategies to assist the business recovery of affected customers and loan growth for Small Segment credit management, including the implementation of COVID-19 stimulus policies for Small segment customers, namely:

1. Providing Loan Restructuring Stimulus to MSMEs affected by the COVID-19 pandemic;
2. Supporting the interest subsidy assistance for MSME debtors through the distribution of additional interest subsidies for KUR customers and the provision of interest subsidies for non-KUR MSME customers.

Also for assisting and maintaining business recovery through the implementation of strategic policies, BNI continued to encourage the growth of the small segment through several strategic initiatives to help the small segment continue to grow with maintained loan quality. Some of these policies included:

1. Selective growth by focusing on economic sectors that still show good performance and continue to grow;
2. Increasing loan expansion through KUR financing which is considered to have lower loan risk and provides good profitability;

3. Encouraging the growth of non-KUR MSME small loans through Government policies related to the implementation of the non-KUR MSME loan guarantee stimulus scheme;
4. Optimizing BNI's Corporate customer Value Chain Business by increasing intensification with corporate partners;
5. Encouraging the development of potential financing through digital ecosystems and agricultural cluster financing;
6. Building a growth base for the small segment through export-oriented customers in the Xpora program;
7. Improving the capability of loan workers through industry knowledge improvement programs and ecosystem-based financing.

2021 Small Segment Awards

1. Best MSME Supporting Bank (Bank Buku 3 & 4 Category) – Bank Indonesia Award 2021;
2. Best KUR Channeling Bank II (Commercial Banks Category) – Awarded by the Coordinating Ministry for Economic Affairs.

Medium and Small Segment Productivity

Implementation and execution of a series of strategies for the medium business segment in 2021, with loan performance for the Medium Segment by sector, as follows:

Medium Segment Loan Distribution by Sector

SECTOR	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP- BILLION)	COMPOSITION (%)	TOTAL (RP- BILLION)	COMPOSITION (%)	NOMINAL (RP- BILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Trade, Restaurant and Hotel	26,590	26.8	27,324	27.5	(734)	(2.7)
Mining	2,948	3.0	2,702	2.7	246	9.1
Industry	28,161	28.4	27,020	27.2	1,141	4.2
Agriculture	9,993	10.1	8,501	8.5	1,492	17.6
Construction	7,518	7.6	8,945	9.0	(1,427)	(16.0)
Transportation, Warehousing and Communication	8,857	8.9	9,561	9.6	(704)	(7.4)
Electricity, Gas and Water	2,458	2.5	1,884	1.9	574	30.5
Business Services	9,140	9.2	9,646	9.7	(506)	(5.2)
Social Services	3,468	3.5	3,881	3.9	(413)	(10.6)
Total	99,133	100.0	99,464	100.0	(331)	(0.3)

Medium segment loan growth based on economic sector saw the highest percentage in the Electricity, Gas and Water sector with 30.5% or an increase of Rp574 billion, followed by the Agriculture sector with 17.6% or Rp1,492 billion and the Mining sector with 9.1% or Rp246 billion. The Medium segment remains focused on improving the quality of a healthy portfolio through selective expansion in priority sectors that had business potential during the COVID-19 pandemic.

To support its operational activities, HC improvement in the middle segment is carried out by increasing hard skills and soft skills in the loan sector.

Small segment productivity is reflected in its loan performance by product type, namely People's Business Credit (KUR) and Non-KUR as well as by sector, as shown below.

Small Segment Loan Growth per Product Type

PRODUCT	2021			2020			INCREASE (DECREASE)	
	OUTSTANDING (RP-BILLION)	COMPOSITION (%)	NPL (%)	OUTSTANDING (RP-BILLION)	COMPOSITION (%)	NPL (%)	NOMINAL (RP-BILLION)	PERCENTAGE (%)
	(1)			(2)			(3 = 1-2)	(3/2)
KUR	44,008	46.0	0.6	32,602	38.4	0.2	11,406	35.0
Non KUR	51,774	54.0	4.1	52,198	61.6	3.5	(454)	(0.9)
Total	95,752	100.0	2.5	84,800	100	2.2	10,952	12.9

The small segment maintain a double-digit loan growth during the COVID-19 pandemic. Small segment loans in 2021 reached Rp95,752 billion, a 12.9% increase of Rp10,952 billion from the previous year. This growth was due to the KUR product that grew 35.0% and increased to Rp11,406 billion from the previous year.

The small loans quality saw the NPL ratio maintained at 2.5% during the COVID-19 pandemic that affected the Indonesian economy massively, especially during the second wave in mid-2021 which led to the imposition of restrictions on community activities (PPKM).

Small Segment Loan Distribution by Economic Sector

SECTOR	2021			2020			INCREASE (DECREASE)	
	TOTAL (RP-BILLION)	COMPOSITION (%)	NPL (%)	TOTAL (RP-BILLION)	COMPOSITION (%)	NPL (%)	NOMINAL (RP-BILLION)	PERCENTAGE (%)
	(1)			(2)			(3 = 1-2)	(3/2)
Industry	8,758	9.1	2.9	8,538	10.1	2.4	220	2.6
Trade, Restaurant and Hotel	53,234	55.6	2.6	46,954	55.4	2.4	6,280	13.4
Agriculture	15,084	15.8	1.6	12,624	14.9	1.0	2,460	19.5
Business Services	5,468	5.7	3.6	5,444	6.4	3.0	24	0.4
Transportation, Warehousing and Communication	2,316	2.4	1.9	2,167	2.6	2.0	149	6.9
Construction	3,273	3.4	4.8	3,047	3.6	3.0	226	7.4
Electricity, Gas and Water	145	0.2	0.0	101	0.1	1.9	44	43.6
Mining	452	0.5	7.3	382	0.4	7.5	70	18.3
Social Services	7,022	7.3	1.1	5,543	6.5	1.5	1,479	26.7
Total	95,752	100	2.5	84,800	100.0	2.2	10,952	12.9

Loan growth in the small segment was driven by increases in the Trade, Restaurant and Hotel sectors, the Agriculture sector, and the Social Services sector that became the sectors with the highest nominal growth.

The Medium and Small segment productivity is also reflected in customer deposits in this customer segment.

Medium and Small Segment Customer Savings

PRODUCT	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP-TRILLION)	COMPOSITION (%)	TOTAL (RP-TRILLION)	COMPOSITION (%)	NOMINAL (RP-TRILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Current Accounts	88,4	67.4	77,9	67.4	10,5	13.5
Non-individual deposits	29,4	22.4	25,8	22.3	3,6	14.0
Savings	13,4	10.2	11,9	10.3	1,5	12.6
Total	131,2	100.0	115,6	100.0	15,6	13.5

Current accounts in the Medium and Small Segments increasing by Rp10.5 trillion was in line with the increase in customers actively transacted BNI cash management through BNIDirect. BNI's cash management system innovations and developments in 2021 made BNI the main bank for customers to deposit funds and transact on an ongoing basis. In addition to its developments and innovations, BNI also provided programs that make it easier for customers to transact, and encourages customers to continue to transact digitally using BNIDirect.

Total Middle and Small Segment Accounts

PRODUCT	2021		2020		INCREASE (DECREASE)	
	TOTAL (ACCOUNTS)	COMPOSITION (%)	TOTAL (ACCOUNTS)	COMPOSITION (%)	NOMINAL (ACCOUNTS)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Current Accounts	677,813	60.5	639,061	64.0	38,752	6.1
Non-individual deposits	16,198	1.5	14,639	1.5	1,559	10.6
Savings	426,171	38.0	345,167	34.5	81,004	23.5
Total	1,120,182	100.0	998,867	100.0	121,315	12.1

The increase in current accounts and non-individual deposits from BNI was due to the superiority of BNI's solutions for customers with various needs.

BNI also provided Other Transaction services for the Medium and Small segment as reflected in the number of BNI Cash Management accounts and the number of accounts, as shown below.

Number of Cash Management Account Units for Medium and Small Segments

PRODUCT	2021 (ACCOUNTS)	2020 (ACCOUNTS)	INCREASE (DECREASE)	
			NOMINAL (ACCOUNTS)	PERCENTAGE (%)
Cash Management	194,573	160,416	34,157	21.3

The COVID-19 pandemic situation was one of the driving forces for the increase in accounts for cash management and transactions, due to the need of corporate and individual customers in transact anywhere and at anytime, leading to an increase in digital transactional users. This can be seen in the significant increase in accounts and transactions from fintech and e-commerce companies during the COVID-19 pandemic.

BNI Direct Transactions for Medium and Small Segments

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Amount of Transaction (million Rupiah)	26,5	20,0	6,5	32.5
Transaction Nominal (trillion Rupiah)	1,071,3	753,0	318,3	42.3
Number of User*	72,409	61,287	11,122	18.10

*The number of CM users and active transactions for medium and small is calculated by CIF

The total number of BNIDirect users of 73.5 thousand customers, 72,409 customers are Middle and Small segment customers. The increase in the number and nominal of BNIDirect transactions was in line with the increase in the number of entities using BNI Cash Management, which increased by 18.1% (YoY). This certainly increases both the number, volume and FBI of BNIDirect.

The increase in the number of transactions in 2021 by 32.5% was mainly due to an increase in fintech and e-commerce transactions through BNI's Corporate API solution. In addition, the latest solutions and innovations from BNI to make it easier for Commercial customers to transact also boosted the number of transactions and accounts with Cash Management, and included BNI Trade Online, Smart Commerce Pay, and ecosystem-based solutions.

Medium Segment Profitability

The Medium segment income and profitability are presented as follows:

ACCOUNTS	2021 (RP-MILLION)	2020 (RP-MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP-MILLION)	PERCENTAGE (%)
Interest income and Sharia income - net*	3,977,445	2,521,102	1,456,343	57.8
Other operating income	920,719	445,549	475,170	106.7
Establishment of allowance for impairment losses	(4,194,414)	(5,916,228)	(1,721,814)	(29.1)
Other operating expenses	(1,329,417)	(602,548)	726,869	120.6
Operational profit	(625,667)	(3,552,125)	2,926,458	(82.4)
Net non-operating incomes (expenses)	(792)	(192)	(600)	312.5
Profit before tax expenses	(626,459)	(3,552,317)	2,925,858	(82.4)
Total Assets	84,474,794	58,073,837	26,400,957	45.5
Total Liabilities	7,171,123	9,658,373	(2,487,250)	(25.8)

*including internal transfer pricing components between operating segments

Small Segment Profitability

The Small segment income and profitability are presented as follows:

ACCOUNTS	2021 (RP-MILLION)	2020 (RP-MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP-MILLION)	PERCENTAGE (%)
Interest income and Sharia income - net*	6,189,403	4,757,756	1,431,647	30.1
Other operating income	1,050,299	777,372	272,927	35.1
Establishment of allowance for impairment losses	(1,911,448)	(1,801,066)	110,382	6.1

ACCOUNTS	2021 (RP-MILLION)	2020 (RP-MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP-MILLION)	PERCENTAGE (%)
Other operating expenses	(2,293,444)	(1,196,387)	1,097,057	91.7
Operational profit	3,034,810	2,537,675	497,135	19.6
Net non-operating incomes (expenses)	(794)	(194)	(600)	309.3
Profit before tax expenses	3,034,016	2,537,481	496,535	19.6
Total Assets	92,840,478	82,738,751	10,101,727	12.2
Total Liabilities	2,645,588	3,619,509	(973,921)	(26.9)

*including internal transfer pricing components between operating segments

Medium and Small Segments Prospects and Strategies in 2022

In 2022, the medium business segment is optimistic it will grow positively in line with the Government's controlled management of the COVID-19 pandemic that will have a positive impact on national economic improvement and growth.

The medium business segment growth direction in 2022 will continue the 2021 strategy of sharpening and strengthening exports, priority sectors, ecosystems, and supply financing, as well as handling Loan at Risk (LaR), in addition, increasing business enablers through digital-based business processes will be implemented in stages in 2022, and is expected to provide added value for customers. In general, the medium business segment strategy in 2022 is as follows:

1. Optimize risk management and credit process discipline in improving credit quality;
2. Increase selective business expansion and sustainable financial solutions;
3. Increase global market expansion by accelerating international business strategies;
4. Strengthen digital capability through innovation and partnership improvement;
5. Increase Fee Based Income (FBI) and Current Account Saving Accounts (CASA) by offering sustainable transaction solutions;
6. Optimize Human Capital to supporting the Bank's business.

Looking at the economic recovery that occurred in 2021, BNI believes the small segment business potential will continue to recover and it is projected that in 2022 it will continue to grow due to business potential opening up in 2022. To respond to growth opportunities while maintaining the small segment loan quality, for 2022 BNI has prepared several strategies including:

- a. Execute the business potential based on guarantees and subsidies in this case the People's Business Credit (KUR);
- b. Improve the capability of digital business processes to increase work effectiveness and provide optimal work productivity;
- c. Optimize the Value Chain business of BNI Corporate customers by developing attractive financial solutions and expanding reach to MSMEs in the BNI Corporate customer business value chain;
- d. Increase digital-based financing of agricultural ecosystems and clusters;
- e. Strengthen the capability of business personnel through industry knowledge improvement programs and ecosystem-based financing as well as build capabilities as business partners for customers;
- f. Increase the contribution of the dunning team in maintaining and monitoring small segment customers;
- g. Strengthen integrated business solutions (loans, transactions, and increased business capability) for export-oriented MSMEs directly or indirectly through BNI Xpora.

CONSUMER AND RETAIL

Consumer and Retail Segment Business Activities and Products

The Consumer and Retail segment manages the business of individual customers and mass market customers, and includes lending, managing deposits and other transactions.

To meet customer needs, the Consumer Credit business is disbursed in the form of loans or financing for consumption purposes, including: home ownership loans, multipurpose loans, payroll loans (loans without collateral), pension loans, loans with deposit guarantees or ORI (Instan), credit cash cards, and credit cards.

Consumer Loan products consist of mortgage/mortgage loans, credit cards, payroll based loans, and others.

1. Mortgage/Home Ownership Loans

BNI Griya is a loan facility aimed at individuals wanting to own new or second hand residential houses, apartments, shop houses/offices and villas. This facility can also be used to purchase plots of land, construction, renovation, refinancing, take over, top up, while other consumptive needs can be fulfilled through the BNI Griya Multiguna program.

2. Payroll Based Loan/Loans Without Collateral

BNI Fleksi is BNI's Unsecured Loan product available for active and retired employees who receive income and pension benefits, and make payments through BNI.

3. Credit Card

Credit cards are one a consumer loan product used as a way for individuals and corporations to make payments.

4. BNI Instan

BNI Instan is a loan product with guaranteed Deposits, Savings, BNI Current Accounts, and securities (ORI).

Consumer Loan Productivity performance is shown below.

Consumer Loan Performance

PRODUCT	2021 RP-BILLION)	2020 RP-BILLION)	INCREASE (DECREASE)	
			NOMINAL RP-BILLION)	PERCENTAGE (%)
Mortgage	49,573	46,038	3,535	7.7
Payroll Loan	35,799	30,265	5,533	18.3
Fleksi	31,869	26,514	5,355	20.2
Employee Loans	3,928	3,751	177	4.7
Credit Card	11,868	11,647	221	1.9
Others*	1,788	1,927	(139)	(7.2)
Total Consumer Loan	99,028	89,877	9,151	10.2

*Others: Instan, Multiguna, Oto

BNI Griya: Mortgage/House Ownership Loans

In 2021, the BNI Griya portfolio amounted to Rp49.60 trillion, an increase of 7.7% compared to 2020. BNI Griya's expansion of Rp3.5 trillion focused on the primary property market segment by collaborating with Top Selected Developers, working on Griya through synergies with the Consumer Sector and Business Banking Sector (Corporate, Commercial, and Retail), as well as optimizing internal databases. In addition, BNI also participated in the One Million Houses Program with the Ministry of Public Works and Public Housing by distributing subsidized mortgages in the form of FLPP, SSB, & BP2BT facilities amounting to Rp2.2 trillion.

BNI Griya Strategy in 2021

The continuing COVID-19 pandemic in 2021 affected public demand for property, but BNI continued to maintain a positive growth and maintained a better market position by implementing the following programs and strategies:

1. Distribution of BNI Griya especially in the primary market through strategic partnerships with Developers, and in the secondary property market by optimizing existing customers by providing convenience and speed of loan application processes for prospective debtors, supported by virtual gathering activities with Emerald & Top Developer customers to increase BNI Griya;
2. BNI Griya's marketing focus was on customers in the fixed income segment and optimizing the role of branches, especially in big cities, to accelerate the loan process. In addition, synergies were also carried out with Business Banking (Corporate, Commercial, and Retail) and subsidiaries, to provide banking services for employees from BNI's institutional partners, including providing developer construction loans;
3. BNI did not lag behind in its digital transformation and improved the BNI Griya application process by providing convenience for the public to access and apply for housing loans online via e-Form. In addition, BNI Griya also offered light installment facilities through a grace period for the first 2 years with interest rates starting at 4.40% for the first 3 years, an Instant Approval process for Top Developers, and flexibility of loan tenors of up to 30 years.

Support for Government Programs

BNI continued to play a role in supporting Government programs for providing housing for low-income communities (MBR), through the Housing Financing Liquidity Facility (FLPP) distribution program, in collaboration with the Ministry of Public Works and Public Housing. In 2021 BNI held a virtual mass Prosperous KPR FLPP contract with the aim of providing convenience to the Low-Income Community (MBR) debtors in the form of low down payments, affordable installments and an installment period of up to 20 years.

BNI Fleksi and Fleksi Pensiun: Payroll Based Loan/Credit Without Collateral

BNI Fleksi is a consumer loan with its main focus on payroll/employee benefits being the main driver for consumer loan growth. The BNI Fleksi portfolio in 2021 reached Rp31.9 trillion, with a growth (YoY) of 20.2%. BNI Fleksi growth was due to the optimization of payroll and payroll loan acquisitions from the Business Banking database (Corporate, Commercial, and Retail) as well as selected customers from Government and private institutions managed by BNI. During 2021, BNI Fleksi strategy was focused on expanding customers with a low risk profile, especially quality institutional payroll, top-up of existing debtors, as well as expansion strategies to work on new market segments through the acquisition of BNI Fleksi with third parties such as fintech and e-commerce.

BNI Fleksi Pensiun is also a feature of the payroll loan product and provides loan facilities for retired and future retirees in collaboration with PT Taspen, Asabri, and other pension institutions. The BNI Fleksi Pensiun portfolio reached Rp6.1 trillion, with a growth (YoY) of 55.9%. The growth of BNI Fleksi Pensiun was driven by attractive features, programs and pricing, speed of processing and wide reach for providing banking services to retirees & future retirees through BNI branches throughout Indonesia, as well as the good cooperation between BNI and Taspen and other Pension Fund Institutions. .

BNI Strategy for Fleksi & Fleksi Pensiun in 2021

The increased collaboration and synergy between BNI and the Business Banking Segment (Corporate, Commercial, and Retail) also had an impact on the increase in the number of Payroll accounts during 2021, with the potential for BNI Fleksi to increase through collaborations with several companies or agencies, as well as by optimizing the value chain of existing customers. The development of the BNI Fleksi consumer business as a BNI payroll loan during 2021 was carried out through the following strategies:

1. Focusing on the expansion of BNI Fleksi & Fleksi Pensiun through selected institutions and companies, synergies by bundling payroll & Fleksi with business banking debtors companies (Corporate, Commercial, and Retail), as well as strengthening cooperation with PT Taspen, Dapen BUMN, and other pension institutions by offering attractive programs and schemes;
2. Ease of submitting BNI Fleksi & Fleksi Pensiun at the nearest BNI branch equipped with a digital e-Form facility in a relatively short processing time. The flexibility of marketing channels through e-Form can be accessed through Mobile Banking applications, SMS Banking, Internet Banking, and the BNI website supported by the acceleration of the SLA (Service Level Agreement) 1 (one) day loan process, simplification of documents and ease of loan approval;
3. Increasing BNI Fleksi and Fleksi Pensiun bookings through DigiLoan Mitra Fronting, bulk acquisitions through digital platform development, as well as partnerships with third parties (e-Commerce, Fintech, etc.);
4. Increasing Acquisition of BNI Fleksi & Fleksi Pensiun through Existing Payroll Dataleads offering attractive programs to take over, top up, and Win Back Fleksi debtors that have matured or have been paid off.

Credit Card

Credit cards can be used by individuals and corporations to make payments for transactions such as shopping purchases or cash withdrawals. Credit cards are one of the consumer loan products. BNI Credit Card products consist of:

1. Regular Credit Card, consisting of: BNI Visa Silver, BNI Mastercard Silver, BNI Visa Gold, BNI Mastercard Gold and BNI JCB Gold.
2. Premium Credit Card, consisting of: BNI Style Titanium, BNI Visa Platinum, BNI American Express Business Card, BNI JCB Precious, BNI Mastercard World, Visa Signature, and BNI Visa Infinite.
3. Co-Branding Credit Card, which consists of BNI-LOTTE Mart, BNI-Garuda, BNI-Pertamina, BNI-Telkomsel, BNI-Bank bjb, and BNI-Bank DKI.

4. Affinity Credit Cards, consisting of: University Cards, Alumni Association Cards, and Community Cards such as BNI WWF Credit Cards and BNI Harley Owners Group.
5. Corporate Credit Cards, consisting of: BNI Visa Corporate Card Gold, BNI Visa Corporate Card Platinum.
6. Private Label Credit Card consisting of: BNI Traveling Card, BNI Gasoline Card and BNI Health Card.
7. BNI Cash Card is an unsecured loan that can only be used to make cash withdrawals at ATMs, and can be converted into fixed installments.

Credit Card - Strategy 2021

The credit card business is one that has been affected by the COVID-19 pandemic that has been ongoing since the beginning of 2020. However, BNI Credit Cards during 2021 will remain focused on efforts to maintain market share in the industry.

Various initiatives have been taken to maintain positioning and market share in the credit card industry as follows:

1. Increasing credit card sales volume growth with a focus on "New Lifestyle Experience" transactions;
2. Increasing credit card sales volume growth with a focus on increasing transaction volume with top merchants or features, Travel related merchants, as well as strengthening e-commerce transactions with a focus on top strategic e-commerce partners;
3. Increasing credit card portfolio growth through Extended Installment and Balance Conversion for selected cardholders, as well as optimizing recurring payments;
4. Increasing the contribution of credit card sales volume in all regions through collaboration with local strategic merchants;
5. Implementing the use of contactless or touchless-based credit cards to improve customer security and convenience in conducting transactions without physical contact with an EDC terminal;
6. Developing digital-based credit card acquisitions through digital signature mechanisms;
7. Increasing credit card acquisitions by optimizing captive and non-captive customer data leads for selected cardholders, as well as bundling and cross-selling programs for consumer and business banking products;
8. Developing Transactional Features and Services with the BNI Credit Card Mobile application such as cash funds and installment changes;

9. Mitigating and managing credit risk through asset quality improvement programs as well as facilitating credit card payments, especially for cardholders;
10. Increasing Corporate Cards sales volume with a strategy focused on the use of Corporate Cards and the new VCN Corporate Initiative;
11. Increasing transaction volumes by optimizing Strategic CoBrand, and Affinity partners and the addition of new partners.

Credit Card Performance in 2021

Credit card outstandings in 2021 began to increase in Q2 2021, then in Q3 2021 a significant impact of the pandemic effect was felt in the growth in transaction volume and credit card outstandings. At the end of 2021, BNI's outstanding credit cards continued to grow by 1.9% compared to the end of 2020.

BNI continued to strive to increase credit card transactions, with strategies in line with the new life style and transaction behavior during the pandemic.

Attractive programs for BNI credit card holders and new product development to expand the market for BNI in 2021 included:

1. Cooperating with strategic e-commerce merchants to increase transactions. The e-commerce partners that have collaborated this year include Tokopedia, Shopee, Bukalapak, Blibli, JD.ID, Traveloka, Tiket.com, Pegipegi, Agoda, Zalora, and other favorite e-commerce merchants. In an effort to provide services for cardholders, BNI also offers regular, tactical programs, as well as 0% installment facilities, and redemption of BNI Reward Points;
2. In addition to cooperating with e-commerce merchants, the continuity program will continue continuously with merchants providing daily needs in non-Jakarta (regional) areas. Other collaborations are in the healthcare category, the restaurant category both in Jakarta and in non-Jakarta (regional) areas;
3. BNI has the only credit card product that offers redemption reward points (BNI Reward Points) at e-commerce merchants such as Garuda Indonesia, Citilink, Tokopedia, JD.ID, Blibli, Dinomarket and others;
4. Organizing events with strategic partners such as Indonesia Maternity Baby & Kids Expo (IMBEX), Garuda Indonesia Online Travel Fair (GOTF), Garuda Indonesia Travel Fair (GATF) Hybrid, Inacraft Digital x Tokopedia vol. 1, and also branding with leading malls in Jakarta, namely Pondok Indah Mall and Senayan City;

5. Developing special programs/campaigns for BNI Credit Card holders during the festive season, such as Lunar New Year promo, Ramadan Promo, BNI 75th Anniversary, RI-76 Anniversary, Let's Go Travel to Bali, PayDay e-commerce campaign, National Customer Day, Habornas, as well as Christmas and New Year (Nataru) promos;
6. BNI makes it easy for prospective cardholders to submit their credit card applications online through the development of the digital e-Form.

Credit Card - Awards in 2021

BNI Credit Card received a number of awards in 2021, including:

1. The Best Total Number of Credit Cards in Indonesia 2020 from the JCB Indonesia Award 2021 on March 9, 2021;
2. The 3rd Best Issuing Sales Volume in Southeast Asia Countries 2020 from the JCB Indonesia Award 2021 on March 9, 2021;
3. Top Social Media Award 2021 in the Credit Card category from Marketing Magazine in September 2021;
4. BNI Credit Card Mobile as Top Mobile Application based on Installed, rating application, and user experiences at the Top Mobile Application Award held by Infobrand on December 9, 2021;
5. Best E-Commerce Spends Portfolio from Mastercard given on December 30, 2021;
6. Best Telco Co-Brand Credit Card from Mastercard given on December 30, 2021;

Credit Card - Prospects and Strategy for 2022

As the Indonesian economy begins to improve in 2022, BNI credit card business is optimistic that they will continue to grow in 2022, and maintain their position in the industry. Approval of credit cards still refers to the precautionary principle in order to maintain credit quality. BNI continues to initiate business expansion in a sustainable manner. BNI Credit Card focus and strategies in 2022 include:

1. Improving Credit Quality by improving risk management, as well as providing credit cards to selected customers only;
2. Increasing Sales Volume and customer preferences with a strategy that focused on New Life Style Experience transactions, optimizing partnerships with existing merchants and merchant acquisitions, both on a national and regional scale;

3. Improving digital capability in meeting the needs of cardholders, by developing digital-based products and features through Credit Card Mobile in BNI Mobile Banking;
4. Optimizing cooperation with strategic partners, including increasing sales volume of Virtual Card Number (VCN);
5. Increasing synergy with the Business Banking and optimizing cooperation with subsidiary companies.

BNI Instan

BNI Instan is a Cash Collateral Credit product for BNI customers, offering loan facilities secured with customer deposits at BNI (time deposit accounts/current accounts/savings accounts), or with liquid Government Bonds instruments (SUN) such as Retail Government Bond (ORI) and Retail Sukuk (SR) with Fixed Rate (FR) or Variable Rate (VR), except Savings Sukuk (ST) and Retail Savings Bonds (SBR), where customers can purchase from BNI, other banks or securities companies as Sales Agents, and kept in the Sub-Registry as regulated.

BNI Instan's portfolio in 2021 reached Rp702 billion, a decrease of 8.1% (YoY). BNI Instan is currently focused on being one means of driving BNI's third party fund retention strategy.

BNI Instan Strategy in 2021

The BNI Instan expansion strategy in 2021 was focused on the disbursement of facilities to existing debtors and facilitating the booking process with the support of a digital platform.

Customer Deposits/Third Party Funds

BNI has a variety of customer deposit products to meet the needs of all customers, including savings and time deposits products. In 2021, BNI has the following deposit products:

Savings

The BNI Savings Products are as follows:

1. Saving Account Plus (Taplus), a savings account that provides PLUS services with various features and benefits.
2. Taplus Bisnis, a savings product intended for businesses and non-businesses, both individuals and non-individuals, equipped with features and facilities that provide convenience and flexibility in supporting business ventures.

3. TAPPA (Taplus Pegawai/Anggota), a savings product intended for employees/members of a company/institution/association/professional organization that collaborates with BNI, which functions as a means of savings and as employee/member identity cards.
4. Taplus Muda, a savings product in the form of savings intended for young people ranging in age from 17 (seventeen) to 35 (thirty five) years.
5. Taplus Anak, a savings product to help teach children to save from an early age, intended for children under 17 (seventeen) years of age.
6. Emerald Saving, a savings product for Emerald segment customers (Personal, Priority and Private Banking).
7. BNI Dollars, a deposit in foreign currency (USD/SGD/AUD) that has a more stable exchange rate and provides convenience in transactions.
8. Tapenas, a time deposit to assist financial planning to achieve future goals with more certainty.
9. Simpanan Pelajar (SimPel), a savings product for PAUD, TK, SD, SMP, SMA, Madrasah (MI, MTs, MA) students or equivalent that are issued nationally by banks in Indonesia, with easy and simple requirements and attractive features, in the context of education and financial inclusion to encourage a culture of saving from an early age.
10. Tabunganku, a savings product for individuals with easy and light requirements issued jointly by banks in Indonesia in order to foster a culture of saving to improve the welfare of the community.
11. BNI Pandai, a savings for individuals with easy and light requirements issued by BNI with the characteristics of a Basic Saving Account (BSA) and can be opened through a BNI Branch Office or through an Agent.

Time Deposits

BNI Time Deposit products offer term deposit placements in a number of currencies (Rp/USD/SGD/JPY/HKD/EUR/GBP/AUD) at attractive interest rates. BNI Time Deposits can be the investment choice for customers who want relatively higher returns. The current BNI Time Deposit opening service is also very flexible and can be accessed through the BNI Mobile Banking application, which can be accessed anywhere and anytime, and includes a choice of time periods and deposit amounts according to the needs and desires of customers.

Consumer Customer Deposits – Strategy 2021

Consumer Customer Deposits – Strategy 2021

A selection of savings products offered by BNI are tailored to the needs of customers at every stage of life. During 2021 the strategy for achieving TPF from the consumer segment is the focus on managing the Emerald, Affluent, Upper Mass & Mass segments, managing main customers, Emerald, Payroll, Merchant, and Entrepreneurs, and on increasing sustainable savings from customer transactions using debit cards and e-channel and closed loop transactions.

Taplus

As the core savings product with the largest portfolio, BNI Taplus plays an important role in achieving TPF growth. To increase the penetration of BNI Taplus products, BNI continues to develop the BNI Taplus digital opening, where customers who do not have a BNI savings account can open BNI Taplus simply by taking selfies, and savings customers can directly make transactions anywhere and anytime through the mobile banking application. This capability has been realized as in December 2020, BNI obtained a permit to use biometric e-KYC for opening individual savings. This was BNI's breakthrough development during the pandemic where customer mobility was very limited where it became a challenge for BNI to bring customers to branch offices. BNI answers this customer challenge and need through the launch of the digital savings opening feature, making it easier for customers to open BNI savings anywhere, anytime, simply by taking a selfie.

BNI has a rewards program for customers who open BNI Taplus savings, including a 4,600 BNI POIN+ program for opening new savings, OVO Balance Rewards up to 250 thousand, Link Aja Balance Rewards up to 175 thousand, and many other programs.

BNI Poin+

To show our appreciation for loyalty to savings customers, BNI provides rewards to individual savings customers through reward points, called BNI POIN+. Individual savings customers who are active in conducting financial transactions and increase their balances will receive BNI POIN+, with the accumulated BNI POIN+ available to exchange for various gift options through BNI Mobile Banking, including shopping e-Vouchers, donations, auction coupons, games, and sweepstakes.

In April 2021, the **BNI Rejeki #Gapakenanti Auction and Games program** were held, where customers could exchange Auction Coupons or Games Coupons in an auction for items such as iPhone 13, Samsung Z Fold3, PS 5, refrigerators, LED TV etc., with Bidding starts at Rp75,000. In addition, customers could take part in the Spinning Games to win various prizes, including Microwaves, 55" TV, Nintendo Switch etc. for free. This program ran until December 31, 2021 with the auctions running every Friday to Sunday and the Games being held every Monday to Wednesday.

In addition to the Auction Program and Games, BNI with BNI POIN+ also held a BNI Fortune #Gapakenanti Lucky Draw Program with the main prizes being 2 Tesla units, 2 Toyota Hilux Double Cabin units, 17 Toyota Raize units, up to 100 Honda PCX units. This transparent lottery program took place from August 01, 2021 to January 31, 2022, giving customers a chance to win in exchange for as many BNI POIN+ as possible lottery coupons in BNI Mobile Banking.

In addition to developing the benefits that customers receive, BNI POIN+ continues to develop features and systems to make it easier to use, including single sign on at BNI Mobile Banking so that customers do not need to register.

The BNI POIN+ program also provides BNI savings customers with the opportunity to win various prizes that can be selected by the customers.

Emerald Savings

In an effort to achieve savings funds in the Emerald segment, BNI continues to hold programs that focus on meeting customer needs and providing more rewards to customers as a form of loyalty for customer loyalty with BNI. Special programs for customers include New to Emerald, Emerald Get Emerald, Get Your Gold for BNI customers who are in the Emerald segment and Top Up Investment & Bancassurance for customers who add managed funds at BNI and place investments in various mutual fund products, bonds and bancassurance through BNI. The BNI Emerald Card which is a special identity for Emerald customers is also presented as one of the privileges that can be enjoyed. The BNI Poin+ for Emerald bonus also adds benefits for Emerald customers.

Taplus Bisnis

In an effort to create transactional banking, BNI continues to innovate various features and benefits of savings products for the entrepreneur segment for the purpose of monitoring finances or the flow of business transactions. The entrepreneurial segment is a target market that is being worked on seriously by offering BNI Taplus Bisnis to make it easier for entrepreneurs in their transactions with banks.

Special programs targeting the entrepreneurial segment include the Taplus Bisnis acquisition program through programs in collaboration with e-commerce sellers such as Tokopedia & Bukalapak in line with the increase in online e-commerce transactions during the Covid-19 pandemic, Loyalty & Racing Merchant programs, BNI Taplus Bisnis-KUR Retail Bundling, BNI Taplus Bisnis – BCM Bundling, POIN+ Taplus Bisnis Bonus Program, Lotte Wholesale Co-Branding Program, Indogrosir, Indonesian Notary Association and acquisition of BNI Taplus Bisnis Sahabat Agen46.

The growth of Taplus Bisnis in 2021 focused on increasing closed loop transactions, inline with business processes by increasing the entrepreneurial segment transactions, including increasing the number of merchant transactions, as well as optimizing merchant management at all branches/outlets.

The Taplus Bisnis product is currently equipped with attractive mobile banking features based on the Entrepreneurial customer needs, especially for monitoring business transactions through its monitoring feature and downloading the latest transaction in the form of an E-Statement Digital Invoice from the Transaction History feature of BNI Mobile Banking.

Payroll

In an effort to increase the collection of low-cost funds, especially to increase savings account balances, BNI has marketed the BNI Taplus and BNI TAPPA (Taplus Pegawai/Anggota) products specifically for employees of current account holders and companies/institutions, especially those who are BNI customers/debtors in the Business Banking sector (Corporate, Commercial and Retail).

Employees of companies with a payroll account with BNI will receive benefits, including the BNI Fleksi loan facility with its competitive interest rate and the BNI Griya KPR fast process. As well as these benefits, BNI Payroll customers can also enjoy debit shopping promotions through discounts or cashbacks, bundling products with other savings products such as Taplus Anak and Tapenas through the Family Benefit Program, loyalty payroll programs and promo info through the BNI Mobile Banking application.

Taplus Anak and Taplus Muda

The Taplus Anak savings product focuses on providing benefits for parents to teach their children to save, and can also be used by parents to prepare funds for their children's future. Getting closer to the children's segment is achieved by collaborating with online schools, providing sponsorships, collaborating in the distribution of prizes for children's programs, as well in creating programs that encourage children to save, and providing literacy on the importance of saving from an early age.

Taplus Muda focuses on the young people's lifestyle and transaction-making style. The banking products style are youthful, starting with a channel for account opening, account opening promos or transactions, to transactions with a fun debit card design with the Mastercard logo (worldwide transactions).

Taplus Muda savings can be opened digitally through BNI Mobile Banking simply by taking a selfie, and digital savings transaction records are provided in the form of an E-Statement. Taplus Muda collaborates with podcasts, talks and local brands, and actively sponsoring events often attended by young people. Taplus Muda is a savings account that satisfies the transaction style of young people.

Aside from being a savings account fulfilling the transaction style of young people, BNI is also becoming better known in the community for its BNI Friends of the Campus jargon. BNI is still trying to develop itself as a companion for students in more than 300 higher education institutions throughout Indonesia.

BNI understands very well that the largest youth communities are in the campus, so BNI Taplus Muda Co-brand and Student Identity Card (KTM) products are being made available as products that are suitable for students.

KTM Combo Card, is a multifunctional student card that features as a student ID card and a BNI debit card, and also as an electronic money card (Tapcash). Students can start saving and managing their finances independently through BNI Mobile Banking and can use the banking transaction products on campus.

It doesn't stop there, BNI currently collaborates with various Alumni Associations at universities so that after graduating, students can still continue using their savings and debit cards with the Alumni Association's Special Debit Card. Through this Alumni Association Special Debit Card, and BNI's remains attached to the academic community. BNI also cooperates through partnerships and sponsorships in activities organized by the campus and its alumni associations.

Taplus Anak and Taplus Muda are starting points for customers to experience a lifetime journey of saving and managing their finances with BNI.

Tapenas

BNI Tapenas as a savings plan for the future, is a BNI term deposit product to help realize various financial plans at a more definite future goal. BNI Tapenas customers are automatically provided with premium-free personal accident insurance protection as a manifestation of BNI's commitment to provide more certainty for the realization of various customer plans in the future, with a choice of Rp & USD currency, with freedom to determine monthly deposits starting from Rp100,000 to Rp25,000,000 (in multiples of Rp50 .000)

The pricing features BNI Tapenas offered in 2021 to customers is considered competitive compared to competitors with a choice of periods starting from 3 (three) months. In addition, Tapenas also has a Lifegoals feature in BNI mobile banking that offers a choice of timeframe, initial deposit, and monthly deposit based on the customer's savings goals or objectives (Investment, Vacation, Purchase of Gadgets, Education, etc.).

Customer Deposits

In 2021 through BNI Mobile Banking, the opening of deposits was made easier by placing a minimum deposit of Rp1 million/bilyet for the millennial segment. Meanwhile, to accommodate the public's investment interest through Branch Offices, the flexibility of opening Deposits was also expanded with a minimum deposit of Rp5 million/Bilyet from the previous minimum of Rp10 Million/Bilyet.

One of the attractive Deposit Programs offered in 2021 was the e-Channel Deposit Race Up with prizes for an e-Wallet balance of Rp200,000 and was given to Customers making their first open Deposit accounts through BNI Mobile Banking.

Support for Government Programs in Financial Literacy and Inclusion

In addition to general customers, BNI savings products that have the characteristics of a basic saving account are also used to support government programs in terms of channeling Government aid funds as well as support for financial inclusion programs, and include:

1. Financial Literacy:
 - a. Collaborating with the Provincial/Regency/City Governments for the implementation of student financial literacy through the Let's Save with Waste program;
 - b. Collaborating with BP2MI and OJK to provide financial literacy training in the form of Training for Trainers (ToT) to BP2MI instructors;
 - c. Collaborating with BP2MI to provide financial literacy and education material for Indonesian Migrant Workers (PMI) prior to departure through BNI Branch Offices.
 - d. Cooperating with the Women's World Banking (WWB) to pilot the Ayo Menabung program, a financial literacy program for mothers who receive assistance through the PKH Program (Program Keluarga Harapan) from the Ministry of Social Affairs in Bogor City, with the aim of providing education on the use of aid funds, and the habit of saving for their business activities, and meeting family needs even on a small scale, and getting used to setting aside government aid funds as savings, and not only for consumptive needs.
2. Financial Inclusion:
 - a. Acquisition of Student Savings;
 - b. Smart City integrated program;
 - c. Acquisition of savings for Indonesian Migrant Workers and Families;
 - d. Fertilizer subsidy through Kartu Tani.
3. Distribution of Government Programs
 - a. Indonesia Pintar Program for SMA/SMK Education and Research and Technology and MA/Mts Ministry of Religion education levels;
 - b. The Indonesian Ministry of Education and Culture's Smart Card Lecture Program;
 - c. Assistance programs from the Ministry of Religion Directorate of Education & Islamic Boarding Schools, including: Life Skills Assistance Program and Infrastructure Facilities, New Classroom Assistance Program (RKB), the Diniyah Takmiliyah Madrasah Assistance Program, Al-Quran Education Park Assistance Program, Islamic Boarding Schools Assistance Program, Rehab, Sanitation and Boarding School Education BOP Assistance Programs;

- d. Ministry of Social Affairs Child Social Rehabilitation Assistance Program;
- e. Ministry of Education and Research and Technology's Wage Subsidy Assistance Program;
- f. Ministry of Social Affairs Family Hope Program;
- g. Ministry of Social Affairs Basic Food Program;
- h. Ministry of Education and Culture, Research and Technology Scholarship Program;
- i. Ministry of Religious Affairs Community of Teachers & Education Personnel Program;
- j. The Ministry of Cooperatives and SMEs Micro Business Assistance Program;
- k. The Ministry of Manpower's Wage Subsidy Assistance Program.

BNI Financial Inclusion Awards in 2021

The Bank with the Best SimPel/iB SimPel Development in the category of State-Owned Banks Best SimPel/SimPel iB Implementation 2021 (Financial Inclusion Month, Financial Services Authority 2021).

Digital Opening Account- face Recognition (DOA-FR)

Since January 2021, BNI has launched its latest feature for opening a savings account through the BNI Mobile Banking digital channel, called "Open a Savings Account with a Selfie" where previously customers when opening a digital savings account needed to place a video call with a Bank Officer or visit the nearest BNI Branch Office. With this new feature, the customer experience is better and the myth of the difficulty of opening a bank account is answered through BNI's breakthrough. The products that can be opened through DOA-FR are Taplus, Taplus Bisnis and Taplus Muda. BNI is also the first bank to launch a feature to open a savings account with just a selfie, where an account is immediately created and can be used directly for transactions.

The development of community behavior during the pandemic where mobility was limited and coming to the Branch Office was not the main option. Therefore, the "Open a Savings Account with a Selfie" feature made it easy for customers to open a savings account anywhere and anytime by only having an e-KTP and smartphone.

This strategy to increase account acquisition through digital channels was also supported by strengthening marketing communications through the BNI #GaPakenanti Rejeki program (Lottery, Auction and Games) where customers had the opportunity to get a Tesla model 3 car by only opening an account. BNI has also expanded account opening collaborations with e-commerce, fintech, and other digital service providers such as Tokopedia, Bukalapak, JD.ID, Doku Wallet, OVO, LinkAja, Good Doctors, Traveloka and others. On the application or website, partners also offered cooperation promo programs for opening BNI digital accounts with prizes in the form of LinkAja balances of up to Rp175 thousand for every BNI digital account opening through the LinkAja application and many other promo programs.

DIGITAL ACCOUNT OPENING (DOA)	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Number of Accounts	141,857	29,864	111,993	375.0
Balance (Rp Million)	312,989	44,934	268,055	596.6

BNI Pra Kerja Card E-Form

BNI supported the Prakerja Card Program by providing convenience for Pre-Employment Card participants to open an account digitally through the Prakerja E-form that can be accessed through the Prakerja website or smartphone by all Prakerja Card participants. The account can be directly used by the recipients of the Prakerja Card Program incentives for banking transactions as it is directly integrated with BNI mobile banking facilities. BNI also provides direct benefits to Prakerja card customers in the form of life insurance facilities and attractive programs with raffle prizes such as motorbikes, smartphones, e-vouchers, and so on.

DIGITAL ACCOUNT OPENING (PRA KERJA CARD E-FORM)	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Number of Accounts	56,434	13,809	42,625	308.7
Balance (Rp Million)	23,925	2,323	21,602	929.9

BNI DOA Face Recognition Digital Feature and Prakerja Card Feature Awards

1. Top Digital Implementation 2021 #LevelStars5 2021 (ItWork Magazine in collaboration and supported by several associations and IT consulting companies TELCO/Digital 2021)

Consumer Savings Productivity in 2021

Consumer Deposits Productivity is reflected in the number of TPF accounts and the collection of TPF for the Consumer segment, as shown below.

Number of Consumer Third Party Fund Accounts

PRODUCT	2021		2020		INCREASE (DECREASE)	
	TOTAL (ACCOUNTS)	COMPOSITION (%)	TOTAL (ACCOUNTS)	COMPOSITION (%)	NOMINAL (ACCOUNTS)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Savings	64,171,821	99.4	63,831,217	99.4	340,604	0.5
Individual Deposits	394,677	0.6	415,711	0.6	(21,034)	(5.1)
Total	64,566,498	100.0	64,246,928	100.0	319,570	0.5

The number of savings accounts increased in 2021 through a payroll cooperation program with companies/institutions, especially those who are BNI Business Banking sector (Corporate, Commercial, and Retail) customers/debtors, customer acquisition programs through strengthening digital channel transactions, increased funds from the Emerald segment, as well as by implementing the financial literacy program in 2021. The number of time deposit accounts decreased by 5.1% from 2020 due to BNI's efforts to increase the proportion of CASA in collecting third party funds.

Consumer Third Party Fundraising

PRODUCT	2021		2020		INCREASE (DECREASE)	
	TOTAL (ACCOUNTS)	COMPOSITION (%)	TOTAL (ACCOUNTS)	COMPOSITION (%)	NOMINAL (ACCOUNTS)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Savings	224,630	75.4	211,260	82.3	13,370	6.3
Individual Deposits	73,191	24.6	80,182	31.2	(6,991)	(8.7)
Total	297,821	100.0	291,442	100.0	6,379	2.2

In 2021, the savings portfolio amounting to Rp224.6 trillion, an increase (YoY) of 6.3%, due to BNI's focus on increasing sustainable and low-cost funds by optimizing the increase in customer transactions. This was in line with the positive growth of savings in the individual business segment, driven by the Employees, Housewives, Students, and Individual Entrepreneurs segments. In 2021, the deposit portfolio amounted to Rp73.2 trillion, down 8.7% YTD in line with BNI's strategy to focus on increasing low-cost CASA funds in 2021.

BNI DEBIT CARD

BNI Debit Card is a flexible choice to meet customers' daily transaction needs and comes with Indonesian batik designs to energetic designs for young people. They include Silver, Gold, Platinum Debit Cards, and BNI Emerald Cards (especially for priority customers). BNI Debit Cards can be used for on-site transactions (offline) as well as online transactions through 3D Secure Mastercard. It is already used for online transactions after expansion of the online merchant collaboration in 2021 to increase customer transaction flexibility. BNI also continues to collaborate with communities & institutions with the Lotte Wholesale Co-Brand Debit Card, Indogrosir Debit Card, Garuda Debit Card, Citilink Debit Card and Affinity Komunitas Debit Cards for the Indonesian Notary Association, UI Alumni, Indonesian Doctors Association, and others.

Support for Government Programs

BNI continues to play a role in supporting Government programs through the National Payment Gateway (GPN), a national payment system by issuing Debit Cards bearing the GPN logo that are accepted for transactions at all ATMs and EDCs connected to GPN. Through GPN, customer transaction data is protected, and provides transaction cost efficiencies.

To improve security and convenience of transactions using debit cards, BNI also encouraged the switch-over of debit cards using magnetic stripes to chip debit cards, following directives from the Government and Bank Indonesia. This debit card replacement was facilitated by BNI through the nearest BNI branch offices/outlets and through the BNI DigiCS facility at BNI outlets/branches. Customers replacing their magnetic stripe debit cards with chip debit cards received a cash back for the first transaction on their BNI chip debit card, for e-commerce transactions and transactions through EDC at merchants or stores, and also enjoyed other attractive offer programs at various leading merchants.

BNI Debit Card Strategy in 2021

BNI understands the development in dynamic types of customer transactions, therefore BNI debit cards through the 3D secure payment method for debit cards with the Mastercard logo, and the B-Secure payment method for debit cards with the GPN logo, are available to meet customer needs for safe and practical online transactions at e-commerce merchants.

In addition, BNI debit card has delivered campaign programs through digital media and print media to increase awareness and provide education on the safe and convenient use of BNI Debit cards, such as changing PIN regularly, maintaining the confidentiality of the PIN & OTP and immediately replacing the older debit cards to chip debit cards. For the debit chip migration program, BNI also offered rewards to customers and to take advantage of this momentum educated customers on security and transaction convenience. As of November 2021, the BNI chip debit migration had reached 100%, in accordance with the Bank Indonesia directives and regulations.

During 2021 BNI debit cards ran programs with featured online merchants, including year-round promos and thematic promos at the Ramadhan event, BNI Anniversary, RI Anniversary, Youth Pledge, Hero's Day, Mother's Day, National Customer Day, and National Shopping Day. (10.10, 11.11, 12.12). BNI debit cards also consistently carry out promos at merchants that are the locations for routine customer transactions, such as Supermarkets, Convenience Stores, Department Stores, Restaurants, as well as Cinemas and Home Furnishings. BNI debit card also plays an active role in providing programs to customers through events such as Proud Made in Indonesia, GATF, Inacraft Digital x Tokopedia, and many more. In addition, BNI also has a special program for conducting recurring entertainment online merchant transactions such as Netflix, Spotify, Apple TV, Google Play, and others.

Several BNI debit card programs are intended to provide business benefits for both parties in the form of appreciation that is not only given to BNI customers but also BNI business partners. For holders of Co-Brand debit cards from the Indonesian Notary Association of BNI, customers can get BNI POIN+ for every activation and account opening through BNI Mobile Banking that can be exchanged for various benefits & prizes. The LotteGrosir Co-Brand debit card program provides benefits in the form of daily cash back for every Gold member customer who transacts at LotteGrosir. In addition, for BNI-Indogrosir debit card holders, BNI customers also get additional cash back benefits for every transaction at IndoGrosir outlets. For Co-Brand Garuda debit card owners, BNI provides benefits in the form of reward miles and top spender cashback every month. Meanwhile, Citilink BNI Co-Brand debit card holders receive benefits in the form of discounts on ticket purchases through the Citilink website.

BNI Debit Card Productivity

BNI Debit Card productivity is reflected in the sales volume and number of transactions, as shown below.

Debit Card Performance

DESCRIPTION	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Sales Volume (Rp-billion)	30,430	25,520	4,910	19.2
Total Transactions	63,843,045	48,560,372	15,282,673	31.5

In 2021, BNI Debit Card Sales volume increased by 19.2% YOY due to an increase in debit transactions during 2021 compared to 2020. This was also due to the increase in merchant business operations during 2021 in line with the gradual opening of COVID-19 pandemic social restrictions. There were significant declines at certain times, especially in July-August 2021 when the PPKM Level 5 was strictly enforced in several regions in Indonesia.

Support for Government Programs

To support the Government Programs by delivering convenience for Government program assistance recipients to transact and disburse funds, various types of debit cards are provided with special designs for the various Government Programs, including KIP Debit Cards & KIP Lectures (PIP Program), Family Welfare Debit Cards (PKH Program), Debit Cards for the BSU Program, Debit Cards for the BPUM Program, Debit Cards for the Farmer's Card Program.

2021 BNI Debit Card Award

Best Debit Card Supporting Governance (Prakerja Savings) 2021 from PT Mastercard Indonesia.

Consumer and Retail Segment Profitability

The Consumer and Retail segments income and profitability are presented as follows:

POST ACCOUNT	2021 (RP-MILLION)	2020 (RP-MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP-MILLION)	PERCENTAGE (%)
Interest income and sharia income - net*	11,999,669	11,558,741	440,928	3.8
Other operating income	8,150,720	7,032,629	1,118,091	15.9
Allowance for Impairment Losses	(993,757)	(2,489,868)	(1,496,111)	(60.1)
Other operating expenses	(11,582,124)	(10,489,862)	1,092,262	10.4
Operating Income	7,574,508	5,611,640	1,962,868	35.0
Non-Operating Income (Expense) - Net	32,487	27,673	4,814	17.4
Income before tax expenses	7,606,995	5,639,313	1,967,682	34.9
Total Assets	99,584,317	90,214,571	9,369,746	10.4
Total Liabilities	299,585,884	293,318,818	6,267,066	2.1

*Includes internal transfer pricing components between operating segments.

Consumer and Retail Segment Prospects and Strategies in 2022

The consumer and retail segment prospects and strategies in 2022 included Consumer Credit Products (BNI Griya, BNI Fleksi, Credit Cards, BNI Instan) and TPF Products (Savings and Time Deposits, and Debit Cards) are as follows:

Credit Card Prospects and Credit Card Strategy for 2022

As the Indonesian economy begins to improve in 2022, BNI is optimistic that credit cards will continue to grow, and will maintain its position in the industry. The provision of credit cards still refers to the precautionary principle in order to maintain credit quality. BNI's initiatives aim to increase business expansion in a sustainable manner. BNI Credit Card focus and strategies in 2022 includes:

1. Improving Credit Quality through improved risk management, as well as providing credit cards to selected customers;
2. Increasing Sales Volume and customer preferences with a strategy that focuses on New Life Style Experience transactions (Groceries, Health, Dining, Gadgets), maintaining partnerships with existing merchants and acquiring new merchants;
3. Increasing Sales Volume by focusing on the merchant travel category while still referring to the community mobility regulations;
4. Improving digital capability in meeting customer needs, through various digital-based product developments to increase credit card transactions and features;
5. Increasing FBI income by adding new features, and optimizing features in Credit Card Mobile in BNI Mobile Banking;
6. Optimizing cooperation with Fintech, and increasing Sales Volume through VCN for corporate cards.

Consumer Credit Products

BNI Griya Potential and Strategy for 2022

BNI Griya remains optimistic it will grow better than 2021, in line with the property industry growth prediction in 2022 and the economic growth and positive sentiment from the Government's success in carrying out Covid-19 vaccinations. BNI Griya is expected to increase market share for consumer loans and increase interest and non-interest income. BNI Griya marketing strategies to be implemented in 2022 include:

1. Focusing on the BNI Griya expansion in the low risk segment and existing customers, as well as optimizing the value chain business through synergies with Business Banking (Corporate, Commercial and Retail) and with subsidiaries, which will provide business potential for Consumer Banking, especially in working on BNI Griya.

2. Penetrating to the Griya Primary Market through increased collaboration with PKS Developer partners and optimizing the entire branch/outlet network throughout Indonesia as a marketing channel of BNI Griya.
3. Digitizing the credit applications (e-Form) and strengthening marketing through strategic partnerships with online property media to increase the convenience and speed of the BNI Griya process.
4. Increasing partnerships with third parties (fronting agents, multi-finance & online websites, etc.)
5. Marketing BNI Griya by optimizing the internal database and targeting the millennial segment with the following efforts:
 - a. Optimizing Big Data (Crawling through the Business Directory, Universities, Market Place, and Social Media) to obtain quality Griya data leads;
 - b. Organizing a massive online and social media campaign, while providing education for the millennial segment concerning the importance of owning a home from an early age.
6. Optimizing the absorption of the BNI Griya Subsidy quota consisting of FLPP, SSB, and BP2BT as well as providing a Bridging Loan scheme for house construction.

BNI Fleksi & Fleksi Pensiun Potential & Strategy for 2022

As the focus of the consumer loan strategy in 2022, BNI Fleksi and Fleksi Pensiun remains optimistic it can maximize the various existing potential and achieve a better share of the market in 2022.

To increase the BNI Fleksi and Fleksi Pensiun credit expansion in 2021, the strategy will focus on:

1. Expansion in selected institutions and companies, Taspen participants, ASABRI, DP BUMN/BUMD through offering schemes and bundling features utilizing various marketing channels through the branches as office channeling, Fronting Agent, and e-channels through e-forms & mobile banking;
2. Penetrating potential payroll & non-payroll customers by optimizing data analytics and optimizing dataleads from existing debtors & Emerald customers through offering top up, take over and Win Back Fleksi Debtor programs that are due/paid off;
3. Providing easy acquisition of new BNI Fleksi and existing payroll through digital platforms, as well as convenience in the credit process and optimizing the expansion of the digital e-Form website and BNI Mobile Banking channels;

4. Expanding of BNI Fleksi & BNI Fleksi Pensiun segments and channels through massive campaigns using the e-form Fleksi, optimizing the PMI market segment, and expanding Fleksi MicroLoan & Standby Loans;
5. Increasing partnerships cooperation with third parties such as Traveloka, Fronting Agents, Financial Institutions, Cooperatives, Fintech & Multifinance in supporting the consumer business and financial transactions as a whole (one stop solution) as well as working on a wider debtor segment;
6. Expanding partnerships for the acquisition of Fleksi Pensiun Purna & Pra Purna with potential Pension Funds through optimizing acquisitions through Digital Assessment in collaboration with Fronting Agents.

BNI Instan Potential and Strategy for 2022

BNI Instan will still be positioned as one of the drivers of third party funds retention, with a focus on facilitating the booking process through partner institutions, customers in the SOEs, Corporate, Government Ministries, and University sectors, as well as existing customers and employees of selected partners, supported by digital enhancement and development of product features.

Consumer Funds Product and BNI Debit Cards Potential and Strategy for 2022

To achieve the consumer funds target in 2022, BNI will focus on cultivating customers from the Emerald, Affluent, Upper Mass, and Mass segments so the BNI consumer fund products development will be more targeted to the needs and desires of each of these segments. In addition, the strategy for increasing closed loop transactions through e-channel transactions, both POS and e-commerce, is still being carried out to increase the sustainable funds available at BNI and to optimize the role of Agen 46 in improving operations for exploiting potential consumer funds in the community.

In an effort to achieve savings funds in the Emerald segment, BNI continues to hold programs that focus on meeting customer needs and providing more rewards to customers as a form of loyalty for customer loyalty with BNI. Special programs for customers include New to Emerald, Emerald Get Emerald, Get Your Gold for BNI customers who are in the Emerald segment and Top Up Investment & Bancassurance for customers who add managed funds at BNI and place investments in various mutual fund products, bonds and bancassurance through BNI. The BNI Emerald Card which is a special identity for Emerald customers is also presented as one of the privileges that can be enjoyed. The BNI Poin+ for Emerald bonus also adds benefits for Emerald customers.

In the Affluent segment, the strategy to increase the savings portfolio will be through the acquisition of new customers by optimizing dataleads based on analytical

data, increasing existing customer balances by improving customer service, providing Virtual RM & Digital Wealth Platform services for the Affluent segment, bundling products through the synergy of BB-CR to acquiring new customers and increasing the PHR (product holding ratio). In the Mass & Upper Mass segment, the strategy to increase the savings portfolio is through the provision of digital onboarding & partnerships to increase the acquisition of DOA (Digital Open Account) digital accounts with Face Recognition, opening digital accounts through e-commerce, digital branches, SONIC and EDC Android as well as increasing transactions and increasing existing customer savings balances through efforts to increase customer preferences and customer experience, education and activation of e-channel facilities, debit usage programs and e-channel transactions, BNI POIN+ campaigns and POIN+ loyalty programs to BNI savings customers by actively adding savings balances, transactions via e-channel and debit card as well as optimization of government assistance accounts to paid accounts. Ease of saving transactions will also be pursued by developing digital applications and transactions through Electronic Data Capture (EDC) machines. In addition, BNI will also utilize DigiCS to optimize the consumer funds potential in the Mass & Upper Mass segment.

The Mass and Upper Mass segment will focus its consumer funds strategy on the SME (Small Medium Enterprise) segment by making BNI a one-stop business solution by acquiring Tabungan as a merchant & entrepreneur business affiliate, increasing financial transactions for SME customers, merchants, & entrepreneurs through various programs with attractive rewards, optimizing savings as operational accounts for KUR Debtors, as well as improving Digital Personal Business services and continuing to synergize with the Business Banking segment (Corporate, Commercial, & Retail) as well as synergies with subsidiaries. Through Business Banking synergies, BNI will also work on the consumer funds business ecosystem potential by optimizing the cultivation with XPora to make BNI the first choice in transactions to realize a one-stop business solution for its customers.

The Mass and Upper Mass segments through the focus on savings and consumer payroll funds and universities are by making payroll acquisitions for the Top Tier Regional Economic Sector, making payroll acquisitions for Business Banking debtors (Corporate, Medium, & Small) as well as ministry customers, BUMN, BUMD, universities, hospitals, & other educational institutions, acquiring Taplus Muda Co-Brand in institutions/communities based on the education ecosystem, enhancing digital platforms for future generations and providing convenient onboarding.

For time deposit products, BNI will continue to make it easy for customers to open a time deposit account by digitalizing deposits. Customers will be able to open their own time deposit accounts via the internet and mobile banking features quickly and easily. It is hoped that this digitalization will meet the needs of the millennial segment and customers who want convenience during their busy schedules and activities.

Debit Card, in an effort to increase its sales volume growth, BNI Debit Card will focus its strategy by committing to continuing to expand customer preferences and providing a good customer experience through debit usage programs with strategic merchants to increase the frequency of debit card transactions, both POS and e-commerce transactions.

BNI debit card will actively observe market developments and customer transaction behavior to capture business potential such as e-commerce transactions and the millennial generation. In addition, other untapped potential in the second tier area will be further optimized to get closer to customers, especially those outside the Greater Jakarta area.

BNI debit card will look to increase customer awareness of transacting with debit cards through online and offline media, both owned by BNI and through paid media.

BNI debit card will continue to develop debit card features, to improve customer security and convenience in conducting transactions, by:

1. Cooperating with BNI Debit Card Co-Brand in selected institutions;
2. Increasing Debit Card users both at regular merchants and e-commerce platforms through massive campaign programs, promotions and social media education, as well as branch optimization with regional usage programs & campaigns;
3. Developing the contactless debit feature as a payment feature to facilitate faster transactions by simply sticking the card into the EDC machine;
4. Developing Co-bage Cards and Digital Cards to increase digital capabilities and debit card transactions to drive BNI's sustainable funds.

Treasury and International

Treasury and International Segment Business Activities, Strategy and Productivity

In the Treasury and Financial Institution segment, BNI provides investment solutions with due consideration of customer needs and their risk types, through the best in banking products. The Treasury and Financial Institution segment comprises the Bank's treasury activities including foreign exchange transactions, money market, capital market and fixed income, as well as business international services such as trade, remittance and financial Institutions and supervision of overseas branches.

Treasury

Types of Treasury Products

BNI treasury products are classified as foreign exchange transactional products, investment products, money market transactions and hedging products.

Transactional

Transactional products consist of Forex-TOD, Forex-TOM, Forex-SPOT, and Forex-Bank Notes. Details of these products are as follows:

1. Forex – TOD
Foreign exchange buy-sell transaction where the transaction agreement and transaction settlement are carried out on the same day.
2. Forex – TOM
Foreign exchange buy-sell transaction where transaction settlement is carried out 1 (one) working day after the date of the transaction agreement.
3. Forex – SPOT
Foreign exchange buy-sell transaction where transaction settlement is carried out 2 (two) working days after the date of the transaction agreement.
4. Forex – Bank Notes
Transactions involving the exchange of physical ownership of the currency (banknotes) involved in the transaction. Distinguished by:

Investment

Treasury investment products consist of Deposit on Call (DOC), Money Market Account (MMA), and retail bonds. Details of investment products are as follows:

1. Deposit on Call (DOC)
 - a. Placement of funds for a minimum period of 3 (three) days and up to 30 (thirty) days;
 - b. The interest rate is based on the interbank interest rates;
 - c. Can be withdrawn at any time.;
 - d. Minimum placement of Rp100 million or USD75 thousand.

2. Money Market Account (MMA)

- Placement of funds for a minimum period of 1 (one) days and up to 1 (one) year;
- The interest rate is based on the interbank interest rates;
- Can be withdrawn at any time;
- Minimum placement of Rp1 billion or USD100 thousand.

3. Retail Bonds

Bonds are evidence of indebtedness by the issuer, which will be repaid at maturity in accordance with the terms and conditions previously established. Bond transactions are made between the Treasury Division and Individual Clients, in the following transaction types:

- In the primary market, for corporate bonds and non-retail government bonds;
- In the secondary market, for corporate bonds and retail government bonds;
- Non-retail government bonds and other countries' government bonds.

4. Depo Swap

A Depo Swap is an investment product in foreign currency with a maximum rate of return and guaranteed payment of 100% of the principal investment placement. Depo Swap is a combination of forex transactions in the form of FX Swap and deposit. In this transaction the customers convert their forex currency into other foreign currencies and reconverts the forex currency in the future, at a tenor and exchange rate established at the start of the transaction agreement. The foreign exchange gain on foreign exchange transactions (forex gain) becomes the optimal return on the customers' investment fund placement.

5. Market Linked-Dual Currency Investment (ML-DCI)

ML-DCI is a structured product that is a combination of foreign exchange savings products and FX Options. This product provides a high return when compared to conventional savings products as it combines savings products linked to exchange rate movements. This product has non-capital protected characteristic, that is, it does not guarantee the principal investment.

settlement mechanism with no movement of the principal funds by calculating the difference between the forward transaction rate and the reference rate on a certain date specified at the fixing date.

b. PAR Forward

Par Forward is a derivative contract to make a series of sales/purchases of one currency (reference currency) against another currency (non-reference currency) in a period, where the payment/delivery of funds (settlement) is carried out more than 2 (two) working days after the date of the transaction agreement (trade date).

2. Currency Swap

'Buy and Sell' or 'Sell and Buy' transactions in one currency against another currency that is carried out simultaneously with the same counterparties.

3. Currency Option

Agreement to provide a right and not an obligation of the seller (option writer) to the buyer (option holder) to buy or sell a certain amount of nominal currency in the foreseeable future at a predetermined price (strike price), on or before the specified time (expiry date).

4. Interest Rate Swap (IRS)

Agreement between two parties to exchange a series of fixed interest payments (fixed rate) in one currency with a series of fluctuating interest payments (variable rate) in the same currency (or vice versa), without the exchange of principal loans.

• Overnight Index Swap (OIS)

OIS is an interest rate derivative product, namely a contract/agreement between 2 parties to periodically exchange interest rate flows in Rupiah during a certain contract period, calculated using a daily interest basis (Daily Compounding). The transaction scheme is the same as the Interest Rate Swap (IRS) but the method of calculating the interest is on a daily compounding basis with the overnight benchmark interest rate.

5. Cross Currency Swap (CCS)

An agreement between two parties to exchange principal and interest payments in different currencies. The exchange loan principal uses the exchange rate at inception.

Hedging

1. Currency Forward

Sale and purchase of foreign currencies where settlement is carried out more than two business days after the transaction date. The exchange rate used for forward transactions takes into account the forward points.

a. Domestic Non-Deliverable Forward (DNDF)

A standard (plain vanilla) foreign exchange against rupiah derivative transaction in the form of a forward transaction with fixing mechanism conducted in the domestic market. A fixing mechanism is transaction

6. Call Spread Option (CSO)

CSO is a structured product with a combination of 2 (two) Currency Option transactions i.e. Buy Call Option (purchase of the right to purchase a particular currency) and Sell Call Option (sale of the right to purchase a particular currency), for the same nominal amount and time period, but with different strike prices for each Buy Call Option and Sell Call Option. The CSO transaction must be made through Dynamic Hedging with the aim that hedging executors are not exposed to exchange rate risk due to market rates beyond the Sell Call Option strike price.

- Series Of Call Spread

Series of CSOs is a contract for a series of call spread option within a certain period.

Treasury Strategy 2021

During 2021, BNI implemented the following strategies and policies in the Treasury segment:

1. Financial Strategy:

- Optimizing the management of excess liquidity on instruments that provide the best return (yield) while taking into account daily liquidity conditions;
- Managing active securities portfolio with measurable risks both through primary and secondary markets;
- Managing the Bank's optimal Net Open Position.
- Intensifying customer transactions through digital channels, including FX Mobile.

2. Non-Financial Strategy:

- Developing a digital ecosystem to cover customer needs in transacting Treasury products.
- Increasing Treasury product awareness both internally and externally at BNI.
- Refocusing the Treasury Division Organization to adapt to business needs in line with BNI's organizational changes.
- Increasing customer engagement through promotional media and activities involving potential customers.

Treasury Productivity

The Treasury segment productivity, involving the performance of Forex gain, Capital Gain – Interbank Trading and Capital Gain – Bonds and Securities are discussed below.

1. Forex Gain

As one of the leading Foreign Exchange banks in Indonesia, BNI is the bank of choice for private corporations and SOEs as a provider of comprehensive financial solutions for Treasury products.

Forex Gain Growth by Volume and Profit

PRODUCT	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Based on Volume (USD-million)				
Spot	75,197	61,405	13,792	22.5
Derivative	39,690	33,103	6,587	19.9
Total	114,887	94,509	20,378	21.6
Based on Volume (Rp-million)				
Forex Gain	1,324,8	1,093,9	230,9	21.1

In 2021, forex Gain Treasury Division including KCLN saw an increase in volume to reach USD20,378 million, an increase of 21.6% compared to 2020, and a 21.1% increase in Forex Gain of USD230.97 million compared to 2020.

2. Capital Gain - Trading Interbank

Capital Gain - Trading Interbank Growth by Volume and Profit

PRODUCT	2021*		2020		VOLUME INCREASE (DECREASE)		PROFIT INCREASE (DECREASE)	
	VOLUME (RP- TRILLION)	PROFIT (RP- TRILLION)	VOLUME (RP- TRILLION)	PROFIT (RP- TRILLION)	NOMINAL (RP- TRILLION)	PERCENTAGE (%)	NOMINAL (RP- TRILLION)	PERCENTAGE (%)
	(1)	(2)	(3)	(4)	(5 = 1-3)	(5/3)	(6 = 2-4)	(6/4)
Bond Trading	189,066	69	100,015	124	89,051	89.0	(55)	(44.4)

Capital Gain Trading Interbank Treasury Division per 2021 position saw an increase in volume of Rp89,051 billion or an increase of 89.0% compared to the 2020 position, and a decrease in profit of Rp55 billion or a decrease of 44.4% compared to the 2020 position.

3. Capital Gain - Bonds and Securities

Capital Gain - Trading Interbank Growth by Volume and Profit

PRODUCT	2021*		2020		VOLUME INCREASE (DECREASE)		PROFIT INCREASE (DECREASE)	
	VOLUME (RP- TRILLION)	PROFIT (RP- TRILLION)	VOLUME (RP- TRILLION)	PROFIT (RP- TRILLION)	NOMINAL (RP- TRILLION)	PERCENTAGE (%)	NOMINAL (RP- TRILLION)	PERCENTAGE (%)
	(1)	(2)	(3)	(4)	(5 = 1-3)	(5/3)	(6 = 2-4)	(6/4)
Bond and Securities	90,735	1,536	80,874	1,237	9,861	12.2	299	24.2

Capital Gain – Bond & Securities including Treasury KCLN in 2021 experienced an increase in volume of Rp9,861 billion, an increase of 12.2% compared to 2020, and an increase in profit of Rp299 miliar, an increase of 24.2% compared to 2020.

INTERNATIONAL

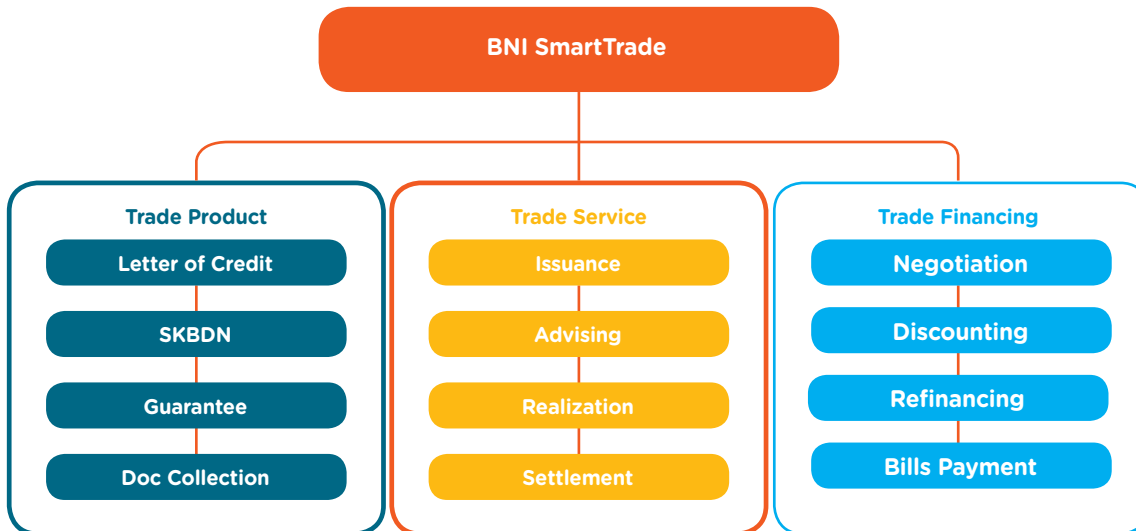
The International segment manages International businesses and offers international services and services both through Domestic Branch Offices and overseas Branch Offices, including Trade Finance services, Remittance services, International Desk and Financial Institutions.

International Banking Domestic Services

The International segment offers business services from branch offices in Indonesia, including banking products in the form of BNI Smart Trade, Financial Institutions, Remittances and International Desk.

BNI Smart Trade

BNI Smart Trade consists of Trade Products, Trade Services, and Trade financing.



Trade Products

1. Letter of Credit

Letter of Credit is a guaranteed payment instrument issued by a bank (Issuing Bank) to recipients (Beneficiary), which is subject to Uniform Customs and Practice for Documentary Credits (UCP).

2. Domestic Letter of Credit

A Domestic Letter of Credit is a guaranteed payment instrument issued by a bank (Issuing Bank) to recipients (Beneficiary), which is subject to Bank Indonesia Regulations and is used for domestic trade transactions.

3. Demand Guarantee/Standby Letter of Credit (Guarantee)

A Guarantee is an agreement/letter issued by the issuing bank that is obligated to pay to the guarantee beneficiary party (Beneficiary) when the secured party (Applicant) is in breach of contract or default. The Guarantee issued is in the form of a Demand Guarantee and is subject to Uniform Rules for Demand Guarantee (URDG) or Standby Letter of Credit subject to UCPDC or International Standby Practices (ISP).

4. Documentary Collection (Non LC)

Documentary Collection is a payment system for world trade conducted through banking services in the form of undocumented bills subject to Uniform Rules for Collections (URC).

5. Irrevocable and Confirmed L/C

This form of L/C is considered the most perfect and safest from the point of view of the L/C recipient (beneficiary), as the payment or settlement of draft drawn on this L/C is fully guaranteed by the opening bank or by the advising bank, if all conditions are met, and cannot easily be undone due to its irrevocable nature.

Trade Services

Trade Services is a trade business that provides export/import as well as domestic services to customers to obtain services in the context of trading.

The following constitute trade services:

1. Issuance

Issuance is a service for issuing an (L/C, Domestic L/C, Guarantee) instrument that guarantees payment certainty or guarantees the implementation of certain contracts to the recipient with conditions in accordance with the terms of L/C, Domestic L/C, or Guarantee.

2. Advising

Advising is an L/C, Domestic L/C, or Guarantee service to be delivered to the recipient/beneficiary in accordance with the instructions from the Issuing Bank.

3. Realization

Realization is a service for delivering documents in the framework of trade to the document recipient as importer/buyer with agreed conditions.

4. Settlement

Settlement (Payment) is a service for settling trade transactions in the form of payments for transactions that have been executed or agreed upon. This service is a cycle of trade transactions by making payments to exporters/sellers via bank transfer.

Trade Financing

Trade Financing is a business managed by the International Division to provide financing to customers in the context of trade/trade transactions with instruments in the form of L/C, Domestic L/C, Documentary Collection, Bills Payment, and Invoice or bill-based.

The following constitute trade:

1. Negotiation

Negotiation is the takeover of the payment of draft drawn by the beneficiary to a bank based on the documents presented and as stated in accordance with the terms and conditions of an L/C/Domestic L/C/SBLC with a sight tenor.

2. Discounting

Discounting is the takeover of the payment of draft value drawn by the beneficiary to a bank based on the documents presented and stated in accordance with the terms and conditions of an L/C/Domestic L/C/SBLC with a usage tenor.

3. Refinancing

Refinancing is financing in the form of taking over payments against L/C or Domestic L/C issuance transactions. Financing in the form of refinancing can be carried out at the beginning of the issuance or when the payment is nearing maturity.

4. Non L/C Financing

Non L/C Financing is financing to exporters/sellers and importers/buyers on the basis of documentary collection/open account transactions.

BNI Trade Online

BNI Trade Online is a trade transaction service for customers using a web-based application system, which can be used by customers to apply online for trade transactions or receive the results of trade transaction decisions from the bank.

Financial Institutions Products and Services

Products and services in the Financial Institution business include the following Business to Business services:

1. Bank Guarantee Under Counter (BGUC)

The issuance of Bank Guarantees based on the request and with a sure guarantee from the correspondent bank (The Instructing Party).

2. Bank to Bank Financing – Refinancing

A financing facility made by BNI to a correspondent bank in the form of payment for the realization of LC or Domestic LCN based on a loan agreement between BNI and the correspondent bank

3. Bank to Bank Financing-Trade Advance Financing

Financing made by BNI to correspondent banks with underlying transactions in the form of LC/ Domestic LC and non-LC/Domestic LC.

4. Bank to Bank Financing-Forfaiting

Purchasing the right to collect Banker's Acceptances (B/As) held by the Correspondent Bank as a Nominated Bank (forfeiter) in respect of L/C or Domestic L/C transactions without recourse.

5. Bank to Bank Financing-Term Loan Facility Bank

Granting of loan facilities to other banks either with the status of BUMN, BUSN, BUMD, or Branch Offices of Foreign Banks domiciled in Indonesia.

6. Risk Participation

Is the partial transfer of risk owned by an applicant bank to BNI in a funded or unfunded form that is related to trade transactions agreed upon between the applicant bank and the other bank.

Remittance Services

Remittance is a form of money transfer service to another designated party (beneficiary customer or institution) based on a written order or request from an individual, legal entity (ordering customer or institution) to the remitting bank/ institution both inside and outside the country.

The types of remittances are as follows:

1. Incoming Fund Transfer or Incoming transfer (ITR)

Incoming remittances

Remittances from individuals or legal entities through overseas remitting banks in foreign currency/rupiah, or through domestic banks, especially for foreign currency, addressed to BNI as the recipient bank, for recipients' benefit whose names are designated in the remittance, either as BNI customers or non-customers in the country.

2. Outgoing Fund Transfer (OTR)

An Unconditional written order from BNI at the request of a customer and/or for BNI's benefit addressed to the correspondent bank to pay a certain amount of money to a specified person/entity (beneficiary). Includes foreign currency remittances to correspondent banks at home and abroad. The OTR BNI transaction code is S10. BNI remittances can be received on the same day (same day service) with time limits (cut off time) determined by each currency. BNI also has multi currency remittances services that can be received in 125 (one hundred twenty five) types of local currency from 160 (one hundred sixty) countries.

International Desk

To strengthen BNI's role as a Gate to Investment, Overseas Branch Offices and Financial Institutions (FI) and to support Foreign Direct Investment (FDI), an International Desk has been established to deliver banking services to foreign entities investing in Indonesia through the following facilities:

1. Loans

The International Desk unit provides loan facilities in the form of Rp-denominated loans or offshore loans in USD and JPY currencies as well as Open Account Financing (OAF) for international corporate clients in Indonesia with competitive interest rates, based on Stand by LC (SBLC) guaranteed by international banking/financial institutions. In providing these loans or Open Account Financing (OAF) scheme, the International Desk coordinates with the Credit unit.

2. Third Party Funds

Cooperating with branches in providing Savings, Current and Time Deposit account opening services to customers, both foreign individuals and international corporations in Indonesia.

3. Cash Management

Cooperating with the Transaction Banking Services (TBS) division in the marketing of BNI Cash management products to international corporation customers in Indonesia.

4. Credit Card

Cooperating with the Card Business (BSK) division in offering personalized credit cards to foreign individuals and international corporations.

Overseas Branch Offices (KCLN)

The Overseas Branch Office (KCLN) network provides BNI with a competitive edge in strengthening its International business and to supporting global business partners in expanding their business.

KCLN has 3 Strategic Values as follows:

1. Source of International Funding

BNI focuses on increasing the role of Overseas Branch Offices (KCLN) and correspondent banks as a source

of low-cost funding to support BNI's business growth and customer business development, especially export-based corporations.

2. Go Global with BNI

BNI strives to support Indonesian businesses to expand in the global market and plays an active role in providing digital-based global services.

3. Gate to Investment

Optimizing the role of Overseas Branch Offices and Financial Institution (FI) units to support foreign investment as well as optimizing the International Desk in providing banking and advisory services to foreign entities interested in investing in Indonesia.

Products and Services Provided by Overseas Branch Offices (KCLN)

The above-mentioned strategic values are manifested in the form of products and services provided by the KCLN to customers, and include:

1. Lending Products

The provision of lending products is focused on the value-chain of Indonesia-related companies to assist in their business development through:

a. Local Loans

Local loans are a credit facility offered by Overseas Branch Offices (KCLN) to Indonesian business groups or the overseas counter parties of Indonesian companies, both bilaterally and syndicated. The types of loans offered can be in the form of Working Capital Loans, Investment Loans and term loans.

b. Offshore Loans

Offshore loans are a facility provided by the Overseas Branch Offices (KCLN) to debtor customers in Indonesia in the form of a foreign currency-denominated working capital loan (short-term) to finance the procurement of capital goods for the purpose of rehabilitation, modernization, and expansion, with medium or long-term loan settlement.

c. Trade Loans

Trade Loans are a financing facility offered by the Overseas Branch Offices (KCLN), based on Trade Finance transactions conducted by Indonesian business groups and the overseas counter parties of Indonesian companies.

2. Third Party Fund Products

Overseas Branch Offices with Full License Bank status (KCLN Singapore, KCLN Hong Kong, KCLN Tokyo and KCLN Seoul) can carry out activities to collect Third Party Funds (DPK) from local customers where the KCLN is located, consisting of Savings, Time Deposits, and Current Account products.

Bank to Bank Funding

Bank to Bank Funding is an interbank lending-borrowing activity to meet liquidity and financing needs for customers. These activities include, among others, Banker Acceptance, Term Loans or Money Market Borrowing. Bank to Bank Funding is carried out by leveraging on synergies and mutual business relationships with leading correspondent banks around the world.

Treasury and International Segment Strategy in 2021

International Segment Strategy in 2021

The International Division, through its vision of being a major player in the international trade and international payment business for the banking industry in Indonesia, continued to support BNI's business through various strategies in 2021.

The entire KCLN network is located in business and world economic centers such as Singapore, Hong Kong, Tokyo, Seoul, London and New York. At the end of 2021, BNI is in the process of expanding its network by establishing Representative Offices in several countries, which aims to increase BNI's business in several potential countries. Network expansion will continue to be carried out in the years to come in countries that have high Indonesia Related business potential.

BNI followed several strategies to strengthen its international business including:

1. Establishing an International Desk, which consisted of the Japan Desk, Korean Desk and China Desk;
2. Establishing a Syndicated Loan Desk in Singapore;
3. Establishing BNI Securities Private Limited in Singapore.

One of the keys to the International segment's success was to be focused and selective in managing assets by controlling business risk by:

1. Focusing on Indonesia Related and Diaspora businesses, particularly in supporting the value chain of Indonesian companies overseas and providing superior digital-based global services. This business focus has improved the following:
 - a. Supervision of business activities;
 - b. Domestic trade business growth;
 - c. Encouraging local loan expansion at the KCLN.
2. Taking advantage of the trend of low interest rates in world financial markets to improve customer business competitiveness and optimize Net Interest Income;
3. Optimizing digital banking services, especially in the face of the Covid-19 pandemic, where the majority of people reduced their activities outside the home. One being the Digital Remittance Service (BNI More and OTR Mobil Tunai), which maintained the remittance business penetration in 2022.

Treasury and International Segment Productivity in 2021

1. Overseas Branch Offices (KCLN)
 - a. KCLN assets

Overseas Branch Offices (KCLN) Asset Development

	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP- MILLION)	COMPOSITION (%)	TOTAL (RP- MILLION)	COMPOSITION (%)	NOMINAL (RP- MILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Total Loan	58,605,171	66.2	53,114,046	65.3	5,491,125	10.3
Other Assets	29,913,188	33.8	28,189,499	34.7	1,723,689	6.1
Total Assets	88,518,359	100.0	81,303,545	100.0	7,214,814	8.9

In 2021, KCLN booked financing of Rp58.6 trillion, an increase of 10.3% compared to 2020. This growth is also in line with KCLN's strategy to focus on Indonesian-Related Business financing as show the KCLN efforts to support Indonesian companies through Go Global and increased trade transactions between Indonesia. This strategy has proven to be effective in maintaining the consolidated KCLN non-performing loan level at 0.25% of the total portfolio.

b. KCLN Third Party Fund Products

Total Foreign Branch Offices (KCLN) Third Party Fund)

	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP- MILLION)	COMPOSITION (%)	TOTAL (RP- MILLION)	COMPOSITION (%)	NOMINAL (RP- MILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Savings	119,461	2.5	120,444	1.4	(983)	(0.8)
Current Accounts	3,474,695	72.8	2,498,001	29.4	976,694	39.1
Time Deposits	1,178,527	24.7	5,893,774	69.2	(4,715,247)	(80.0)
Total	4,772,683	100.0	8,512,219	100.0	(3,739,536)	(43.9)

IN 2021, total TPF amounted to Rp4.7 trillion, a decrease of 43.9% YoY, due to a decrease in deposits by 80.0% and savings by 0.8%. The decrease in deposits was due to a decrease in the outstanding Certificates of Deposit at New York KCLN of Rp5.0 trillion as of December 31, 2020, with all maturing in 2021. The outstanding certificate of deposits as of December 31, 2021 was Rp0.7 trillion compared to January 2021. In 2022, KCLN plans to reissue Certificates of Deposit at New York KCLN as part of its liquidity back stop strategy.

c. KCLN Revenue

Overseas Branch Offices (KCLN) Revenue

	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP- MILLION)	COMPOSITION (%)	TOTAL (RP- MILLION)	COMPOSITION (%)	NOMINAL (RP- MILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Net Interest Income	1,906,863	84.7	1,741,547	69.5	165,316	9.5
Fee Based Income	345,598	15.3	764,277	30.5	(418,679)	(54.8)
Net Operating Income	2,252,461	100.0	2,505,824	100.0	(253,363)	(10.1)

Net Operating Income in 2021 amounted to Rp2.2 trillion and was driven by Net Interest Income growth of 9.5% YoY due to efficiencies in cost of funds and loans that grew positively during 2021. Fee Based Income in 2021 came under pressure due to a decrease in Capital Gain as a result of unfavorable market conditions.

2. Domestic and International Banking Services faced challenges in 2021 due to unfavorable market conditions during the pandemic, weakening global trade up to session 1, increased competition in the expansion of quality assets, as well as the expectation of rising benchmark interest rates which suppress bond prices. A snapshot of international business revenue for 2021 follows:

International Business Income

	2021		2020		INCREASE (DECREASE)	
	TOTAL (RP- MILLION)	COMPOSITION (%)	TOTAL (RP- MILLION)	COMPOSITION (%)	NOMINAL (RP- MILLION)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Fee Based Income	1,832	64.1	1,651	63.1	181	11.0
Interest Income	1,025	35.9	967	36.9	58	6.0
Net Operating Income	2,857	100.0	2,618	100.0	239	9.1

In the midst of declining global and domestic economic growth rates, International business still recorded a positive performance and growth. Total Domestic International Business Revenue in 2021 increased by Rp239 billion, or 9.1% YoY, driven by growth in Fee Based Income, especially from Trade Finance, and Remittances and Interest income from the Financial Institutions and International Desk.

Financial Institutions business revenue on a YoY basis was quite stable with a growth of 0.8%. The COVID-19 pandemic did bring a decline in investments in various sectors in Indonesia. This resulted in a decrease in Fee Based Income from BNI's Financial Institutions business. However, the decrease in Fee Based Income was compensated for by a significant growth in interest income in the Financial Institutions business, which grew 50% YoY, and was derived from an increase in bank-to-bank financing provided by BNI to correspondent banks.

Remittance activities previously affected by the COVID-19 pandemic showed improvement with an 8.3% increase in volume to reach USD83.6 billion. Digitalization of the remittance process as the main strategy changed customer behavior to choosing transactions through digital channels, making transactions easier and more efficient. This strategy helped maintain income from the remittance business stable throughout 2021. The remittance business performance success can be seen in the following achievements:

1. BNI cooperated with 100 remittance partners worldwide, more than 55% of whom successfully transacted using the BNI API Remittance service which is equipped with the following features:
 - a. Transactional remittance services intended for bank accounts, e-wallet, bill payments and can also be withdrawn in cash at all BNI branch offices, Agen 46 and BNI partners including the Post Office, Pawnshops and Alfamart.
 - b. Inquiry status service and transaction movements that can be accessed by partners in real time.
2. BNI MORE, the Mobile Remittance application that was launched in 2017 in Singapore has become the customer's choice for sending money to Indonesia. Incoming remittance activity from this digital platform grew by 30% and became a development standard to be applied in other countries.

3. While domestically, customers also switched to using BNI Direct and BNI Mobile Banking digital channels to send money overseas. Outgoing Remittance activities through digital platforms grew by 41%, and future service features will be added, including currency options and real-time inquiry of transaction status.

These success stories were helped by the role played by Remittance Representatives in 6 countries including Malaysia, Hong Kong, Taiwan, South Korea, UAE and Saudi Arabia, who maintained relationships with partners and conducted marketing activities to Indonesian diaspora communities in their countries.

The International Desk business also showed good growth. This is reflected in the growth of third party funds and loans disbursed by the International Desk, which increased rapidly. On a YoY basis, third party funds managed by the International Desk grew by 10.5%, while loans grew by 17.3% YoY. These increases contributed to an increase in income in the form of interest and fees that grew by 32.9% compared to 2020.

The Trade Finance business maintained a good performance and contribution to BNI's profit. This is reflected in the Trade Finance income which grew by 2.17% YoY, less the growth in Fee Based Income of 7.46% YoY. A number of strategies implemented to support the Trade Finance performance achievement in 2021, included:

1. Focusing on working on international (Export & Import) and domestic trade transactions that are starting to recover from the effects of the Covid 19 pandemic;
2. Optimizing the provision of digital-based Trade Finance services through BNI Trade Online as a branchless & paperless service solution;
3. Providing Trade Finance products & services as tailored solutions to provide added value as a solution for customers' business needs in accordance with industry variables, for retaining existing customers and acquiring new customers;
4. Optimizing the use of the customer's Trade Facility by offering the appropriate needs for a more dynamic market;
5. Actively working on the existing customers' business value chains to increase the volume of closed loop trade finance transactions with BNI.

Treasury and International Segment Profitability

Treasury and International segment income and profitability are presented as follows:

ACCOUNTS	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Interest income and sharia income - net*	4,000,114	2,928,779	1,071,335	36.6
Other operating income	5,222,711	4,500,467	722,244	16.1
Establishment of allowance for impairment losses	(762,544)	(444,906)	317,638	71.4
Other operating expenses	(2,240,281)	(2,418,814)	(178,533)	(7.4)
Operational profit	6,220,000	4,565,526	1,654,474	36.2
Non-operating income/(expenses) - net	(1,637)	16,016	(17,653)	(110.2)
Profit before tax expenses	6,218,363	4,581,542	1,636,821	35.7
Total Assets	412,545,301	306,013,725	106,531,576	34.8
Total Liabilities	75,632,039	79,531,757	(3,899,718)	(4.9)

*Includes internal transfer pricing components between operating segments.

Treasury and International Segment Prospects and Strategies for 2022

International Segment Strategy 2022

The International Division, through its vision of being a major player in the international trade and international payment business for the banking industry in Indonesia, will continue to support BNI's business through the following strategies in 2022.

BNI will implement several strategies for strengthening international business including:

1. Strengthening the Syndicated Loan Desk at the Singapore Overseas Branch Office to explore the potential of syndicated Indonesia-related business in Singapore through synergistic collaboration with the Head Office Syndication Division.
2. Focusing on improving banking services to overseas Indonesian Diaspora, through financing Indonesian Diaspora MSMEs, opening domestic Taplus BNI accounts, providing financial inclusion training, and offering investments in the
3. Implementing BNI Direct at KCLN as a platform for supporting transactional banking activities to meet the expectations of KCLN customer needs. In the piloting stage, it will be implemented first at KCLN London.
4. Becoming part of the SOE overseas program through Indonesia Incorporated.

One of the International segment will be to focus and be selective in managing assets by controlling business risk by:

1. Focusing on Indonesia-Related and Diaspora businesses, especially in supporting the Value Chain of Indonesian overseas companies' businesses and providing superior digital-based global services.
2. Taking advantage of the trend in low interest rates in world financial markets to improve customer business competitiveness and optimize Net Interest Income;

3. Focusing remittance business in 2022 on increasing digital channel capacity, focusing on programs that have a massive impact on the FBI achievements, collaborating with related units to work on certain segments, and growing the number of customer based. Financial Institutions business strategy initiatives in 2022 will include becoming an arranger for Export Credit Agency Financing, Foreign Private Creditors, syndications and credit referrals in collaboration with correspondent banks and other strategic partners. In addition, it will also develop the digitization of Bank Guarantee Under Counter to improve services and make it easier for customers.
4. One of the focuses for increasing BNI's trade business in 2022 is to expand the export market with the following initiatives:
 - a. Increasing BNI's presence as a Bank that supports national export activities through the Regional Trade Forum activities in every BNI Regional Office by cooperating with all stakeholders supporting export activities in the Region.
 - b. Providing structured trade financing schemes to meet debtor financing needs more accurately at a minimal risk level, as well as providing more competitive pricing.
 - c. Optimizing the use of digital-based trade finance services, BNI Trade Online as a branchless & paperless service solution.



Head Office

Information on the Head Office Segment

The Head Office segment is a BNI Cost Center activity that cannot be classified into other segments.

Head Office Segment Profitability

The Head Office segment income and profitability is presented as follows:

ACCOUNTS	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Interest income and sharia income - net*	-	-	-	0.00
Other operating income	-	442,809	(442,809)	(100.0)
Establishment of allowance for impairment losses	(2,317,041)	(237,814)	(2,079,227)	874.3
Other operating expenses	-	-	-	0.00
Operational profit	(2,317,041)	204,995	(2,522,036)	(1230.3)
Non-operating income/(expenses) - net	(145,271)	(56,327)	(88,944)	157.9
Profit before tax expenses	(2,462,312)	148,668	(2,610,980)	(1756.3)
Total Assets	49,560,519	53,316,643	(3,756,124)	(7.0)
Total Liabilities	(8,930,757)	(7,477,355)	(1,453,402)	19.4

*Includes internal transfer pricing components between operating segments.

Subsidiaries

As one of the main banks in Indonesia, the role of BNI and its subsidiaries, as members of the BNI Group, in the financial industry occupies a very strategic position. To that end, BNI continues to improve the synergy between BNI and its subsidiaries so that they can provide comprehensive financial services under one umbrella to customers.

In accordance with the applicable banking industry regulations, BNI manages its subsidiary companies by investing in companies engaged in finance. By the end of 2021 BNI had equity participation in 9 (nine) subsidiaries. Majority ownership in several subsidiary companies is intended to build strategic alliances and synergies to provide added value for BNI customers. Meanwhile, minority ownership is carried out to comply with applicable policies/regulations such as OJK and BI, as well as in the context of building business cooperation with BNI partners.

Subsidiaries in which BNI acts as the majority shareholder are PT BNI Life Insurance (60.0%), PT BNI Sekuritas (75.0%), PT BNI Multifinance (99.9%) and BNI Remittance Ltd (100.0%). Meanwhile, minority shareholdings include PT Bank Syariah Indonesia Tbk (24.9%), PT Pemeringkat Efek Indonesia (0.16%), PT Kustodian Sentral Efek Indonesia (2.5%), PT Bank Mizuho Indonesia (1.0 %), and PT Bank Tabungan Pensiunan Nasional Tbk (0.15%).

In 2021, PT Bank BNI Syariah, a subsidiary of BNI as a majority shareholder, together with PT Bank Syariah Mandiri and PT Bank BRI Syariah Tbk, effective February 1, 2021 merged to become PT Bank Syariah Indonesia Tbk ("BSI"). BNI with a share ownership of 24.9%, still remains as the controlling shareholder in BSI, together with PT Bank Mandiri (Persero) Tbk and PT Bank Rakyat Indonesia (Persero) Tbk with ownership in BSI of 50.8% and 17.3%, respectively. Through this merger, BSI will become the largest Sharia entity in Indonesia, playing a greater role in the development of the sharia economy as a source of inclusive economic growth, with the large potential for the sharia industry in Indonesia and globally.

**Notes:**

Operating Year

As the public and corporate needs develop for increasingly diverse financial services requires banks to provide integrated financial services. With restrictions on banking services/products from the authorities, banks cannot meet all stakeholder needs for financial services, so it is necessary to involve subsidiary companies.

BNI Subsidiaries Profit Performance

	2021	2020	2019	2018	2017	INCREASE (DECREASE) 2020-2021	
	TOTAL (RP-BILLION)	TOTAL (RP-BILLION)	TOTAL (RP-BILLION)	TOTAL (RP-BILLION)	TOTAL (RP-BILLION)	NOMINAL (RP-BILLION)	PERCENTAGE (%)
	(1)	(2)				(3 = 1-2)	(3/2)
BNI Life	158,08	85,98	302,10	185,04	374,90	72,10	83.9
BNI Sekuritas	61,19	36,39	20,72	18,28	10,91	24,80	68.2
BNI Multifinance	11,01	6,25	19,37	27,36	26,87	4,76	76.2
BNI Remittance	3,53	3,98	0,77	0,37	(1,00)	(0,45)	(11.3)
TOTAL	233,81	132,60	342,96	231,05	411,68	101,21	76.3

In 2021 all BNI Subsidiaries posted A positive performance, with an overall total profit of Rp234 billion, growing by 76.32% compared to Rp133 billion in 2020. The biggest profit growth was at BNI Life, due to the growth in Investment and Premium income, although it was still overshadowed by an increase in claim fees related to the COVID-19 pandemic that was still ongoing. BNI Sekuritas occupied the second largest profit growth, due to the improving IHSG performance driven by the growth in Brokerage & Investment Banking transactions, and the growth in the number of BNI Sekuritas customers. BNI Multifinance's performance grew in line with the chosen strategy to focus the business on risk tolerance in consumer financing. Even though BNI Remittance's 2021 profit performance decreased compared to 2020, its business performance is still growing. The decline in profits was due to the decline in the HKD to rupiah exchange rate, which had previously jumped sharply in 2020.

Looking forward, BNI's business development strategies to improve financial performance, business growth, customer satisfaction, and the position of subsidiaries among peer groups and industries in 2022 includes the following:

1. Improving and strengthening the business synergy of Subsidiaries with BNI, through BNI's distribution channels and point of sales;
2. Improving the IT synergy between Subsidiaries and BNI;
3. Applying a strategic policy for capital management that includes supporting the Subsidiaries' business to grow bigger;
4. Optimizing the Executive Dashboard Management as a tool for monitoring the performance of Subsidiaries;
5. Increasing joint marketing and corporate communication activities between Subsidiaries and BNI, especially with related Business Units and Outlets.

PT BNI Life Insurance ("BNI Life")

BNI Life Financial Performance

	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Financial Position				
Assets	22,769,205	20,570,606	2,198,598	10.69
Earning/Investment Assets	20,695,719	19,044,501	1,651,218	8.67
Obligations	16,871,697	14,700,226	2,171,471	14.77
Equity	5,897,508	5,870,380	27,128	0.46
Profit and Loss				
Operating Income	5,998,545	5,419,742	578,804	10.68
Gross Premium Income	4,627,857	4,569,563	58,293	1.28
Net Premium Income	1,258,787	744,460	514,327	69.09
Non LINK	975,393	750,966	224,427	29.89
LINK	283,394	(6,505)	289,899	4.456.23
Other income	111,902	105,718	6,184	5.85
Total Expenses	(5,849,847)	(5,329,626)	520,221	9.76
Insurance/Claim Fee	(4,487,687)	(4,012,617)	475,070	11.84
Acquisition Fee	(645,153)	(641,614)	3,540	0.55
Business costs	(493,220)	(457,330)	35,890	7.85
Non operating expenses (income)	223,787	218,066	5,721	2.62
Profit before tax	148,699	90,115	58,583	65.01
Tax	(9,377)	(4,131)	(5,245)	126.97
Laba Bersih	158,075	85,984	72,091	83.84

In 2021, BNI Life Insurance posted a net profit after tax of Rp158 billion, an increase of 83.84% from Rp86 billion in 2020. This increase was due to the increase in income in 2021 of 10.68%, which was greater than the increase in expenses of 9.76%. The largest growth was in investment income at 69.09%, in line with the improving investment climate and the IHSG. BNI Life assets managed to reduce costs amidst soaring Claim Fees during the ongoing pandemic. BNI Life's assets amounted to Rp22,769 billion, an increase of 10.69% from Rp20,571 billion in 2020.

BNI Life Financial Ratio Performance

	2021 (%)	2020 (%)	INCREASE (DECREASE)	
			NOMINAL (%)	PERCENTAGE (%)
Return On Asset (ROA)	0,77	0,48	0,29	61.17
Return On Equity (ROE)	2,72	1,53	1,19	77.61
Operating Expenses to Operating Income (BOPO)	96,14	96,77	(0,63)	(0.65)
Investment Return	6,08	3,91	2,17	55.60
Risk Based Capital (RBC)	717,33	781,06	(63,73)	(8.16)

BNI Life's ROA and ROE in 2021 stood at 0.77% (2020 0.48%) and 2.72% (2020 1.53%), an increase due to profit growth. BOPO stood at 96.14% (2020 by 96.77%) a decrease due to improved performance with income growth greater than the increase in expenses. BNI Life's RBC in 2020 stood at 717.33%, a decrease from 781.06% in 2019, in line with business growth.

In recognition of the performance achieved, BNI Life again won awards in 2021 including the following:

Awards Received by BNI Life in 2021

NO.	AWARD	PREDICATE	CATEGORY	AWARDER	DESCRIPTION	DATE
1	Indonesia Public Relation Award 2021	The Best Public Relation in Company Management	Life Insurance	Warta Ekonomi	Marvelous Commitment and Dedication Toward Customer Services and Experiences	26.01.21
2	Iconomics Syariah Award	The best Sharia Unit Life Insurance	Asuransi Syariah	Iconomics		29.01.21
3	Unit Link Award 2021	Unit Link Terbaik dana aktif	Saham periode 5 th	Majalah Investor		18.02.21
4	Unit Link Award 2021	Unit Link Terbaik dana aktif	Saham periode 7 th	Majalah Investor		18.02.21
5	Unit Link Award 2021	Unit Link Terbaik dana aktif	Saham periode 10 th	Majalah Investor		18.02.21
6	Unit Link Award 2021	Unit Link Terbaik dana kombinasi	Saham periode 3 th	Majalah Investor		18.02.21
7	Unit Link Award 2021	Unit Link Terbaik dana kombinasi	Saham periode 5 th	Majalah Investor		18.02.21
8	Unit Link Award 2021	Unit Link Terbaik dana kombinasi	Saham periode 7 th	Majalah Investor		18.02.21
9	Unit Link Award 2021	Unit Link Terbaik dana kombinasi	Campuran periode 10 th	Majalah Investor		18.02.21
10	Unit Link Award 2021	the best Syariah Balance Fund	Campuran syariah 3 th	Majalah Investor		18.02.21
11	Unit Link Award 2021	the best Unit link Dana mantap 13	Pendapatan tetap periode 3 th	Majalah Investor		18.02.21
12	Unit Link Award 2021	Unit Link Terbaik Dana Cemerlang	Pendapatan tetap periode 3 th	Majalah Investor		18.02.21
13	Unit Link Award 2021	Unit Link Terbaik Dana Cemerlang	Pendapatan tetap periode 5 th	Majalah Investor		18.02.21
14	Unit Link Award 2021	Unit Link Terbaik Dana Cemerlang	Pendapatan tetap periode 7 th	Majalah Investor		18.02.21
15	Unit Link Award 2021	Unit Link Terbaik Dana Liquid	Pasar Uang 3 th	Majalah Investor		18.02.21
16	Indonesia Most Popular Digital Financial Brands Awards 2021	Millenials Popular Digital Brands in E Customer Service	Life Insurance > 15 T	Iconomics		26.02.21

NO.	AWARD	PREDICATE	CATEGORY	AWARDER	DESCRIPTION	DATE
17	Iconomics Inspiring Women Award 2021	Inspiring Women 2021	Industri asuransi Syariah	Iconomics		31.03.21
18	Indonesia Most Acclaim Companies Awards 2021	Indonesia Good Acclaimed Company 2021	Life Insurance	Warta Ekonomi		28.04.21
19	Teropong Csr Award 2021	Peduli COVID-19	Peduli COVID-19	Teropong Senayan		28.04.21
20	Excellent Service Experience Index 2021	Excellent	Insurance Life & Health	Majalah Marketing		05.21
21	Digital touch Points customer engagement Award 2021	Good	Insurance Life & Health	Majalah Marketing		05.21
22	Sharia Finance Award 2021	The Outstanding Life Protection & Sharia Based investment Product	Sharia Bussines Unit of Life Insurance	Warta Ekonomi		31.05.21
23	Indonesia Millenial's Brand Choices Award 2021	Indonesia Outstanding Millenials Brand Choice 2021	Life Insurance	Warta Ekonomi		24.06.21
24	Indonesia Financial Top Leader Award 2021	Best Leader	Life Insurance, Asset 10-20T	Warta Ekonomi	Business Resilience through Business Innovation Effectiveness of Digital Acceleration	28.07.21
25	22nd Infobank Insurance Award 2021	Excellent	Asuransi Jiwa Premi Bruto 1-5 Triliun	Infobank		08.06.21
26	Insurance Market Leader Award 2021	Life Insurance Market Leader	Life Insurance	Media Asuransi		31.08.21
27	Asuransi Terbaik 2021	Asuransi Jiwa Terbaik	Aset 10-25 Triliun	Majalah Investor		21.09.21
28	Infobank 10th Sharia Award	Excellent	Unit Syariah Perusahaan Asuransi Jiwa	Infobank		30.09.21
29	TOP GRC Awards 2021	TOP GRC 2020 4 Stars	TOP GRC	TOP Business		10.07.21
30	TOP GRC Awards 2021	The Most Committed Leader 2021	TOP GRC	TOP Business		10.07.21
31	Indonesia BUMN Awards 2021	The Best Brand Popularity	Life Insurance	Iconomics		10.12.21
32	The Best Contact Center Indonesia 2021	The Best Business Contribution	Gold	ICCA		21.10.21
33	Indonesia Best Insurance Award 2021	Best Insurance 2021	Life Insurance	Warta Ekonomi	Outstandng Financial Performance & Corporate Bussines Development	28.10.21

BNI Life's business strategy planning for 2022 will be a continuation of the strategic plans of previous years. In formulating the strategies, the Company considered internal conditions, changes in customer behavior due to the COVID-19 pandemic, industry trends, and macroeconomic conditions. BNI Life will strive to adapt to all changes, both internally and externally, to achieve business growth in 2022.

To achieve the company's performance in 2022, BNI Life set several main strategies as follows:

1. Maintaining regular premiums, increasing unit links and selling profitable products;
2. Improving the product mix & persistence;
3. Un-organic business strategy.

PT BNI Sekuritas ("BNI Sekuritas")

BNI Sekuritas Financial Performance

	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Financial Position				
Assets	1,655,831	1,510,990	144,841	9.59
Obligations	367,342	510,380	(143,039)	(28.03)
Equity	1,288,489	1,000,609	287,880	28.77
Profit and Loss				
Income	451,620	330,640	120,980	36.59
Brokerage Commissions	164,433	122,487	41,946	34.24
Investment Management Fees	106,588	96,925	9,663	9.97
Brokerage Comm. from Fix Income Activities	44,020	38,742	5,279	13.63
Fees from Inves. Banking Activities	114,594	46,659	67,935	145.60
Increase/(Decrease) on Net Asset Value of Mutual Funds	1,141	(132)	1,273	965.67
Interest Revenue from Fund Separation & Bond & Dividend	3,538	6,834	(3,295)	(48.22)
Gain/(Loss) on Trading of Marketable Securities - Net	262	133	128	96.18
Margin and Overdue Revenue	12,873	11,436	1,437	12.57
Other	4,171	7,556	(3,385)	(44.80)
Business Expenses	(371,415)	(290,473)	80,941	27.87
Other income	15,412	21,056	(5,644)	(26.81)
Interest & Other Finance Fees	(18,507)	(17,203)	(1,305)	7.58
Total Income	467,032	351,696	115,336	32.78
Total Expenses	389,922	307,676	82,246	26.73
Profit Before Tax	77,110	44,020	33,090	75.17
Tax	(15,915)	(7,618)	(8,297)	108.91
Profit After Tax	61,195	36,402	24,793	68.11

By the end of 2021, BNI Sekuritas managed to record a net profit of Rp61 billion, growing by 68.11% from 2020 of Rp36 billion. Operating income in 2021 amounted to Rp452 billion, grew by 36.59% from 2020 of Rp331 billion.

The main income sources are derived from brokerage commissions that contributed Rp164 billion, or 36.41% of the total operating income of BNI Sekuritas, with an increase of 34.24%, Investment Banking Fees contributed Rp115 billion, an increase of 145.60%, and investment management fees (through BNI Asset Management as a subsidiary of BNI Sekuritas) contributed Rp107 billion or grew 9.97%.

The total value of BNI Sekuritas' equity brokerage transactions in 2021 was Rp125 trillion, an increase of 40% from Rp89 trillion in 2020. Online transactions contributed Rp37 trillion, with Regular transactions contributing Rp88 trillion. The number of active BNI Sekuritas accounts in 2021 stood at 182,436 accounts, an increase of 26% from 144,802 accounts in 2020.

BNI Sekuritas Financial Ratio Performance

	2021 (%)	2020 (%)	INCREASE (DECREASE)	
			NOMINAL (%)	PERCENTAGE (%)
Return On Asset (ROA)	4.66	2.91	1.74	59.85
Return On Equity (ROE)	4.75	3.64	1.11	30.55
Operating Expenses to Operating Income (BOPO)	82.24	87.85	(5.61)	(6.39)

In 2021, BNI Sekuritas ROA and ROE stood at 4.66% (2020 2.91%) and 4.75% (2020 3.64%). The ROA and ROE increase was due to profit growth, and BOPO improved to 82.24% in 2021 from 87.85% in 2020.

In recognition for its performance during 2021, BNI Sekuritas won awards from several institutions including:

Awards Received by BNI Sekuritas in 2021

NO.	AWARD	PREDICATE	CATEGORY	AWARDER	DESCRIPTION	DATE
1	Most Popular Digital Financial Brands Award	Predicate 2	Millennials' Choice	Iconomics Indonesia's		February 2, 2021
2	Top Digital Corporate Brand Award 2021	Top Special Achievement BUMN	Subsidiary BUMN	Suara Pemerintah	2021 Special Achievement	September 29, 2021

The national capital market growth trend will continue in 2022, due to the increasing number of corporations or MSMEs using the capital market as a source of business financing and will also be enlivened by the arrival of technology-based Unicorn companies.

However, BNI Sekuritas will also pay attention to the global challenges in 2022. The global and domestic economic recovery challenges are filled with uncertainty and the potential of a third wave of the COVID-19 variant. In addition, there are still unforeseen risk from global events such as an energy crisis, or the Evergrande case that has slowed down the Chinese economy, as well as monetary policy normalization or tapering off of the US Central Bank, which is likely to start at the end of 2021.

Facing this uncertain business situation, BNI Sekuritas has set several main strategies for 2022 including:

1. Increasing the customer base and business volumes through synergies with BNI and the BNI Group;
2. Increasing synergy with BNI corporate banking by providing advisory and IPO services to BNI customers, as well as optimizing the existing BSPL to support investment banking transactions;
3. Strengthening risk management through improvements and refinements to operational excellence and HC quality;
4. Improving the technology infrastructure quality and utilizing digital technology in collaboration with BNI and the best technology service providers.

PT BNI Multifinance ("BNI Multifinance")

BNI Multifinance Financial Performance

	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Financial Position				
Assets	1,241,245	1,623,227	(381,982)	(23.53)
Cash & Bank	24,993	27,726	(2,732)	(9.86)
Deposits	25,229	60,464	(35,234)	(58.27)
Financing	1,089,303	1,517,353	(428,050)	(28.21)
CKPN for Financing	(81,804)	(124,130)	42,325	34.10
Leasing	848,357	1,257,572	(409,215)	(32.54)
Consumer Payments	134,520	135,793	(1,273)	(0.94)

	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Factoring	106,426	123,989	(17,563)	(14.16)
Liabilities	980,022	1,373,015	(392,993)	(28.62)
Equity	261,222	250,212	11,010	4.40
Profit and Loss				
Operating Income				
Leasing Income	126,677	162,287	(35,610)	(21.94)
Operating Lease Income	29,657	36,850	(7,193)	(19.52)
Income from Consumer Payments	16,587	18,999	(2,412)	(12.70)
Income from Factoring	13,277	18,342	(5,065)	(27.61)
Other Operating Income	5,057	3,000	2,057	68.58
Total Operating Income	191,256	239,478	(48,222)	(20.14)
Total Operating Expenses	(163,999)	(222,197)	(58,198)	(26.19)
Other Income (Expenses)	(7,086)	1,365	(8,451)	(618.99)
Profit Before Tax	20,171	18,646	1,525	8.18
Tax	(9,161)	(12,393)	3,232	(26.08)
Net Profit After Tax	11,010	6,253	4,757	76.07

Up to December 2021, BNI Multifinance recorded a positive performance with a net profit of Rp11 billion, an increase of 76.07% from Rp6 billion in 2020. Total Assets amounted to Rp1,241 billion, a decrease of 23.53% from Rp1,623 billion in 2020. The decline in assets was due to BNI Multifinance shifting its business strategy to focus on financing the consumer segment (multi product & BNIMF OTO) especially in synergies with the BNI Group, with selected low risk customers to maintain a healthy portfolio.

BNI Multifinance Financial Ratio Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL (%)	PERCENTAGE (%)
Non Performing Loan (NPL) (%)	1.08	3.07	(1.99)	(64.82)
Return On Asset (ROA) (%)	1.40	1.01	0.39	38.58
Return On Equity (ROE) (%)	4.00	1.76	2.24	127.25
Operating Expenses to Operating Income (BOPO)	85.75	92.78	(7.04)	(7.58)
Debt Equity Ratio (DER) (kali)	3.7	5.49	(1.76)	(31.99)

BNI Multifinance's ROA and ROE in 2021 stood at 1.40% (2020 1.01%) and 4.00% (2020 1.76%) respectively, an increase in line with profit growth. BOPO stood at 85.75% (2020 92.78%), due to cost efficiencies by the company. NPL in 2021 stood at 1.08%, a decrease from 2020 at 3.07%. The DER in 2021 stood at 3.7, down from 5.49 in 2020 due to the decline in bank loans, in line with the declining financing business.

Awards Received by BNI Multifinance in 2021

NO.	AWARD	PREDICATE	CATEGORY	AWARDER	DESCRIPTION	DATE
1	Indonesia Good Corporate Governance Award VI 2021	1st Place - The Best (Silver)	Multifinance Assets: IT-ST	Economic Review	Standardization of the Implementation of Sustainable GCG after the Pandemic COVID-19"	05.02.21
2	Indonesia Enterprises Risk Management Award IV 2021	1st Place - The Best (Silver)	Multifinance - State Owned Enterprise's & Subsidiaries - Asset: < 10 T	Economic Review	Strengthening Risk Awareness in the Face of Future Business Disruptio	09.04.21

NO.	AWARD	PREDICATE	CATEGORY	AWARDER	DESCRIPTION	DATE
3	Indonesia Best Multifinance Awards 2021	Best Multifinance 2021 with Great Financial Performance & Business Segmentation Development	Multifinance Assets: 1T-5T	Warta Ekonomi	Regain Stability Over The Calamity	29.09.21
5	Indonesia Finance Award-IV-2021 (IFA-IV-2021)	Gold Award (Excellent) - B	Soe & Subsidiaries Multifinance Company - Asset Rp 1T	Economic Review		19.11.21
6	3rd Indonesia Best Financial Brands Award 2021	Best Brand Image	Multifinance Assets: <Rp 15T	The Iconomics	Millennials' Choice	19.11.21

Consumer Financing will grow in 2022 in line with the optimism for economic growth and the return of business activities with the COVID-19 pandemic under control, which will increase people's purchasing power.

To minimize risk in 2022, BNI Multifinance has established the following business strategies:

1. Refocusing Business to Consumer Segment Financing;
2. Controlling and recovering NPF;
3. Digitizing Business Processes and Reporting;
4. Strengthening Funding Sources.

BNI Remittance Limited ("BNI Remittance")

BNI Remittance Financial Performance

	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Financial Position				
Assets	20,071	20,875	(805)	(3.85)
Current Assets	11,912	9,574	2,337	24.41
Fixed Assets	289	151	138	91.43
Other Assets	7,870	11,150	(3,280)	(29.42)
Liabilities	9,033	13,416	(4,383)	(32.67)
Current Liabilities	9,033	13,416	(4,383)	(32.67)
Equity	11,038	7,460	3,578	47.96
Profit and Loss				
Income	15,011	15,305	(294)	(1.92)
Commission Earned	4,178	4,290	(112)	(2.61)
Exchange gain/Loss	2,196	4,145	(1,950)	(47.03)
Other Commission	8,638	6,869	1,768	25.74
Expenses	11,477	11,320	156	1.38
Operational Expenses	11,477	11,320	156	1.38
Earning Before Tax (EBT)	3,535	3,985	(450)	(11.30)
Tax*	-	-	-	-
Earning After Tax (EAT)	3,535	3,985	(450)	(11.30)

*) Tax BNI Remittance is nil, as there is no obligation to pay, due to an accumulation of negative profits in the equity component.

In 2021, BNI Remittance recorded a positive performance with a profit of Rp3.54 billion, a decrease of 11.30% from Rp3.98 billion in 2020. The decline was due to a decrease in Exchange gain/Loss in 2021 to Rp2.20 billion from Rp4.15 billion in 2020, due to a decrease in the HKD to Rp exchange rate that soared in 2020. BNI Remittance's main business is still improving, as seen in the opening of Taplus PMI accounts assisted through BNI Remittance during 2021 that reached 14,655 accounts (an average of 1,221 accounts per month) and the total number of Taplus PMI accounts opened through BNI Remittance that reached 64,851 accounts, an increase of 29.20% compared to 2020. Total BNI Remittance assets in 2021 amounted to Rp20.07 billion, a decrease of 3.85% from Rp20.87 billion in 2020.

BNI Remittance Financial Ratio Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL (%)	PERCENTAGE (%)
Return On Asset (ROA) (%)	16.72%	34.22%	(17.50)	(51.14)
Return On Equity (ROE) (%)	36.94%	52.91%	(15.97)	(30.18)
Operating Expenses to Operating Income (BOPO)	76.45%	72.06%	4.39	6.10
Debt Equity Ratio (DER) (times)	0.818	1.798	(0.98)	(54.49)

BNI Remittance's ROA and ROE in 2021 stood at 16.72% (2020 34.22%) and 36.94% (2020 52.91%), respectively, a decrease due to the decrease in profits, and the increase in equity from retained earnings BOPO that increased to 76.46% in 2021 from 72.06% in 2020.

Especially for BNI Remittance, the improving conditions during the COVID-19 pandemic will open up the potential for a distribution of migrant workers from Indonesia to Hong Kong. Welcoming a challenging 2022, BNI Remittance focuses on the following business strategies:

1. Digitizing the remittance business and account opening process;
2. Synergizing with the BNI Group;
3. Optimizing cooperation with counterparts.

Subsidiary Segment Profitability

The Subsidiary Segment income and profitability are presented as follows:

ACCOUNTS	2021 (RP- MILLION)	2020** (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)
Interest income and sharia income - net*	371,296	151,550	219,746	145.0
Premium income - net	1,398,957	1,471,088	(72,131)	(4.9)
Other operating income	593,853	459,914	133,939	29.1
Establishment of allowance for impairment losses	(50,935)	(7,746)	43,189	557.6
Other operating expenses	(1,909,666)	(1,782,544)	127,122	7.1
Operational profit	403,505	346,262	57,243	16.5
Non-operating income/(expenses) - net	(97,627)	(79,130)	(18,497)	23.4
Profit before tax expenses	305,878	267,132	38,746	14.5
Total Assets	25,686,351	27,226,276	(1,539,925)	(5.7)
Total Liabilities	18,228,094	49,142,102	(30,914,008)	(62.9)

*Includes internal transfer pricing components between operating segments.

**Financial Performance 2020 excludes BNI Syariah performance figures.

Subsidiaries' net interest income in 2021 has increased by 145%, mainly due to a decrease in financing affected by the pandemic and the business focus on improving asset quality from financing entities. Net premium income decrease by 4.9%, while other operating income grew by 29.1% supported by Brokerage, Investment Banking and Investment Management Fees from Securities entities and Investment Returns from the 2021 Annual Report > PT Bank Negara Indonesia (Persero) Tbk 270 Jumping Higher for State Insurance Entities. Profit before tax increased by 14.5%, all BNI entities posted positive profit before tax performance, with growth in Securities, Insurance and Financing entities, while Remittance entities saw a decrease.

The Subsidiary Segment Prospects and Strategies for 2022

The subsidiary segment growth prospects in 2022 will be in line with the improvement in people's purchasing power and the economic growth, capital market growth and insurance growth with increasing awareness of the importance of insurance products. To capture these business prospects, the subsidiary segment strategies include:

1. Improving and strengthening the business synergy of Subsidiaries with BNI;
2. Digitizing & Refocusing subsidiaries' businesses;
3. Increasing the customer base and business volume of subsidiaries.

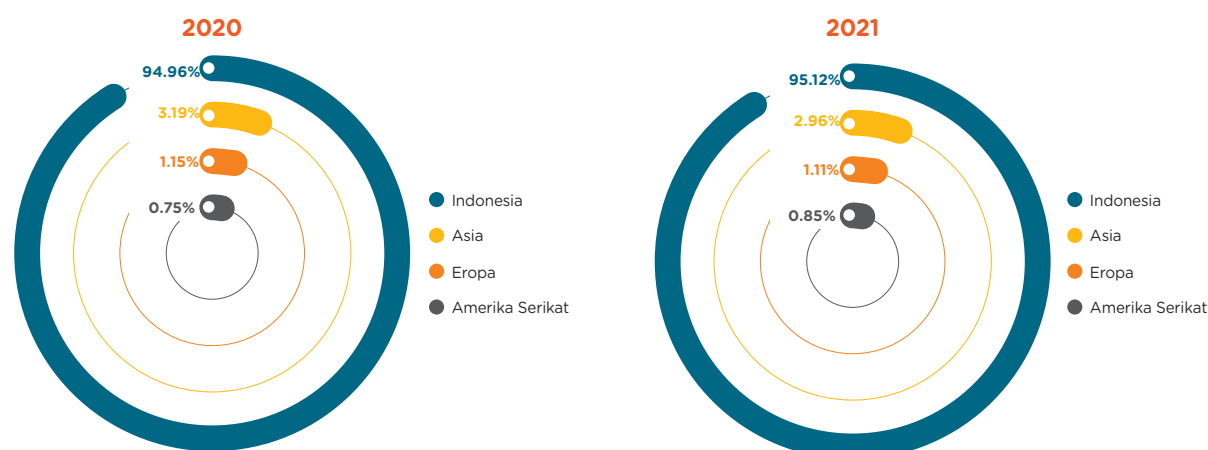
As well as presenting operating segments based on main customer groups and products, BNI's Audited Financial Report also provides geographic segment information that provides an overview of BNI's business distribution. BNI's geographic segment is divided into Indonesia, the United States, Europe and Asia.

To provide an overview of the business distribution by geographical segments, the following shows each region's contribution to Interest Income and Sharia-Net income as well as BNI's total assets.

Contribution per Geographical Segment to Interest Income and Sharia-Net Income

SEGMENT	2021		2020*		INCREASE (DECREASE)	
	TOTAL (RP-BILLION)	COMPOSITION (%)	TOTAL (RP-BILLION)	COMPOSITION (%)	NOMINAL (RP-MILIAR)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Indonesia	36,381	95.12	32,327	94.96	4,054	12.5
Amerika Serikat	325	0.85	255	0.75	70	27.5
Eropa	425	1.11	392	1.15	33	8.4
Asia	1,133	2.96	1,086	3.19	47	4.3
Adjustment and Elimination	(17)	(0.04)	(19)	(0.06)	2	(10.5)
Total Interest Income and Sharia-Net Income	38,247	100.00	34,041	100.00	4,206	12.4

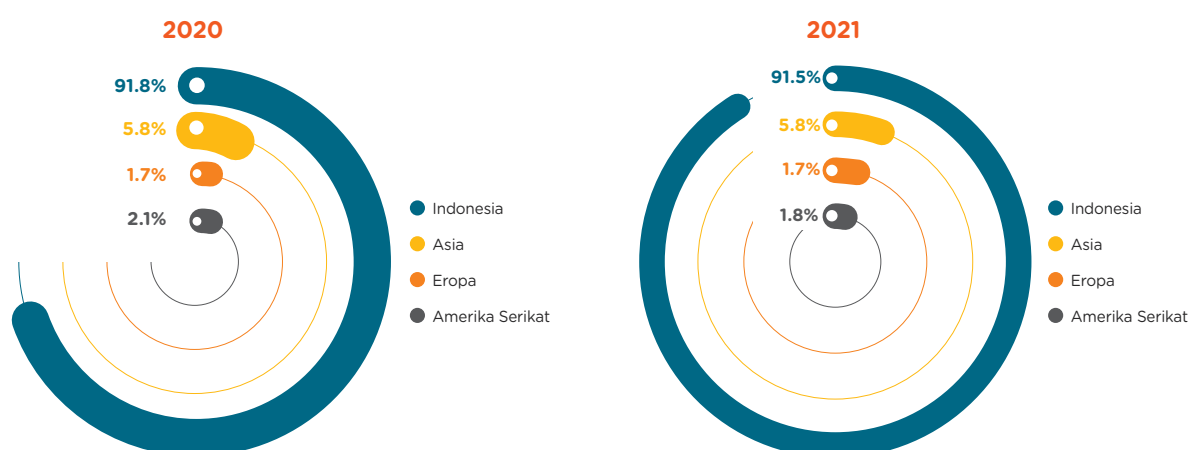
*on February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia in accordance with the Capital Market OJK approval letter No. S-289/D.04/2020 dated December 11, 2020, and OJK Banking letter No. 4/KDK.03/2021 dated January 27, 2021 so it is no longer consolidated into the consolidated financial statements of BNI and its Subsidiaries. However, the Indonesian segment interest income in 2020 still includes net sharia income.



Contribution per Region to Bank Assets

SEGMENT	2021		2020*		INCREASE (DECREASE)	
	TOTAL (RP-BILLION)	COMPOSITION (%)	TOTAL (RP-BILLION)	COMPOSITION (%)	NOMINAL (RP-MILIAR)	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Indonesia	882,365	91.5	770,847	91.8	111,518	14.5
Amerika Serikat	17,121	1.8	17,518	2.1	(397)	(2.3)
Eropa	16,063	1.7	14,309	1.7	1,754	12.3
Asia	55,659	5.8	49,025	5.8	6,634	13.5
Adjustment and Elimination	(6,370)	(0.7)	(11,789)	(1.4)	5,419	(46.0)
Total Assets	964,838	100.0	839,910	100.0	124,928	14.9

*on February 1, 2021, BNI Syariah officially joined Bank Syariah Indonesia in accordance with the Capital Market OJK approval letter No. S-289/D.04/2020 dated December 11, 2020, and OJK Banking letter No. 4/KDK.03/2021 dated January 27, 2021 so it is no longer consolidated into the consolidated financial statements of BNI and its Subsidiaries. However, the Indonesian segment interest income in 2020 still includes net sharia income.



From the tables and graphs above, it can be seen that in 2021 the Indonesian region made largest contribution to the Bank's interest income and net sharia income, and the largest contribution to the Bank's total assets. The contribution per Region to interest income and sharia-net bank income in 2021 was Rp38 trillion, an increase of 12.4% compared to Rp34 trillion in 2020. The contribution per region to the Bank's assets in 2021 was Rp965 billion, an increase of 14.9% compared to Rp840 billion in 2020.

The following shows the geographical segment financial performance for 2020-2021.

Geographical Segment Profitability

ACCOUNT	INDONESIA				AMERIKA SERIKAT				
	2021 (RP- MILLION)	2020** (RP- MILLION)	INCREASE (DECREASE)		2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)		
			NOMINAL (RP- MILLION)	PERCENTAGE (%)			NOMINAL (RP- MILLION)	PERCENTAGE (%)	
Interest Income and sharia income – net *)	36,381,183	32,327,745	4,053,438	12.5	324,838	255,299	69,539	27.2	
Premium Income - net	1,398,957	1,471,088	(72,131)	(4.9)	-	-	-	-	
Other Operating Income	16,148,959	13,177,482	2,971,477	22.5	160,398	192,641	(32,243)	(16.7)	
Allowance for Impairment Losses	(17,845,190)	(21,931,189)	4,085,999	(18.6)	(4)	(402)	398	(99.0)	
Other Operating Expenses	(23,917,545)	(21,129,295)	(2,788,250)	13.2	(266,029)	(225,059)	(40,970)	18.2	
Operating Income	12,166,364	3,915,831	8,250,533	210.7	219,203	222,479	(3,276)	(1.5)	
Non- Operating (Expense)/ Income - Net	(218,228)	(113,770)	(104,458)	91.8	(67)	(70)	3	(4.3)	
Income before tax expenses	11,948,136	3,802,061	8,146,075	214.2	219,136	222,409	(3,273)	(1.5)	
Total Assets	882,365,085	770,848,268	111,516,817	14.5	17,120,548	17,517,711	(397,163)	(2.3)	
Total Liabilities	750,739,281	650,279,537	100,459,744	15.4	17,126,353	17,531,363	(405,010)	(2.3)	

*Includes internal transfer pricing components between geographic segments.

**Financial Performance 2020 excludes BNI Syariah performance figures.



	EROPA				ASIA			
	2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)		2021 (RP- MILLION)	2020 (RP- MILLION)	INCREASE (DECREASE)	
			NOMINAL (RP- MILLION)	PERCENTAGE (%)			NOMINAL (RP- MILLION)	PERCENTAGE (%)
	425,192	391,778	33,414	8.5	1,132,501	1,085,782	46,719	4.3
	-	-	-	-	-	-	-	-
	234,520	247,413	(12,893)	(5.2)	257,890	649,561	(391,671)	(60.3)
	(94,879)	(876)	(94,003)	10730.9	(357,078)	(106,368)	(250,710)	235.7
	(114,775)	(165,621)	50,846	(30.7)	(502,603)	(567,696)	65,093	(11.5)
	450,058	472,694	(22,636)	(4.8)	530,710	1,061,279	(530,569)	(50.0)
	(1,239)	(1,057)	(182)	17.2	2,091	17,487	(15,396)	(88.0)
	448,819	471,637	(22,818)	(4.8)	532,801	1,078,766	(545,965)	(50.6)
	16,062,916	14,308,839	1,754,077	12.3	55,658,808	49,025,258	6,633,550	13.5
	16,065,089	14,301,802	1,763,287	12.3	55,590,188	48,739,512	6,850,676	14.1

Digital Banking

BNI develops its digital banking through a variety of products as well as the development of marketable e-channel features that and at the same time provides added value to all BNI business segments, both in terms of cost efficiency and revenue. In addition, BNI's digital banking capability development also supports the realization of BNI's vision to become a financial institution that excels in services and to make BNI the Digital Banking of choice for Indonesian customers. In addition to responding to challenges and changes, BNI Digital Banking also provides convenience and comfort for customers in making transactions and conducting financial activities.

Digital banking Products and Services

In supporting the convenience of customers in carrying out banking transaction activities, BNI offers a variety of E-Banking facilities which are constantly being improved through various customer-centric developments and innovations, according to customer needs.

1. ATM

Banking service channel that is ready to facilitate customers for 24/7 for cash deposit-withdrawal transactions (Cash Recycle Machine), balance checks, transfers, payments and purchases. BNI's ATM services currently total 18,230 machines spread across Indonesia and are connected to the ATM Link Network, ATM Bersama, ATM Prima, ATM Alto, as well as International Networks such as Mastercard, Visa, JCB, APN, Union Pay and Cirrus.

2. SMS Banking

BNI SMS Banking is a banking service facility that can be used by customers to transact transfers, payments and purchases which can be accessed through the BNI SMS Banking application (for smartphone users based on Android & iOS), Syntax SMS and access to USSD *141#.

3. Mobile Banking

BNI Mobile Banking makes it easy for individual customers to make transfers, investments and bill payments through one application. BNI Mobile Banking is available on IOS and Android devices and can be activated and used for overseas transactions. BNI Mobile Banking is also equipped with reliable features to facilitate customer transactions, such as Mobile Cash, Biometric Login, User-ID Autofilling, account opening and credit card and loan applications.

4. Internet Banking

BNI Internet Banking is a banking service channel that can be accessed through the BNI Internet Banking URL, either via a computer or smartphone. 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, which can be used to monitor cash flow and trends in spending/inflows of 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 according to customer needs in conducting business transactions.

5. Agen46

Agen46 is a partner of BNI in providing banking services to the public in the context of financial inclusion. In addition to being BNI partners in providing banking services, Agen46 is also involved in various Government programs, such as the distribution of social assistance and subsidies, both cash and non-cash.

Through Agen46, banking transactions are easier, faster and more accessible to the local community.

6. TapCash

TapCash is card-based electronic money (chip-based) in lieu of cash that can be transacted at various acceptance points in the form of BNI cooperating merchants as well as various modes of transportation, parking and toll roads. TapCash users are also spoiled with the TapCash Go application which makes it easy to check balances and top up their TapCash cards.

For increasing the ease with which customers can obtain and top up their TapCash cards, BNI has expanded its cooperation with various retailers, e-commerce, partners & fintech partners.

7. BNI Debit Online

BNI Debit Online (BDO) is a payment method for online transactions using a Virtual Card Number (VCN) which can be requested via BNI Mobile Banking to provide convenience for customers in online transactions.

8. SMS Notification

Is an information service for banking transactions carried out by customers which is sent via SMS to the mobile number registered by the customer for notification of debit/credit transactions made by customers, especially BNI Taplus/BNI Giro Rp Individual account holders.

9. iPay

BNI iPay is a product derivative of BNI Internet Banking that makes it easy for BNI Internet Banking users to complete online shopping transactions in one transaction flow. After selecting goods or services on the e-commerce site, the User will be directed to the BNI iPay site to make immediate payments using the user id, password and secure code generated by e-secure or m-secure BNI Internet Banking.

10. Smartpay

BNI Smartpay is a product derivative of BNI SMS Banking that provides seamless transactions for customers using BNI SMS Banking for their online shopping transactions in one transaction flow. After selecting goods or services on an e-commerce site, the customer only needs to enter a challenge pin from the incoming SMS 3346.

11. EDC BNI

The BNI EDC merchant network is a network that serves payment transactions using APMK (credit, debit and prepaid cards). The BNI EDC merchant network has wide acceptance, which is collaboration between BNI as the acquirer bank and the principal, both global principals such as VISA, MasterCard, JCB, UPI, and local principal.

12. BNI Credit Card Mobile

An application-based BNI credit card service to help customers receive their transaction information via smartphones. Other features include installment conversions, bill payment lists, cash withdrawals, submissions for credit limit increases, and data updating, as well as information related to BNI Credit Card promos and products.

13. Contactless Credit Card

A BNI Credit Card in collaboration with Principles where the cardholder simply taps the BNI Credit Card on the EDC machine with the contactless logo. This feature provides more benefits to customers making transactions more practical and secure.

14. E-Form Credit Card

A credit card application facility or channel using the mobile web that can be accessed anytime, anywhere using smartphone media by inputting the link applykartukredit.bni.id using Google Chrome or Safari browsers. This e-form provides advantages in the form of:

- Data security for prospective cardholders directly stored in the system;
- Credit card applications can be made digitally via smartphone without the need to meet with sales or come to the branch.

15. BNI Credit Card Virtual Card Number

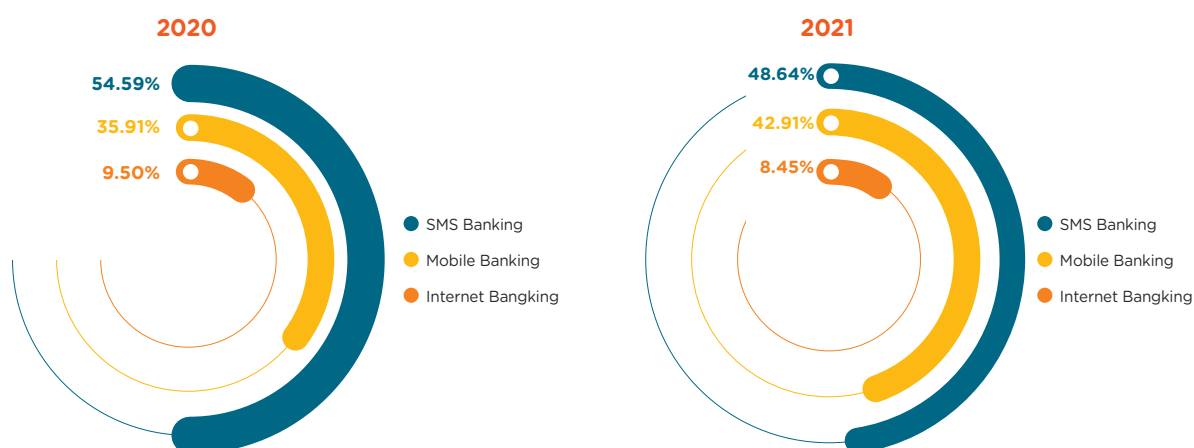
This BNI Credit Card feature is a more effective and efficient alternative for credit card transaction payments that provides security and convenience in online transactions through a unique virtual number as a substitute for the original credit card number used in the BNI Corporate Credit Card.

16. Digital Card Issuance

Digital issuance of credit cards where banks allow for sending card credentials (card number, expiry date, and CVV/CVC code) directly to consumer accounts in the Mobile Banking application.

E-Banking Users Composition

DESCRIPTION	2021		2020		INCREASE (DECREASE)	
	TOTAL	COMPOSITION (%)	TOTAL	COMPOSITION (%)	NOMINAL	PERCENTAGE (%)
	(1)		(2)		(3 = 1-2)	(3/2)
Internet Banking	2,128,662	8.45	2,060,221	9.50	68,441	3.32
Mobile Banking	10,812,341	42.91	7,786,849	35.91	3,025,492	38.85
SMS Banking	12,258,085	48.64	11,837,176	54.59	420,909	3.56
Total	25,199,088	100.00	21,684,246	100.00	3,514,842	16.21



The performance of each e-Banking product showing the growth in number of users, number of transactions, and volume of transactions throughout 2021 is as follows:

1. ATM

ATM Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Total Transactions (millions)	1,532.51	1,534.11	(1.61)	(0.11)
Volume of Transactions (Rp-trillion)	559.97	621.87	(66.96)	(10.68)

In 2021, services on ATM channels experienced a decrease in the number of transactions by 1.61 million transactions or 0.11% to 1,532.51 million transactions from 2020 transactions of 1,534.11 million transactions. Meanwhile, the nominal value for transactions decreased by 10.68% or Rp66.96 trillion to Rp559.97 trillion from 2020, which was Rp621.87 trillion.

2. SMS Banking

SMS Banking Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Users (millions)	12,26	11,84	0,42	3.56
Total Transactions (millions)	704,11	688,78	15,33	2.23
Volume of Transactions (Rp-trillion)	28,53	31,23	(2,70)	8.56

In 2021, SMS Banking users reached 12.26 million, an increase of 3.56% from the position in 2020 which was 11.84 million users. Based on the number of transactions, SMS Banking recorded a total of 704.11 million transactions, an increase of 2.23% compared to the previous year which reached 688.78 million transactions. The value of SMS Banking transactions in 2021 reached Rp28.53 trillion, a decrease of 8.56% compared to the 2020 achievement of Rp31.23 trillion.

3. Mobile Banking BNI

Mobile Banking PerformanceBanking

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Users (millions)	10,81	7,79	3,03	38.85
Total Transactions (millions)	433,84	302,49	131,35	43.42
Volume of Transactions (Rp-trillion)	615,05	466,14	148,91	31.94

Throughout 2021, BNI Mobile Banking is still BNI's product champion. It can be seen from the growth in the number of users in 2021 which reached 38.85% to 10.81 million users, from 2020 as many as 7.79 million users. Along with the increase in the number of users, Mobile Banking recorded the number of transactions of 433.84 million transactions, grew by 43.42% compared to 2020 of 302.49 million transactions. The increase in the number of users and the number of transactions affected the increase in the volume of Mobile Banking transactions in 2021 which grew 31.94% to Rp615.05 trillion from the previous year which was recorded at Rp466.14 trillion.

4. Internet Banking

Internet Banking Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Users (millions)	2,13	2,06	0,68	3.32
Total Transactions (millions)	23,08	28,51	5,42	(19.04)
Volume of Transactions (Rp-trillion)	56,63	78,67	22,04	(28.01)

The number of Internet Banking users in 2021 reached 2.13 million users, an increase of 3.32% compared to 2.06 million users in the previous year. Internet Banking also recorded the number of transactions of 23.08 million in 2021, a decrease of 19.04% compared to 2020 of 28.51 million transactions. In line with the decrease in the number of transactions, Internet Banking recorded a transaction volume of Rp56.63 trillion in 2021, a decrease of 28.01%, compared to the position in 2020 of Rp78.67 trillion.

5. Agen46

Agen46 Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Agen46 (thousands)	157,63	152,76	4,87	3.19
Transactions (millions)	146,38	145,67	0,71	0.49
Nominal (Rp trillion)	92,31	82,54	9,77	11.84
Pandai Accounts (millions)	19,76	18,34	1,41	7.68
TPF BNI Pandai (Rp billion)	1,387	3,102	(1,715,00)	(55.29)
TPF Agen46 (Rp billion)	3,548	1,935	1,613,00	83.36

In 2021, the number of BNI Agen46 agents was recorded at 157.63 thousand agents or an increase of 3.19% compared to the number of Agen46 agents in 2020 which amounted to 152.76 thousand agents. Based on the number of transactions, the number of Agen46 transactions reached 146.38 million transactions, an increase of 0.49% from the previous year of 145.67 million transactions. In line with the increase in the number of agents and transactions, transaction volume increased by 11.84% to Rp92.31 trillion in 2021 from the 2020 position of Rp82.54 trillion.

BNI also noted that the number of Pandai accounts increased by 7.68% to 19.76 million accounts in 2021 from the previous 18.34 million accounts at the end of 2020. The BNI Pandai deposits generated by these accounts reached Rp1,387 billion, a decrease 55.29% compared to 2020 which was recorded at Rp3,102.49 billion. The amount of Agen46 deposits was recorded at Rp3,548 billion in 2021 or grew by 83.36% compared to 2020 which was Rp1,935 billion.

6. TapCash

TapCash Performance

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Users (millions)	8.37	7.48	0.88	11.82
Total Transactions (millions)	37.98	39.76	1.78	(4.49)
Volume of Transactions (Rp-trillion)	1,033,57	1,008,78	0,24	2.46

In 2021, the number of TapCash cards was recorded at 8.37 million cards, an increase of 11.82% from 7.48 million cards in 2020. On the other hand, Tapcash transactions decreased to 37.98 million in 2021, down 4.49% compared to the 2020 achievement of 39.76 million transactions. Tapcash transaction volume in 2021 increased by 2.46% to Rp1,033.57 billion compared to the position in 2020 of Rp1,008.78 billion.

7. Electronic Data Capture (EDC)

ELECTRONIC DATA CAPTURE (EDC) PERFORMANCE

	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Total Transactions (millions)	68.74	59.22	9.52	16.08
Volume of Transactions (Rp-trillion)	69.49	61.86	7.63	12.34

EDC services increased in the number of purchase transactions by 16.08%, to 68.74 million transactions in 2021 from 59.22 million transactions in the previous year. This affected the transaction volume, which increased by 12.34% to Rp69.49 trillion in 2021 compared to the previous year which reached Rp61.86 trillion.

Variety of Digital Banking Products and Services for Corporations

1. 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 can be accessed with Web Base and Mobile Apps.

- Cash Management

BNI Cash Management is the right solution for managing your company's cash flow that is integrated with the business community. Thus, your company's various activities such as managing financial flows, supporting business decision making, and optimizing company profits can be carried out easily, quickly and precisely. BNI Cash Management has three management functions: Collection Management, Liquidity Management, and Payment Management

- Liquidity Management

Solutions provided for Non-Individual Customers so that the management of company/institutional financial cash flow can always be maintained in an ideal position to meet the company's operational needs. With BNI Liquidity Management, customers can easily move (consolidate) the company's largest funds in various BNI accounts in real time with the support of automatic sweeping mechanisms, and minimize operation handling costs.

- Payment Management

Management of payment transactions from BNI which makes it easy for Institutional/Company Customers to settle their financial obligations in a timely and accurate manner. The need for payment reports for these obligations can also be obtained quickly and in real time, so that customers will immediately get a recapitulation of the required reports.

(Full details: <https://bnidirectng.bni.co.id/>)

2. BNIDirect Mobile

BNIDirect Mobile is a mobile application (mobile-apps) designed for smartphones (Android and iOS) to access BNIDirect (Internet Banking for Non-Individual Customers), and is a new channel in the form of an addition to the current BNIDirect channel (web version). . BNIDirect Mobile supports the activities of executives of companies/agencies/institutions who have high mobility in running their business/activities. Transaction activities that occur on BNIDirect (web version) can also be monitored through BNIDirect Mobile, and vice versa. BNIDirect Mobile offers convenience and is equipped with the use of M-PIN (Mobile Personal Identification Number) and SMS OTP (One Time Password) for every transaction.

CASH MANAGEMENT	2021	2020
Amount of Transaction (million Rp)	494	230
Transaction Volume (trillion Rp)	4,570	4,044
Cash Management FBI (billion Rp)	307,965	270,258
Cash Management Users	73,443	62,325



BNIDirect Advantages

Fast:

- 24-hour internet access (for in-house transactions and online transfers).

Easy:

- User Friendly;
- Equipped with a transaction guide;
- Can make transactions anywhere.

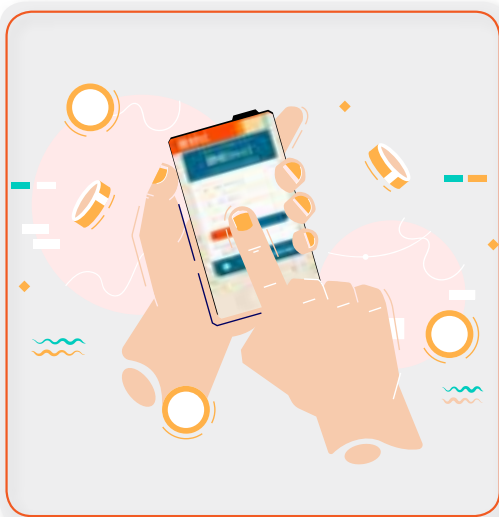
Safe:

- Secure Line with Verisign Security Certification Socket Line (SSL) 128 bit;
- Transaction authorization using Electronic Signature, namely BNI e-Source (Hard Token) or mobile token (soft token);
- Equipped with company ID, User ID and password. The distribution of transaction authority consists of Maker, Approver and Releaser, Matrix of transaction authority and transaction limit.



BNIDirect Feature Advantages

- Flexible menu that can be adapted to customer needs;
- The number of users can be created according to needs;
- Access authority over features and accounts can be determined by the customer;
- Transaction authorization is carried out with a dynamic PIN generated by an electronic signature (BNI w-Secure/mobile token);
- Has various types of report formats that can be downloaded on customer transactions and can be sent via email;
- Consists of two languages, namely in Indonesian and English.

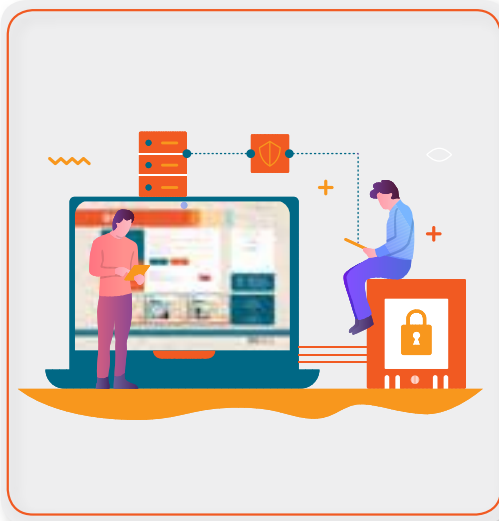


Advantages of BNIDirect Mobile

- Accessed through devices based on Android and iOS;
- Display according to screen size;
- No need to carry Tokens;
- Layered security;
- Auto update BNIDirect Mobile feature (no need to reinstall).

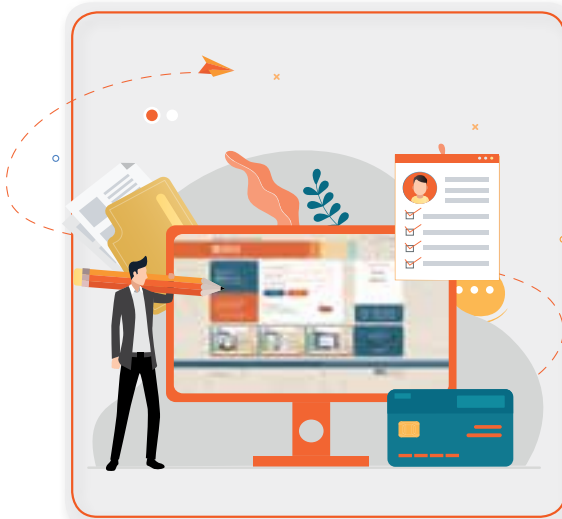
Min version. Android : Lollipop

Min version. iOS : iOS 8



BNIDirect Mobile Security

- BNIDirect Mobile users must carry out activities;
- Transaction authentication using M-PIN and OTP sent to the user's mobile number registered with BNIDirect;
- Access to sensitive menus required M-PIN;
- AES 256 encrypted data communication between Device and App server;
- Verify Web Application Firewall (WAF).



Terms and Conditions of Becoming a BNIDirect Mobile User

- Already registered on the web version of the BNIDirect application;
- For new customers, use the BNIDirect/BNIDirect Mobile Registration Application by adding the BNIDirect Mobile feature and including the mobile/HP number of each user;
- For existing customers, use the BNIDirect/BNIDirect Mobile Maintenance Application to add the BNIDirect Mobile feature and each user's mobile/HP number.

3. Financial Supply Chain Management

Chain Financing is a business solution in a chain from upstream to downstream tailored to the needs of Corporate Customers. With the BNI Financial Supply Chain Management (BNI FSCM) platform, Customers get transparency in monitoring document flow and money flow from third parties (BNI, Corporate, and their Corporate Partners), real time information, easier and more flexible disbursement and implementation, as well as facilitating Customers in reconciling invoices in a paperless and secure manner. BNI FSCM services are divided into three solutions: Supplier Financing, Distributor Financing, and Receivable Financing.

- **Supplier Financing**

Supplier Financing is a facility to take over the bill of a Corporate Partner (Supplier) to the Corporate before the due date to be paid at a faster time. We provide Supplier Financing services for companies that want to increase business growth and accelerate the cash cycle production process by providing bill payment bailouts that have been accepted by the Corporate.

- **Distributor Financing**

Distributor Financing is a financing facility for Corporate bills to Corporate Partners (Distributors) on the due date and provides an extension for payment of bills from Corporate Partners to BNI. Distributor Financing services provide for companies that want to increase business growth and manage their production cash cycle processes with leeway in paying off Corporate bills. In this case, the Corporate Partner can make arrangements for payment of bills according to their cash flow capabilities.

- **Receivable Financing**

Receivable Financing is a facility in the form of taking over Corporate bills to Corporate Partners (Distributors) to be paid before the bill's due date. Receivable Financing services provide for Corporates who want to increase business growth and accelerate the cash cycle production process by bridging Corporate billing financing to finance collection of receivables. BNI provides corporate receivables bailout to be paid more quickly.

(Full details: <https://bnifscm.bni.co.id/>)

Selamat Datang di layanan BNI FSCM
Pastikan alamat Anda akses adalah: <https://bnifscm.bni.co.id>
Contact us: Service Action Team (SAT) 021 299 46066

FSCM
Financial Supply Chain Management
Sistem aplikasi milik BNI berbasis webservice yang mengakomodasi kebutuhan BNI, KORPORAT beserta MITRA KORPORAT untuk melakukan transaksi finansial terkait dengan Supply Chain Financing

ACTIVITY
Histori transaksi keuangan yg bisa dilihat/monitoring berdasar periode Hari, 7, 30 dan 90 hari yang lalu

DOCUMENT MONITORING
Daftar dokumen yang masuk ke sistem bank sehingga dokumen bank, pencatatan dan pelacakan

INTEGRATION
Integrasi dilakukan secara otomatis (API, upload manual di FSCM) maupun manual (upload integrasi ke aplikasi BNI, dalam hal ini ICONE)

UPCOMING SETTLEMENT
Daftar invoice yang akan jatuh tempo ke Bank

BALANCE
Ringkasan total saldo

FSCM	2021	2020
Number of Transactions (thousands Rp)	102	82
Transaction Volume (Trillion Rp)	16	19
FSCM FBI (Billion Rp)	680	410

4. E-Bank Guarantee

Along with technological developments, BNI presents Online Bank Guarantee (BNI e-Bank Guarantee and m-BG Checking) as a solution that makes it easy for customers to apply for issuance, monitoring and checking bank guarantees online with various features. as follows:

- e-Application (Submission of an online bank guarantee issuance application accompanied by tiered approval).
- e-Tracking (Monitoring the status of bank guarantee issuance).
- e-Reporting (Bank guarantee report that has been issued (as applicant) and received (as beneficiary)).
- e-Checking (Checking the validity of bank guarantee documents that have been issued (as applicant) and/or accepted as bowheer).
- e-Plafond Monitoring (Monitoring of bank guarantee ceiling (maximum, usage, and remaining ceiling)).
- BNI m-BG Checking (checking the correctness of bank guarantee documents via mobile apps through scanning QR Code on bank guarantees).

(Full details: <https://gb-online.bni.co.id/>)

5. API Corporate Banking

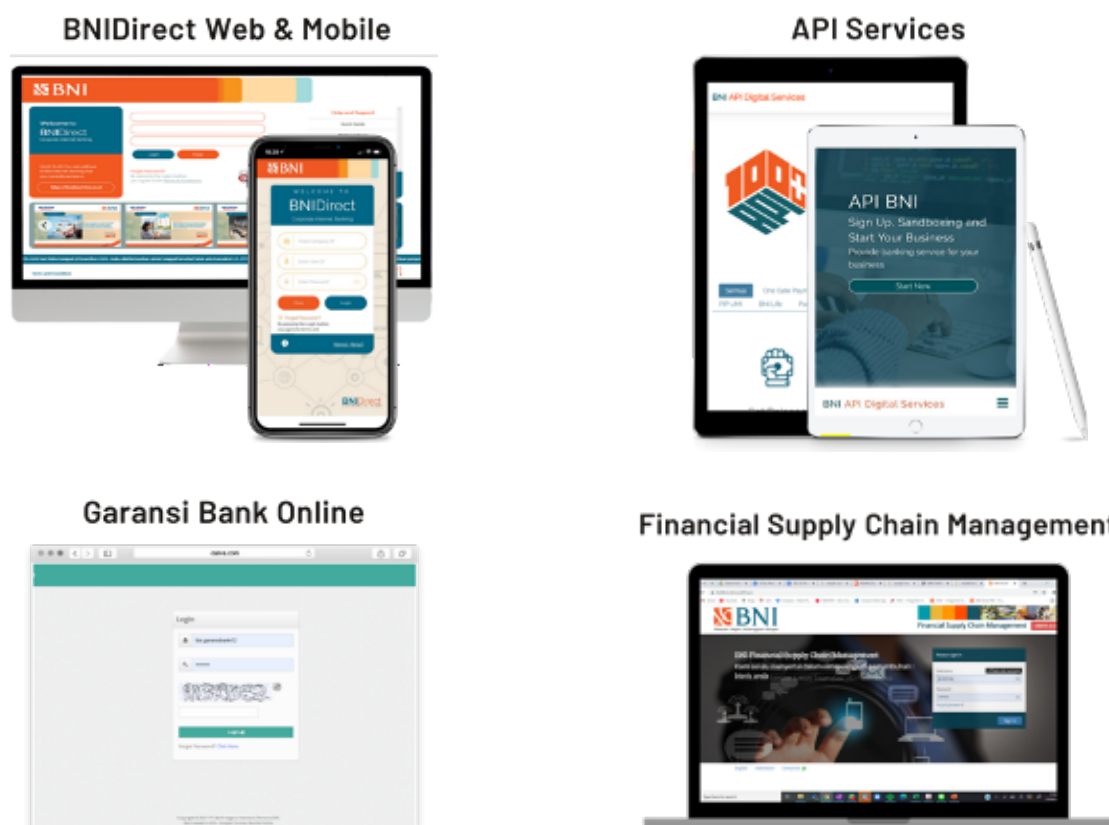
BNI API is a digital solution using open api technology to make it easier for consumer application to be directly integrated with the BNI banking system. BNI supports your business both domestically and abroad through the Corporate API service and expands the retail business reach through the Retail API service.

Use the BNI API to increase your business with BNI to a higher level. One of the digital reforms in banking is through open banking to answer the challenges of disruption.

BNI API Open Banking solution that has been implemented in the corporate sector, where corporate customers can access banking services, especially those related to transactional financial applications that are built independently by each company and integrated directly with the BNI API. Through BNI API Open Banking, B2B Cooperation can be carried out.

(Full details: <https://digitalservices.bni.co.id/>)

Picture 2:



Marketing Aspects

Marketing strategy

Driven by the rapid development of the latest technology, BNI is consistent in becoming a leading Digital Financial Institution that is capable of gaining a competitive position in the digital banking business. It is also supported by changes in people's behavior that demand convenience and speed across all transaction activities, from consumer to corporate level. This shifting behavior has paved the way for digital transactions, such as account opening, which initially required customers to directly visit the branch, but now can be performed from the palm of their hands through their own gadgets, anywhere and anytime, so that customers can do more important things in their lives.

This is in line with the BNI brand communication in 2019, namely, Be BNI, Be Exponential, in which all the convenience and comprehensiveness that BNI digital services brings, will provide an advantage in customers' lives such as having more time for family, relatives or self- development.

Competition in the banking business today happens not only among banks, but also with technology-based financial businesses (Fintech), requiring BNI maintain its competitiveness under the rapidly growing market development and needs.

As a financial services institution, BNI is committed to providing ease of transactions during these unprecedented circumstances by offering digital-based services; one of which is through BNI Mobile Banking. BNI Mobile Banking is a solution for customers to carry out financial transactions without having to leave the house. Simply by using their smartphone, customers can carry out banking transactions, ranging from paying bills to investing. This convenience has made BNI Mobile Banking a digital financial platform that excels in services. In 2020, BNI's commitment to remain consistent as a Digital Financial Institution underwent a test.

On March 2, 2020, the first case of Covid-19 in Indonesia was announced by President Joko Widodo himself. As a follow-up, the Government decided to impose PSBB (Large-Scale Social Restrictions) in almost all cities in Indonesia with the aim of preventing the Covid-19 virus from spreading. This policy required people to perform many activities from home, such as school, prayer, and working. The concept of social distancing was believed to be an effective way of mitigating the spread of this virus.

As a financial service institution, BNI is committed to providing ease of transactions during these unprecedented circumstances by offering digital-based services; one of which is through BNI Mobile Banking. BNI Mobile Banking is a solution for customers to carry out financial transactions without having to leave the house. Simply by using a smartphone, customers can carry out banking transactions, ranging from paying bills to investing. This convenience has made BNI Mobile Banking a digital financial platform that excels in services.

For marketing, to maximize potential results, marketing activities were focused on the wider community through several digital platforms already available and used by BNI. One being the use of BNI's organic social media, due to BNI's social media as of December 31, 2021, the Twitter account @BNI already has 1,250,781 followers, Instagram @bni46 with 592,138 followers, then Facebook BNI has 393,076 fans and since July 29, 2021 BNI has a TikTok account @bni46 with current followers as many as 221,500. The engagement rate in BNI's four organic social media is one of the best in the banking sector. The public's enthusiasm for some of the digital financial services new features have received a very good response, this can be seen in the many testimonies submitted through BNI's social media accounts.

Marketing activities are also carried out through paid social media placements or using online publishers such as placements at Detik.com, Tribunnews.com, Kompas.com and many more. The selection of publishers is always based on the publisher's achievements, especially being ranked in the top 5 for monthly visitors. This method is also used with the intention of increasing the scope of the messages to be conveyed. In addition to digital media, other Offline media platforms through Adlips on Radio, Advertisements on television, Billboard installations, advertisements in print media are used.

BNI has also succeeded in proving its success in adapting to existing conditions, during this pandemic period BNI moved events usually held offline to online. Many online events were successfully organized by BNI during 2021.

The first activity was carried out through the BNI Creative Club, a collection of inspirational classes dedicated to young Indonesians to become a more creative and innovative young generation. The classes included an entrepreneurship club with Putri Tanjung, a storytelling club with Marchella FP, a content creating club with Raditya Dika, a songwriting club with Nino Kayam, and a music performance by Ardhito Pramono.

BNI consistently supports the love for domestic products campaign in many ways. In July 2021, BNI supported the Proudly Made in Indonesia National Movement (BBI) to strengthen the role of Micro, Small and Medium Enterprises (MSMEs) in various regions as an economic driver to go digital and go global. BNI collaborated with the Indonesian Ministry of Trade and the Provincial Government of North Sulawesi in this campaign with the theme #PelangiSulawesi. This campaign is expected to increase the love of the Indonesian people for Sulawesi products, and bring these products to the global arena.

BNI Xpora is a BNI innovation to support MSMEs to jump higher by opening a one stop shopping solution hub in seven cities in Indonesia. Through BNI Xpora, BNI provides integrated services and assistance to SMEs to be more productive (Go Productive), increase literacy, inclusion, and digital capabilities (Go Digital), and to expand their business to penetrate the global market (Go Global).

BNI presented a webinar for the BNI Business Idea by Xpora Festival, aimed to provide inspiration, tips and tricks, to innovative business ideas in an effort to penetrate the export market from BNI MSME Entrepreneur Heroes. The event lasted for 5 days between July 30 - August 3, 2021 and featured different topics and BNI Entrepreneur Heroes every day including the Founder Naruna Ceramic, Roy Wibisono, Founder of Arane Indonesia, Elsana Bkti Nugroho, the Founder of Plepah Indonesia, Rengk Banyu Mahandaru, and many more. This activity reached 1,204,244 viewers.

Through BNI Xpora, BNI seeks to encourage exports by small and medium enterprises (SMEs). The launch of BNI Xpora was held on October 21, 2021, in conjunction with the 2021 Indonesia Trade Expo Indonesia (TEI) Opening Ceremony in Jakarta. The 36th TEI Digital Edition in 2021, with the theme "Reviving Global Trade" aims to revive Indonesia's economic conditions.

BNI also actively adapts its communication strategy to the community conditions and situations without reducing the benefits of the programs or promos offered. This can be seen when BNI held the BNI #GaPakenanti event on October 1, 2021, which was enlivened by various artists, comedians, and top Indonesian singers including Andre Taulany, Wendy Cagur, Hesti Purwadinata, Rigen Rakelna, Rizky Febian, Marion Jola, Sigi Wimala, and Kahitna. Through this event, the public received education how opening a BNI digital savings account is now very easy, just takes a selfie and also had the opportunity to win prizes from the BNI #GaPakenanti Lucky Draw, by multiplying and conducting transactions using BNI Mobile Banking and BNI Debit Cards. This event reached 1,134,501 viewers.

BNI with its pioneer digital banking has qualified digital services that can speed up transactions, the process of disbursing financing, and other banking services. BNI has always been proactive in supporting all forms of partner transformation through business cooperation and empowerment programs. On November 10-11, 2021, BNI again supported the national economy recovery efforts,

the foster people's love for local products through an exhibition campaign entitled INACRAFT Digital, held by the Association of Indonesian Handicraft Exporters and Manufacturers (ASEPHI) in collaboration with Tokopedia.

On Heroes' Day, BNI held a Spirit of Heroes' Day to encourage Indonesian youth to be more optimistic, inspirational, and creative, and to continue to be excited to jump higher in all aspects of life. These events consist of online conferences and webinars, as well as concerts. In the conferences and webinars, BNI presented speakers such as SELO Electric Vehicle Developer, Ricky Elson, Founder & CEO of Evo & Co, David Christian, Director of Creative Community & Partnerships - Du Anyam Hanna Keraf, World Endurance Championship (WEC) Driver, Sean Gelael, and many others. At the concerts, BNI featured Erwin Gutawa in collaboration with Ari Lasso, Raisa, Once, HiVi!, Tulus, Adikara, and Cantika. These activities reached 1,277,750 viewers.

Then as a form of BNI's commitment to encouraging the national Tourism sector to recover and grow again after being affected by the COVID-19 Pandemic, BNI presented the 2021 Garuda Indonesia Travel Fair (GATF) Event. GATF 2021 was hybrid as it is held offline at The Hall, Senayan City on December 10-12, 2021 and online via gatf2021.com & Fly Garuda Apps during December 10-16, 2021.

Product Positioning and Monitoring Intensity to Increase Sales Productivity

The pattern of marketing activities accompanied by the intensity of daily monitoring through operational discipline, is still a marketing execution pattern that was encouraged in the 2020's period to achieve the target numbers set. All of these are still based on the vision of

forming BNI Sales who are highly skilled, knowledgeable, and have a positive attitude, and during 2021 BNI continuously built and instilled strong Sales Culture habits and characteristics to create an operational rhythm that will have an impact on achieving BNI's strategies and business growth, which are monitored through Sales Productivity.

To improve and maintain BNI Sales productivity, leadership plays an active role in monitoring, mentoring and coaching on a regular basis to Sales by:

1. Monitoring daily sales activities adjusted to the Sales work plan in the account plan;
2. Conducting coaching and mentoring for Sales;
3. Providing assistance for Sales who have low productivity.

To support the monitoring of marketing activities up to Sales execution, all Sales have been equipped with the DigiSales application, which is used for:

1. Accessing information on BNI's products through the DigiSales application, as well as information on integrated promo programs;
2. Monitoring the performance realization and sales performance either via mobile or desktop (PC) for easy access;
3. Monitoring Sales activities for marketing activities for BNI and subsidiary products & services on a daily/monthly basis;
4. Monitoring the achievements of the entire marketing team under their coordination.

	ACQUISITION OF GRIYA & FLEKSI			INCREASE (DECREASE) AND ACHIEVEMENT	
	2021 REALIZATION (RP-BILLION)	2021 TARGET (RP- BILLION)	2020 REALIZATION (RP-BILLION)	2020-2021 (%)	TARGET (%)
	(1)	(2)	(3)	((1-3)/3)	(1/2)
Booking Griya	11,263	10,448	8,771	28.4	107.8
• Booking Griya Regular	8,670	8,453	6,284	38.0	102.6
• Booking Griya Program	2,593	1,995	2,486	4.3	130.0
Booking Fleksi	15,380	14,025	12,585	22.2	109.7
• Booking Fleksi Regular	12,155	11,321	10,217	19.0	107.4
• Booking Fleksi Pensiun	3,225	2,704	2,369	36.1	119.3

1. BNI Griya

BNI Griya bookings in 2021 reached Rp11.26 trillion with a 107.8% achievement, a 28.4% growth YoY from 2020 (Rp8.77 trillion). This positive growth was due to regular Griya expansion of 38% from 2020 and the consistency in the distribution of Subsidized Mortgages (Griya Program) which grew by 4.3% from 2020. The positive growth of BNI Griya bookings was the result looking at the market potential and focusing on prudent customers, as well as the increased collaboration with BNI Selected & Top Tier Developers.

2. BNI Fleksi

BNI Fleksi bookings in 2021 reached Rp15.38 trillion with a 109.7% achievement, a 22.2% growth YoY from 2020 (Rp12.58 trillion). This was due to the consistency of the Regular Fleksi expansion that grew by 19.0% from 2020, and the increased expansion of BNI Fleksi Pensiun that grew by 36.1% from 2020. This was looking at the market potential and focusing on BNI's Top Tier Institutions & Companies and optimizing programs for customers who are nearing retirement age.

Market Share

	2021	2020**	INCREASE (DECREASE) 2020-2021 (%)	2020	2019
Based on Banking Industry Assets					
Industry* (Rp-trillion)	9,824	9,178	7.0	9,178	8,563
BNI (Rp-trillion)	965	840	14.9	891	846
Market Share to Industry (%)	9.8	9.2	0.6	9.7	9.9
Based on Banking Industry Outstanding Loans					
Industry* (Rp-trillion)	5,658	5,482	3.2	5,482	5,617
BNI (Rp-trillion)	582	553	5.2	586	557
Market Share to Industry (%)	10.3	10.0	0.3	10.56	9.80
Based on the Banking Industry's Outstanding Third Party Funds					
Industry* (Rp-trillion)	7,245	6,665	8.7	6,665	5,999
BNI (Rp-trillion)	729	632	15.3	647	615
Market Share to Industry (%)	10.1	9.5	0.6	9.7	10.25
Comparison of Capital Adequacy Ratio (CAR) with Commercial Bank Industry Average					
Industry* (%)	25.3	23.9	1.4	24.2	23.4
BNI (%)	19.7	16.8	2.9	16.8	19.7

	2021	2020**	INCREASE (DECREASE) 2020-2021 (%)	2020	2019
Comparison of Operating Expenses to Operating Income (BOPO) Ratio with Commercial Bank Industry Average					
Industry* (%)	83,1	86,6	(3.5)	86,0	79,4
BNI (%)	81,2	93,3	(12.1)	93,3	73,2
Comparison of Return On Asset (ROA) Ratio with Commercial Bank Industry Average					
Industry* (%)	1,9	1,6	0.3	1,6	2,5
BNI (%)	1,4	0,5	0.9	0,5	2,4
Comparison of Loans to Total Deposit Ratio (LDR) with Commercial Bank Industry Average					
Industry* (%)	78,2	82,5	(4.3)	82,3	94,4
BNI (%)	79,7	87,3	(7.6)	87,3	91,5

*Source: Indonesian Banking Statistics, Financial Services Authority, industry data in 2021 is the position of November 2021

**Since February 1, 2021, BNI Syariah has officially joined Bank Syariah Indonesia in accordance with the approval of the Capital Market OJK through letter No. S-289/D.04/2020 dated 11 December 2020, as well as Banking OJK Letter No. 4/DK.03/2021 dated January 27, 2021 so no longer consolidated in the consolidated financial statements of BNI and its Subsidiaries for the fiscal year 2021. Therefore, the 2020 financial performance is presented back by taking into account the impact of the issuance of BNI Syariah performance.

Market Share based on Assets

Over the past few years, BNI has positioned itself as one of the leading banks in Indonesia in terms of assets. In line with the increase in BNI's assets to Rp965 trillion, BNI's market share in terms of assets was 9.8%, compared to 9.1% in 2020 in line with the growth in loans.

Market Share based on Third Party Funds (TPF)

During the 2020-2021 period, BNI maintained its position as one of the largest banks in Indonesia in terms of collecting deposits. With deposits reaching Rp729 trillion, BNI's market share in terms of deposits was 10.1% in 2021, compared to 9.5% in 2020.

Market Share based on Loans Disbursed

In line with the increase in third party funds, BNI was able to optimize its loans by paying attention to credit quality, with loans disbursed reaching Rp582 trillion. The market share in 2021 was 10.3% compared to 10.0% in 2020.

Comparison of Financial Ratios with Average Commercial Bank Industry Ratios

Based on the Company's financial ratios, the capital adequacy ratio (CAR) in 2021 reached 19.7%, up from 2020 and still lower than the industry average. Operating expenses per operating income (BOPO) decreased in 2021 to 81.2% compared to 93.3% in 2020. Return on assets (ROA) rose to 1.4% in 2021 and was lower than the industry. In addition, the liquidity level (LDR) was 79.7% in 2020 and lower than last year and the industry.

Awards Received in 2021 Throughout 2021

BNI received a variety of awards include the following:

- 1. Great Performing Brand in Social Media Category Credit card**
Award from Marketing Magazine in Top Social Media Awards 2021
- 2. Ranked #1 Digital Brand of The Year 2021 Savings Category**
Award from Infobank Magazine in Digital Brand of The Year 2021 BNI Taplus won the Rank number 1
- 3. Ranked #1 Digital Brand of The Year 2021 Debit Card Category**
Award from Infobank Magazine in Digital Brand of The Year 2021 BNI Debit Card won 1st rank

4. Ranked #1 Digital Brand of The Year 2021

Mortgage Category Award from Infobank Magazine in Digital Brand of The Year 2021 BNI Griya won 1st place

5. Rank 2 Digital Brand of The Year 2021

Credit Card Category Award from Infobank Magazine in Digital Brand of The Year 2021 BNI Credit Card won 2nd rank

6. Rank 2 Digital Brand of The Year 2021

Category State-Owned Bank E-Money Award from Infobank Magazine in Digital Brand of The Year 2021 Tapcash BNI won 2nd place

7. 2nd Place in Digital Brand of The Year 2021 in Wealth Management Bank Category

Award from Infobank Magazine in Digital Brand of The Year 2021 BNI Emerald 2nd Place

8. Anugerah Campus Financial Ecosystem Dikti Research and Technology 2021

Best Partner BUMN Bank Award that supports Higher Education Financial Ecosystem Research & Technology

9. The Most Innovative Priority Banking in Pandemic

BNI Emerald Award at CNBC Indonesia Awards 2021

10. Best Affluent Volume and Issue Growth Debit Card

Award from Mastercard Award Category of growth in sales volume and number of debit cards best affluent

Marketing Prospects and Plan for 2022

Achieving business targets and optimal profits in line with BNI's vision and mission in 2022 will be full of challenges, the marketing strategy for BNI products will optimize Sales channels (Marketers) across all BNI outlets in Indonesia and other digital channels and will focus on 3 strategies:

1. Increasing business expansion through **collaborative selling** schemes by optimizing the value chain in integrated product/solution offerings, focusing management on selected institutions and developers at national and regional levels, and by focusing on low-risk business sectors (retail, Government sector, Health, Education, fintech, etc.);
2. **Adding new marketing channels through digital collaboration & enhancing the digital tools capabilities** to increase business achievements, absorbing a wider potential and supporting the acceleration of current marketing activities, including:
 - a. Adding marketing channels in collaboration with e-commerce/fintech/marketplaces;
 - b. Adding cooperation for submitting digital banking products on the websites of the Cooperating Institutions;
 - c. Maximizing the BNI & Subsidiary products marketing through a digitally integrated referral scheme, optimizing BNI staff & Agen46 as Points of Sales;
 - d. Developing Digisales as a core selling tool for all marketing teams, to include information on product and program development for customers, recording marketing activities and monitoring marketing activity results.
3. **Implementing a marketing motivation** program for the entire sales team in marketing BNI products as summarized in the 2022 Sales Championship program, supported by events and tactical programs designed to provide a stimulus to achieve targets according to business focus, and increase enthusiasm for results-oriented execution.

Financial Review and Other Material Information

PRESENTATION AND COMPLIANCE WITH INDONESIAN ACCOUNTING STANDARDS

National banking assets grew slower in 2021 influenced by the slowdown in national economic growth during to the COVID-19 pandemic, with BNI's assets grew moderately by 14.9%.

PT Bank Negara Indonesia (Persero) Tbk, or Company, or BNI, presents the following financial review based on the Company's audited consolidated Financial Statements as of December 31, 2021 and 2020, as well as for the years ending on December 31, 2021 and 2020. The Financial Statements were audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Rekan (member of PricewaterhouseCoopers) with a fair in all material aspects opinion, for the consolidated financial position of PT Bank Negara Indonesia (Persero) Tbk and its subsidiaries as of December 31, 2021, as well as the consolidated financial results and cash flows for the year ending on that date, in accordance with Indonesian Financial Accounting Standards. The independent auditors report to the shareholders was dated January 21, 2022, and signed by Drs. M. Jusuf Wibisana, M.Ec., CPA who holds public accountant license No. AP 0222.

The account values presented in this report represent the net amount after deducting any allowance for impairment losses, unless otherwise stated.

FINANCIAL PERFORMANCE ANALYSIS

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) (2020-2021)		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Assets	964,838	839,910	124,928	14,9	891,337	845,605	45,732	5.4
Liabilities	838,318	729,226	109,092	15,0	746,236	688,489	57,747	8.4
Temporary Syirkah Fund	-	-	-	0,0	32,230	32,112	117	0.4
Equity	126,520	110,684	15,836	14,3	112,872	125,004	(12,132)	(9.7)

*) Since February 1, 2021, BNI Syariah has officially joined Bank Syariah Indonesia according to the effective statement from the Capital Market OJK through letter No. S-289/D.04/2020 dated December 11, 2020, as well as a merger permit from the OJK Banking based on the Decree of the OJK Board of Commissioners No. 4/DK.03/2021 dated January 27, 2021, so that it is no longer consolidated in the consolidated financial statements of BNI and its Subsidiaries for the 2021 financial year. In this regard, interest income of subsidiaries in 2020 does not include BNI Syariah.

ASSETS



In this challenging situation, BNI still increased its loan disbursements while still maintaining good asset quality management.

In line with the slowing growth in national banking assets in 2020, which was influenced by the national economic growth slowdown due to the Covid-19 pandemic, BNI's assets grew by 14.9% in 2021. This moderate asset growth in loans disbursed of 4.3% was higher than the industry, and amounted to Rp510.2 trillion in 2020 compared to Rp532.1 trillion in 2021. Loans disbursed provided the largest contribution to total assets at 55.2% in 2021 from 61.0% in the previous year reflecting BNI's core business as a lending channel. Other productive assets in the form of Government bonds contributed 11.5% to BNI's total assets, an increase of 32.4% from Rp84.2 trillion in 2020 to Rp111.4 trillion in 2021. Placements with Other Banks and Bank Indonesia was the third largest contributor with 9.6%, a significant increase of 64.4%, or Rp36.1 trillion from Rp56.1 trillion in 2020 to Rp92.3 trillion by 2021.

ASET	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2019-2020		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Cash	13,684	16,908	(3,224)	(19,1)	17,324	15,362	1,962	12.8
Current accounts with Bank Indonesia	48,682	33,550	15,132	45,1	35,066	37,104	(2,038)	(5.5)
Current accounts with other banks - net	19,570	15,678	3,892	24,8	16,108	14,963	1,145	7.7
Placements with other banks and Bank Indonesia - net	92,290	56,141	36,149	64,4	61,329	47,777	14	28.4
Marketable securities - net	25,803	22,632	3,171	14,0	29,687	27,162	2,525	9.3
Securities purchased under agreements to resell - net	22,011	8,666	13,345	154,0	8,666	411	8,255	2.006.3
Bills and other receivables	19,563	17,894	1,669	9,3	17,894	19,208	(1,324)	(6.8)
Acceptances receivables - net	20,543	20,499	44	0,2	20,576	18,558	2,017	10.9
Derivative receivables - net	494	1,461	(967)	(66,2)	1,461	312	1,148	367.7
Loans disbursed - net	532,141	510,174	21,967	4,3	541,979	539,862	2,117	0.4
Government Bonds	111,429	84,150	27,279	32,4	90,659	81,029	9,632	11.9
Prepaid taxes	1,051	1,050	1	0,1	1,050	1,050	-	0
Prepaid expenses	3,096	2,699	397	14,7	2,807	2,609	198	7.6
Investment in Associated Entities	8,689	-	8,689	100,0	-	-	-	-
Equity investments - net	830	4,177	(3,347)	(80,1)	813	523	290	55.4
Other assets - net	11,849	13,383	(1,534)	(11,5)	13,758	11,801	1,957	16.6
Fixed assets - net	26,883	26,257	626	2,4	27,362	26,525	838	3.2
Deferred tax assets - net	6,230	4,591	1,639	35,7	4,800	1,349	3,450	255.7
Total Assets	964,838	839,910	124,928	14,9	891,337	845,605	45,732	5.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance

Cash

BNI's cash in 2021 amounted to Rp13.7 trillion, a 19.1% decrease compared to Rp16.9 trillion the previous year. The decline was due to BNI's strategy to start aggressively disbursing loans to support business performance. The decrease in cash denominated in Rupiah was 18.4% and amounted to Rp13.2 trillion in 2021. The cash denominated in Rupiah remained dominant at 96.8% of BNI's total cash.

Current Accounts with Bank Indonesia

BNI and its Subsidiaries as commercial and sharia banks are required to maintain Statutory Reserve Requirements (GWM) for their Rupiah activities, and their foreign currency activities.

BNI's current accounts with Bank Indonesia (BI) amounted to Rp48.6 trillion in 2021, and the number of current accounts with BI increased by 45.1% compared to Rp33.5 trillion the previous year. This 5.0% portion in 2021, an increase from the previous year of 4.0% in line with the increase in the Statutory Reserves by BI to maintain the Bank's liquidity. BNI's Statutory Reserves (GWM) complied with Bank Indonesia Regulation (PBI) No. 15/15/PBI/2013 dated December 24, 2013 concerning Statutory Reserves for Commercial Banks in Rupiah and Foreign Exchange for Conventional Commercial Banks, as amended several times, the latest being the Members of the Board of Governors Regulation (PADG) No. 22/19/PADG/2020 which came into effect on August 1, 2020.

Current Accounts with Bank Indonesia

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Rupiah	42,949	27,958	14,991	53,6	29,444	28,887	556	1.9
US Dollar	5,733	5,592	141	2,5	5,621	8,217	(2,595)	(31.6)
Total	48,682	33,550	15,132	45,1	35,066	37,104	(2,038)	(5.5)

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Statutory Reserve Requirement (GWM)

STATUTORY RESERVE REQUIREMENT (GWM)	2021 (%)	2020 (%)	2019 (%)
GWM - Rupiah	7.6	5.4	6.7
GWM - Foreign Currency	4.0	4.0	8.0

BNI's primary reserve requirement ratio is 7.6% and 5.4% for Rupiah and 4.0% and 4.0% for foreign currency as of December 31, 2021 and 2020.

Current Accounts with Other Banks

BNI's current accounts with other banks amounted to Rp19.6 trillion, an increase of 24.8% compared to Rp15.7 trillion in 2020. The increase was mainly due to the increase in current accounts with other banks in foreign currencies which reached Rp19.1 trillion (gross), an increase of 27.9% compared to Rp14.9 trillion the previous year, in line with the growth in customer deposits. This account contributed 2.0% to total assets in 2021, naik dibandingkan dengan porsi tahun sebelumnya yaitu sebesar 1,9%.

Current Accounts with Other Banks

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Rupiah	472	745	(273)	(36,6)	732	562	170	30.2
Foreign currency	19.098	14.933	4.165	27,9	15.382	14.402	980	6.8
Allowance for impairment losses	(0)	(0)	0	0,0	(6)	(2)	(4)	200.0
Total - net	19.570	15.678	3.892	24,8	16.108	14.963	1.145	7.7

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

All current accounts with other banks are classified as current and the Bank's management believes that the allowance for impairment losses is adequate. The annual interest rate for accounts in Yuan is 2.00%, while for US Dollars it is 0.01-0.13% and 0.01-0.15% for 2021 and 2020 respectively.

Placements with Other Banks and Bank Indonesia

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Deposit Facility	90,320	52,317	38,003	72,6	57,564	39,993	17,571	43.9
Call money	714	1,175	(461)	(39,2)	1,175	6,080	(4,905)	(80.7)
Time deposits	1,207	2,196	(989)	(45,0)	2,137	1,491	646	43.3
Negotiable Certificate Deposits	49	453	(405)	(89,2)	453	212	241	113.5
Allowance for impairment losses	(0)	(0)	(0)	0,0	(0)	(0)	0	0.0
Total - net	92,290	56,141	36,149	64,4	61,329	47,777	13,553	28.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Placements with other banks and BI by BNI in 2021 amounted to Rp92.3 trillion, an increase of 64.4% compared to Rp56.1 trillion the previous year. This increase was mainly due to an increase in the Deposit Facility of Rp90.3 trillion in 2021 compared to Rp52.3 trillion the previous year. The increase was to maintain the Bank's liquidity requirements. Cumulatively, the Deposit Facility accounts contributes the largest portion of 97.9% of the total placements with other banks and BI.

Marketable Securities

Marketable Securities are one alternative for placement of funds by BNI in addition to the loans disbursed. 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, 2021, the Bank's total securities amounted to Rp25.8 trillion, a decrease of 14.0% compared to Rp22.6 trillion the previous year. The composition of marketable securities owned by BNI was as follows:

Composition of Securities owned by BNI

COMPOSITION OF MARKETABLE SECURITIES OWNED BY BNI	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Mutual funds	15,896	12,730	3,166	24.9	12,730	9,541	3,189	33.4
Bonds	8,520	9,104	(584)	(6.4)	16,164	12,445	3,718	29.9
Subordinated Bonds	608	626	(18)	(2.9)	625	1,015	(388)	(38.3)
Bank Indonesia Certificates	128	0	128	100.0	0	3,446	(3,446)	(100)
Asset-backed securities	72	161	(89)	(55.3)	161	242	(81)	(33.3)
Other securities	829	266	563	211.7	266	758	(330)	(64.9)
Allowance for impairment losses	(250)	(255)	5	(2.0)	(260)	(285)	25	(8.7)
Total - net	25,803	22,632	3,171	14.0	29,687	27,162	2,525	9.3

MARKETABLE SECURITIES	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)
Fair value through profit or loss	9,572	100.0	7,212	100.0	2,360	32.7	7,212	100.0	8,646	100.0	(1,434)	(16.6)
Mutual funds	8,714	91.0	6,421	89.0	2,293	35.7	6,421	89.0	5,180	59.9	1,241	24.0
Other bonds	23	0.2	525	7.3	(502)	(95.6)	525	7.3	2,299	26.6	(1,774)	(77.2)
Subordinated bonds	6	0.1	0	0.0	6	100.0	0	0.0	409	4.7	(409)	(100.0)
Other securities	829	8.7	266	3.7	563	211.7	266	3.7	758	8.8	(492)	(64.9)
Fair Value through Other Comprehensive Income	16,225	100.0	15,414	100.0	811	5.3	15,414	100.0	17,117	100.0	(1,703)	(9.9)
SBI	128	0.8	0	0.0	128	100.0	0	0.0	3,446	20.1	(3,446)	(100.0)
Mutual funds	7,182	44.3	6,310	40.9	873	13.8	6,310	40.9	4,362	25.5	1,948	44.7
Other bonds	8,241	50.8	8,318	54.0	(77)	(0.9)	8,318	54.0	8,463	49.4	(145)	(1.7)
Subordinated bonds	602	3.7	625	4.1	(23)	(3.7)	625	4.1	604	3.5	21	3.5
Asset Backed Securities	72	0.4	161	1.0	(89)	(55.3)	161	1.0	242	1.4	(81)	-33.3
Diamortisasi Amortized Cost	256	100.0	261	100.0	(5)	(1.9)	7,321	100.0	1,684	100.0	5,637	334.8
Other Bonds	256	100.0	261	100.0	(5)	(1.9)	7,321	100.0	1,684	100.0	5,637	334.8
Sub Total	26,053	100.0	22,887	100.0	3,166	13.8	29,947	100.0	27,447	100.0	2,500	9.1
Allowance for impairment losses	(250)		(255)		5	(2.0)	(260)		(285)		25	(8.7)
Total - net	25,803		22,632		3,171	14.0	29,687		27,162		2,525	9.3

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

MARKETABLE SECURITIES BY ISSUER	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)
Corporations	21,827	83.8	18,403	80.4	3,424	18.6	18,861	63.0	18,465	67.3	395	2.1
Bank	4,098	15.7	4,484	19.6	(386)	(8.6)	4,510	15.1	5,535	20.2	(1,025)	(18.5)
Bank Indonesia	128	0.5	0	0.0	128	100.0	6,576	22.0	3,447	12.6	3,130	90.8
Sub Total	26,053	100	22,887	100.0	3,166	13.8	29,947	100.0	27,447	100.0	2,500	9.1
Allowance for impairment losses	(250)		(255)		5	(2.0)	(260)		(285)		25	(8.7)
Total - net	25,803		22,632		3,171	14.0	29,687		27,162		2,525	9.3

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance,

When viewed from the composition of the issuers of these securities, securities issued by corporations have the largest portion reaching 83.8% or Rp21.8 trillion in 2021, compared to 80.4% or Rp18.4 trillion (gross) the previous year.

In terms of collectability, most of the securities owned by BNI are in the current category with 98.8% for the period ended December 31, 2021 and 2020. Therefore, the allowance for impairment losses is adequate.

MARKETABLE SECURITIES COLLECTIBILITY	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)
Current	25,483	98.8	22,360	98.8	3,123	14.0	29,421	99.1	26,966	99.3	2,455	9.1
Doubtful	320	1.2	272	1.2	48	17.6	266	0.9	196	0.7	70	35.7
Loss	-	-	-	-	-	-	-	-	-	-	-	-
Total - net	25,803		22,632		3,171	14.0	29,687		27,162		2,525	9.3

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Securities Purchased with Agreement to Resell

As of December 31, 2021, securities purchased with agreements to resell amounted to Rp22.0 trillion with a current classification of 154%, compared to Rp8.7 trillion the previous year. The biggest increase was with Bank Indonesia's counterparts where the Reverse Repo transaction increased by Rp12.1 trillion. The contractual interest rate for securities purchased under agreements to resell is 2.8%-3.5%.

Bills and Other Receivables

BNI's bills and other receivables amounted to Rp19.6 trillion, an increase of 9.3% in 2021. This increase was mainly due to the increase in transactions of Export Notes in foreign currencies of Rp2.0 trillion, or 72.7% to Rp4.7 trillion in 2021 from Rp2.7 trillion the previous year.

Bills and other receivables denominated in Rupiah contribute a dominant portion in the composition of BNI's bills and other receivables with 62.8% and 73.4% for 2021 and 2020, respectively. Bills and other receivables are in the form of Documentary Certificates Domestic (SKBDN), export notes, open account financing and supply chain financing.

Acceptance Receivables

Based on the beneficiary party, BNI acceptance receivables are divided into non-bank debtors and bank debtors. BNI's acceptance receivables amounted to Rp20.54 trillion in 2021, a slight increase of 0.2% compared to Rp20.50 trillion the previous period. This increase was mainly influenced by the increase in acceptance receivables to customers in foreign currencies from non-bank debtors which reached Rp6.9 trillion in 2021 compared to Rp4.8 trillion the previous year.

Based on the collectibility of Bank Indonesia, there is an outstanding of Rp20.2 trillion in the current classification and Rp1.3 trillion in the special mention classification, and allowances for impairment losses have been established in accordance with applicable regulations. Management believes that the allowances for impairment losses established is adequate.

Derivative Receivables

In the normal course of business, BNI enters into transactions involving derivative financial instruments such as foreign currency forward contracts, foreign currency swaps, interest rate swaps and spot transactions for financing, trading and hedging purposes. The instruments BNI uses are classified based on the type of risk associated with exchange rate, interest rate and both. Derivative receivables based on exchange rate are in the form of buy/sell forward contracts, buy/sell currency swaps, buy/sell currency spot, and buy/sell currency options. Interest rate related instruments comprise interest rate swaps while exchange and interest rate related instruments are in the form of USD cross currency and interest rate swaps.

Cumulatively, BNI's derivative receivables amounted to Rp0.49 trillion in 2021, a decrease of 66.2% from Rp1.46 trillion the previous year. Of the total derivative receivables, foreign currency swap-sell instruments in US Dollars contributed the largest nominal amount of Rp2.5 trillion in 2021 from Rp1.5 trillion the previous year. All derivative receivables as of December 31, 2021 are in the current classification.

Loans Disbursed

In 2021, there was a trend of slowing growth in loans disbursed by the banking industry in Indonesia due to the Covid-19 pandemic. Loans disbursed by BNI still grew year on year by 4.3% (net) and 5.0% (gross). The growth in loans (net) was due to an increase in Working Capital Loans that increased by Rp28.0 trillion, an increase of 9.9% to reach Rp311.4 trillion compared to Rp283.4 trillion in 2020. Loans are the core business of the Bank and contribute 55.2% to total assets in 2021 against 60.7% in 2020. BNI loans are provided in Rupiah and foreign currency. Loans in Rupiah (gross) still has the largest contribution at 80.7% in 2021 and 81.2% in 2020. Meanwhile, loans in foreign currency (gross) were dominated by US Dollar with a contribution of 19.3% and 18.8% in 2021 and 2020.

The interest rates on loans in Rupiah was 5.00%-24.00%; US Dollar (0.02%-8.50%); Chinese Yuan (4.00%-7.00%); and Japanese Yen (0.50%-2.09%) for the period December 31, 2021. For the previous one year period, the contract interest rates on BNI loans for the four currencies was 5.50%-38.50%; 1.13%-11.00%; 7.00%; and 0.50%-2.06%, respectively.

Based on loan type, BNI disburses loans in the form of working capital loans, investment loans, consumer loans, syndicated loans, employee loans and Government program loans. Working capital loans contribute the largest portion of BNI's loan portfolio (gross) at 53.5% and 48.7% in 2021 and 2020. Cumulatively, the loan portfolio is well diversified with contributions from other types with the largest portion being investment loans (22.6%); consumer credit (16.4%); and syndicated loans (6.8%) in 2021. The composition of loans by loan type is as follows:

Loans by Type

LOAN TYPE	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Working capital	311,419	283,484	27,935	9.9	291,624	264,813	26,811	10.1
Investment	131,886	129,386	2,500	1.9	134,989	133,984	1,005	0.8
Consumer	95,335	86,404	8,931	10.3	103,482	98,043	5,439	5.5
Employee	3,927	3,749	178	4.7	4,170	4,123	47	1.1

Loans by Type

LOAN TYPE	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Syndicated	39,741	49,918	(10,177)	(20.4)	51,777	55,352	(3,575)	(6.5)
Government program	128	165	(37)	(22.4)	165	455	(290)	(64.0)
Allowance for impairment losses	(50,295)	(42,932)	(7,363)	17.2	(44,228)	(16,909)	(27,319)	161.6
Jumlah	532,141	510,174	21,967	4.3	541,979	539,862	2,117	0.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

For syndicated loans, BNI's participation in syndicated loans with other banks amounted to Rp39.7 trillion and Rp49.9 trillion as of December 31, 2021 and 2020, respectively. Syndicated loans represent loans given to debtors based on joint financing agreements with other banks. The percentage of BNI's share in syndicated loans, where BNI acts as the syndicate leader is 5.04%-83.30% in 2021 and 2020.

Employee loans are loans given to employees with an interest rate of 3%-5% per annum intended for the purchase of houses and other purposes with maturities ranging from 1 year to 20 years. Payment of loan principal and interest is made through salary deductions every month. The Government Loan Program consists of Food Security Loans (KKP), Two Steps Loans (TSL), Cattle Breeding Business Loans (KUPS), and Plantation Revitalization, which can be partially and/or fully funded by the Government.

The structure of the loan portfolio in 2021 is again dominated by the corporate segment at 39.3%, followed by the consumer and medium segments each with 17.0%, then the small segment 16.4% and the International 10.0% of the total loan which is given. On a consolidated basis, the subsidiaries contributed 0.2% of the total loans disbursed.

Loans Per Segment

LOANS BY SEGMENT	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)	(RP- BILLION)	%	(RP- BILLION)	%	NOMINAL (RP- BILLION)	PERCENTAGE (%)
Corporate	229,028	39.3	226,473	40.9	2,555	1.1	256,601	43.8	246,629	44.3	9,972	4.0
Rupiah	184,838	80.7	177,543	78.4	7,295	4.1	207,672	80.9	201,139	81.6	6,533	3.2
Foreign currency	44,190	19.3	48,930	21.6	(4,740)	(9.7)	48,929	19.1	45,490	18.4	3,439	7.6
Medium	99,132	17.0	99,463	18.0	(331)	(0.3)	67,193	11.5	72,691	13.1	(5,498)	(7.6)
Rupiah	89,217	90.0	95,246	95.8	(6,029)	(6.3)	65,117	96.9	70,292	96.7	(5,175)	(7.4)
Foreign currency	9,915	10.0	4,217	4.2	5,698	135.1	2,075	3.1	2,399	3.3	(323)	(13.5)
Small	95,752	16.4	84,800	15.3	10,952	12.9	84,800	14.5	75,461	13.6	9,339	12.4
Rupiah	95,634	99.9	84,709	99.9	10,925	12.9	84,709	99.9	75,331	99.8	9,378	12.4
Foreign currency	118	0.1	91	0.1	27	29.4	91	0.1	130	0.2	(39)	(30.2)
Consumer	99,028	17.0	89,877	16.2	9,151	10.2	89,876	15.3	85,925	15.4	3,951	4.6
Rupiah	98,997	100.0	89,864	100.0	9,133	10.2	89,863	100.0	85,917	100.0	3,946	4.6
Foreign currency	31	0.0	13	0.0	18	140.1	13	0	8	0.0	5	63.5
Overseas	58,446	10.0	50,972	9.2	7,474	14.7	53,114	9.1	41,750	7.5	11,364	27.2
Rupiah	-	-	-	-	-	-	-	-	-	-	-	-
Foreign currency	58,446	100.0	50,972	100.0	7,474	14.7	53,114	100.0	41,750	100.0	11,364	27.2
Subsidiaries	1,050	0.2	1,521	0.3	(471)	(31.0)	34,623	5.9	34,316	6.2	307	0.9

Loans Per Segment

LOANS BY SEGMENT	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)
Rupiah	1,050	100.0	1,521	100.0	(471)	(31.0)	34,454	99.5	34,142	99.5	313	0.9
Foreign currency	-	-	-	-	-	-	169	0.5	174	0.5	(5)	(3.1)
Total Loans	582,436	100.0	553,106	100.0	29,330	5.3	586,207	100.0	556,771	100.0	29,436	5.3
Total Rupiah	469,736	80.7	448,883	81.2	20,853	4.6	481,816	82.2	466,820	83.8	14,996	3.2
Total Foreign currency	112,700	19.3	104,223	18.8	8,477	8.1	104,391	27.8	89,951	16.2	14,440	16.1

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

When viewed from the economic sector, the loans disbursed by BNI are well diversified so there is no exposure to risk of loan concentration in certain economic sectors. The three economic sectors that have contributed more than 10% of loans in 2021 were the industrial or manufacturing sector with a share of 20.9%; trade, restaurants and hotels (17.5%); and agriculture (10.2%). In the previous year, the portion of loan disbursements for the three sectors were relatively the same at 19.7%; 17.2%; and 11.1%.

CREDIT PER ECONOMIC SECTOR	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Trade, Restaurant and Hotel	101,676	95,032	6,644	7.0	97,779	97,649	129	0.1
Manufacturing	121,997	108,753	13,244	12.2	110,963	107,125	3,838	3.6
Agriculture	59,430	61,540	(2,110)	(3.4)	62,396	56,942	5,454	9.6
Trade Services	42,959	47,612	(4,653)	(9.8)	50,126	55,216	(5,090)	(9.2)
Construction	55,210	49,595	5,615	11.3	51,923	41,177	10,746	26.1
Transportation Warehousing and Communications	43,010	39,761	3,249	8.2	40,528	28,985	11,543	39.8
Electricity Gas and Water	20,301	21,788	(1,487)	(6.8)	23,344	31,020	(7,675)	(24.7)
Social Services	20,925	21,311	(386)	(1.8)	23,585	20,027	3,559	17.8
Mining	15,685	15,060	625	4.2	15,230	12,391	2,838	22.9
Others	101,243	92,654	8,589	9.3	110,332	106,238	4,094	3.9
Allowance for impairment losses	(50,295)	(42,932)	(7,363)	17.2	(44,228)	(16,909)	(27,319)	161.6
Total – net	532,141	510,174	21,967	4.3	541,979	539,862	2,117	0.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Loans disbursed by Overseas Branches

OVERSEAS BRANCHES LOANS DISBURSED	2021 (RP-BILLION)	2020 (RP-MILIAR)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)	INCREASE (DECREASE) 2020-2021	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		NOMINAL (RP-BILLION)	PERCENTAGE (%)
BNI New York	12,684	11,675	1,009	8.6	8,771	2,904	33.1
BNI London	12,343	11,127	1,216	10.9	8,571	2,556	29.8
BNI Tokyo	8,716	6,785	1,931	28.5	5,490	1,295	23.6
BNI Hong Kong	9,148	8,783	365	4.2	7,560	1,223	16.2
BNI Singapura	12,577	12,670	(93)	(0.7)	9,452	3,218	34.0

Loans disbursed by Overseas Branches

OVERSEAS BRANCHES LOANS DISBURSED	2021 (RP- BILLION)	2020 (RP- MILIAR)	INCREASE (DECREASE) 2020-2021		2019 (RP- BILLION)	INCREASE (DECREASE) 2020-2021	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)		NOMINAL (RP- BILLION)	PERCENTAGE (%)
BNI Seoul	3,643	2,074	1,569	75.7	1,906	168	8.8
Total	59,111	53,114	5,997	11.3	41,750	11,364	27.2

In terms of Bank Indonesia collectibility, the collectibility of loans disbursed by BNI is mostly in the current category at 91.6% and 90.6% for 2021 and 2020. BNI and Subsidiaries non-performing loan ratio on a gross basis (before deducting allowances for impairment losses) as of December 31, 2021 and 2020 was 3.7% and 4.3%, respectively. BNI's consolidated non-performing loan ratio on a net basis for the same period reached 0.7% and 0.9%.



LOAN COLLECTIBILITY	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Current	533,439	501,207	32,232	6.4	532,515	518,397	14,117	2.7
Special Mention	27,470	28,384	(914)	(3.2)	29,062	25,412	3,650	14.4
Substandard	4,114	8,838	(4,724)	(53.5)	9,320	5,041	4,279	84.9
Doubtful	2,346	3,410	(1,064)	(31.2)	3,490	696	2,795	401.7
Bad	15,068	11,268	3,800	33.7	11,819	7,225	4,594	63.6
Allowance for impairment losses	(50,295)	(42,932)	(7,363)	17.2	(44,228)	(16,909)	(27,319)	161.6
Total - net	532,141	510,174	21,967	4.3	541,979	539,862	2,117	0.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Write-off of Loan Assets and Reacquisition - Bank Only

Where debtors no longer have potential, both business-wise and operational, BNI wrote off loan assets amounting to Rp9.5 trillion during 2021, lebih rendah dibandingkan tahun 2020 yang mencapai Rp9,8 triliun. For this, BNI Management prioritizes debtors who are bankrupt and have legal problems, where maximum efforts have been made. When compared to the total loans provided by the Bank alone, the write-off ratio for loans is relatively low at around 1.6%. Meanwhile, recovery recoveries of written-off loans amounted to Rp3.1 trillion with a recovery rate in 2021 of 32.8%, an increase compared to 20.1% in 2020.

Government Bonds

Government Bonds are financial instruments that fall into the low risk criteria but offer competitive interest rates, and help fund the Government in managing the State Budget. As of December 31, 2021, BNI's Government Bonds amounted to Rp111.4 trillion, an increase of 32.4% compared to 2020. BNI holds Government Bonds in both Rupiah and foreign currency. The Government bond transactions in Rupiah amounted to Rp83.0 trillion, an increase of 31.8% in 2021, compared to Rp62.9 trillion the previous year. Meanwhile, Government bond transactions in foreign currency amounted to Rp28.5 trillion and Rp21.2 trillion in 2021 and 2020. The contribution of these accounts to BNI's total assets in 2021 and 2020 was 11.5% and 10.1%, respectively.

Government Bonds

	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)
Fair value through profit or loss	4,112	3.7	3,003	3.5	1,109	36.9	3,023	3.3	3,327	4.1	(304)	(9.1)
Fair Value through Other Comprehensive Income	85,198	76.4	58,619	69.7	26,579	45.3	58,672	64.7	55,715	68.8	2,957	5.3
Amortised Expenses	22,120	19.9	22,528	26.8	(408)	(1.8)	28,966	31.9	21,987	27.1	6,979	31.7
Total	111,430	100.0	84,150	100.0	27,280	32.4	90,661	100.0	81,029	100.0	9,632	11.9
Fixed interest rate	111,330	99.9	84,050	99.9	27,280	32.5	88,261	97.4	76,966	95.0	11,294	14.7
Floating Interest Rate	100	0.1	100	0.1	0	0.0	2,400	2.6	4,063	5.0	(1,662)	(40.9)
Total	111,430	100.0	84,150	100.0	27,280	32.4	90,661	100.0	81,029	100.0	9,632	11.9

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Viewed from the Government bond interest rate, Government Bond transactions with fixed interest rates contributed the most at 99.9% in 2021 and 2020, with floating interest rate Government Bonds contributing 0.1%.

The market price of Government Bonds with fixed interest rates ranged from 100.7% to 132.6% and between 95.4% to 132.9% as of December 31, 2021 and 2020. The market price of Government Bonds with floating interest rates ranged up to 100% as of December 31, 2021 and 2020.

In the Government Bonds financial instruments, there are Government Bonds from its recapitalization program, the total recapitalization bonds as of December 31, 2021 and December 31, 2020 were Rp100 billion, respectively.

The Government Bonds contract interest rate in 2021 for fixed rate was 3.8%-12.9% and was denominated in Rupiah; 0.7%-5.9% (US Dollar); and 2.8%-3.1% (Singapore Dollar), compared to the previous year for the three currencies of 5.1%-12.0%; 2.3%-4.4%; and 2.3%-3.3%. On the other side, the annual floating interest rate for Government Bonds in 2020 was 3.8% -4.5% from 4.0% the previous year.

Prepaid Taxes and Prepaid Expenses

BNI's prepaid taxes and expenses for the period ended December 31, 2021, amounted to Rp1.0 trillion and Rp3.1 trillion, respectively, compared to Rp1.0 trillion and Rp2.7 trillion respectively in the previous year

Share Participation

Investments in shares and investments in BNI's associated Entities amounted to Rp9.1 trillion in 2021, an increase on the previous year's Rp4.2 trillion due to investment in Bank Syariah Indonesia.

Ownership Percentage

	2021 (%)	2020 (%)	2019 (%)
PT Sarana Bersama Pembiayaan Indonesia	-	-	8.0
PT Swadharma Nusantara Pembiayaan	6.9	6.9	6.9
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	0.6	0.6	0.6
PT Bank Mizuho Indonesia	1.0	1.0	1.0
PT Bank BTPN Tbk	0.2	0.2	0.2
PT PANN Pembiayaan Maritim	48.4	48.4	48.4
PT Fintek Karya Nusantara	9.9	10.2	10.9
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	17.5	17.5	-
PT Bank Syariah Indonesia Tbk	24.9	-	-

Other Assets

BNI's net other assets amounted to Rp11.8 trillion in 2021, a 11.5% decrease compared to Rp13.4 trillion the previous year. This was caused by several accounts, including BNI acting as acquiring bank, and foreclosed collateral.

Fixed assets

BNI's net fixed assets amounted to Rp26.9 trillion in 2021 compared to Rp26.3 trillion the previous year, where none of BNI's fixed assets were pledged as collateral. The increase was due to the implementation of PSAK 73 where BNI must recognize leases that meet the PSAK 73 criteria as right-of-use assets. Right to use assets as of December 31, 2021 amounted to Rp1.4 trillion (net). 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 amount of property, plant and equipment does not exceed the estimated recoverable value. The contribution of fixed assets (net) to BNI's total assets in 2021 and 2020 was 2.8% and 3.1%, respectively.

	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Land	15,969	15,372	597	3.9	16,024	15,781	242	1.5
Buildings	8,387	7,029	1,358	19.3	7,200	6,487	712	11.0
Office Equipment and motor vehicles	12,747	12,095	652	5.4	12,527	10,719	1,808	16.9
Total acquisition cost	37,103	34,496	2,607	7.6	36,762	32,988	2,763	8.4
Construction in progress	2,210	982	1,228	125.1	1,012	2,674	(1,662)	(62.2)
Right-of-Use Assets	522	1,996	(1,474)	(73.8)	2,196	-	2,196	100.0
Total acquisition cost	38,935	37,474	2,361	6.3	36,762	35,662	3,296	9.2
Accumulated depreciation								
Buildings	2,250	1,230	1,020	82.9	1,247	820	427	52.0
Office Equipment and motor vehicles	9,890	9,484	406	4.3	9,770	8,317	1,454	17.5
Right-of-Use Assets	812	503	309	61.4	578	-	578	100.0
Total accumulated depreciation	12,952	11,217	1,735	15.5	11,596	9,137	2,459	(26.9)
Net book value	26,883	26,257	626	2.4	27,362	26,525	838	3.2

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Deferred Tax Assets - Net

BNI's net deferred tax assets amounted to Rp6.2 trillion in 2021, an increase from Rp4.6 trillion the previous year.

Liabilities



The growth of Third Party Funds (DPK) in challenging times, illustrates BNI as the best bank that is able to continue to maintain public trust.

BNI's liabilities grew 15.0% to Rp838.3 trillion in 2021, mainly supported by an increase in customer deposits and subordinated securities. BNI's TPF increased by 15.5% to Rp729.2 trillion in line with the 17,1% increase in CASA of Rp506.1 trillion. Subordinated securities increased totalled Rp15.8 trillion in 2021 due to the issuance of Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) and Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021) to strengthen complementary capital (tier 2) and strengthen additional core capital (additional tier 1) in general, to help with the Company's business expansion and to optimize the composition of long-term funding.

Liabilities

LIABILITIES	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Obligations due immediately	4,554	5,508	(954)	(17.3)	5,561	5,273	288	5.5
Deposits from customers	729,169	631,551	97,618	15.5	647,572	582,541	65,031	11.2
Deposits from other banks	14,377	9,245	5,132	55.5	9,023	11,584	(2,554)	(21.4)
Derivative payables	110	414	(304)	(73.4)	414	203	211	104.0
Securities sold under agreements to repurchase	1,829	2,590	(761)	(29.4)	2,590	2,183	407	18.6
Acceptance payables	5,588	5,423	165	3.0	5,500	5,341	159	3.0
Accrued expenses	1,242	1,125	117	10.4	1,182	997	184	18.5
Taxes payable	1,284	1,060	224	21.1	1,148	568	580	102.1
Employee benefits	6,138	5,652	486	8.6	6,344	4,392	1,952	44.4
Provisions	2,276	1,421	855	60.2	1,422	185	1,237	668.5
Other liabilities	20,542	18,038	2,504	13.9	18,280	14,901	3,380	22.7
Debt Securities	2,986	2,985	1	0.0	2,985	2,985	0	0.0
Borrowings	32,458	44,114	(11,656)	(26.4)	44,114	57,236	(13,121)	22.9
Subordinated Securities	15,765	100	15,665	15,665.0	100	100	0	0.0
Total Liabilities	838,318	729,225	109,093	15.0	746,236	688,489	57,747	8.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Obligations due immediately

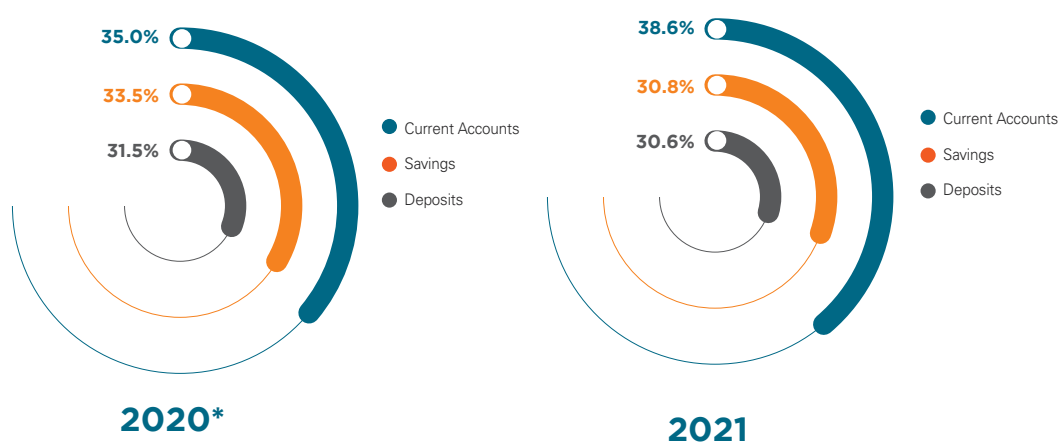
BNI's Obligations due immediately decreased by Rp1.0 trillion or 17,3% to Rp4.6 trillion. Compared to the previous position of Rp5.6 trillion, the decline in this account in 2021 was in line with the settlement of several BNI obligations to third parties, including obligations as an issuer bank (ATM) which decreased in 2021 by Rp1.3 trillion from the previous year.

Deposits from customers

During the tight liquidity conditions in the banking industry during 2021, BNI's TPF amounted to Rp729.2 trillion, an increase of 15.5% in 2021 from Rp631.6 trillion the previous year. Of the total TPF, 69.4% were in the form of Current Account Saving Accounts (CASA), and amounted to Rp506.1 trillion in 2021, an increase of 17.1% or Rp73.7 trillion compared to the previous year. The CASA achievement growth was mainly supported by an increase in demand deposits of 27.3% to Rp281.4 trillion. This increase was in line with BNI's policy to optimize low-cost third party funding sources.

BNI's Third Party Funds (DPK) were the dominant contributor to liabilities at 87.0% and 86.6% of total liabilities in 2021 and 2020.

BNI Customer Deposits Composition



BNI's TPF portfolio is well diversified with a composition of savings and current accounts (CASA) of 69.4% with time deposits at 30.6% in 2021, an increase compared to 2020. This shows that during the tight liquidity, BNI was able to gather low-cost funding resources.

In terms of currency, BNI's TPF are denominated by Rupiah at 83.5% and 82.0% in 2021 and 2020 in line with loan disbursements, which is also dominated in Rupiah. The portion of TPF in foreign currency is 16.5% and 18.0%. The foreign currency TPF reached Rp120.4 trillion, with US Dollars as the dominant portion with Rp117.3 trillion in 2021 and Rp110.7 trillion the previous year.

	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)
Current accounts	281,398	38.6	221,050	35.0	60,348	27.3	224,663	34.7	202,227	34.7	22,436	11.1
Rupiah	197,760	27.1	159,029	25.2	38,731	24.4	162,546	25.1	149,427	25.7	13,118	8.8
Foreign currency	83,638	11.5	62,021	9.8	21,617	34.9	62,117	9.6	52,800	9.1	9,318	17.6
Savings accounts	224,670	30.8	211,278	33.5	13,392	6.3	223,686	34.5	191,390	32.9	32,296	16.9
Rupiah	215,223	29.5	196,745	31.2	18,478	9.4	209,031	32.3	183,274	31.5	25,757	14.1
Foreign currency	9,447	1.3	14,533	2.3	(5,086)	(35.0)	14,655	2.3	8,116	1.4	6,539	80.6
Total Current accounts and Savings accounts	506,068	69.4	432,328	68.5	73,740	17.1	448,349	69.2	393,617	67.6	54,732	13.9
Time deposits	223,101	30.6	199,223	31.5	23,878	12.0	199,223	30.8	188,924	32.4	10,299	5.5
Rupiah	195,790	26.9	162,350	25.7	33,440	20.6	162,350	25.1	152,575	26.2	9,775	6.4

	2021		2020*		INCREASE (DECREASE) 2020-2021		2020		2019		INCREASE (DECREASE) 2019-2020	
	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)	(RP-BILLION)	%	(RP-BILLION)	%	NOMINAL (RP-BILLION)	PERCENTAGE (%)
Foreign currency	27,311	3.7	36,873	5.8	(9,562)	(25.9)	36,873	5.7	36,349	6.2	524	1.4
Total Deposits from Customers	729,169	100.0	631,551	100.0	97,618	15.5	647,572	100.0	582,541	100.0	65,149	11.2
Rupiah	608,773	83.5	518,124	82.0	90,649	17.5	533,927	82.5	485,276	83.3	48,651	10.0
Foreign currency	120,396	16.5	113,427	18.0	6,969	6.1	113,645	17.5	97,265	16.7	16,380	16.8

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

As savings products, this type of BNI TFP product is classified into BNI Savings and Hajj Savings. The two types of savings accounts accounted for 99.8% and 0.2% of total savings in 2021, respectively. In 2020, the contributions of these two types of savings to BNI's total savings were 98.7% and 1.3%.

For 2021, the interest rate and annual profit sharing for TPF denominated in Rupiah was 0.0%-7.3%; 0.0%-1.5% (US Dollar); 0.0%-0.8% (Singapore Dollar); 0.0%-0.8% (Euro) and 0.0% (Japanese Yen), compared to the previous year when the interest rate and annual profit sharing for TPF denominated in Rupiah was 0.0%-8.0%; 0.0%-3.7% (US Dollar); 0.0%-0.5% (Singapore Dollar); 0.0%-0.8% (Euro) and 0.0% (Japanese Yen).

Deposits from Other Banks

In 2021, BNI's deposits from other banks amounted to Rp14.4 trillion, an increase of 55.5% compared to Rp9.2 trillion the previous year. The increase in current accounts with other banks of Rp6.2 trillion in 2021, was 139.5% higher than the Rp2.6 trillion in 2020. There was also an increase in interbank money market loan instruments of Rp4.5 trillion or 71.0% from the previous year. This is one of the short-term interbank funding facilities.

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Negotiable Certificate of Deposits	-	-	-	-	373	3,151	(2,777)	(88.1)
Current accounts	6,192	2,585	3,607	139.5	2,393	2,870	(477)	(16.6)
Time deposits	1,530	1,927	(397)	(20.6)	1,927	875	1,052	120.3
Other deposits	2,114	2,078	36	1.7	1,675	883	792	89.7
Interbank money market	4,541	2,655	1,886	71.0	2,655	3,805	(1,151)	(30.2)
Total	14,377	9,245	5,132	55.5	9,023	11,584	(2,561)	(22.1)

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Interest rates and annual profit sharing for deposits from other banks in Rupiah in 2021 were 0.0%-3.3% (Rupiah); 0.0%-0.8% (US Dollar); 0.0%-0.4% (Japanese Yen); and 0.0%-0.8% (Singapore Dollar). For 2020, the interest rates and annual profit sharing for the four currencies was 0.0%-5.5% (Rupiah); 0.0%-1.3% (US Dollar); 0.0%-0.4% (Japanese Yen); and 0.0%-0.5% (Singapore Dollar).

Derivative Payables

In conducting its business, BNI conducts derivative financial instrument transactions such as foreign currency futures contracts, foreign currency swaps, interest rate swaps and spot transactions for financing, trading and hedging purposes. BNI's derivative payables decreased by Rp304 billion or 73.4% to Rp110 billion from Rp414 billion the previous year. The decrease in derivative liabilities came from derivative liabilities to third parties amounting to Rp261 billion.

DESCRIPTION	2021	2020	INCREASE (DECREASE)		2019	INCREASE (DECREASE)	
	(RP-BILLION)	(RP-BILLION)	2020-2021		(RP-BILLION)	2019-2020	
			NOMINAL	PERCENTAGE		NOMINAL	PERCENTAGE
			(RP-BILLION)	(%)		(RP-BILLION)	(%)
Related parties	12	55	(43)	(78.2)	30	25	83.3
Third parties	98	359	(261)	(72.7)	173	186	107.5
Total	110	414	(304)	(73.4)	203	211	103.9

Securities Sold under Agreements to Repurchase

BNI's securities sold under agreements to repurchase decreased by 29.4% from Rp2.6 trillion in 2020 to Rp1.8 trillion in 2021. The annual interest rate for securities sold under agreements to repurchase was 1.00%-2.00% (US Dollars) for 2021 and 0.60%-2.22% (US Dollars) for 2020.

Acceptance Payables

BNI's acceptance payables increased by 3.0% from Rp5.4 trillion in 2020 to Rp5.6 trillion the following year. This increase was due to acceptance claims from third parties that rose from Rp4.7 trillion to Rp5.3 trillion in 2021.

Accrued Expenses

BNI's accrued expenses amounted to Rp1.2 trillion in 2021, an increase of 10.5% compared to Rp1.1 trillion the previous year, mainly due to office expenses of Rp117 billion.

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Issuer Bank Liabilities	98	126	(28)	(22.2)	127	20	107	549.0
Office expenses	501	384	117	30.5	439	396	42	10.7
Mudharabah time deposits	-	-	-	-	30	52	(22)	(41.7)
Technology and telecommunication expenses	476	388	88	22.7	388	348	40	11.5
Loyalty expenses	52	79	(27)	(34.2)	79	76	3	3.4
Promotion expenses	6	9	(3)	(33.3)	9	30	(21)	(69.7)
Others	110	139	(29)	(20.9)	110	76	35	45.8
Total	1,243	1,125	118	10.5	1,182	997	184	18.5

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Taxes Payable

BNI's taxes payable increased by 21.1% from Rp1.1 trillion in 2020 to Rp1.3 trillion in 2021. This increase was due to the increase of Rp283 billion in corporate income tax to reach Rp1.2 trillion in 2021. The increase in corporate income tax payable was due to the impact of implementing PSAK 71 since 2020.

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Corporate income tax	1,210	927	283	30.5	992	457	535	117.3
Other taxes	74	133	(59)	(44.4)	156	111	45	40.0
Total	1,284	1,060	224	21.1	1,148	568	580	102.1

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Employee Benefits

Employment benefits in 2021 amounted to Rp6.1 trillion, an increase of 8.6% compared to Rp5.7 trillion in 2020. BNI's employee expenses increased from Rp820 billion in 2020 to Rp2.2 trillion in 2021, an increase of 171.8%, largely due to the change in discount rate from 6.25% on December 31, 2020 to 7.00% in December 31, 2021. The decrease in employee benefits in particular came from the defined benefit pension plan of Rp1.0 trillion, while long-term employee benefits increased by Rp99 billion.

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Employee Costs	2,229	820	1,409	171.8	1,134	2,082	(984)	(45.5)
Other Long-term Employee Benefits	3,909	4,832	(923)	(19.1)	5,209	2,310	2,889	125.5
Total	6,138	5,652	486	8.6	6,344	4,392	1,951	44.4

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Allowances

BNI's allowances consists of estimated losses on commitments and contingencies as well as allowance for legal cases. BNI's allowances amounted to Rp2.3 trillion, an increase compared to Rp1.4 trillion the previous year. The increase was due to the estimated loss on commitments and contingencies of Rp1.4 trillion in 2020 to Rp2.2 trillion on December 31, 2021. This is due to a provision for off balance sheet accounts being established as a result of the implementation of PSAK 71 in 2020.

Other Liabilities

Other liabilities increased by 13.9% from Rp18.0 trillion in 2020 to Rp20.5 trillion in 2021. The largest component of other liabilities was payables to policyholders that increased by 8.7% to Rp14.8 trillion in 2021 from the previous year's of Rp13.6 trillion.

Debt Securities

BNI issued debt securities in the form of Shelf-Registered Bonds I BNI Year 2017 worth Rp3.0 trillion with a term of 5 years and a coupon of 8.0% per annum paid quarterly. The BNI bonds, rated idAAA from Pefindo, were issued on July 11, 2017 and listed on the Indonesia Stock Exchange on July 12, 2017. The issuance of these bonds was based on an effective statement from OJK through letter No. S-349/D.04/2017. The outstanding value of these bonds after deducting the unamortized discount is Rp161 million as of December 31, 2021 and Rp447 million as of December 31, 2020.

DESCRIPTION	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		NOMINAL (RP-BILLION)	PERCENTAGE (%)
Related parties	1.012	1.165	(153)	(13.1)	1.269	(104)	(0.1)
Third parties	1.974	1.820	154	8.5	1.716	104	0.1
Total	2.986	2.985	1	0.0	2.985	0	0.0

Borrowings

BNI borrowings consist of two-step loans, liquidity loans for primary cooperative loans to its members, bilateral loans, bankers acceptances and other loans. Total borrowings for the period ended December 31, 2021 amounted to Rp32.5 trillion, down 26.4% from the previous year's position of Rp44.1 trillion. This decrease was due to the fall in bilateral loans of 25.5% to Rp28.3 trillion in 2021 from Rp38.0 trillion the previous year, and was also in line with the optimization of low-cost funds through customer deposits.

DESCRIPTION	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		NOMINAL (RP-BILLION)	PERCENTAGE (%)
Step Loans	57	63	(6)	(9.5)	61	3	4.6
Liquidity Credit for Members of Primary Cooperatives Credit	1	1	0	0.0	1	0	(2.6)
Bilateral Loans	28,315	37,999	(9,684)	(25.5)	39,650	(1,651)	(4.2)
Banker Acceptance	3,278	4,873	(1,595)	(32.7)	16,298	(11,426)	(70.1)
Others	807	1,178	(371)	(31.5)	1,225	(47)	(3.9)
Total	32,458	44,114	(11,656)	(26.4)	57,236	(13,121)	(22.9)

Subordinated Securities

As well as corporate bonds, BNI also issued subordinated securities in the form of 2018 BNI Subordinated Medium Term Notes ("Subordinated MTN"), 2021 BNI Subordinated MTN II and BNI Additional Tier 1 Capital Securities.

BNI received an effective statement from OJK through letter No. S-73/PB.31/2018 to issue the 2018 BNI Subordinated Medium Term Notes I on June 8, 2018 with the issued Subordinated MTN valued at Rp100.0 billion for a term of 5 years, with a coupon of 8.0% per year paid quarterly. The BNI Subordinated MTN were issued with a limited offer.

On March 30, 2021, BNI issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) amounting to US\$500 million for a 5-year term, with a coupon of 3.75% per annum paid semi-annually, and listed on the Singapore Exchange. Tier 2 Subordinated Notes can be recorded as a component of supplementary capital (Tier 2) based on approval from the Financial Services Authority through letter No. S-64/PB.31/2021 dated March 31, 2021.

On September 24, 2021, BNI issued Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021) in the amount of US\$600 million with no term but a call option of 5.5 years, with a coupon of 4.30% per annum paid semi-annually, and listed on the Singapore Exchange. Additional Tier 1 Capital Securities can be recorded as a component of additional core capital (Additional Tier 1) based on approval from the Financial Services Authority through letter No. S-210/PB.31/2021 dated 30 September 2021.

BNI used the proceeds from the Subordinated MTN issuance to strengthen complementary capital (Tier 2) and working capital in the context of business development, especially for lending and increasing the composition of long-term fund structure, in accordance with OJK Regulation No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks, as amended by OJK Regulation No. 34/POJK.03/2016, and they will subsequently be used by BNI to support the increase in productive assets.

DESCRIPTION	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		NOMINAL (RP-BILLION)	PERCENTAGE (%)
Related parties	28	25	3	12.0	25	0	0.0
Third parties	15,737	75	15,662	20.882.7	75	0	0.0
Total	15,765	100	15,665	15.665.0	100	0	0.0

Temporary Syirkah Fund

Since February 1, 2021, BNI Syariah has officially joined Bank Syariah Indonesia in accordance with the approval of the Capital Market Supervisory Financial Services Authority (OJK) through letter No. S-289/D.04/2020 dated 11 December 2020 as well as through the Banking Supervisory OJK letter No. 4/KDK.03/2021 dated January 27, 2021.

By merging BNI Syariah with Bank Syariah Indonesia, BNI's control over BNI Syariah has ended and there is no consolidation of the Bank Syariah Indonesia financial statements in the consolidated financial statements of BNI and its Subsidiaries.

DESCRIPTION	2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Deposits from Customers				
Mudharabah Current Accounts	2,812	4,808	(1,996)	(41.5)
Mudharabah Saving Accounts	13,010	10,876	2,134	19.6
Mudharabah Deposit Accounts	16,058	16,086	(28)	(0.2)
Deposits from Customers Sub Total	31,880	31,770	110	0.3
Deposits from other Banks				
Mudharabah Current Accounts	12	11	1	9.1
Mudharabah Saving Accounts	185	151	34	22.5
Mudharabah Deposit Accounts	151	179	(28)	(15.6)
Deposits from other Banks Sub Total	349	341	7	2.1
Mudharabah Sukuk Issued				
Total Temporary Syirkah Funds	32,228	32,111	117	0.4

Deposits from Customers

Mudharabah Savings are deposits of other parties that receive profit sharing from the Bank's income for the use of these funds at a predetermined and agreed ratio. Meanwhile, Mudharabah Deposits are investments from other parties that receive profit sharing from the Subsidiary's income for the use of these funds at a pre-determined and agreed ratio.

DEPOSITS FROM CUSTOMERS

	2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Mudharabah Current Accounts	2,812	4,808	(1,996)	(41.5)
Mudharabah Savings Accounts	13,010	10,876	2,134	19.6
Mudharabah Deposit Accounts	16,058	16,086	(28)	(0.2)
Total	31,880	31,770	110	0.3

Deposits from Other Banks

Similar to customer deposits, deposits from other banks also consist of Mudharabah Current Accounts, Mudharabah Savings, and Mudharabah Deposits.

DEPOSITS FROM OTHER BANKS

	2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Mudharabah Current Accounts	12	11	1	9.1
Mudharabah Savings Accounts	185	151	34	22.5
Mudharabah Deposit Accounts	151	179	(28)	(15.6)
Total	348	341	7	2.1

Equity

BNI's total equity increased by 14.3% to Rp126.5 trillion in 2021. This significant increase came from an increase in retained earnings of 20.6% or equivalent to Rp13.4 trillion compared to 2020 as a result of BNI's profit growth.

EQUITY	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Share capital: Issued and fully paid	9,055	9,055	0	0.0	9,055	9,055	0	0.0
Additional paid-in capital	17,010	14,568	2,442	16.8	14,568	14,568	0	0.0
Asset Revaluation Reserve	15,442	14,882	560	3.8	14,963	14,947	16	0.1
Transactions with non-controlling interests	2,257	2,257	0	0.0	2,257	2,257	0	0.0
Unrealized (losses) gains on marketable securities and Government Bonds at fair value through other comprehensive income, net of tax	1,949	2,424	(475)	(19.6)	2,424	(822)	3,246	394.9
Differences in Foreign Currency Translation of Financial Statements	(17)	23	(40)	(173.9)	23	47	(24)	(50.7)
Retained earnings	78,250	64,878	13,372	20.6	66,981	82,464	(15,483)	(18.8)

EQUITY	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Non-controlling interests	2,781	2,676	105	3.9	2,680	2,488	191	7.7
Treasury Stock	(207)	(79)	(128)	162.0	(79)	0	(79)	(100)
Total Equity	126,520	110,684	15,836	14.3	112,872	125,004	(12,132)	(9.7)

*) Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Share Capital

BNI's share capital in 2021 reached Rp9.1 trillion, the same as 2020 which reached Rp9.1 trillion.

Additional Paid-in Capital

BNI's additional paid-in capital/agio shares reached Rp17.0 trillion. The increase from 2020 of Rp14.6 trillion was due to the premium for shares from equity participation in Bank Syariah Indonesia ("BSI") of Rp2.4 trillion.

Asset Revaluation Reserve

The asset revaluation reserve in 2021 was Rp15.4 trillion, an increase of Rp560 million from 2020 due to the revaluation of fixed assets in 2021.

Transactions with Non-Controlling Interests

Transactions with non-controlling interests reached Rp2.3 trillion in 2021, the same as in 2020 which reached Rp2.3 trillion.

Unrealized Net Gain from Unrealized Increase/(Decrease) in Securities and Government Bonds in the Fair Value Group through Other Comprehensive Income After Tax

Unrealized Net Gain from the increase in fair value of securities and Government bonds are measured at fair value through other comprehensive income after deducting deferred tax at BNI of Rp1.9 trillion in 2021. This was a decrease of Rp475 million from Rp2.4 trillion in 2020. The decline was due to market conditions for securities with a decrease in the benchmark interest rate on the market in 2021 compared to 2020.

Differences in Foreign Currency Translation of Financial Statements

The difference in exchange rates due to the translation of financial statements in foreign currencies at BNI 2021 reached -Rp17 billion. This achievement experienced a decrease of Rp40 billion compared to 2020 of Rp23 billion.

Retain Earnings

The balance of profit in 2021 reached Rp78.3 trillion, an increase of Rp13.4 trillion or 20.6% compared to the previous year of Rp64.9 trillion.

Non-controlling interests

BNI's Non-controlling interests in the consolidated net assets of subsidiaries reached Rp2.8 trillion, an increase of 3.9% or Rp105 billion from Rp2.7 trillion.

Reclaimed Share Capital

BNI's reclaimed share capital (treasury shares) reached Rp207 billion in 2021, an increase of Rp128 billion or 162% from 2020.

Consolidated Profit and Loss Statements and Other Comprehensive Income



BNP recorded a profit in 2021 of Rp10.9 trillion, a significant growth of 232.2% YoY, supported by the growth of Net Interest Income (NII) that grew by 12.4% YoY, and other Operating Income that also grew positively by 18.9% YoY.

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Interest Income and Sharia Income	50,026	52,144	(2,118)	(4.1)	56,173	58,532	2,360	(4.0)
Interest Expense and Sharia Income Expense	(11,779)	(18,103)	6,324	(34.9)	(19,021)	(21,930)	2,909	(13.3)
Interest Income and Sharia Income - Net	38,247	34,041	4,206	12.4	37,152	36,602	550	1.5
Premium Income - Net	1,399	1,471	(72)	(4.9)	1,471	1,697	(226)	(13.3)
Other Operating Income	16,219	13,640	2,579	18.9	13,413	13,712	(300)	(2.2)
Total Operating Income	55,865	49,152	6,713	13.7	52,036	52,012	24	-
Other Operating Expenses	(24,801)	(22,088)	(2,713)	12.3	(24,214)	(23,687)	(527)	2.2
Allowance for Impairment Losses	(18,297)	(22,038)	3,741	(17.0)	(22,590)	(8,838)	(13,752)	155.6
Operating Profit	12,767	5,026	7,741	154.0	5,231	19,487	(14,255)	(73.2)
Non Operating Income (Expense) - Net	(216)	(95)	(121)	127.4	(119)	(118)	(2)	1.5
Income Before Tax Expense	12,551	4,931	7,620	154.5	5,112	19,369	(14,257)	(73.6)
Tax Expense	(1,574)	(1,610)	36	(2.2)	(1,791)	(3,861)	2,070	(53.6)
Income for the Year	10,977	3,321	7,656	230.5	3,321	15,509	(12,187)	(78.6)
Other Comprehensive Income, After Income Tax	745	872	(127)	(14.6)	872	2,875	(2,004)	(69.7)
Total Comprehensive Income for the Current Year	11,722	4,193	7,529	179.6	4,193	18,384	(14,191)	(77.2)
Profit for the current year attributable to:								
Equity Holder of the Parent Entity	10,898	3,280	7,618	232.2	3,280	15,384	369	(78.7)
Non-Controlling Interests	79	41	38	92.7	41	124	83	(66.9)
Total comprehensive income for the current period attributable to:								
Equity Holder of the Parent Entity	11,620	4,001	7,619	190.4	4,001	18,192	(14,191)	(78.01)
Non-Controlling Interests	102	192	(90)	(46.9)	192	191	0	0.00
Earnings per Share Attributed to Owners of Parent Entity (EPS) (full amount)	585	176	409	232.4	176	825	649	(78.7)

Interest Income and Sharia Income

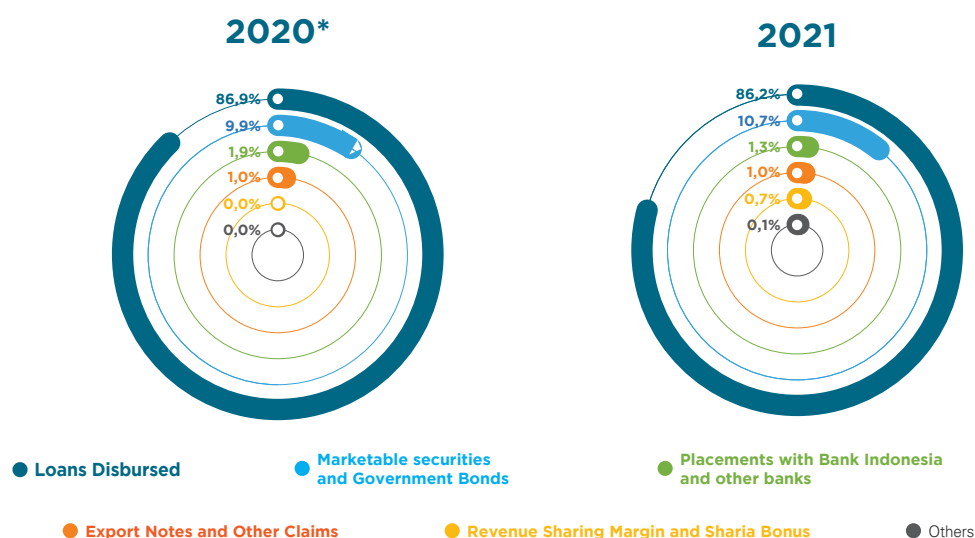
DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Loans disbursed	43,129	45,321	(2,192)	(4.8)	45,321	47,748	(2,426)	(5.10)
Marketable securities and Government Bonds	5,353	5,185	168	3.2	5,185	4,936	249	5.00
Margin, profit-sharing revenue and sharia bonus	333**	-	333	100.0	4,029	4,036	(7)	(0.20)
Placements with Bank Indonesia and other banks	668	985	(317)	(32.2)	985	824	161	19.50
Bills and other receivables	479	501	(22)	(4.4)	501	654	(153)	(23.40)
Others	64	152	(88)	(58.0)	152	334	(182)	(54.40)
Total	50,026	52,144	(2,118)	(4.1)	56,173	58,532	(2,353)	(4.00)

*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance

**)Sharia Income before the effectiveness of Bank Syariah Indonesia as of February 1, 2021

BNI recorded interest and Sharia income of Rp50.0 trillion, experiencing a slight decline a decline of 4.1% YoY. This achievement was obtained in the midst of the global economic recovery process in 2021 which was experiencing challenges with the 2nd wave of the COVID-19 pandemic. Income from loans provided the largest contribution at 86.2% of the total interest income in 2021. This was followed by interest income from bonds and securities at 10.7%.

Interest Income and Sharia Income - Net



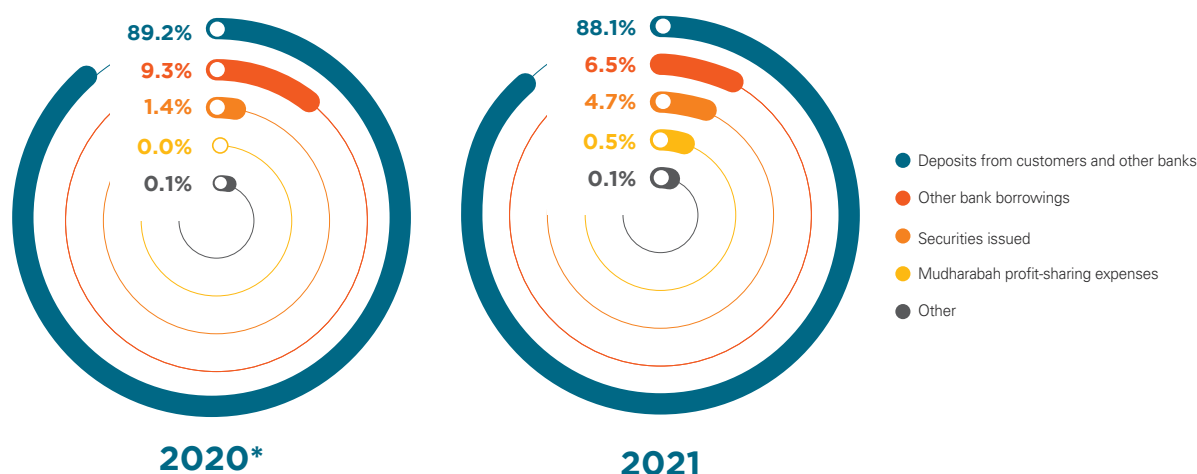
Interest and Sharia Expenses

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2020-2021	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Deposits from customers and other banks	10,382	16,156	(5,774)	(35,7)	16,156	17,244	(1,088)	(6,3)
Other bank borrowings	770	1,689	(919)	(54,4)	1,689	3,440	(1,751)	(50,9)
Mudharabah profit-sharing expenses	58**	-	58	100,0	914	981	(67)	(6,8)
Securities issued	552	248	304	122,6	248	248	-	-
Others	17	10	7	70,0	14	18	(4)	(22,6)
Total	11,779	18,103	(6,324)	(34,9)	19,021	21,930	(2,909)	(13,3)

*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

**)Mudharabah profit sharing prior to the effectiveness of Bank Syariah Indonesia as of February 1, 2021.

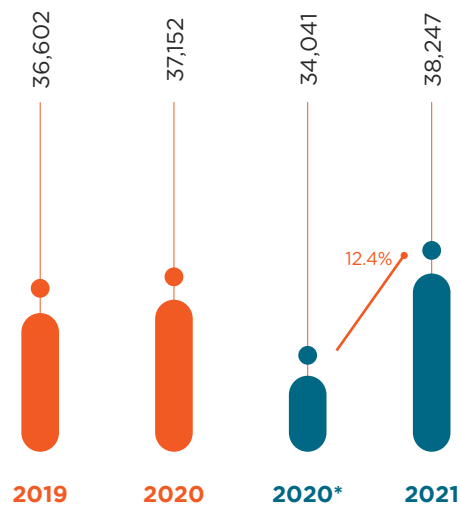
Although customer deposits and deposits from other banks experienced quite high growth, BNI was successful in implementing an interest expense efficiency strategy so that it could be reduced to a negative growth of 34.9%. The composition of interest expense and sharia is still dominated by customer deposits and other banks which are BNI's main source of funding with a contribution of 88.1% in 2021 and 89.2% in 2020.



Interest Income and Sharia Income - Net

BNI's interest income and sharia income - net amounted to Rp38.2 trillion, an increase of 12.4% compared to the position in 2020 of Rp34.0 trillion. This was due to the Bank's success in reducing the cost of funds in 2021, which fell by Rp6.3 trillion or 34.9% compared to 2020.

Interest Income and Sharia Income - Net (Rp-Billion)

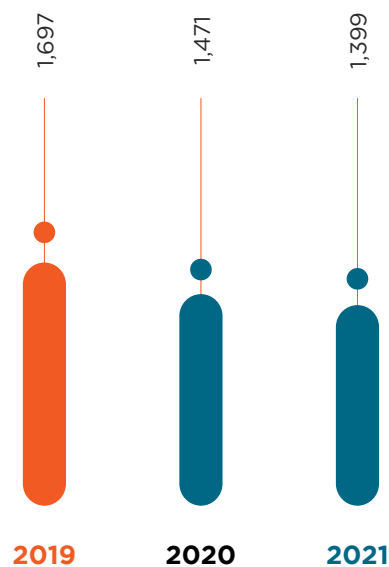


*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance

Premium Income - Net

This account represents the contribution of BNI Life as a BNI subsidiary to BNI's consolidated income. BNI Life's net premiums reached Rp1.4 trillion in 2021, a decrease of 5.0% compared to Rp1.5 trillion in 2020. In addition, investment income was affected by fluctuations in the market prices of securities and Government bonds which are BNI Life's investment vehicles. for portfolio development.

Premium Income - Net (Rp-Billion)



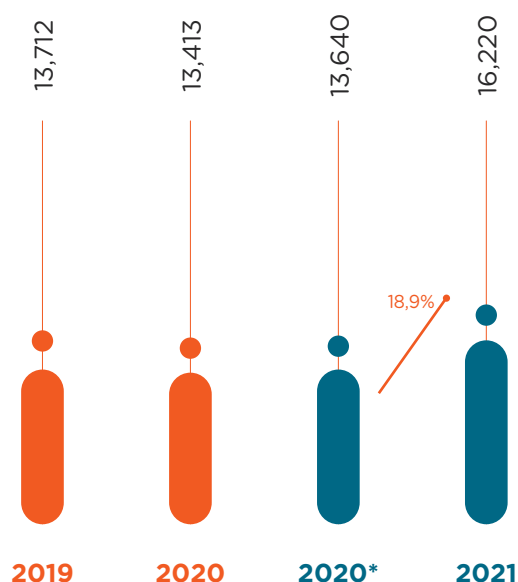
Other Operating Income

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Other fees and commission	8,943	8,309	634	7.6	8,309	8,851	(542)	(6.1)
Laba Dari Entitas Asosiasi	698	443	255	57.6	-	-	-	-
Recovery of assets written off	2,581	1,549	1,032	66.6	1,549	2,354	(805)	(34.2)
Gain on sale of financial assets classified as available for sale and held for trading	(4)	11	(15)	(136.4)	11	0	11	100.0
Gain on sale of financial assets classified as available for sale classified as available for sale	1,720	1,424	296	20.8	1,424	972	452	46.5
Foreign exchange gains - net	1,328	1,097	231	21.1	1,109	633	476	75.2
Others	954	807	147	18.2	1,011	903	108	12.0
Total	16,220	13,640	2,580	18.9	13,413	13,712	(299)	(2.2)

*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

BNI's other operating income amounted to Rp16.2 trillion in 2021, an increase of 18.9% from Rp13.6 trillion the previous year. The largest increase came from the recovery of assets written-off of Rp1.0 trillion, an increase of 66.6% compared to 2020. In 2021 BNI also received operating income from the profit of Bank Syariah Indonesia associate entities of Rp698 billion an increase of 57.6% compared to the December 2020 period of Rp 443 billion. Other fees and commissions also increased by Rp634 billion or 7.6% compared to the realization in 2020..

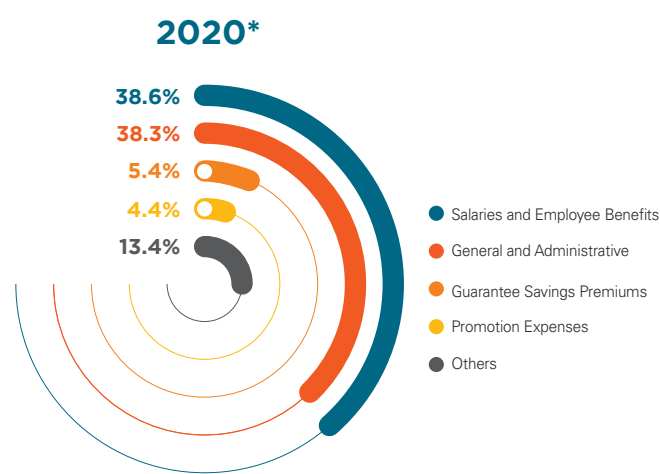
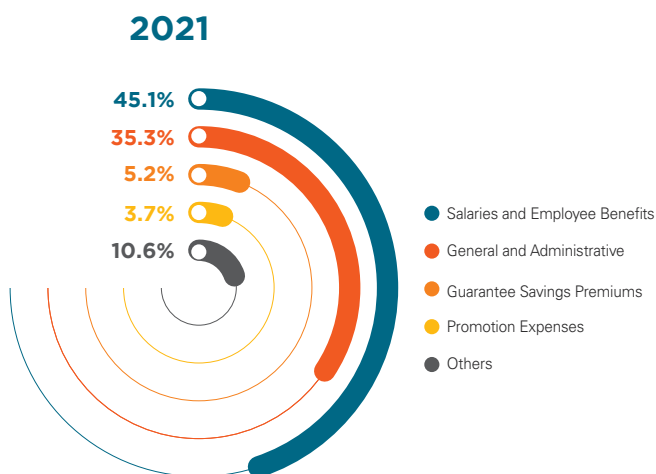
Other Operating Income (Rp billion)



*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Other Operating Expenses

DESCRIPTION	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP- BILLION)	2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)			NOMINAL (RP- BILLION)	PERCENTAGE (%)
Salaries and Employee Benefits Expenses	11,195	8,521	2,674	31.4	9,751	10,186	(435)	(4.3)
General and Administrative Expenses	8,765	8,464	301	3.6	9,063	8,259	804	9.7
Promotion Expenses	922	963	(41)	(4.3)	1,030	1,312	(282)	(21.5)
Guarantee Savings Premiums	1,293	1,189	104	8.7	1,189	1,111	78	7.0
Others	2,626	2,951	(325)	(11.0)	3,181	2,819	362	12.9
Total	24,801	22,088	2,713	12.3	24,214	23,687	527	2.2



*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

Overall, other operating expenses increased by 12.3% to Rp24.8 trillion in 2021, an increase of Rp2.7 trillion compared to Rp22.1 trillion in 2020. This increase was due to BNI's business expansion throughout 2021. Peningkatan beban operasional lainnya didominasi oleh Beban gaji dan Tunjangan yang naik sebesar Rp 2,7 triliun atau 31,4% dibandingkan tahun 2020. The increase was also due to General and Administrative Expenses and Deposit Insurance Premiums of 3,6% and 8,7%, respectively. Meanwhile, Promotional Expenses and Other Expenses decreased by 4,3% and 11,0%, respectively.

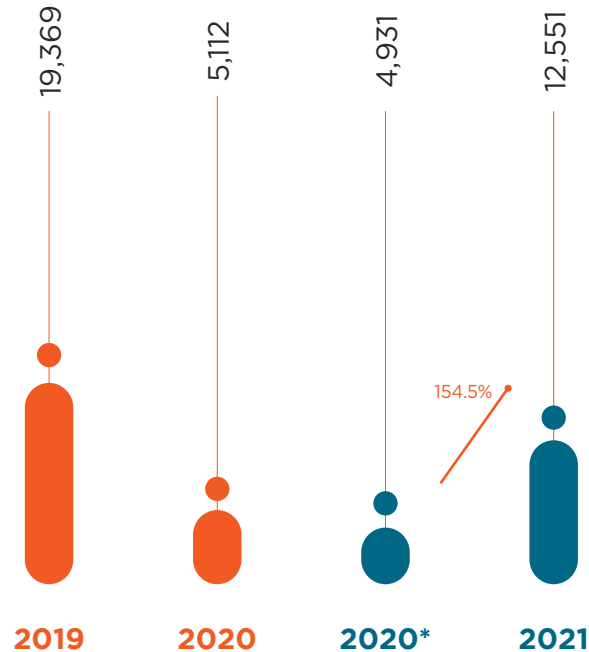
Allowance for Impairment Losses

The allowance for impairment losses in 2021 decreased by Rp3.7 trillion or -17% to Rp18.3 trillion from Rp22.0 trillion in 2020. This decrease is part of the bank's risk management policy in line with the trend of asset quality recovery and the gradual recovery of economic conditions.

Profit Before Tax Expenses

BNI's profit before tax expenses in 2021 amounted to 12.6 trillion, a significant increase of 154.5% compared to Rp4.9 trillion in 2020.

Profit Before Tax Expenses (Rp billion)



*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

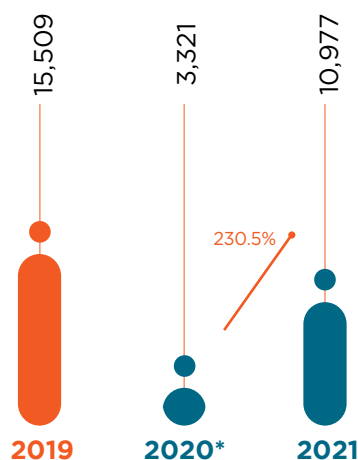
Tax expense

BNI's tax expense amounted to Rp1.57 trillion in 2021, a 2.3% decrease compared to Rp1.61 trillion in 2020. This was due to the increase in deferred tax revenue and the efficiency of the Corporate tax rate. This is affected by changes in the cfm tax rate. The Law on the Harmonization of Tax Regulations resulted in the adjustment of deferred tax assets in accordance with the prevailing rates and resulted in a lower tax burden compared to the previous year. In addition, in 2021 BNI will also take advantage of the tax facility on the profits of overseas branches which are exempt from taxation in accordance with the conditions stipulated in the Job Creation Law jo. Minister of Finance Regulation 18/PMK.03/2021.

Income for the Year

Supported by growth in Net Interest Income and efficiency in interest expense, BNI posted income for the year of Rp11.00 trillion, an increase of 230.5%.

Income for the Year (Rp billion)



*)Financial performance in 2020 is restated by taking into account the impact of the issuance of BNI Syariah performance.

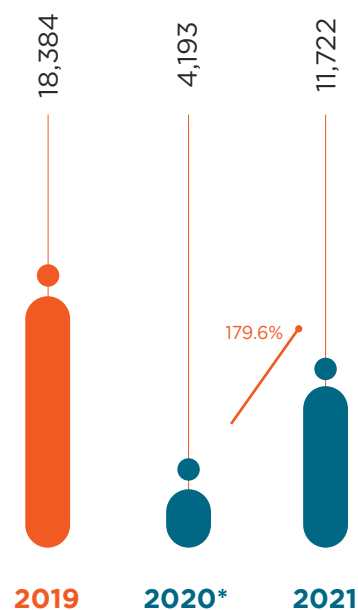
Other Comprehensive Income, After Income Tax

BNI's other comprehensive expenses/income reached Rp745 billion in 2021, a decrease of Rp126 billion from Rp871 billion the previous. The decrease was dominated by the gain (loss) from changes in the fair value of financial assets measured at fair value through other comprehensive income, where in 2020 it recorded a gain of Rp2.9 trillion and in 2021 recorded a loss of Rp416.5 billion.

Total Comprehensive Profit for the Current Year

BNI's profit and comprehensive income attribution was Rp11.7 trillion, due to an increase of Rp7.5 trillion or 179.6% compared to Rp4.2 trillion in 2020.

Total Comprehensive Profit for the Current Year (Rp billion)



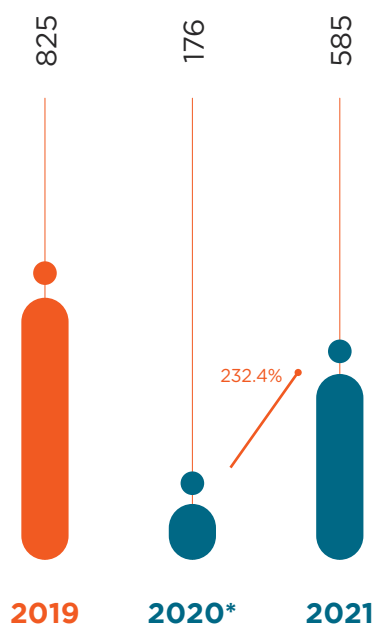
Earnings per Share Attributable to Owners of Parent Entity

Basic earnings for the year per share are calculated by dividing the profit for the year attributable to owners of the parent by the weighted average number of ordinary shares outstanding during the year.

DESCRIPTION	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP-BILLION)	PERCENTAGE (%)			NOMINAL (RP-BILLION)	PERCENTAGE (%)
Profit for the current year attributable to Equity Holder of the Parent Entity (Rp-billion)	10,898	3,280	7,619	232.3	3,280	15,384	(12,104)	(78.7)
Weighted average number of ordinary shares outstanding (million shares)	18,620	18,632	(12)	(0.06)	18,632	18,649	(17)	(0.1)
Basic earnings per share attributable to Equity Holder of the Parent Entity (full amount)	585	176	409	232.4	176	825	(649)	(78.7)

The Company's profit and diluted attributable to owners of the parent entity was Rp585 in 2021 compared to Rp176 in 2020, an increase of 232.4%.

Earnings per Share (Full rupiah)



Consolidated Statement of Cash Flows



On a consolidated basis, in 2021 BNI recorded a net cash flow of Rp45.9 trillion, an increase of 1.8% compared to Rp45.1 trillion in 2020. Net cash flows from Operating, Investment and Funding Activities in 2021 amounted to Rp97.5 trillion, (Rp15.7 trillion) and Rp1.7 trillion, respectively. In 2021, there will be an additional cash flow change of (Rp37.6 trillion) as a result of the separation of BNI Syariah into Bank Syariah Indonesia.

DESCRIPTION	2021 (RP- BILLION)	2020 (RP- BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP- BILLION)	INCREASE (DECREASE) 2019-2020	
			NOMINAL (RP- BILLION)	PERCENTAGE (%)		NOMINAL (RP- BILLION)	PERCENTAGE (%)
Net cash (used for) provided from operating activities	97,479	74,254	23,225	31.3	(12,611)	86,865	686.4
Net cash (used for) provided from investment activities	(15,656)	(11,992)	(3,664)	30.6	13,483	(25,475)	(188.9)
Net cash (used for) provided from financing activities	1,719	(17,139)	18,858	(110.0)	(18,491)	1,352	7.3
Net increase in cash and cash equivalents	83,541	45,123	38,418	85.1	(17,618)	62,741	356.1
Impact of Losing Control	(37,614)	-	(37,614)	-	-	-	-
Net Cash Flow after the impact of loss of control	45,927	45,123	804	1.8	(17,618)	62,741	356.1
Exchange Rate Impact	505	600	(95)	(15.8)	(119)	719	(604)
Cash and cash equivalents at beginning of year	126,908	81,185	45,723	56.3	98,922	(17,737)	(17.9)
Cash and cash equivalents at end of year	173,340	126,908	46,432	36.6	81,185	45,724	56.3

Cash Flows from Operating Activities

BNI's net cash from operating activities was Rp97.5 trillion in 2021 and Rp74.3 trillion in 2020. The operating cash flow activities came from by customer deposits of Rp81.6 trillion in 2021, higher than the previous year's Rp65.0 trillion. The increase in operating cash flow was also influenced by a decrease in cash interest payments of Rp6.8 trillion from the previous Rp18.5 trillion in 2020 to Rp11.6 trillion in 2021, as well as an increase in other operating income cash of Rp6.1 trillion compared to 2020.

Cash Flows from investment Activities

BNI net cash use for BNI's investment activities reached Rp15.7 trillion in 2021, and was dominated by purchases of Government bonds of Rp20.4 trillion (net) and receipts from the sale of securities of Rp6.3 trillion (net) in 2021.

Cash Flows from Financing Activities

Cumulatively, net cash used for financing activities was Rp1.7 trillion in 2021. 2 financing activities dominates, namely payment of borrowings amounting to Rp12.1 trillion and cash receipts from issuance of subordinated securities of Rp15.7 trillion. There were also dividend payments and payments on securities sold under agreements to repurchase amounting to Rp820.1 billion and Rp541.8 billion, respectively.

Impact of Losing Control

In 2021, there was an additional cash outflow of Rp37.6 trillion as a result of the separation of BNI Syariah to Bank Syariah Indonesia related to Temporary Syirkah Funds of Rp32.2 trillion.

Cash and Cash Equivalents at End of Year

In 2021, BNI's surplus of net cash and cash equivalents after losing control amounted to Rp45.9 trillion, and was dominated by cash flows from operating activities. At the end of 2021 cash and equivalents amounted to Rp173.3 trillion.

FINANCIAL RATIOS

	2021 (%)	2020 (%)	2019 (%)	INCREASE (DECREASE) 2020-2021 (%)
Capital				
Capital Adequacy Ratio (CAR)-Tier I	17.7	15.7	18.7	2.0
Capital Adequacy Ratio (CAR)-Tier II	2.0	1.1	1.1	0.9
Capital Adequacy Ratio (CAR) (Credit, Market and Operational Risk)	19.7	16.8	19.7	2.9
Asset Quality				
Non Performing Loan (NPL) Neto	0.7	0.9	1.2	(0.2)
Non Performing Loan (NPL) Bruto	3.7	4.3	2.3	(0.6)
Adequacy ratio of provision for losses to non-performing loans	233.4	182.4	133.5	51.0
Profitability				
Return On Assets (ROA)	1.4	0.5	2.4	0.9
Return On Equity (ROE)	10.4	2.9	14.0	7.5
Net Interest Margin (NIM)	4.7	4.5	4.9	0.2
Efficiency				
Operating Expenses to Operating Income (BOPO)	81.2	93.3	73.2	(12.1)
Cost to Income (CIR)	43.3	44.2	43.9	(0.9)
Liquidity				
Loan to Deposit Ratio (LDR)	79.7	87.3	91.5	(7.6)
Macroprudential Intermediation Ratio (RIM)	74.1	75.4	86.6	(1.3)
Compliance				
GWM (Rupiah)	7.7	5.4	6.7	2.3
GWM (Valuta Asing)	4.0	4.0	8.0	0.0
Net Open Position	0.9	3.2	2.4	(2.3)
BMPK Violation Percentage	0.0	0.0	0.0	0
BMPK Exceedance Percentage	0.0	0.0	0.0	0

Capital Ratio: Capital Adequacy Ratio

The capital adequacy ratio (CAR) in 2021 strengthened to 19.7% compared to 16.8% in 2020. This increase was mostly due to BNI's management policy to strengthen the Bank's capital by issuing subordinated securities which can be counted as capital. In 2021, BNI issues Tier 1 Capital Bonds of US\$600 million (Rp8.5 trillion) and Tier 2 Capital Bonds of US\$500 million (Rp7.1 trillion) to strengthen BNI's capital. The increase in BNI's CAR also came from an increase in profit for the year in 2021.

Asset Quality Ratio

1. Non-Performing Loans (NPL) Ratio

BNI's NPL as of December 31, 2021 decreased from the previous year's 4.3% to stand at 3.7%, with Net NPL also decreasing from 0.9% to 0.7%. This was due to BNI's policy to prudently manage productive assets during the loan expansion period, by selectively choosing the loan sector, and supporting the management of debtors who were in trouble but still had the potential for improvement through remedial and restructuring schemes to support the debtor's finance and business improving conditions, all key steps to managing BNI's NPL.

2. Coverage Ratio

On December 31, 2021, BNI's coverage ratio stood at 233.4%, an increase compared to 182.4% in 2020. Establishing a higher coverage ratio is a risk mitigation measure for future non-performing loans.

Profitability Ratio: The Bank's Ability to Performing Efficiently and Generating Profits

1. Return on Assets (ROA)

BNI's Return on Assets (ROA) stood at 1.4%, an increase compared to 0.5% in 2020. This was due to the significant increase in BNI's profit in 2021.

2. Return on Equity (ROE)

Return on Equity (ROE) BNI tercatat sebesar 10,4%, mengalami peningkatan jika dibandingkan tahun 2020 sebesar 2,9%. Peningkatan tersebut sejalan dengan kenaikan laba BNI di tahun 2021 yang cukup signifikan meskipun juga terdapat kenaikan disisi permodalan BNI.

3. Net Interest Margin (NIM)

BNI's Net Interest Margin (NIM) in 2021 increased from 4.5% in 2020 to 4.7% in 2021. This is in line with the success of the bank in reducing the cost of funds, which fell 34.9% compared to 2020 and increasing business expansion in line with improving economic conditions.

4. Ratio of Operating Expenses to Operating Income

BNI's BOPO (Operating Expenses to Operating Income) ratio decreased to 81.2% in 2021 from 93.3% in 2020. This was due to BNI's operating income growth that reached 14.2% in 2021, higher than the growth in operating expenses of 12.3%.

5. Cost to Income Ratio (CIR)

Cost to Income Ratio (CIR) is one of the ratios that measures the efficiency level of operating expenses

to optimal income. BNI's CIR decreased by 0.9% from 44.2% in 2020 to 43.3% in 2021. This was due to income growth and expense efficiencies, especially interest expense.

Liquidity Ratio

1. Loan to Deposit Ratio (LDR)

Loan to Deposit Ratio BNI shows the ratio of loans disbursed to deposits collected by banks. LDR decreased 7.6% due to higher third party fund (DPK) growth (15.5% YoY) compared to lending which only grew 4.3% YoY. The growth in deposits mainly came from low-cost funds (CASA) which grew 16.9% YoY.

2. Macroprudential Intermediation Ratio (RIM)

Macroprudential Intermediation Ratio in 2021 decreased to 74.1% compared to 75.4% in 2020. This was below the regulatory requirements of 84%-94%, however there was a relaxation not subject to disincentives if RIM is outside the specified range

Compliance Ratio

1. Statutory Reserves

BNI consistently maintained an optimal level of liquidity adequacy to support its daily operations and comply with Bank Indonesia regulations through the Statutory Reserves (GWM). In 2021, BNI's Rupiah Statutory Reserves were 7.7%, and Foreign Exchange Statutory Reserves were 4.0%, relatively stable compared to the previous year's position of 5.4% and 4.0%, respectively. BNI's Statutory Reserves (GWM) complies with Bank Indonesia Regulation (PBI) No. 15/15/PBI/2013 dated December 24, 2013 concerning Statutory Reserves for Commercial Banks in Rupiah and Foreign Exchange for Conventional Commercial Banks, as amended several times, with the latest being Board of Governors Members Regulation (PADG) No. 22/19/PADG/2020 that came into effect on August 1, 2020.

2. Net Open Position

BNI's Net Open Position (NOP) for the period ended December 31, 2021 was 0.9%, lower than the previous year's position of 3.2%. However, this figure was still far below the maximum 20% of capital 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 the capital.

COMMITMENTS AND CONTINGENCIES

An overview of the Bank's commitments and contingencies, as stated in its contracts, are as follows:

	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP- BILLION)	2019 (RP- BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		
Commitment Receivables						
Unsettled Purchased of Foreign Currency Futures	71,605	54,457	17,148	31.5	54,457	39,866
Others	417	296	122	40.9	296	178
Total	72,022	54,753	17,269	31.5	54,754	40,044
Commitment Payables						
Unused Customer Loan Facilities	59,614	45,732	13,882	30.4	47,273	58,305
Outstanding Irrevocable Letters of Credit	8,746	10,111	(1,365)	(13.5)	10,113	9,170
Sales of Foreign Currency Futures Unresolved	70,966	53,146	17,820	33.5	53,146	39,661
Total	139,326	108,989	30,337	27.8	110,533	107,136
Contingent Receivables						
Bank Guarantees Received	17,896	18,177	(281)	(1.5)	18,202	18,396
Interest Receivable on Non Performing Assets	11,043	7,090	3,953	55.8	7,174	5,004
Others	330	292	38	13.0	300	229
Total	29,269	25,559	3,710	14.5	25,676	23,629
Contingent Payables						
Guarantees Issued in the form of Performance Bonds	25,883	28,207	(2,324)	(8.2)	28,255	27,941
Advance Payment Bonds	7,850	8,885	(1,035)	(11.6)	8,896	9,735
Standby Letters of Credit	12,568	8,825	3,743	42.4	8,840	7,384
Other Bank Guarantees	9,875	10,238	(363)	(3.5)	10,246	10,043
Bid Bonds	1,479	1,279	200	15.6	1,280	2,752
Shipping Guarantees	6	6	0	0.0	6	4
Risk Sharing	0	0	0	0.0	0	0
Other Contingent Liabilities - Subrogation Liabilities - Credit	0	0	0	0.0	0	0
Total	57,661	57,440	221	0.4	57,522	57,859

The following table shows the commitment and contingency transactions occurring during the normal course of the Bank's activities with credit risk:

	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)	
Bank Guarantees Issued					
Related Parties	19,084	17,983	1,101	6.1	17,983
Third Parties	38,577	39,457	(880)	(2.2)	39,539
Irrevocable Letters of Credit					
Related Parties	3,705	5,396	(1,691)	(31.3)	5,396
Third Parties	5,041	4,715	326	6.9	4,718
Total	66,407	67,551	(1,144)	(1.7)	67,635

The collectibility of commitments and contingencies transactions with loan risk are shown in the following table:

	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP- BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)	
Current	64,607	65,922	(1,315)	(2.0)	66,006
Special Mention	1,158	1,611	(453)	(28.1)	1,611
Substandard	1	2	(1)	(50.0)	2
Doubtful	2	2	0	0.0	2
Loss	640	14	626	4,471.4	14
Total	66,408	67,551	(1,143)	(1.7)	67,635

BNI has compiled details pertaining to Commitment and Contingency growth as shown in the following table:

	2021 (RP- BILLION)	2020* (RP- BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP- BILLION)	2019 (RP- BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		
Commitment Bills						
Purchase of Foreign Currency Futures Not Resolved	71,605	54,457	17,148	31.5	54,457	39,866
Others	417	296	121	40.9	296	178
Total Commitment Bills	72,022	54,753	17,268	31.5	54,754	40,044
Commitment Liabilities						
Unused Customer Credit Facilities	59,614	45,732	13,882	30.4	47,273	58,305
Outstanding Irrevocable L/C	8,746	10,111	(1,365)	(13.5)	10,113	9,170
Ongoing Spot Sales and Derivative Positions	70,966	53,146	17,820	33.5	53,146	39,660
Total Commitment Liabilities	139,326	108,989	30,337	27.8	110,533	107,135
Contingency Bill						
Bank Guarantees Received	17,896	18,177	(281)	(1.5)	18,202	18,396
Interest Income in Settlement	11,043	7,090	3,953	55.8	7,174	5,004
Others	330	292	38	13.0	300	229
Total Contingency Charges	29,269	25,559	3,710	14.5	25,676	23,629
Contingent Liabilities						
Bank Guarantees Provided	57,661	57,440	221	0.4	57,522	57,859
Other Contingent Liabilities	0	0,1	(0,1)	100.0	0,1	-
Total Contingent Liabilities	57,661	57,440	221	0.4	57,522	57,859

Commitment receivables increased by 31.5% in 2021 or reached Rp17.3 trillion, most of which were unsettled foreign currency futures purchases. Total commitment liabilities in 2021 increased by 27.8% compared to 2020 which was mostly influenced by an increase in the position of spot and derivative sales that are still ongoing in 2021 by 33.5%. Contingent receivables in 2021 increased by 14.5% compared to 2020 which was dominated by an increase in Interest Income in Settlement by 55.8%. The contingent liability position experienced a slight increase of 0.4% compared to 2020 which was influenced by an increase in stand by letters of credit. In general, fluctuations in the movement of commitments and contingent items are in line with credit growth, considering that debtors are increasingly optimizing the use of BNI's various products and services with competitive features.

DERIVATIVES AND HEDGING FACILITIES

BNI conducts derivative transactions for both the Bank's and the customer's interests. As of December 31, 2021, there was an increase in derivative transactions compared to the previous year, in line with the improvement in the bank's business and strategy related to derivative transactions. The increase in derivative transactions was dominated by foreign currency swap transactions and interest rate swaps.

In conducting its business, BNI conducts derivative financial instrument transactions, such as foreign currency forward contracts, foreign currency swaps, interest rate swaps and spot transactions to manage exposure to market risks such as currency risk and interest rate risk. Derivative financial instruments are recognized in the consolidated statement of financial position at fair value. Any increase in fair value of derivative contracts is recorded as an asset when the fair value is positive and as a liability when the fair value is negative. Derivative receivables and payables are classified as financial assets and liabilities at fair value through profit or loss. Any gains or losses arising from changes in fair value are recognized in the consolidated income statement.

The fair value of derivative instruments is determined based on discounted cash flows and broker's quoted price models for other instruments with similar characteristics. Foreign currency futures contracts, foreign currency swaps and cross currency swaps and interest rate swaps are made for funding and trading purposes.

In addition, in conducting business, BNI carries out transactions in derivative financial instruments such as foreign currency forward contracts, foreign currency swaps, interest rate swaps and spot transactions for financing, trading and hedging purposes.

Derivative Bills and Liabilities by Type and Currency

INSTRUMENT	2021			2020		
	NOTIONAL AMOUNT IN FOREIGN CURRENCY (FULL AMOUNT)	FAIR VALUE		NOTIONAL AMOUNT IN FOREIGN CURRENCY (FULL AMOUNT)	FAIR VALUE	
		DERIVATIVE BILLS (RP MILLION)	DERIVATIVE LIABILITIES (RP MILLION)		DERIVATIVE BILLS (RP MILLION)	DERIVATIVE LIABILITIES (RP MILLION)
Related Exchange Rates						
Futures Contract - Buy						
USD	113,692,000	418	(10,876)	234,259,900	-	(243,504)
Futures Contract - Sell						
EUR	-	-	-	926,440	568	-
USD	203,494,247	10,149	(1,170)	217,639,471	108,816	-
Swap Foreign Currencies - Buy						
EUR	396,204	1	(34)	21,903,488	11,274	(1)
USD	897,705,593	5,342	(66,598)	684,779,500	185	(98,315)
Swap Foreign Currencies - Sell						
AUD	-	-	-	15,000,000	-	(576)
EUR	31,000,000	71	(18)	79,850,000	73	(23,041)
GBP	8,000,000	-	(883)	-	-	-
USD	2,490,090,459	445,133	(5,733)	1,484,784,471	1,283,345	
Spot Foreign Currencies - Buy						
EUR	7,520,000	-	(232)	1,500,000	-	(31)
GBP	1,050,000	8	-	10,000,000	-	(294)
USD	60,286,000	284	(595)	22,700,000	5	(897)
Spot Foreign Currencies - Sell						
EUR	1,150,000	28	(3)	-	-	-
GBP	-	-	-	10,000,000	26	
USD	68,810,000	1,048	(182)	72,400,000	2,657	(142)

Derivative Bills and Liabilities by Type and Currency

INSTRUMENT	2021			2020		
	NOTIONAL AMOUNT IN FOREIGN CURRENCY (FULL AMOUNT)	FAIR VALUE		NOTIONAL AMOUNT IN FOREIGN CURRENCY (FULL AMOUNT)	FAIR VALUE	
		DERIVATIVE BILLS (RP MILLION)	DERIVATIVE LIABILITIES (RP MILLION)		DERIVATIVE BILLS (RP MILLION)	DERIVATIVE LIABILITIES (RP MILLION)
Related to Interest Rates						
Swap on Interest Rates						
USD	468,026,229	31,471	(23,398)	238,026,229	45,878	(40,454)
Related Exchange Rates and Interest Rates						
Swap in Foreign Currencies and Interest Rates						
USD	699,842	230	(226)	37,275,585	7,787	(7,025)
Total		494,183	(109,948)		1,460,614	(414,280)

Derivative Claims and Liabilities based on Relationships

INSTRUMENT	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE
	(RP-BILLION)	(RP-BILLION)	(RP-BILLION)	(%)
Derivative Bills				
Related Parties				
Foreign Currency	29,948	139,757	(109,809)	(78,6)
Third Parties				
Foreign Currency	464,235	1,320,857	(856,622)	(64,9)
Total	494,183	1,460,614	(966,431)	(66,2)
Derivative Liabilities				
Related Parties				
Foreign Currency	(12,277)	(55,108)	42,831	(77,7)
Third Parties				
Foreign Currency	(97,671)	(359,172)	261,501	(72,8)
Total	(109,948)	(414,280)	304,332	(73,5)

All derivative claims as of December 31, 2021 and 2020 are classified as current based on the results of the Bank's management review and evaluation.

BANK HEALTH LEVEL

The Bank's Health Level (BHL) is the result of the Bank's risk and performance assessment. The Bank Health Level Assessment is carried out using a Risk-based Bank Rating approach both individually as well as on a consolidated basis. The Bank's health level is a means to identify at an early stage the bank's problems, determine the future business strategy, formulate and implement corrective action over the Bank's weakness/problem, provide the basis for the process of linking capital with risk, as a basis for decision-making as well as to enhance competitiveness.

The Bank's Health Level serves as a means for determining the strategy and supervision focus on the Bank by the supervisory authorities.

The Bank's health level rating is based on 4 (four) factors as follows:

1. Risk Profile

Risk Profile assessment is conducted by evaluating the risks inherent in the Bank's activities and the quality of risk management implementation on the 8 types of risk.

2. Good Corporate Governance

Good Corporate Governance assessment evaluates the quality of the Bank's management in the application of Good Corporate Governance principles.

3. Earnings

Assessment of the Earnings factor covers the evaluation of profitability performance, profitability sources, profitability sustainability, and profitability management.

4. Capital

Assessment of Capital covers the evaluation of capital adequacy and adequacy of capital structure management. At BNI, evaluation of capital adequacy is related to the Bank's Risk Profile.

Assessment of Bank Health Level is reported to the regulator (OJK) every 6 months (semesterly) in June and December. Bank BNI's Health Level assessment results for December 31, 2021 ranked "Healthy" meaning that:

1. The Bank's condition is generally healthy, so it is considered capable of facing significant negative effects from changes in business conditions and other external factors.
2. The ratings for the assessment factors (Risk Profile, Governance, Profitability, and Capital) are generally good. If there are any weaknesses, then in general these weaknesses are less significant.

PLEDGED ASSETS

In the period ending December 31, 2021, there were no pledged assets of BNI.

IMPACT OF INTEREST RATE CHANGES ON BANK PERFORMANCE

The BI 7-day (Reverse) Repo Rate (7DRR) benchmark interest rate has been lowered several times by the monetary authority Bank Indonesia during the COVID-19 Pandemic since early 2020. The 7DRR benchmark interest rate before the Pandemic was 5.00% and since the Pandemic started has been lowered several times, to 4.75% in February 2020, then 4.50% (March 2020), 4.25% (June 2020), 4.00% (July 2020), 3.75% (November 2020), and during 2021 there was one reduction in 7DRR to 3.50% in February 2021. The decrease in the 7DRR is to adjust it to the real sector conditions that experienced contraction in 2020 and slowing growth in 2021, to help the real sector to keep moving. Inflation in 2021 was recorded at a relatively low level of 1.87% year on year (YoY).

The non-optimal activity in the real sector resulted in low loan demand and high third party deposits in the Indonesian banking industry. Bank loan growth up to October 2021 was 3.24% YoY, lower than the loan growth in 2019 (pre-pandemic period) of 6.08% YoY, but better than 2020's loan growth of -2.41% YoY. The growth in third party funds (TPF) as of October 2021 was 9.44% YoY, higher than the growth in 2019 of 6.5% YoY, but lower than the growth in 2020 of 11.10%.

In the sub-optimal real sector where interest rates were tending to decline, BNI was able to take advantage and increase its loan expansion. BNI (Only) loan expansion in 2021 was 4.3% from Rp510.2 trillion in 2020 to Rp532.1 trillion at the end of 2021, higher than the banking expansion until October 2021 of 3.24% YoY. This loan expansion saw BNI's interest income slightly decrease by 4.1% from Rp52.1 trillion during 2020 to Rp50.0 trillion during the 2021.

Overall, efforts to increase interest income through loan expansion and interest expenses efficiencies through increased low-cost funds resulted in BNI's 2021 net interest income increasing by Rp4.2 trillion, or 12.4%, from Rp34.0 trillion in 2020 to Rp38.2 trillion in 2021. Net Interest Margin (NIM) in 2021 was 4.67%, an increase of 0.17% compared to the 2020 NIM of 4.50%.

Where interest rates were tending to decline, coupled with a relatively abundant volume of banking deposits, provided BNI with an opportunity to conduct cost of funds efficiencies to increase the level of BNI's overall profitability. BNI's interest expenses decreased by 34.9% from Rp18.1 trillion in 2020 to Rp11.8 trillion in 2021. The decrease in interest expenses was higher than the 15.5% increase in BNI deposits in 2021 from Rp631.6 trillion in 2020 to Rp729.2 trillion in 2021. Other than this, the composition of BNI's low-cost funds (current account, saving account/CASA) increased from 68.5% in 2020 to 69.4% in 2021 or up 0.9%.

PRIME LENDING RATE

Based on OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports and Bank Indonesia Regulation No. 7/6/PBI/2005 concerning Transparency of Bank Product Information and Use of Customer Personal Data (State Gazette of the Republic of Indonesia 2005 Number 16, Supplement to the State Gazette of the Republic of Indonesia No. 4475), Commercial Banks who carry out conventional business activities in Indonesia are required to report and publish the Prime Lending Rate (SBDK) in Rupiah.

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 Bank. In addition, publication of prime lending rates are 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, the prime lending rate is calculated based on 3 (three) components, namely the Cost of Funds for Loans (HPDK) arising from customer fundraising activities, operating expenses incurred for fundraising and lending and the profit margin component set by the Bank 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 Bank Indonesia on a monthly basis and periodically publish in the wider media. The prime lending rate calculation applies to types of corporate loans, retail loans, micro loans, and consumption loans (KPR and non-KPR). However, Bank Indonesia submits the classification of corporate loans, retail loans and consumer loans (KPR and non-KPR) based on the internal criteria used by each bank.

The following is the prime lending rate determined by BNI in 2021:

	PRIME LENDING RATE PER YEAR				
	PRIME LENDING RATE PER YEAR BASED ON BUSINESS SEGMENTS				
	CORPORATION LOANS (%)	RETAIL LOANS (%)	MICRO LOANS (%)	CONSUMPTION CREDIT	
				KPR (%)	NON KPR (%)
Prime Lending Rate	8.00	8.25	0.00	7.25	8.75

FEE BASED INCOME GROWTH ACCELERATION

BNI's fee-based income in 2021 amounted to Rp13.5 trillion, an increase of 10.34% from Rp12.3 trillion in 2020. The increase was dominated by 4 (four) banking activities including Investment Banking, Syndication, Marketable Securities dan ATM & E-channel. Di tengah pandemi COVID-19, Investment Banking, Syndication dan Marketable Securities dapat tumbuh masing-masing sebesar 59,9%, 36,9% 19,6% serta ATM & E-channel tumbuh sebesar 14,5%. A significant increase occurred in fee based non-recurring which each grew significantly in 2021 by 45.6%

FEE BASED INCOME (BANK ONLY)	2021	2020	2019	INCREASE (DECREASE) 2020-2021	
	(RP-BILLION)	(RP-BILLION)	(RP-BILLION)	(RP-BILLION)	(%)
Recurring Fee	12,529	11,577	11,107	952	8.22
Non Recurring Fee	1,016	698	244	318	45.56
Total	13,544	12,275	11,351	1,270	10.34

*FBI consolidated (including Sharia) in 2021 amounted to Rp13.6 trillion, or an increase of 12.8% from Rp12.1 trillion in 2020

ABILITY TO PAY DEBT

BNI maintained good liquidity and solvency levels for the period until December 31, 2021. This was reflected in BNI's ability to fulfill all maturing obligations in a timely manner, both for principal debt or interest expense payments. The banking financial ratios to measure BNI's liquidity and solvency are as follows:

Ability to Pay Short-Term Debt (Bank Liquidity)

BNI's ability to meet short-term obligations is carried out by good liquidity management. To increase short-term liquidity resilience, BNI maintains adequate liquidity by managing several indicators, including the Primary Reserve (Minimum Demand Deposit and Cash), Secondary Reserve (Liquidity Reserve), and Liquidity Coverage Ratio (LCR) in accordance with regulatory requirements.

LCR is a comparison ratio between High Quality Liquid Assets (HQLA) and the estimated total net cash outflow for the next 30 (thirty) days in a crisis scenario. In December 2021, BNI's LCR reached 230.21% (Bank Only) and 230.69% (consolidated), above the regulatory requirement for minimum LCR fulfillment of 85% until March 31, 2022 or during the banking relaxation period.

TO manage liquidity over a longer time period (1 year), BNI maintained its Net Stable Funding Ratio (NSFR) by increasing the Bank's funding stability, adjusted to the composition of assets and off balance sheet accounts. NSFR is the ratio of the Available Stable Funding to the Required Stable Funding. As of December 2021, BNI's NSFR was 151.76% (Bank Only) and 151.81% (consolidated), above the regulatory requirement for minimum NSFR fulfillment of 85% until March 31, 2022 or during the banking relaxation period.

Ability to Pay Long-Term Debt (Bank Solvency)

BNI's Capital Adequacy Ratio (CAR) is the ratio of capital to risk-weighted assets (RWA) and in 2021 it increased to 19.7% compared to 16.8% in 2020. This indicates that BNI's capital structure has the capability to offset loan risk, market risk, and operational risk, as the ratio is higher than the minimum CAR set by the regulator.

LOAN COLLECTIBILITY

Restructured Loans based on Restructuring Categories

RESTRUCTURING CATEGORY	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP-BILLION)	2019 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		
Decrease in Credit Interest Rates	34,984	32,360	2,624	8.1	32,359	3,986
Extension of Loan Period	33,912	45,582	(11,670)	(25.6)	45,582	7,924
Other Restructuring Scheme	54,033	61,652	(7,619)	(12.4)	70,997	26,500
Total	122,929	139,594	(16,665)	(11.9)	148,938	38,410
Allowance for Impairment Losses	(35,065)	(29,004)	(6,061)	20.9	(29,982)	(6,924)
Total Neto	87,864	110,590	(22,726)	(20.5)	118,956	31,483

Restructured Loans per Collectability

COLLECTABILITY	2021 (RP-BILLION)	2020* (RP-BILLION)	INCREASE (DECREASE) 2020*-2021		2020 (RP-BILLION)	2019 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)		
Current	87,112	106,993	(19,881)	(18.6)	115,053	14,905
Special Mention	24,523	20,775	3,748	18.0	21,212	17,866
Substandard	3,862	7,036	(3,174)	(45.1)	7,517	3,396
Doubtful	1,528	2,344	(816)	(34.8)	2,396	160
Bad	5,904	2,446	3,458	141.4	2,760	2,083
Total	122,929	139,594	(16,665)	(11.9)	148,938	38,410

Restructured Loans per Type of Business Sector

BUSINESS SECTOR	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)	
Business Services	14,612	18,058	(3,446)	(19.1)	3,498
Social Services	2,196	4,911	(2,715)	(55.3)	266
Construction	18,092	13,389	4,703	35.1	1,553
Others	11,348	13,695	(2,347)	(17.1)	1,576
Electricity, Gas and Water	2,289	2,676	(387)	(14.5)	506
Freight, Warehousing and Trade	5,699	9,956	(4,257)	(42.8)	2,043
Restaurant and Hotel	27,457	36,631	(9,174)	(25.0)	8,419
Mining	1,502	1,429	73	5.1	1,569
Industry	29,904	26,174	3,730	14.3	12,794
Agriculture	9,830	12,675	(2,845)	(22.4)	3,148
Total	122,929	139,594	(16,665)	(11.9)	35,372

Restructured Loans per Designation Type

DESIGNATION	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)	
Working capital Loans	74,401	73,197	1,204	1.7	24,576
Investment Loans	40,677	55,271	(14,594)	(26.4)	9,222
Consumptive Loans	7,851	11,126	(3,275)	(29.4)	1,574
Total	122,929	139,594	(16,665)	(11.9)	35,372

Restructured Loans per Segment Type

SEGMENT	2021 (RP-BILLION)	2020 (RP-BILLION)	INCREASE (DECREASE) 2020-2021		2019 (RP-BILLION)
			NOMINAL (RP-BILLION)	PERCENTAGE (%)	
Consumer	7,851	10,940	(3,089)	(28.2)	1,574
Corporation	61,349	64,310	(2,961)	(4.6)	18,515
Small	19,629	33,180	(13,551)	(40.8)	4,525
Middle	34,100	31,164	2,936	9.4	10,758
Total	122,929	139,594	(16,665)	(11.9)	35,372

CAPITAL STRUCTURE AND MANAGEMENT POLICIES FOR CAPITAL STRUCTURE AND RISK MANAGEMENT PRACTICES

Management Policy for Capital Structure

BNI manages the Bank's capital in order to maintain a strong capital position to support business growth as well as to maintain investors, depositors, customers and market's confidence. In terms of capital management, the Bank considers factors such as: optimizing capital return to shareholders, maintaining a balance between higher profits and gearing ratios as well as the security provided by a healthy capital position. It is carried out because BNI has a strong commitment to maintaining its capital structure composition in accordance with applicable provisions and does not violate the minimum limit provisions applied by the Financial Services Authority (OJK) as the banking regulator.

Details of Capital Structure

CAPITAL COMPONENT-BANK ONLY	2021	2020	2019	INCREASE (DECREASE) 2020-2021	
				NOMINAL	PERCENTAGE
Core Capital (Rp billion)	112,685	96,481	111,672	16,204	16.8
Supplementary Capital(Rp billion)	12,931	6,665	6,424	6,266	94.0
Total Core Capital and Supplementary Capital (Rp billion)	125,616	103,145	118,095	22,471	21.8
Risk Weighted Assets (RWA) for Credit Risk (Rp billion)	547,220	528,899	519,095	18,321	3.5
Risk Weighted Assets (RWA) for Operational Risk (Rp billion)	87,259	82,457	76,232	4,802	5.8
Risk Weighted Assets (RWA) for Market Risk (Rp billion)	1,722	3,277	3,157	(1,555)	(47.5)
Core Capital Ratio (%)	17.7	15.7	18.7	2.0	12.8
Capital Adequacy Ratio for Credit Risk, Operational Risk and Market Risk (%)	19.7	16.8	19.7	2.9	17.5

Capital Component - Bank Only

1. Core Capital

Core Capital represents the Bank's capital and consists of main core capital and additional core capital in accordance with OJK Regulation (POJK) concerning "Minimum Capital Adequacy Requirements for Commercial Banks". BNI's Core Capital increased by 16.8% from Rp96.48 trillion in 2020 to Rp112.68 trillion in 2021. This increase was due to an organic increase through retained earnings, and an inorganic increase through the issuance of sub debt (Additional Tier).

2. Supplementary Capital (maximum 100% of core capital)

Supplementary capital (referring to the Bank's capital) consists of general reserves for productive assets and capital instruments that meet Tier 2 requirements. BNI's supplementary capital increased from Rp6.7 trillion in 2020 to Rp12.9 trillion, or by 94.01%. This increase was due to the issuance of subdebt (Tier 2).

Risk Management Practices

Assessments of the Bank's Health Level is reported to the regulator (OJK) every 6 months (semesterly) in June and December. The COVID-19 pandemic affected BNI's Bank Health Level (BHL) but not significantly. This was seen in BNI's BHL assessment results for the period to December 31, 2021, which showed a "Healthy" rating (stable compared to the previous year) meaning that:

1. The Bank's condition is generally healthy, and is considered capable of facing significant negative effects from changes in business conditions and other external factors;
2. The assessment factor ratings (Risk Profile, Governance, Profitability, and Capital) are generally good. If there are weaknesses, then in general these weaknesses are less significant.

BNI's risk profile, as one of the BHL assessment factors for the period of December 31, 2021, was ranked 2 (low to moderate). As a result of BNI's risk profile being in the Low to Moderate level, and based on calculations using the Internal Capital Adequacy Assessment Process (ICAAP), the minimum CAR based on the risk profile was 9.75%. If added to a buffer capital, the Conservation Buffer 0% (based on POJK No. 48/POJK.03/2020 Amendment to POJK No. 11/POJK.03/2020 concerning National Economic Stimulus as a Countercyclical Policy for the Impact of the Spread of COVID-19, Banks in the BUKU 3 and BUKU 4 Bank groups do not have to fulfill the Capital Conservation Buffer of 2.5% of RWA until March 2022), Countercyclical Buffer 0% and Capital Surcharge 1.50%, then the Minimum Capital Adequacy Ratio (KPM) was 11.25%.

MATERIAL BONDS FOR CAPITAL GOODS INVESTMENT

NO	PROJECT NAME	NAME OF VENDOR WITH LARGEST CONTRACT
1	Gedung Grha BNI	PT Tatametrika Nusantara
2	Regional Office WJY (Jatinegara 88)	PT Brantas Abiparaya
3	KCP Gracia Center (Pondok Pinang)	PT Sempalan Teknologi Nasional
4	KLN Gunung Sahari	PT Puta Rato Mahkota
5	KCU Banjarmasin	PT Ballast Grah
6	Replacement of non EMV ATM	PT Diebold Nixdorf Indonesia & PT. Argenta Parakrama Artha
7	Service-oriented Infrastructure	PT Metrocom Global Solus & PT Mitra Integrasi Informatika
9	Network Infrastructure Development	PT Mastersystem Infotama
10	Office Automation	PT Murni Solusindo Nusantara & PT Inokom Lintas Asia

Bond Purpose

The material commitment for capital goods investment includes the objective of committing to purchase capital goods as planned in the BNI Bank Business Plan (RBB).

Source of funds

BNI's Sources of funds uses any remaining investment budget, total depreciation expenses, and the distribution or a percentage of net profit from the previous financial year as a source of funding for capital expenditure.

Currency

All transactions carried out for the purpose of binding capital goods investment materials are denominated in rupiah.

Foreign Currency Risk Protection

BNI does not protect against foreign currency protection risks as all capital goods investment bindings are carried out in rupiah.

CAPITAL GOODS INVESTMENT REALIZATION

BNI issued funds for Capital 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 Investments

The capital goods investment in 2021 totalled Rp1.2 trillion and consisted of buildings and land, automation furniture, non-automation furniture, and vehicles amounting to Rp340 billion; Rp673 billion and Rp186 billion, respectively.

Capital Goods Investment Purpose

BNI's purchases of capital goods are made to support the Company's overall operational activities.

Capital Goods Investment Value

BNI's capital goods investments reached Rp1.2 trillion in 2021. This amount was done on the investment needs for that year to support the 2021 strategic policies to improve BNI's digital capabilities, as well as to develop business operations and services.

The following table shows the capital goods investment value:

TYPE OF CAPITAL INVESTMENT	2021 (RP-BILLION)	2020 (RP-BILLION)	2019 (RP-BILLION)	INCREASE (DECREASE) 2020-2021	
				NOMINAL (RP-BILLION)	PERCENTAGE (%)
Land and Building	340	483	620	(143)	(29.61)
Automated equipment	673	414	689	259	62.56
Non-automated equipment	186	87	186	99	113.79
Vehicles	-	-	33	-	-
Total	1,198	984	1,528	214	21.75

PROPERTY INVESTMENT

In the period ended December 31, 2021, BNI did not own any property assets used for investment purposes.

TARGET ACHIEVEMENT IN 2021

Assumptions Used and Process for Setting Targets for 2021

Macro and Micro Assumptions

The Government is encouraging an increase in Public Consumption (57.7%), and Investments (31.7%) both of which contributed significantly to the 2020 National GDP (89.4%). The COVID-19 Pandemic Control and National Economic Recovery (PEN) Program in addition to aiming to boost public demand/consumption (demand side) through social assistance programs (bansos), also encourages the supply side (production & trade) through programs for MSMEs and Corporations.

The Government is also optimistic that the enactment of the Omnibus Law on Job Creation will attract foreign investment and encourage the growth of MSMEs, thereby increasing new job opportunities. Meanwhile, the easing of Bank Indonesia monetary and macroprudential policies, and the easing of loan restructuring policies by OJK, are expected to help maintain liquidity and resilience in the banking sector to support the economic recovery and make it easier for the banking sector to channel both productive and consumptive loans/financing.

The theme for the Government's fiscal policy for 2021 was Accelerating Economic Recovery and Strengthening Reforms. This was at the same time as the momentum to continue and strengthen reforms in various policy aspects to prepare a solid foundation after Covid 19. This is instigated to carry out economic transformation towards the vision of an Advanced Indonesia 2045. Economic growth is targeted by the Government at 4.5-5.5%. However, BNI is more conservative and projecting economic growth in 2021 at 4.0-4.5%.

Tabel 22. Macro and Micro Assumptions for 2021-2023

NO.	ASSUMPTION	PROJECTION YEAR		
		2021	2022	2023
Macro Assumption				
1	Economic Growth (%)	4.0 - 4.5	5.0 - 5.5	5.0 - 6.0
2	Inflation (%)	3.0 - 4.0	2.75 - 3.75	3.0 - 4.0
3	Rupiah / United States Dollar Exchange Rate (Rp)	14.000 - 15.000	13.800 - 14.800	13.500 - 14.500
4	BI 7 Days Repo Rate	3.50 - 3.75	3.5 - 3.75	3.75 - 4.25

Tabel 22. Macro and Micro Assumptions for 2021-2023

NO.	ASSUMPTION	PROJECTION YEAR		
		2021	2022	2023
1	Loan Growth (%)	5.0 - 6.0	11 -14	11 -14
2	Third Party Fund Growth (%)	7.0 - 9.0	6 - 8	6 - 8

1. Economic Growth

The global vaccination programs and budgetary stimulus in many countries in the world has boosted optimism for an economic recovery after the COVID-19 pandemic. Indonesia's economic growth is expected to rebound to pre-COVID-19 growth levels in 2022, in line with market expectations that the global economy will recover after the COVID-19 pandemic.

This optimism is caused by the market's belief in the effectiveness of vaccinations, which is expected to suppress the spread of COVID-19 so that herd immunity is achieved. With the community being "immune" from COVID-19, community mobility will return to normal to encourage economic recovery.

The COVID-19 pandemic has delayed work on several infrastructure projects that were expected to increase the attractiveness of foreign investment in Indonesia, especially for development of processing industries that produces raw materials, auxiliary materials, capital goods and finished goods.

By 2023, the end of the second term of President Joko Widodo's Government, the current Government is believed to be maximally mobilizing resources to encourage increased development growth so as to leave a good "legacy" to the Indonesian people.

The GDP projection for 2023-2024 will be higher than GDP growth for 2021-2022 but still within the 5-6% interval considering that Indonesia's dependence on imported goods is estimated to be still quite high. Indonesia's imports are mainly dominated by imports of raw materials, auxiliary materials and capital goods which are used in the processing industry in Indonesia.

2. Inflation Rate

The inflation rate is estimated to increase post-pandemic assuming the COVID-19 pandemic is successfully controlled. People are starting to return to their normal activities. People's purchasing power is increasing, demand is rising more than the speed of goods and services supply, thus prices are being pushed up.

The inflation projection was adjusted in line with the Bank Indonesia and the Government inflation target. On February 12, 2021, the Government and Bank Indonesia agreed on five strategic steps to control inflation. These are:

- Maintaining volatile foods inflation in the range of 3-5%;
- Strengthening the coordination of the Central & Regional Governments in controlling inflation;
- Strengthening the synergy between Ministries/Agencies (K/L);
- Strengthening national food security by increasing production through food estate programs & smooth distribution through optimization of infrastructure;
- Maintaining the Government Rice Reserves (CBP).

Synergy policies pursued by the Government and Bank Indonesia are through various program innovations aimed at maintaining supply stability and smooth distribution during the pandemic to maintain Consumer Price Index (CPI) inflation. In 2020, CPI inflation was 1.68% (yoy) below the target range of 3.0%±1%. The low inflation was influenced by weak domestic demand as a result of the COVID-19 pandemic, and amid adequate supply.

This meeting also agreed an inflation target for the next 3 (three) years as a follow-up to the expiration of the Minister of Finance Regulation (PMK) No. 124/010/2017 concerning Inflation Targets for 2019,

2020 and 2021. Inflation targets for 2022, 2023, and 2024 were agreed at $3.0\% \pm 1\%$, $3.0\% \pm 1\%$, and $2.5\% \pm 1\%$, respectively, to be set later through PMK. These inflation targets are expected to anchor the public's future inflation expectations, especially their support for national economic recovery and structural reforms.

The estimated inflation rate for 2021-2024 is in the range of 2-4% considering Indonesia's dependence on imported goods to support economic growth. However, starting in 2025 the inflation rate is estimated to be maintained in the range of 2-3%, as the domestic industry starts to produce raw material products, auxiliary materials, capital goods and finished goods to meet domestic needs.

3. Rupiah Exchange Rate

The 2021 Exchange Rate projection was based on the latest developments where Indonesia's Trade Balance in 2020 showed a surplus of US\$21.74 billion after the deficits in the previous 2 consecutive years of US\$8.57 billion in 2018, and US\$3.2 billion in 2019. The Current Account Balance (CAB) showed a surplus in Q3 2020 of US\$0.96 billion, the first time since Q4 2011 and throughout 2020 there was improvement in the CAB deficit compared to previous years. In the Q1 2021, Indonesia's CAB again recorded a surplus of US\$5.53 billion, an increase of 133% from the CAB surplus in the same period a year earlier.

Capital inflows to Indonesia were due to the Indonesia's interest rates that were more attractive than interest rates in the United States. Indonesia's Foreign Exchange Reserves trend tended to increase to a position as of March 2021 of US\$137 billion, slightly lower than the previous month's position of US\$138.8 billion, but compared to the position the previous year (US\$114.3 billion) much improved.

Estimates for the Rupiah exchange rate in 2024 refers to the Ministry of Finance 2020-2024 macro assumptions. Their projection for the IDR USD exchange rate is estimated to be stable at a level of Rp13,500-Rp15,000 with the assumption that economic growth is stable and reaches the target, with controlled inflation, stability of crude oil prices, and increasing value of Indonesian exports, as well as the adequacy of Indonesia's foreign exchange reserves. The IDR USD exchange rate in 2025 is estimated to

be in the range of Rp12,000 - Rp. 13,000. In 2025, it is expected that Indonesia will begin to be free from dependence on imports, high foreign investments and foreign tourist visits.

4. BI-7 Days Reverse Repo Rate (BI-7DRRR)

In setting the BI-7DRRR benchmark interest rate, Bank Indonesia considers the balance between domestic stability (inflation rate), external stability (exchange rate) and maintaining the momentum of national economic recovery. Bank Indonesia keeps its benchmark interest rate low until there are signs of an increase in the inflation rate and the possibility of the FED starting to increase its benchmark interest rate as the US economy recovers faster than other countries. This recovery is in line with the smooth vaccination process and the addition of greater fiscal stimulus.

The BI-7DRRR 2021 projection was adjusted to the current BI-7DRRR interest rate at a level of 3.50% in line with the momentum of the national economic recovery. On other occasions, BI has always prioritized synergies to build optimism for economic recovery, both in its role as a monetary authority and as a member of the Financial System Stability Committee (KSSK).

The BI-7DRRR in 2023-2024 is expected to increase in line with the increase in the inflation rate and the increase in the Fed's reference interest rate or the Fed Fund Rate (FFR). However, BI-7DRRR will return to the range of 3-4% in 2025 in line with the forecast for Indonesia's economic condition to be good.

5. Loans and TPF Growth

Along with the optimism for economic growth after the COVID-19 pandemic. Bank loan growth is estimated to grow positively in 2021, at a conservative single digit rate, considering the economy is just starting to recover while the banking industry is still facing pressure from loan risk. Loan movements in 2021 were still dominated by large banks with looser liquidity and better quality debtor choices.

The Bank's loan growth is expected to improve in line with improving corporate performance. It is estimated that the Banks will only start to recover to its position before the pandemic, in 2022, after "herd community" is achieved, and people's mobility returns to normal as before the pandemic.

TPF growth in 2021 is estimated to be higher than loan growth, even though the Bank's deposit interest rates still trend lower. People still save a lot of their funds in banks, as reflected in the high growth of Third Party Funds (TPF). In the future, the Bank will seek to optimize low-cost funds to obtain efficient cost of funds and encourage commission income, supported by digital banking transactions.

2021 Business Expansion Target Achievement

BUSINESS EXPANSION (Bank Only)	2021 REALIZATION (RP TRILLION)	2021 TARGET (RP TRILLION)	ACHIEVEMENT OF 2021 TARGET (%)
	(1)	(2)	(1:2)
Loans disbursed	581,5	585,0	99.4
Deposits From Customers	729,5	652,5	111.8
Current Accounts	281,7	230,6	122.2
Savings	224,7	212,5	105.7
Time Deposits	223,1	209,4	106.6

BNI's success in formulating strategies was reflected in the business expansion target achievement shown in lending and raising TPF. Compared to the 2021 target, lending was only slightly below the target, but exceeded the previous year's total disbursements. For TPF, collecting customer deposits successfully exceeded the 2021 targets for current accounts, savings, and time deposits.

Profitability Target Achievement in 2021

PROFITABILITY (Bank Only)	2021 REALIZATION	2021 TARGET	ACHIEVEMENT OF 2021 TARGET (%)
	(1)	(2)	(1:2)
Net Profit (Rp trillion)	10,7	9,4	113.8
Return on Asset (ROA) (%)	1,43	1,41	101.5
Return on Equity (ROE) (%)	10,42	9,07	115.0
Net Interest Margin (NIM) (%)	4,67	4,78	97.7
Operating Expenses to Operating Income (BOPO) (%)	81,18	82,28	98.7
Cost to Income Ratio (CIR) (%)	43,33	42,94	100.9

With the success in achieving the business expansion target as described above, BNI's profitability recorded a satisfactory performance. Net profit, Return On Assets (ROA), and Return On Equity (ROE) exceeded the set targets. This demonstrates BNI's ability in determining profitability targets and managing strategic initiatives to achieve these targets, which included efficiency strategies that were implemented continuously to create added value for the Bank's profitability.

Other Financial Ratios Target Achievement in 2021

OTHER RATIOS (Bank Only)	2021 REALIZATION (%)	2021 TARGET (%)	ACHIEVEMENT OF 2021 TARGET (%)
	(1)	(2)	(1:2)
Minimum Capital Adequacy Ratio (MCAR)	19,74	19,46	101.5
Gross NPL	3,70	3,94	93.9

BNI's capital management strategy is reflected in its capital structure target achievements, with the Minimum Capital Adequacy Ratio (KPM) finishing above the set target in 2021. The issuance of Additional Tier 1 (AT1) Perpetual Non-Cumulative Capital Securities where BNI became the first bank in Indonesia to issue Additional Tier 1 capital instruments had a positive impact on strengthening BNI's capital.

BNI's success can also be seen in the quality management of its productive assets. Non-Performing Loans (NPLs) were below the set targets. This shows BNI's strong commitment to continuous maintenance in the quality of its assets.

Human Capital Target Achievement in 2021

DESCRIPTION	2021 REALIZATION	2021 TARGET	ACHIEVEMENT OF 2021 TARGET (%)
	(1)	(2)	(1:2)
Number of Employees (people)	27.177	27.177	100.0
Education and Training Costs (Rp-million)	181.783	250.000	72.7

HC management is an important aspect in BNI's business chain. The total number of employees reached the expected target, while the investment in employee education and training was below target, in line with the continuation of the efficiency strategies. Nevertheless, BNI gives priority to employees to attend education and training programs that are in line with BNI's business needs and will have an impact on developing the employees' competencies. In addition to the efficiency strategies, the lower investment in education and training was the result of using more efficient and cost-effective online education and training models.

BUSINESS PROSPECTS AND PERFORMANCE PROJECTIONS FOR 2022

Business Prospects and Strategic Plan for 2022

Global economic growth in 2022 is projected to be better than the previous projection. The IMF's latest projection in October 2021 for global economic growth in 2022 remains at 4.9% compared to the projection in July 2021. Meanwhile, the projection for economic growth in Advanced Economy Countries has increased compared

to the IMF projection in July 2021, from 4.4% to 4.5%. The US economy is projected to grow 5.2%, up from the previous projection of 4.9%. Japan is also expected to grow by 3.2% higher than the previous projection of 3%.

On the domestic side, various institutions are optimistic that the Indonesian economy in 2022 will grow positively from the economic growth in 2021 of 3.7%-4.5% to a range of 5.0%-5.5% in 2022. The factors supporting this optimism for a 2021-2022 economic recovery include:

1. Successful handling and control of the COVID-19 pandemic through the PPKM program and vaccination;
2. Beginning to loosen restrictions on community mobility;
3. Starting to recover the performance of the Indonesian manufacturing industry (PMI Index 57.2 as of October 2021);
4. Indonesia's export performance has continued to improve since May 2020;
5. Structural reform efforts to increase investor confidence and ease of doing business to attract investment;
6. Support for counter cyclical fiscal policy as well as accommodative monetary and financial policies.

Optimism for global & domestic economic recovery, as well as expectations of economic players, in 2021-2022 are expected to have a positive impact on the banking industry performance. The growth of banking deposits is still relatively high during the pandemic, although it has started to slow down. As of September 2021, banking deposits grew by 7.69% (yoy). Meanwhile, loan growth has begun to move positively leaving the contraction zone, and grew by 2.21% (yoy) as of September 2021, higher than banking loan growth in August (1.16% yoy) and July 2021 (0.5 % yoy).

BNI's strategy to face the challenges in 2022 focuses on:

- a. Optimizing risk management and loan process discipline to improve asset quality, including developing end-to-end transformation of the loan process to improve loan quality, and to enhance a risk culture;
- b. Increasing selective business expansion and sustainable financial solutions, including increasing loan expansion in the corporate segment with a focus on top tier priority sectors;
- c. Increasing global market expansion by accelerating international business strategies, including developing the global banking transaction solutions capabilities to improve trade, remittance and cash management businesses;
- d. Increasing sustainable FBI and CASA by offering transaction solutions, including by increasing debtor transactions through optimizing BNI accounts;
- e. Strengthening digital capability through innovations and partnership improvements, by developing digital-based innovations to meet customer needs;
- f. Improving the BNI Group synergy by optimizing the Subsidiaries, by increasing penetration of Subsidiaries to strengthen the position of Subsidiaries as market leaders in each industry;
- g. Optimizing Human Capital and Operations to support business processes, by optimizing talent management and workforce planning to support business development;
- h. Continuing the strategy of strengthening and utilizing Capital Management, by strengthening BNI's capital through corporate actions.

Projected Performance for 2022

BNI has prepared a Bank Business Plan (RBB) for 2022 taking into account the current economic conditions and macro and micro economic projections in 2022 as the basis for business development in 2022. The Bank's business plan is as follows:

(Bank Only, in trillion Rupiah)

PERFORMANCE INDICATORS (Bank Only)	PROYEKSI 2022
Credit Growth (%)	7%-10%
NIM (%)	4.6%-4.8%
Cost of Credit (%)	2.0%-2.3%
NPL (%)	<3.5%
CIR (%)	<43.0%

The financial projections in the 2022 RBB were realistic with a relatively challenging growth rate in an effort to achieve economic recovery due to the pandemic caused by Covid-19. Credit growth will be more progressive when compared to 2021 due to efficiencies through the management of Cost of Credit and Cost to Income Ratio (CIR), which will have a positive impact on increasing Net Interest Margin (NIM). To strong credit growth, BNI will also continue to maintain the quality of its assets by managing Non-Performing Loans (NPL), which will become a foundation for future business growth.

Therefore, it will be necessary to ensure that the 2022 growth is determined in line with the assumptions used and the real conditions of the financial structure and readiness of Bank resources.

MATERIAL INFORMATION AND FACTS THAT HAPPENED AFTER THE ACCOUNTANT'S REPORT DATE

There was no material information and facts that occurred after the date of the accountant's report as of January 21, 2022 up to the ratification of this Annual Report.

DIVIDEND AND DISTRIBUTION POLICY

Basis for Dividend Distribution Policy

Payment of cash dividends by BNI is carried out with reference to Article 21 paragraph (2) letter b jo. Article 26 of the Bank's Articles of Association, which stipulates that in the Annual GMS the Board of Directors is required

to submit a proposal for the use of net profit if the Bank has a positive profit. As well as referring to Article 70 and Article 71 of Law No. 40 of 2007 concerning Limited Liability Companies which stipulates that all net income after deducting allowance for reserves is distributed to shareholders as dividends, unless otherwise stipulated in the GMS. The use of net income includes the determination of the amount of allowance for proposals decided by the GMS. Dividends can only be distributed when the Bank has a positive profit balance.

According to the BNI stock prospectus, BNI's dividend policy is a minimum for of 25% of net profit per year, the amount of which will be determined at the GMS.

Dividends Distributed in 2021 and Dividend Distribution History

The BNI GMS held on March 29, 2021 approved the use of the Fiscal Year 2020 Net Profit as follows:

1. Dividends in the amount of 25% or Rp820,100,820,494.00 (eight hundred twenty billion one hundred million eight hundred twenty thousand four hundred ninety four Rupiah) shall be determined as cash dividends to be distributed to shareholders to be paid with the following conditions:

- a. The Government's share of dividends on ownership of 60% shares or in the amount of Rp492,577,663,633.03 (four hundred ninety-two billion five hundred seventy-seven million six hundred sixty-three thousand six hundred and thirty-three Rupiahs point zero three cents) will be paid to the State General Treasury account;
 - b. Meanwhile, the ownership of 40% public shares worth Rp327,523,159,322.46 (three hundred twenty seven billion five hundred twenty three million one hundred fifty nine thousand three hundred twenty two point four six cents Rupiah) will be given to the shareholders in accordance with their respective ownership;
 - c. Granting authority and power to the Board of Directors with substitution rights to determine the schedule and procedure for the distribution of dividends for the 2020 fiscal year in accordance with applicable regulations.
2. 75% or Rp.2,460,302,461,482.00 (two trillion four hundred sixty billion three hundred two million four hundred sixty-one thousand four hundred and eighty-two Rupiah) will be used as Retained Earnings Balance.

Based on this decision, the GMS approved the payment of dividends from net profit of Rp820,100,820,494.00 or Rp44,022623 per share to be distributed to Shareholders with the following schedule:

NO	DESCRIPTION	DATE
1	End of Trading Period Shares With Dividend Rights (Cum Dividend) Regular and Negotiation Market Cash Market	April 7, 2021 April 9, 2021
2	Beginning of Stock Trading Period Without Dividend Rights (Ex Dividend) Regular and Negotiation Market Cash Market	April 8, 2021 April 12, 2021
3	List of Shareholders entitled to Dividends (Recording Date)	April 9, 2021
4	Cash Dividend Payment Date	April 30, 2021

The procedure for distributing cash dividends from BNI's 2020 net profit was as follows:

1. Cash Dividend distributed to Shareholders whose names were recorded in the Register of Shareholders ("DPS") or recording date and/or share owners in the securities sub-accounts at PT Kustodian Sentral Efek Indonesia ("KSEI") at the close of trading on April 9, 2021;
2. For Shareholders whose shares were deposited in KSEI's collective custody, cash dividend payments will be made through KSEI and distributed on April 30, 2021 into the Customer Fund Account (RDN) at the securities company and/or custodian bank where the

Shareholders open a securities account. Meanwhile, for Shareholders whose shares are not included in the collective custody of KSEI, the cash dividend payment will be transferred to the account of the Shareholders;

3. The cash dividend is subject to tax in accordance with the applicable tax laws and regulations. Shareholders can obtain confirmation of dividend payments through the securities company and or custodian bank where the person concerned has a securities account, then the shareholder must be responsible for reporting the dividend receipts referred to in the tax reporting for the tax year concerned;

4. Shareholders who are Overseas Taxpayers whose withholding tax uses rates based on the Double Taxation Avoidance Agreement (“P3B”) must comply with the requirements of the Director General of Taxes Regulation No. PER-25/PJ/2018 concerning Procedures for Application of Double Taxation Avoidance Agreement and submit a document of record or receipt of DGT/SKD that has been uploaded to the website of the Directorate General of Taxes to KSEI or BAE in accordance with the KSEI rules and regulations, and without this said document, Cash dividends paid will be subject to Article 26 Income Tax of 20%.

The realization of dividend distribution in 2021 for 2020 operating results was as follows:

Distributed Cash Dividend (Rp-million)	Rp820,100,820,494.00
Dividend per Share (Rp)	44.02
Dividend Ratio (%)	25%
Announcement Date	March 31, 2021
Payment Date	April 30, 2021

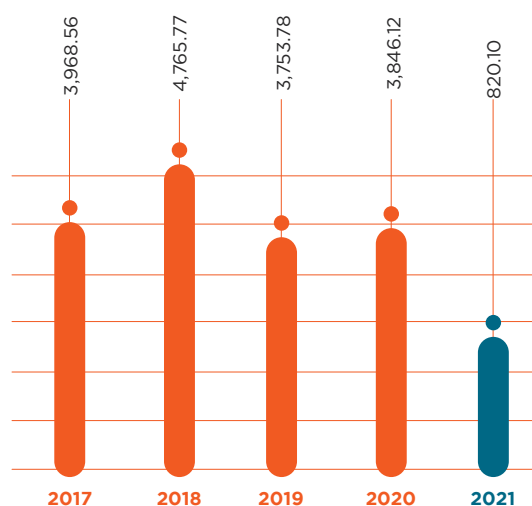
Based on the Annual General Meeting of Shareholders (GMS) decision for the 2019 Fiscal Year on February 20, 2020, BNI has paid dividends from the Bank's net profit of Rp3,846,119,011,149.58 from net profit in 2019 amounting to Rp15,384,476,033,351.00.

The dividend distribution and payments for the last 5 (five) years are as follows:

	DIVIDEND DISTRIBUTION YEAR				
	2021 (FOR BUSINESS RESULTS IN 2020)	2020 (FOR BUSINESS RESULTS IN 2019)	2019 (FOR BUSINESS RESULTS IN 2018)	2018 (FOR BUSINESS RESULTS IN 2017)	2017 (FOR BUSINESS RESULTS IN 2016)
Cash Dividend Distributed (Rp-billion)	820,10	3.846,12	3.753,78	4.765,77	3.968,56
Dividend per Share (Rp)	44,02	206,24	201,29	255,55	212,81
Dividend Ratio (%)	25% of 2020 net profit	25% of 2019 net profit	25% of 2018 net profit	25% of 2017 net profit	25% of 2016 net profit
Announcement Date	March 31, 2021	February 24, 2020	May 14, 2019	March 20, 2018	March 20, 2017
Payment date	April 30, 2021	March 24, 2020	June 14 2019	April 20, 2018	April 20, 2017

Trend of Total Cash Dividend Distributed in the Last 5 Years

(Rp-billion)



TAXATION

BNI TAX CONTRIBUTION

BNI acts as a taxpayer and tax withholding/collector as its contribution to the State. BNI's biggest contribution as a taxpayer is to fulfill corporate income tax obligations. BNI also actively contributes to withholding/collecting taxable objects in carrying out its function as a tax withholder/collector.

BNI is always on time in terms of tax obligation payments and submits tax obligation documents such as annual and monthly tax returns and other obligation documents to the regulators.

Tax Payments 2019-2021

TYPE OF TAX	2021 (RP-BILLION)	2020 (RP-BILLION)	2019 (RP-BILLION)	KENAIKAN (PENURUNAN) 2020-2021	
				NOMINAL (RP-BILLION)	PERCENTAGE (%)
VAT	416	238	268	179	75.24
Withholding Income Tax*	3,244	4,016	4,827	(772)	(19.22)
PPh Corporate	3,240	2,009	3,801	1,231	61.30
Other Taxes	50	61	80	(11)	(17.57)
Total	6,950	6,323	8,976	628	9.92

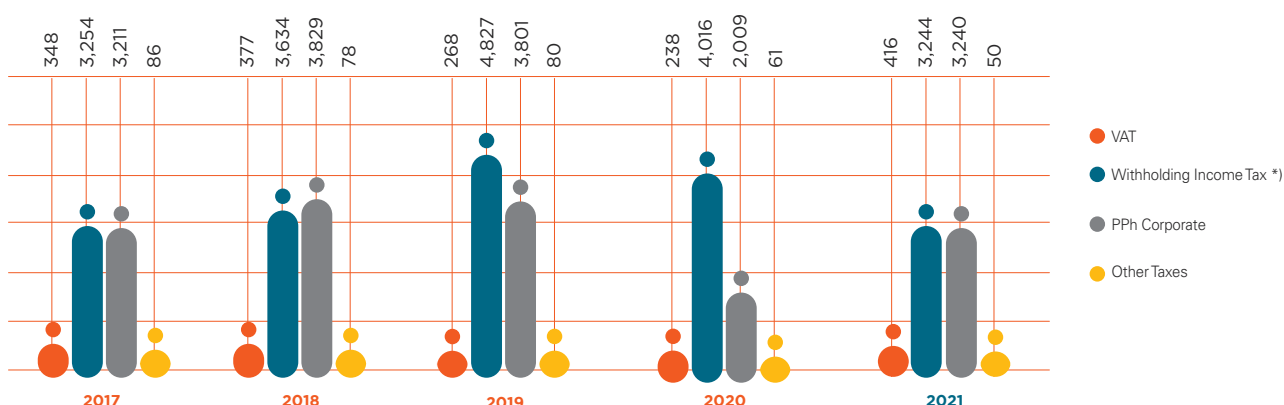
*Withholding Income Tax consists of Income Tax Article 21/26, 15, 22, 23/26, and Income Tax Article 4 paragraph (2)

In 2021, BNI's total tax payments amounted to Rp6.9 trillion, an increase of 9.92% compared to Rp6.3 trillion in 2020.

The decrease in tax payments from Withholding PPh by BNI was due to a decrease in interest expense from customer deposits in line with the Company's strategy to increase low-cost funds or CASA (Current Account & Saving Account).

Progress of the Tax Payments 2019-2021

(Rp-billion)



Taxation Legal Issues

BNI filed an objection application to the Tax Underpayment Assessment Letter (SKPKB) for Corporate Tax for the 2015 fiscal year. In this matter, on April 30, 2019 through the Director General of Taxes Decree No. KEP-00670/KEB/WPJ.19/2019, the Directorate General of Taxes (DGT) partially accepted BNI's objections to the SKPKB of Corporate Tax for the 2015 fiscal year. On July 26, 2019, BNI made an appeal to the Tax Court on some of the objections not yet approved by the DGT. As of the publication of this Annual Report, the Tax Court has not yet issued a decision on the appeal filed by BNI. The appeal decision is expected to be published in 2022. The Bank has confidence that the appeal will be won by BNI.

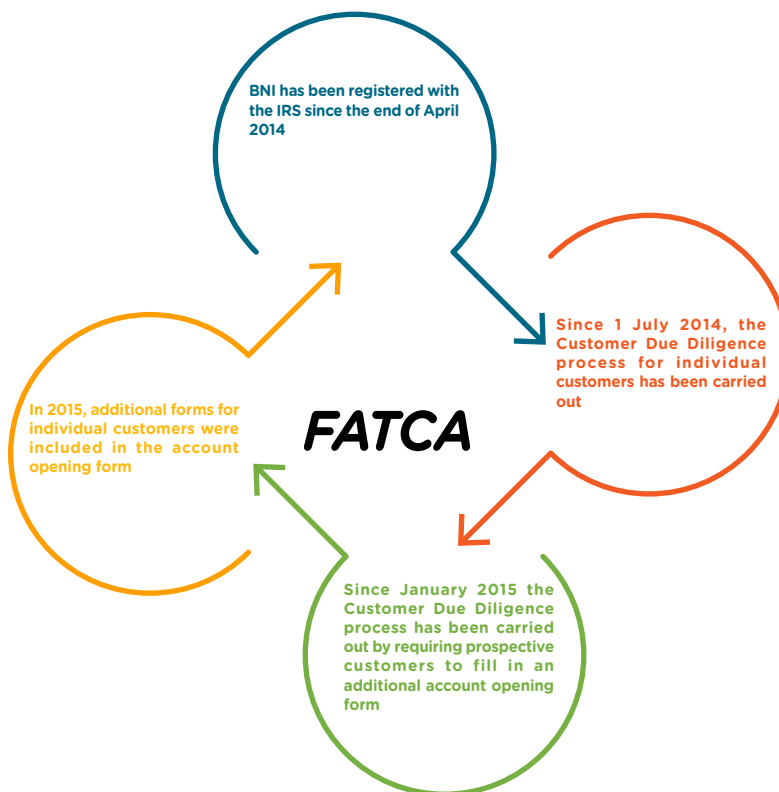
Tax Payments in Arrears

BNI has paid all tax assessments as a result of audits that are due for payment as described in the previous point. Although BNI is still in the process of filing legal actions, BNI has made payments for all tax arrears in order to mitigate the risk of tax penalties.

FOREIGN ACCOUNT TAX COMPLIANCE ACT (FATCA)

FATCA is a regulation issued by the Department of Treasury and the Internal Revenue Service (“IRS”) of the United States to prevent tax evasion by US citizens or companies (US persons) through funds or businesses outside the United States.

Steps taken by BNI regarding FATCA



In addition, through POJK No. 25/POJK.03/2019 dated October 15, 2015 concerning Submission of Foreign Customer Information Regarding Taxation to Partner Countries or Partner Jurisdiction, BNI has also committed to take part in compliance with FATCA provisions, and has registered with the IRS as a financial institution that will implement FATCA provisions. At present compliance with FATCA is part of the Customer Due Diligence process at BNI which has been implemented since July 1, 2017. Bank reporting related to the POJK will be conducted on April 30 for domestic taxation, while for the purposes of international agreements will be reported every August 1.

TRANSFER PRICING DOCUMENT

Minister of Finance Regulation (PMK) No. 213/PM.03/2016 concerning Types of Documents and/or Additional Information that Must Be Stored by Taxpayers Conducting Transactions with Parties with Special Relationships, and Procedures for Management.

This regulation intends to improve the quality of documents prepared by taxpayers and increase transparency. Taxpayers also need to be more proactive and ensure that the information needed to prepare master documents and local documents is available in order to comply with the provisions in accordance with applicable regulations. PT Bank Negara Indonesia, Tbk (BNI) as a taxpayer who obeys and complies with all existing tax regulations and has complied with these regulations.

Preliminary

The Ministry of Finance issued a new regulation on taxpayers requiring them to make Transfer Pricing Documentation (TP Doc). This new TP rule complements the provisions related to the application of the principle of fairness and common business practice in transactions involving related parties.

Based on the definition in Article 1 Paragraph 6 PMK-213/PMK.03/2016 it is stated that the transfer pricing document is a document held by the taxpayer as the basis for applying the principle of fairness and common business Practices in determining the transfer price carried out by the Taxpayer.

This regulation was issued in connection with the provisions for transfer pricing documents, and did not replace the applicable regulation to regulate the principle of fairness and common business practices, namely DJP Regulation No. PER-43/PJ/2010 as last amended by DJP Regulation No. PER-32/PJ/2011 concerning the Application of Principles of Fairness and Common Business Practice in Transactions Between Taxpayers and Related Parties.

Types of Documents That Must be Maintained

Based on these regulations, taxpayers are required to maintain and keep 3 (three) levels of documents consisting of:

1. Master Documents;
2. Local Documents; and
3. Reports by Country.

The aforementioned transfer pricing document must be submitted in Indonesian. However, taxpayers who have obtained permission to keep books in foreign languages and currencies other than Rupiah can produce documents in English accompanied by transfer pricing documents in the Indonesian language.

Subjects Required to Prepare Transfer Pricing Documents

Parties that are required to make Transfer Pricing Document can be grouped into 2 (two), namely:

1. Those who are required to produce master documents and local documents; and
2. Those who are required to produce master documents, local documents and reports per country.

Regulation Impact on the Bank

In terms of implementing regulations related to Transfer Pricing, BNI has disclosed transactions with subsidiaries and other related parties in accordance with applicable regulations. In terms of evaluating arms length transactions or the reasonableness of BNI transactions with related parties, the Bank uses the services of a Tax Consultant, PT. Multi Utama Consultindo (MUC), to conduct an assessment. Based on the assessment results, all transactions conducted by BNI with related parties have met the specified fairness requirements.

ACCESS TO FINANCIAL INFORMATION FOR TAXATION PURPOSES

Preliminary

The Automatic Exchange of Financial Account Information or (AEOI) is a G20 countries' plan and was initiated by the Organization for Economic Cooperation and Development (OECD) regarding a system that supports the exchange of taxpayer account information between countries.

With this system, taxpayers who have opened accounts in other countries will be tracked directly by their home country's Tax Authorities. AEOI has a new global standard that will help reduce the chance of avoiding tax payments.

The AEOI work system is the exchange of financial data of foreign nationals living in a country. The exchange of financial data is not done arbitrarily, but rather is carried out between the tax authorities in each country. Every country that has joined the AEOI system will send and receive pre-agreed information every year without having to submit special requests.

In Indonesia itself, with the presence of AEOI, the Directorate General of Taxes can supervise and explore potential taxation through banking transactions or other financial institutions conducted by taxpayers abroad and developed it so that it applies to taxpayers in the country. This is done to strengthen the database which so far has limited access so that it is expected that the potential of state revenue from the tax sector can be maximized.

Scope

In accordance with Law No. 9 of 2017 concerning Determination of Government Regulation in Lieu of Law Number 1 of 2017 concerning Access to Financial Information for Taxation Purposes, the scope of access to financial information is divided into 2 (two), namely:

1. Exchange information for the benefit of international agreements or foreign customers;
2. For the benefit of Domestic Tax or Domestic Customers in the context of implementing Tax Regulations.

Reporting Subjects and Provider of Financial Information

Based on Law No. 9 Year 2017, Financial Institutions (FI) that are obligated as reporting subjects are as follow:

Financial Institutions by Sector

BANKING	CAPITAL MARKET	INSURANCE	COMMODITY FUTURES TRADING	COOPERATIVES
Commercial banks	Securities Underwriting	General and Sharia Insurance Companies	Futures Brokers	Deposit and Lending Cooperatives
BPR	Broker-Dealer (PPE)	Sharia Life and Life Insurance Company	Futures Broker Clearing Member	
Islamic Bank	Investment Manager (MI)	Sharia Reinsurance & Reinsurance Company		
	Custodian Bank			
	Registrar Bureau			

MANAGEMENT AND/OR EMPLOYEE SHARE OWNERSHIP PROGRAM (MSOP/ ESOP)

In 2021, BNI did not have an employee share ownership program. This program was last implemented in 2018 with a vesting period of up to 2019.

Program Objectives

Employee stock bonus program is a bonus program in the form of Bank shares that are given to employees who meet certain criteria and requirements as stipulated in the Program Implementation Guidelines.

The purpose of this employee stock bonus program is as follows:

1. A form of long run employee retention.
2. An effort to motivate employees to deliver their best performance.
3. An effort to increase employees' sense of belonging to the Bank.

Total ESOP or MSOP Shares and Realization

Taking into account point 4, letter a, number 3, of Regulation No. XI.B.2 jo. Article 9 of the OJK Regulation No. 2/POJK.04/2013, a share buyback may be diverted/ used for the an Employee Stock Option Plan or employee Stock Purchase Plan, and the Company conducted a Disclosure of Information on May 12, 2016 stating that

they will conduct the transfer of Series C shares through a buyback Shareholding Program, for the Company's Management and Employees, in the form of Bonus shares (hereinafter referred to as "Bonus Shares Program").

Supervision of the Shares Bonus Program was carried out by the Company's Board of Directors and reported at the Company's General Meeting of Shareholders closest to the implementation of the program.

The bonus shares allocation to members of the Board of Directors and Board of Commissioners was in accordance with the Minister of State-Owned Enterprises Regulation No. Per-04/MBU/2014 Guidelines for Determination of Salaries for Board of Directors, Board of Commissioners and Board of Trustees of State Owned Enterprises, and was conducted after obtaining approval from the General Meeting of Shareholders/Ministry of SOEs. Based on the Minutes of AGMS No. 8 dated March 10, 2016, the allocation of bonus shares to members of the Board of Directors and Board of Commissioners was carried out after obtaining the approval of the Minister of SOEs.

Ministry of SOE Letter No. S-574/MBU/D5-06/2018 dated June 5, 2018 fixed the determination of Long Term Incentive (LTI) at 10% of the Board of Directors and Board of Commissioners Tantiem for Fiscal Year 2017. LTI was given in the form of shares deferred for three years or

until the end of the term of office. This provision was not given to Independent Commissioners, where LTI is given in cash where the payment is deferred for three years or until the end of the term of office.

Allocation of the first phase for employee was completed in 2016, and employees entitled to be participants in the Bonus Share Program, were permanent employees as at October 30, 2015 (Disclosure date). Employees declared eligible for vesting were notified by email, or other communication media, which contained confirmation of the bonus shares entitlement and the vesting date.

The vesting conditions were determined as follows:

1. No ongoing cases and/or being subject to sanctions according to the applicable Bank Personnel Regulations;
2. Has not terminated their employment relationship on their own accord; or
3. Has not ended their employment relationship due to low performance.

As of December 2018, 35,349,718 shares had been vested to 20,289 employees.

Time Period

The share bonus allocation was conducted over 3 (three) years between 2016 - 2018, with periodic vesting of stock.

1. The terms for the share bonus allocation and vesting requirements for employees covered other performance and administrative requirements based on internal company requirements.
2. Vesting was conducted periodically based on position level at the end of January, April and July 2017 - 2019.

Criteria of Eligible Employees or Management

The Bonus Shares Program became part of the remuneration pursuant to the Ministry of State Owned Enterprises Decree No. Per-04/MBU/2014 concerning Guidelines for Determination of Board of Directors, Board of Commissioners and Supervisory Board of State Owned Enterprises, in the form of long-term rewards where the shares repurchased were allocated to:

1. Employees as a bonus for achievement of company performance, and
2. Members of the Board of Directors, and the Board of Commissioners as part of the bonus for the fiscal year concerned

Exercise Price

Referring to the Financial Services Authority Regulation (OJK) No. 02/POJK.04/2013 dated August 23, 2013 concerning Repurchase of Shares Issued by Issuers or Public Companies in Significantly Fluctuating Market Conditions, and No. SEOJK 5/SEOJK.04/2017 concerning Revocation of SEOJK No. 22/SEOJK.04/2015 concerning Conditions Other than Significantly Fluctuating Market Conditions in the Implementation of Share Buy Back Issued by Issuers or Public Companies, BNI conducted repurchases of Company's shares that had been issued and listed on the Indonesian Stock Exchange (Buy Back). BNI appointed PT BNI Sekuritas as the institution conducting the repurchase of the Company's shares to purchase shares over a period of three months, starting from November 2, 2016 to December 28, 2016.

The number of shares bought back was equal to 0.8% of the issued and fully paid capital, or 150,537,500 shares. The Company's repurchased shares amounted to Rp749,979,275,500.00 (maximum of 750 billion rupiah) and the average Buyback price amounted to Rp4,982.00 per share. After the Company shares repurchase, the Company conducted a Disclosure of Information on October 30, 2016.

After the purchase of the shares, they were distributed back to employees who met the criteria with an exercise price of Rp4,982.00 per share.

UTILIZATION OF PROCEEDS FROM PUBLIC OFFERING

PUBLIC OFFERING OF SHARES

On November 25, 2010, at the Extraordinary General Meeting of Shareholders (EGMS), the Shareholders decided to approve an increase of BNI's issued and fully paid capital through a Limited Public Offering/Rights Issue III (PUT III) with an issuance of Pre-emptive Rights (HMETD) amounting to 3,374,715,948 new Series C shares with a nominal value of Rp375 (full amount) per share. These Pre-emptive Rights could be traded inside and outside the Indonesia Stock Exchange (IDX) from 10 December 2010 to 16 December 2010, taking into account the prevailing regulations in the capital market.

Total Proceeds

The total proceeds from PUT III, net of shares issuance and emission costs, amounted to Rp10.2 trillion. Planned Utilization Of Funds

Funds from the proceeds of PUT III to be used for:

1. 80% for corporate, commercial, small business and consumer loans.
2. 15% for infrastructure development on information technology, outlets, ATMs and others.
3. 5% for the development of subsidiaries namely BNI Life, BNI Syariah, BNI Securities and BNI Multifinance.

Balance of Funds

As of December 31, 2018, the balance of funds from PUT III amounted to Nil, or in other words, 100% of the funds had been disbursed.

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 Multifinance.	as of December 31, 2014 Rp510,819,408,152
Balance of Funds	Nil

For 2021 BNI there is no obligation to report information on the realization of the use of funds from the public offering of shares.

DEBT SECURITIES PUBLIC OFFERING

Sustainable Public Offering

On June 22, 2017, BNI obtained an effective statement from OJK through letter No. S-349/D.04/2017 to issue Sustainable Bonds I BNI Phase I 2017 ("Bonds"). The value of bonds issued amounted to IDR 3,000,000,000 (three trillion Rupiah), for a period of 5 years, with a coupon of 8% per annum to be paid quarterly. The BNI Bonds were issued on July 11, 2017 and listed on the Indonesia Stock Exchange on July 12, 2017.

Bond Issuance Structure	
Name of the Bonds	BNI Phase I Sustainable Bonds I in 2017
Bond's Principal Amount	Amounted to Rp3,000,000,000,000 (three trillion Rupiah)
Bid Price	100.00% of the principal amount of the Bond
Tenor	5 (five) year after date of issue
Trading Unit	Rp1 (one Rupiah) or multiples
Unit/Trading	Rp5,000,000 (five million Rupiah) or multiples
Bond Coupon Rate	8.00% (eight point zero zero percent) per annum
Type of Interest Rate	Fixed
Interest Payment Period	Quarterly
First Interest Payment Date	October 11, 2017

Bond Issuance Structure

Collateral	These bonds are not secured by special collateral, but are secured by all of the Company assets, both movable and immovable property, whether existing or future, that becomes collateral for the Bondholder in accordance with the provisions of Articles 1131 and 1132 of the Civil Code. The Bondholder right is paripassu without any preferential rights with the rights of the other creditor of the Company either present or in the future, except for the rights of the creditor of the Company which are specifically guaranteed with the Company's assets either existing or future.
Securities Rating	idAAA (triple A) from Pefindo
Sinking Fund	The Company does not provide a sinking fund for the bond principal repayment with a view to optimizing the use of the proceeds from the issue in accordance with the planned usage purpose.
Buy Back	These bonds have a repurchase (buy-back) option under the terms and provisions of the Trusteeship Agreement
Trustee	PT Bank Rakyat Indonesia (Persero) Tbk was appointed as the Trustee for the issuance of these Bonds in accordance with the provisions in the Trustee Agreement.

Planned Utilization of Proceeds from Public Offering

The proceeds from the Public Offering of Bonds, after deducting the costs, to be used entirely by the Company for loan expansion in the context of business development.

Information on Changes to the Use of Funds

In 2021 there is no information to report on changes to the use of funds.

Realization and Schedule of PUB Interest Payments

PUB Publishing Realization

TYPE OF PUBLIC OFFERING	EFFECTIVE DATE	PUBLIC OFFERING REALIZATION RESULT			PLANNED UTILIZATION OF FUNDS		USE OF PROCEEDS REALIZATION		PUBLIC OFFERING RESIDUAL FUNDS
		TOTAL PUBLIC OFFERING (RP-BILLION)	PUBLIC OFFERING EXPENSES (RP- BILLION)	NET RESULT (RP- BILLION)	CREDIT EXPANSION (RP- BILLION)	TOTAL (RP- BILLION)	CREDIT EXPANSION (RP- BILLION)	TOTAL (RP- BILLION)	
BNI Phase I SustainabBonds I in 2017	June 22, 2017	3,000	74	2,992	2,992	2,992	2,992	2,992	0

PUB Interest Payment

INTEREST NO.	DATE OF BOND INTEREST PAYMENT	INTEREST (%)
1	October 11, 2017	8.0
2	January 11, 2018	8.0
3	April 11, 2018	8.0
4	July 11, 2018	8.0
5	October 11, 2018	8.0
6	January 11, 2019	8.0
7	April 11, 2019	8.0
8	July 11, 2019	8.0
9	October 11, 2019	8.0
10	January 11, 2020	8.0
11	April 11, 2020	8.0
12	July 11, 2020	8.0
13	October 11, 2020	8.0
14	January 11, 2021	8.0

PUB Interest Payment

INTEREST NO.	DATE OF BOND INTEREST PAYMENT	INTEREST (%)
15	April 11, 2021	8.0
16	July 11, 2021	8.0
17	October 11, 2021	8.0
18	January 11, 2022	8.0
19	April 11, 2022	8.0
20	July 11, 2022	8.0

Subordinated MTN

BNI issued Subordinate Medium Term Notes (MTN) in order to strengthen its complementary capital (tier 2) and working capital for business development, especially lending and increasing the composition of long-term fund association 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.

The Subordinated MTN was not guaranteed by a specific collateral including not guaranteed by the Bank or its subsidiary, 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 applicable laws and regulations and follows the provisions Article 19 paragraph (1) in accordance with OJK Regulation No. 11/ POJK.03/2016, as amended by Financial Services Authority Regulation No. 34/POJK.03/2016 and is a subordinated Bank obligation, in accordance with the provisions of the Subordinated MTN issuance agreement. Rights of Subordinate MTN holders are juniors with the rights of other company creditors.

Information on Subordinated MTN Offered

The Subordinated MTN was issued in the amount of Rp100,000,000,000.00 (One Hundred Billion rupiah) with a coupon payment period of 8% p.a every 3 months (quarterly), based on the interest calculation of 30/360 with a tenor of 5 years.

MTN Subordinated Issuance Structure	
Name	Subordinated Medium Term Notes I BNI - 2018
Principal amount	Rp100,000,000,000 (one hundred billion Rupiah)
Bid Price	100.00% from Subordinated MTN principal value
Tenor	5 (five) years from date of issue
Coupon Rate	8.00% (eight point zero zero percent) per annum
Type of Interest rate Interest Payment Period	Fixed
Interest Payment Period	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.

Balance of Subordinated MTN

As of December 31, 2021, the Subordinated MTN had a balance of Rp100 billion.

Schedule of Subordinated MTN Coupon Payment

An interest rate of 8% per annum is paid every 3 months with the following schedule:

MTN Subordinated Interest Payment

INTEREST NO.	DATE OF BOND 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
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 2 Capital Bond 2021

BNI issued debt instruments with capital characteristics in the form of Tier 2 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 2 Capital Bond is one of BNI's strategies for increasing the Bank's capital through Tier 2 Capital.

Tier 2 Capital Bonds were offered at a fixed interest rate of 3.75% p.a. a term of 5 (five) years. HSBC and Citi Group acts as institutions and supporting professions in the issuance of the Tier II Capital Bonds. The Legal Consultants used were Ginting & Reksodiputro and Allen & Overy, and HSBC acted as Trustee and Paying Agent. The bonds received a rating on long-term debt securities from Fitch Rating with BB rating, and a Moody's Rating of Ba2.

Description of Tier 2 Capital Bonds Offered

Tier II Capital Bonds were issued in the amount of USD 500,000,000.00 (Five Hundred Billion US Dollar) with a coupon payment period of 3.75% p.a and every 6 months (semesterly), with an interest calculation basis of 30/360 with a tenor of 5 years.

Tier 2 Capital Bond Issuance Structure

Name	Tier 2 Capital Bond 2021
Principal Amount	USD500,000,000 (five hundred million US Dollars)
Bid price	100.0% of principal
Time period	5 (five) years from the date of issuance
Interest Rate	3.75% (three point seventy five) 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 OJK
Securities Rating	Fitch Rating of BB Moody's Rating of Ba2.

Purpose of Funds Use from Tier 2 Capital Bonds

The issuance of the Tier 2 Capital Bond aims to increase the Bank's capital through Tier II Capital, for general funding needs and to increase long-term funding.

Tier 2 Capital Bond Fund Balance

As at December 31, 2021, the Tier 2 Capital Bonds balance was USD 500,000,000.00 (Five Hundred Million US Dollars).

Tier II Capital Bond Interest Payment Schedule

The interest rate is 3.75% per annum which is paid every 6 months with the following schedule:

Payment of Tier 2 Capital Bond Interest

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, 2025	3.75
8	March 30, 2025	3.75
9	September 30, 2026	3.75
10	March 30, 2026	3.75

Additional Tier 1 Capital Bond 2021

BNI issued debt instruments with capital characteristics in the form of an Additional Tier I Capital Bond which were listed on the Singapore Exchange (SGX Listing) with a principal amount of USD 600,000,000.00 which has a write down feature and can be calculated 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 aims to increase Tier I Capital, general funding, and improve the structure of long-term funds. Additional Tier 1 Capital Bonds are offered with a fixed interest rate of 4.30% p.a. perpetual term (no maturity) with call option after 5.5 (five and a half) years. BNI Sekuritas, JP Morgan and UBS acted as institutions and supporting professions in the issuance of the Additional Tier 1 Capital Bonds. 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 Additional Tier 1 Capital Bonds Offered

Additional Tier 1 Capital Bonds issued in the amount of USD 600,000,000 (Six Hundred Million US Dollars) have a coupon payment period of 4.3% p.a. and 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.

Additional Tier 1 Capital Bond Issuance Structure

Name	Additional Tier 1 Capital Bond BNI 2021
Principal Amount	USD600,000,000 (Six Hundred Million US Dollars)
Bid price	100.0% of principal
Time period	Perpetual, Non Callable 5.5 (five point five) years from the date of issue
Interest Rate	4.3% (four point three) per year
Type of Interest Rate	Fixed
Interest Payment Period	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 OJK.
Securities Rating	Moody's Rating Ba3.

Purpose of Use of Additional Tier 1 Capital Bond

The issuance of the Additional Tier 1 Capital Bond aims to increase the Bank's capital through Tier II Capital, for general funding needs and to increase long-term funding.

Additional Tier 1 Capital Bond Fund Balance

Until December 31, 2021 Additional Tier 1 Capital Bond balance was USD 600,000,000.00 (Six Hundred Million US Dollars).

Additional Tier 1 Capital Bond Interest Payment Schedule

The interest rate is 4.30% per annum which is paid every 6 months with the following schedule:

Additional Tier 1 Capital Bond Interest Payment

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

NEGOTIABLE CERTIFICATE OF DEPOSIT (NCD)

From 2016 until 2020, BNI issued a number of Rupiah scrippless Negotiable Certificate of Deposit (NCD) for purposes of liquidity management as well as to strengthen Rupiah funding structure and composition, as follow:

1. In Semester I 2016, BNI issued its first scrippless Rupiah NCD with an emission of Rp3.0 trillion in 6 series of tenor (6 months to 3 years).
2. In Semester II 2016, BNI issued another scrippless Rupiah NCD with total realized emission of Rp2.2 trillion, oversubscribed from the original target of Rp1 trillion. This oversubscription showed the high level of investor confidence and interest in BNI.
3. In Semester I 2017, BNI issued scrippless Rupiah NCDs with total realized emission of Rp2.7 trillion.
4. In Semester I 2019, BNI twice issued scrippless Rupiah NCDs with total realized emission of Rp950 billion (2019 BNI Rupiah I NCD) and Rp1 trillion (2019 BNI Rupiah II NCD).
5. In Semester II 2019, BNI issued scrippless Rupiah NCD with an emission of Rp2.39 trillion.
6. In Semester I 2020, BNI issued scrippless Rupiah NCD with an emission of Rp1.39 trillion.

ISSUANCE PHASE	DATE	CURRENCY	PRINCIPAL (RP BILLION)	AMOUNT (RP BILLION)	AVERAGE RATE (%)
1	June 16, 2016	Rupiah	3,023	2,598	8.20
2	September 27, 2016	Rupiah	2,200	1,877	6.70
3	March 10, 2017	Rupiah	2,700	2,483	7.00
4	March 28, 2019	Rupiah	1,000	950	7.70
5	June 28, 2019	Rupiah	1,000	1,000	7.55
6	September 25, 2019	Rupiah	2,390	2,232	6.61
7	May 12, 2020	Rupiah	1,390	611,6	5.60

As of December 31, 2021, the remaining balance of funds not yet due on the above NCDs is nil.

MATERIAL INFORMATION REGARDING INVESTMENTS, EXPANSIONS, DIVESTMENTS, BUSINESS MERGERS, ACQUISITIONS, AND/OR DEBT/CAPITAL RESTRUCTURING

Material Information Regarding the Merger of Subsidiaries

To strengthen the national sharia banking performance and at the same time elevating Indonesia's sharia economy in the global arena, on October 12, 2020, PT Bank Negara Indonesia (Persero) Tbk, PT Bank Mandiri (Persero) Tbk, PT Bank Rakyat Indonesia (Persero) Tbk, PT Bank BNI Syariah ("BNIS"), PT Bank Syariah Mandiri ("BSM"), and PT Bank BRI Syariah Tbk ("BRIS") agreed on an action plan to merge BNIS, BSM and BRIS, and signed a Conditional Merger agreement. This Merger was supported by the Government of the Republic of Indonesia as the ultimate controlling shareholder of the above parties and would become effective after approvals were obtained from the competent authorities, and with due observance of the provisions of the articles of association of each related company, as well as the provisions of prevailing laws.

In the merger action plan, BNI and BNIS Subsidiaries carried out several stages in accordance with prevailing legal provisions, including:

1. Announced a Summary of the Merger Plan to the public, and announced the Merger plan to employees of each Merger-Participating Bank on October 21, 2020, as well as announced additional information and/or changes to the Summary of the Merger Plan to the public on December 11, 2020.
2. Within the time limit specified in Article 127 paragraph (4) of the Company Law (i.e. no later than 14 days after the announcement of the Summary of the Merger Plan) and in Article 37 paragraph (1) of PP No. 28/1999 (i.e. no later than 7 days before the summons for the BNIS general meeting of shareholders), no BNIS creditors raised objections to the proposed Merger.

3. BNIS together with BRIS and BSM submitted a business merger statement to OJK (Capital Market Supervisor) on October 21, 2020 and obtained an effective statement from the OJK Capital Market Supervisor in accordance with OJK Letter No. S-289/D.04/2020 dated December 11, 2020.
4. Obtained approval from the BNIS shareholders based on a BNIS Shareholders outside the EGMS Decision on December 15, 2020, and followed by the signing of the Deed of Merger before a notary on December 16, 2020 as stated in the Merger Deed No. 103 dated December 16, 2020, as restated in Deed No. 37 dated January 14, 2021, drawn up before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta.
5. Obtained a copy of the OJK Board of Commissioners Decision No. 4/KDK.03/2021 dated January 27, 2021 concerning the Granting of a Permit for the Merger of PT Bank Syariah Mandiri and PT Bank BNI Syariah into PT Bank BRI Syariah Tbk and License to Change the Name by Using the Business License of PT Bank BRI Syariah Tbk to become a business license for PT Bank Syariah Indonesia Tbk. as the Merged Bank.
6. Obtained a Minister of Law and Human Rights Letter No. AHUAH.01.10-0011384 dated January 28, 2021 concerning the Receipt of Notification of the Merger of BNIS and BSM into BRIS, which had been received and recorded in the Legal Entity Administration System and became effective on February 1, 2021.
7. Obtained a Minister of Law and Human Rights Letter No. AHU-0006268. AH.01.02.TAHUN 2021 dated February 1, 2021 concerning approval of amendments to the PT Bank Syariah Indonesia Tbk Articles of Association.

After these stages were completed, on February 1, 2021, BNIS effectively merged with BSM and BRIS, and it was no longer a part of the 2021 consolidated financial statements of BNI and its Subsidiaries. The name of the merged entity was PT Bank Syariah Indonesia Tbk ("BSI"). Hereinafter, the capital and shareholders composition of the Merged Bank will be based on Deed No. 38/2021, and the BRIS Shareholder Register issued by PT Datindo Entrycom as the BRIS Securities Administration Bureau, whereby BNI owns 24.9% of BSI's shares.

Material Information Regarding Investments, Expansions, Business Combinations/Mergers, and Debt/Capital Restructuring

Apart from the information stated above, there is no other material information to report regarding investments, expansions, business combinations/mergers, and debt/capital restructuring.

MATERIAL INFORMATION REGARDING CONFLICT OF INTEREST TRANSACTIONS AND/OR TRANSACTIONS WITH AFFILIATED PARTIES/RELATED PARTIES

Definition of Affiliated/Related Parties

In the normal course of its business, BNI conducts transactions with related parties due to ownership and/or management relationships. All transactions with related parties are conducted carried out under mutually agreed policies and terms. BNI and its Subsidiaries conduct transactions with related parties by referring to PSAK 7 concerning "Related Party Disclosures" and Bapepam-LK Regulation No. KEP-347/BL/2012 dated June 25, 2012 concerning "Guidelines for Presentation and Disclosure of Financial Statements of Issuers or Public Companies" which are defined as:

1. Companies under the control of BNI and its Subsidiaries;
2. Associated Companies;
3. Investors who have voting rights, which give that investor a significant influence;
4. Companies under the control of investors who have voting rights, which give the investors significant influence;
5. Key employees and their family members; and
6. Entities that are controlled, jointly controlled or significantly influenced by the Government, namely the Minister of Finance or Regional Governments who are shareholders of the entity.

Types 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	<ul style="list-style-type: none"> • Badan Penyelenggara Jaminan Sosial (BPJS) Kesehatan • Badan Penyelenggara Jaminan Sosial (BPJS) Ketenagakerjaan • Kementerian Keuangan Republik Indonesia • Lembaga Kantor Berita Nasional (LKBN) Antara • Lembaga Pembiayaan Ekspor Indonesia (LPEI) • Perum Badan Usaha Logistik (Bulog) dan Entitas Anak • Perum DAMRI • Perum Jasa Tirta I • Perum Jasa Tirta II • Perum Percetakan Negara Republik Indonesia • Perum Percetakan Uang Republik Indonesia dan Entitas Anak • Perum Perhutani dan Entitas Anak • Perum Perikanan Indonesia • Perum Perumnas • Perum Produksi Film Negara • PT Adhi Karya (Persero) Tbk dan Entitas Anak • PT Amarta Karya (Persero) • PT Aneka Tambang Tbk dan Entitas Anak • PT Asuransi Jasa Indonesia • PT Jasa Raharja dan Entitas Anak • PT Asuransi Jiwasraya (Persero) • PT Asuransi Kredit Indonesia dan Entitas Anak • PT Bahana Pembinaan Usaha Indonesia (Persero) dan Entitas Anak • PT Balai Pustaka (Persero) • PT Bank Mandiri (Persero) Tbk dan Entitas Anak • PT Bank Rakyat Indonesia (Persero) Tbk dan Entitas Anak • PT Bank Tabungan Negara (Persero) Tbk • PT Barata Indonesia (Persero) • PT Berdikari (Persero) dan Entitas Anak • PT Bhandha Ghara Reksa (Persero) dan Entitas Anak • PT Bina Karya (Persero) • PT Bio Farma (Persero) • PT Biro Klasifikasi Indonesia (Persero) • PT Boma Bisma Indra (Persero) • PT Brantas Abipraya (Persero) • PT Dahana (Persero) • PT Danareksa (Persero) dan Entitas Anak • PT Dirgantara Indonesia (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 Garam (Persero) • PT Garuda Indonesia (Persero) Tbk dan Entitas Anak • PT Hotel Indonesia Natour (Persero) • PT Hutama Karya (Persero) dan Entitas Anak • PT Industri Gelas (Persero) • PT Indah Karya (Persero) • PT Indofarma (Persero) Tbk dan Entitas Anak • PT Indonesia Asahan Aluminium (Persero) • PT Indra Karya (Persero) • PT Industri Gula Glenmore • PT Industri Kapal Indonesia (Persero) • PT Industri Kereta Api (Persero) dan Entitas Anak • PT Industri Sandang Nusantara (Persero) • PT Industri Telekomunikasi Indonesia (Persero)

RELATED PARTY RELATIONSHIP AS THE CONTROLLING SHAREHOLDER	THE GOVERNMENT OF REPUBLIC OF INDONESIA THROUGH THE MINISTRY OF FINANCE
	<ul style="list-style-type: none"> PT Istaka Karya (Persero) PT Jaminan Kredit Indonesia PT Jasa Marga (Persero) Tbk dan Entitas Anak PT Kawasan Berikat Nusantara (Persero) PT Kawasan Industri Makassar (Persero) PT Kawasan Industri Medan (Persero) PT Kawasan Industri Wijayakusuma (Persero) PT Kereta Api Indonesia (Persero) dan Entitas Anak PT Kertas Kraft Aceh (Persero) PT Kimia Farma (Persero) Tbk dan Entitas Anak PT Kliring Berjangka Indonesia (Persero) PT Krakatau Steel (Persero) dan Entitas Anak PT Len Industri (Persero) dan Entitas Anak PT Merpati Nusantara Airlines (Persero) PT PAL Indonesia (Persero) dan Entitas Anak PT Pengembangan Armada Niaga Nasional (PANN) (Persero) dan Entitas Anak PT Pegadaian (Persero) dan Entitas Anak PT Pelabuhan Indonesia I (Persero) dan Entitas Anak PT Pupuk Indonesia Holding Company (Persero) dan Entitas Anak PT Rajawali Nusantara Indonesia (Persero) dan Entitas Anak PT Sang Hyang Seri (Persero) PT Sarana Karya (Persero) PT Sarana Multigriya Finansial (Persero) PT Sarinah (Persero) dan Entitas Anak PT Semen Baturaja (Persero) Tbk PT Semen Indonesia (Persero) Tbk dan Entitas Anak PT Sucofindo (Persero) dan Entitas Anak PT Surveyor Indonesia (Persero) PT Bukit Asam (Persero) Tbk dan Entitas Anak PT Taspen (Persero) dan Entitas Anak PT Telekomunikasi Indonesia (Persero) Tbk dan Entitas Anak PT Timah (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)
Control on Company's Activities	Key Management
By Ownership and/or Management	<ul style="list-style-type: none"> Asuransi Tripakarta Dana Pensiun BNI Dana Pensiun Lembaga Keuangan (DPLK) BNI

Affiliated/Related Party Balances and Transactions

Significant transactions with related parties recorded by BNI are presented in the following table:

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
Current Accounts With Other Banks		
PT Bank Mandiri (Persero) Tbk	1,559,840	469,246
PT Bank Rakyat Indonesia (Persero) Tbk	34	4,289
Lembaga Pembiayaan Ekspor Indonesia (LPEI)	-	73
PT Bank Tabungan Negara (Persero) Tbk	-	100
Total	1,559,874	473,608
Placements With Other Banks and Bank Indonesia		
PT Bank Rakyat Indonesia (Persero) Tbk	410,019	31,748

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
PT Bank Mandiri (Persero) Tbk	283,869	652,650
PT Bank Tabungan Negara (Persero) Tbk	435	10,435
Total	694,323	694,833
Marketable Securities		
PT Permodalan Nasional Madani (Persero)	978,000	783,251
PT Perusahaan Listrik Negara (Persero)	896,619	1,015,110
PT Bank Tabungan Negara (Persero) Tbk	715,603	767,617
PT Bank Mandiri (Persero) Tbk	706,957	655,501
PT Bank Rakyat Indonesia (Persero) Tbk	695,552	562,462
PT Hutama Karya (Persero)	434,193	856,159
PT Bahana Pembinaan Usaha Indonesia (Persero)	218,466	293,618
PT Pegadaian (Persero)	183,646	507,745
PT Danareksa (Persero)	167,254	319,540
PT Sarana Multi Infrastruktur (Persero)	149,086	262,772
PT Pelabuhan Indonesia II (Persero)	138,987	313,119
PT Sarana Multigriya Finansial (Persero)	118,143	70,634
PT Semen Indonesia (Persero) Tbk	105,779	139,628
PT Kereta Api Indonesia (Persero)	105,334	221,937
PT Telekomunikasi Indonesia (Persero) Tbk	68,733	72,874
PT Pertamina (Persero)	68,045	214,123
PT Jasa Marga (Persero) Tbk	67,536	51,759
PT Lembaga Pembiayaan Ekspor Indonesia (Persero)	49,694	89,077
PT Pupuk Indonesia (Persero)	23,781	50,691
PT Kimia Farma (Persero) Tbk	15,221	79,788
Lain-lain	9,347	130,853
Total	5,915,976	7,458,258
Securities Purchased Under Resale Agreements		
PT Bank Rakyat Indonesia (Persero) Tbk	933,729	654,090
Total	933,729	654,090
Government Bonds		
Pemerintah Republik Indonesia	111,401,474	89,355,412
Total	111,401,474	89,355,412
Export Bills and Other Receivables		
PT Adhi Karya (Persero) Tbk	4,615,915	2,229,358
PT Brantas Abipraya (Persero)	1,471,426	714,783
PT Wijaya Karya (Persero) Tbk	1,434,765	1,267,256
PT Hutama Karya (Persero)	1,335,712	1,228,259
PT Semen Indonesia (Persero) Tbk	553,599	345,800
PT Bank Mandiri (Persero) Tbk	297,792	251,121
PT Bank Rakyat Indonesia (Persero) Tbk	169,686	85,174
PT Nindya Karya (Persero)	121,535	229,017
PT Telekomunikasi Indonesia	78,118	199,922
PT Semen Baturaja (Persero) Tbk	17,028	48,502

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
PT Garuda Indonesia (Persero) Tbk	-	839,094
PT Pelabuhan Indonesia III (Persero)	-	30,651
PT Waskita Karya (Persero) Tbk	-	3,174,581
PT Barata Indonesia (Persero)	-	9,729
Total	10,095,576	10,653,247
Acceptances Receivables		
PT Krakatau Steel (Persero) Tbk	1,398,563	2,939,516
PT Pertamina (Persero)	1,219,390	-
PT PP (Persero) Tbk	738,343	556,483
PT Utama Karya (Persero)	602,756	516,347
PT Petrokimia Gresik	423,739	-
PT Len Industri (Persero)	359,012	175,663
PT Adhi Karya (Persero) Tbk	338,811	2,160,261
PT Nindya Karya (Persero)	209,096	106,545
PT Wijaya Karya (Persero) Tbk	180,606	33,085
PT Telekomunikasi Indonesia (Persero) Tbk	174,210	-
PT Semen Indonesia (Persero) Tbk	158,607	170,446
PT Pindad (Persero)	125,390	243,357
PT Dahana (Persero)	118,539	61,191
PT Garuda Indonesia (Persero) Tbk	82,633	44,320
PT Infrastruktur Telekomunikasi Indonesia	79,487	98,764
PT Dirgantara Indonesia (Persero)	70,086	87,917
PT Rekayasa Industri	40,211	69,704
PT Bank Mandiri (Persero) Tbk	39,651	14,041
PT Boma Bisma Indra (Persero)	29,071	10,400
PT Industri Kereta Api (Persero)	25,986	68,408
PT Perusahaan Perdagangan Indonesia	21,635	77,728
PT Rajawali Nusindo	17,240	19,655
PT Bank Rakyat Indonesia (Persero) Tbk	12,507	108,523
PT Brantas Abipraya (Persero)	9,049	4,087
PT Pupuk Kujang	6,757	67,564
PT Indofarma (Persero) Tbk	1,512	945
PT Barata Indonesia (Persero)	-	21,032
Total	6,482,887	7,655,982
Derivative Receivables		
PT Pertamina (Persero)	18,069	46,481
PT Perusahaan Listrik Negara (Persero)	6,609	92,038
PT Bank Rakyat Indonesia (Persero) Tbk	2,765	135
PT Bank Mandiri (Persero) Tbk	2,505	494
PT Aneka Tambang Tbk	-	541
Lain-lain	-	68
Total	29,948	139,757

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
Loans Disbursed		
PT Waskita Karya (Persero) Tbk	12,120,747	14,397,234
PT Telkom (Persero) Tbk	8,031,273	8,990,962
Kementerian Keuangan Republik Indonesia	6,302,196	5,900,522
PT Jasa Marga (Persero) Tbk	5,963,869	10,344,185
Perum Bulog	5,428,612	4,439,872
PT Krakatau Steel (Persero)	5,332,329	5,525,357
PT Garuda Indonesia (Persero)	5,117,334	3,408,366
PT Pertamina (Persero)	4,099,947	1,225,999
PT Semen Indonesia (Persero) Tbk	4,067,990	7,025,351
PT PLN (Persero)	4,029,987	5,364,194
PT Hutama Karya (Persero)	3,449,244	4,214,433
PT Kereta Api Indonesia (Persero)	2,967,613	2,554,203
PT Kimia Farma (Persero)	2,179,882	2,551,011
PT Adhi Karya (Persero) Tbk	2,169,189	1,886,246
PT Perkebunan Nusantara VII (Persero)	1,956,255	1,962,525
PT Perkebunan Nusantara III (Persero)	1,878,590	2,636,205
PT Petrokimia Gresik	1,869,010	3,397,306
PT Wijaya Karya (Persero) Tbk	1,628,147	3,210,185
PT Pindad (Persero)	1,506,318	1,150,076
PT Angkasa Pura II (Persero)	1,413,460	1,033,788
PT Pegadaian (Persero)	1,147,195	3,792,349
PT Perkebunan Nusantara XI (Persero)	910,292	920,234
PT Semen Baturaja (Persero)	827,900	945,250
PT PAL Indonesia (Persero)	796,776	806,937
PT Permodalan Nasional Madani (Persero)	745,972	1,302,182
PT Dirgantara Indonesia (Persero)	692,912	693,690
PT Aneka Tambang Tbk	642,816	393,400
PT Pelabuhan Indonesia I (Persero)	637,321	1,328,579
PT Infrastruktur Telekomunikasi Indonesia	627,242	487,289
PT Rajawali Nusindo	486,351	1,395,977
PT Industri Kereta Api (Persero)	391,503	484,444
PT Perkebunan Nusantara VI (Persero)	385,627	-
PT Pos Indonesia (Persero)	377,708	368,497
PT Bukit Asam (Persero) Tbk	364,139	754,728
PT Perkebunan Nusantara IV (Persero)	337,007	358,518
PT Barata Indonesia (Persero)	326,569	-
PT Len Industri (Persero)	288,114	533,444
Perum Peruri	265,442	386,476
PT Pupuk Iskandar Muda	177,083	870,000
PT Brantas Abipraya	123,818	740,700
PT Boma Bisma Indra (Persero)	120,105	703,831
PT Pelabuhan Indonesia IV (Persero)	-	469,325

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
Others	5,370,166	3,953,570
Total	97,554,050	112,907,440
Equity Investment in Associates & Share Participation		
PT. Bank Syariah Indonesia Tbk	8,688,406	-
PT Fintek Karya Nusantara	701,800	412,210
PT PANN (Persero)	-	282,825
Total	9,390,206	695,035
Deposits from Customers		
Entitas Dikendalikan melalui Pemerintah Republik Indonesia	152,148,865	110,272,736
Manajemen Kunci	108,176	113,103
Total	152,257,041	110,385,839
Key Management		
Entities controlled through the Government of the Republic of Indonesia	1,269,116	1,083,744
Total	1,269,116	1,083,744
Securities Issued		
PT Bank Rakyat Indonesia (Persero) Tbk	593,168	773,085
Dana Pensiun Lembaga Keuangan BNI	199,989	199,970
PT Bank Mandiri (Persero) Tbk	148,992	148,978
PT Penjaminan Infrastruktur Indonesia (Persero)	39,998	12,998
Dana Pensiun BNI	29,998	29,996
Total	1,012,145	1,165,027
Borrowings		
PT Bank Mandiri (Persero) Tbk	349,201	821,038
Kementerian Keuangan Republik Indonesia	57,831	64,801
Lembaga Pembiayaan Ekspor Indonesia (LPEI)	0	8,537
Total	407,032	894,376
Subordinated Securities		
PT Asuransi Tripakarta	24,996	24,994
PT Bank Mandiri (Persero) Tbk	2,849	-
Total	27,845	24,994
Derivative Payables		
PT Bank Rakyat Indonesia (Persero) Tbk	7,834	-
PT Bank Mandiri (Persero) Tbk	2,920	24,224
PT Pertamina (Persero)	1,523	-
Total	12,277	24,224
Acceptances Payables		
PT Indonesia Asahan Alumunium	166,252	-
PT Bank Mandiri (Persero) Tbk	40,207	453,411
PT Semen Indonesia (Persero) Tbk	20,921	22,997
PT Bank Rakyat Indonesia (Persero) Tbk	13,780	216,192
PT Barata Indonesia (Persero)	2,367	-
PT Pindad (Persero)	370	9,397
Perum Percetakan Negara Republik Indonesia	332	-

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
Others	-	44,484
Total	244,229	746,481
Bank Guarantees Issued		
PT Utama Karya (Persero)	2,402,746	2,536,591
PT Wijaya Karya (Persero) Tbk	2,308,786	1,853,638
PT Pertamina (Persero)	2,057,123	937,386
PT Telkom (Persero) Tbk	1,890,126	1,549,534
PT Rekayasa Industri	1,588,368	1,597,466
PT Nindya Karya (Persero)	1,575,672	1,202,499
PT Brantas Abipraya (Persero)	916,556	831,251
PT Adhi Karya (Persero)	893,971	1,033,249
PT Bank Mandiri (Persero) Tbk	856,835	738,878
PT Petrokimia Gresik	787,407	839,628
PT PP (Persero) Tbk	747,155	788,967
PT Industri Kereta Api (Persero)	614,178	217,773
PT Waskita Karya (Persero) Tbk	551,459	434,369
PT Pindad (Persero)	526,431	377,797
PT Len Industri (Persero)	265,680	83,301
PT Dirgantara Indonesia (Persero)	231,229	390,986
PT Perusahaan Listrik Negara (Persero)	220,535	136,359
PT Rajawali Nusindo	102,327	101,084
PT Barata Indonesia (Persero)	87,628	103,877
PT Biro Klasifikasi Indonesia (Persero)	53,629	35,318
PT Sucofindo (Persero)	53,391	51,264
PT Bank Rakyat Indonesia (Persero) Tbk	46,057	-
PT Pelabuhan Indonesia II (Persero)	38,608	38,014
PT Bukit Asam (Persero) Tbk	31,385	1,555
PT Djakarta Lloyd (Persero)	28,802	19,899
PT Angkasa Pura II (Persero)	28,234	32,156
PT Dahana (Persero)	27,184	33,715
PT Asuransi Jasa Indonesia	22,193	37,786
PT Virama Karya (Persero)	21,373	38,058
PT Angkasa Pura I (Persero)	20,879	30,601
PT Infrastruktur Telekomunikasi Indonesia	16,229	-
PT Indra Karya (Persero)	9,069	5,230
PT Pengembangan Pariwisata Indonesia (Persero)	8,056	-
PT Perusahaan Perdagangan Indonesia	7,634	-
Others	46,866	1,904,907
Total	19,083,801	17,983,136

DESCRIPTION	2021	2020
	(RP MILLION)	(RP MILLION)
Letters of Credit		
PT Perusahaan Listrik Negara (Persero)	1,247,723	1,136,946
PT PP (Persero) Tbk	495,905	387,582
PT Kereta Api Indonesia (Persero)	476,734	1,071,641
PT Bio Farma (Persero)	290,550	-
PT Petrokimia Gresik	235,038	392,297
PT Semen Indonesia (Persero) Tbk	135,366	178,585
PT Hutama Karya (Persero)	116,404	183,726
PT Nindya Karya (Persero)	110,863	234,690
PT Dahana (Persero)	98,293	36,462
PT Pertamina (Persero)	79,167	365,752
PT Pindad (Persero)	75,227	301,484
PT Perkebunan Nusantara V (Persero)	59,691	24,964
PT Wijaya Karya (Persero) Tbk	53,774	182,031
PT Dirgantara Indonesia (Persero)	39,600	114,994
Perum Percetakan Uang Republik Indonesia	33,297	-
PT Boma Bisma Indra (Persero)	27,605	1,636
PT Adhi Karya (Persero) Tbk	24,150	31,426
PT Perusahaan Perdagangan Indonesia	22,075	-
PT PAL Indonesia (Persero)	17,750	-
PT Industri Kereta Api (Persero)	16,423	-
PT Rajawali Nusindo	11,373	6,152
PT Len Industri (Persero)	9,020	6,800
PT Rekayasa Industri	5,361	93,739
PT Pupuk Kujang	5,140	182,525
PT Brantas Abipraya (Persero)	4,557	2,256
PT Timah (Persero) Tbk	4,211	-
PT Krakatau Steel (Persero) Tbk	2,676	83,139
PT Pupuk Indonesia Holding Company (Persero)	1,840	-
Others	5,400	376,677
Total	3,705,213	5,395,504
Salaries and Benefits		
Salaries, benefits and long-term employee benefits for the Board of Commissioners, Directors, Audit Committee, Senior Executive Vice President (SEVP), Executive Vice President (EVP) and Senior Vice President (SPV)	417,061	413,144
Total	417,061	413,144

The balances of transactions with related parties as of December 31, 2021 and 2020 were as follows:

DESCRIPTION	2021	2020	INCREASE (DECREASE)		TOTAL ASSETS COMPOSITION	
	(RP MILLION)	(RP MILLION)	NOMINAL (RP MILLION)	PERCENTAGE (%)	2021 (%)	2020 (%)
Current accounts with Other Banks	1,559,874	473,708	1,086,166	229.3	0.2	0.1
Placements with Other Banks	694,323	694,833	(510)	(0.1)	0.1	0.1
Securities	5,915,976	7,458,258	(1,542,282)	(20.7)	0.6	0.8
Securities Purchased under Agreements to Resell	933,729	654,090	279,639	42.8	0.1	0.1
Government Bonds	111,401,474	89,355,412	22,046,062	24.7	11.6	10.0
Export Bills and other Receivables	10,095,576	10,653,247	(557,671)	(5.2)	1.1	1.2
Acceptance Receivables	6,482,887	7,655,982	(1,173,095)	(15.3)	0.7	0.9
Derivative Receivables	29,948	139,757	(109,809)	(78.6)	0.0	0.0
Loans Disbursed	97,554,050	112,907,440	(15,353,390)	(13.6)	10.1	12.7
Investments in Associated Entities and Share Participation	9,390,206	695,035	8,695,171	1,251.0	1.0	0.1
Total Assets to Related Parties	244,058,043	230,687,762	13,370,281	5.8	25.3	25.9
Total Consolidated Assets	964,837,692	891,337,425	73,500,267	8.2		

The balance of assets from related parties did not change in composition from the previous year.

DESCRIPTION	2021	2020	INCREASE (DECREASE)		TOTAL LIABILITIES COMPOSITION	
	(RP MILLION)	(RP MILLION)	NOMINAL (RP MILLION)	PERCENTAGE (%)	2021 (%)	2020 (%)
Deposits from Customers	152,257,041	110,385,839	41,871,202	37.9	18.2	14.8
Deposits from Other Banks	1,269,116	1,083,744	185,372	17.1	0.2	0.2
Securities Issued	1,012,145	1,165,026	(152,881)	(13.1)	0.1	0.2
Borrowings	407,032	894,376	(487,344)	(54.5)	0.1	0.1
Subordinated Securities	27,845	24,994	2,851	11.4)	0.0	0.0
Derivative Liabilities	12,277	55,108	(42,831)	(77.7)	0.0	0.0
Acceptance Liabilities	244,229	746,481	(502,252)	(67.3)	0.0	0.1
Total Liabilities to Related Parties	155,229,685	114,383,878	40,845,807	35.7	18.5	15.3
Total Consolidated Liabilities	838,317,715	746,235,663	92,082,052	12.3		

The balance of liabilities from related parties in 2021 increased compared to the previous year, both in nominal value and in composition of the consolidated balance of liabilities. There was an increase in customer deposits from related parties of Rp41.9 trillion, or 37.9% compared to 2020.

DESCRIPTION	2021	2020	INCREASE (DECREASE)		TOTAL TEMPORARY SYIRKAH FUNDS COMPOSITION	
	(RP MILLION)	(RP MILLION)	NOMINAL (RP MILLION)	PERCENTAGE (%)	2021 (%)	2020 (%)
Simpanan Mudharabah	-	3,080,622	(3,080,622)	(100.0)	-	9.6
Jumlah Dana Syirkah Temporer Pihak-Pihak Berelasi	-	3,080,622	(3,080,622)	(100.0)	-	9.6
Jumlah Dana Syirkah Temporer	-	32,229,563	(32,229,563)	(100.0)	-	9.6

As of December 31, 2021, BNI no longer recorded Temporary Syirkah Funds as PT Bank BNI Syariah is no longer consolidated.

Company Policy Concerning Affiliated Transactions and Compliance with Related Regulations and Provisions

In 2021 BNI conducted 2 (two) affiliated transactions which were reported to the Financial Services Authority (OJK) in compliance with OJK Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions, as well as OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Information or Material Facts by Issuers or Public Companies, including:

1. Business merger between PT Bank BNI Syariah, PT Bank Syariah Mandiri and PT Bank BRI Syariah Tbk on February 1, 2021. The transaction value was equal to 100.00% of the market value of BNIS equity as at June 30, 2020, and amounted to Rp.7,989,053,308,480 assuming BNIS's business activities are on going as a going concern, and taking into account the assumptions and qualifications stated in the KJPP Iwan Bachron and Partners reports dated December 7, 2020, No. 00361/2.0047- 05/BS/09/00.465/1/XII/2020.

BNI submitted this affiliated transaction report to OJK through Letter No. KMP/7/0463 dated February 3, 2021 concerning Disclosure of Information on Affiliated Transactions by PT Bank Negara Indonesia (Persero) Tbk.

2. On September 16, 2021, the commission payment for BNI Securities Pte. Ltd. ("BSPL") as one of the Managers in the Subscription Agreement for the issuance of the BNI Additional Tier 1 Capital Bond. The transaction value or BNI fee to BSPL was US\$220,000, the equivalent of Rp3,146,000,000 (1 USD = Rp14,300). The transaction carried out by BNI with BNI Securities. Pte. Ltd. ("BSPL"), where BSPL is a company whose 100% shares are directly owned by PT BNI Sekuritas ("BNIS"), where BNI is the controller of BNIS with 75% ownership.

The detailed description of the affiliate transaction is as follows:

- a. On September 16, 2021, BNI completed a offering and pricing roadshow, in connection with the plan to issue BNI Additional Tier 1 Perpetual Non-Cumulative Capital Securities (hereinafter referred to as "AT-1 Capital Securities") amounting to US\$600,000,000 with a return of 4.3 % per annum in the framework of global securities issuance under the provisions of Regulation S ("Reg S"), US Securities Act, to be listed on the Singapore Stock Exchange.
- b. In the issuance, BNI involved several parties who acted as publishing support managers, one being BSPL.
- c. For services to support the issuance process and in accordance with the Subscription Agreement signed by the Parties, BSPL was entitled to receive a fee from BNI.

BNI has submitted an affiliated transaction report to OJK through Letter No. KMP/7/4096 dated 20 September 2021 concerning Affiliated Transaction Report.

Through the transaction mechanism and report disclosure, the Board of Directors stated that the above two affiliated transactions followed adequate procedures to ensure that affiliated transactions are carried out in accordance with generally accepted business practices and are carried out in compliance with the arm's length principle. The Board of Commissioners and the Audit Committee reviewed and approved the above affiliated transactions, and assured the above two affiliated transactions had gone through adequate procedures, and were carried out in accordance with generally accepted business practices, and complied with the arm's length principle).

There were no affiliated transactions carried out by BNI in 2021 that required approval from independent shareholders.

Significant Prohibition, Limitation and/or Restriction to Transfer Funds between the Bank and Other Entities in the Business Group

BNI provided funds to related parties amounting to Rp5.99 trillion in 2020. The provision of funds to related parties was still in accordance with the maximum threshold for lending in accordance with the POJK No. 32/POJK.03/2018 concerning the Legal Lending Limit (BMPK) for Commercial Banks, namely a maximum of 10% of the Bank's Capital. In 2021, BNI provided funds to related parties, namely BNI Asset Management of Rp3.4 trillion, and BNI Multifinance of Rp166 billion. Cumulatively,

BNI has conducted transactions with related parties based on the equitable and fair principles.

Total Bank Funds Provided to Related Parties up to December 2021

PERIHAL	VALUE (RP-BILLION)
Description	3,674
Capital	125,616
LLL (10% of Capital)	12,562
Over (Under) LLL	(8,888)

Types of Provision of Funds to Related Parties up to December 2021

RELATED PARTIES	TYPE OF PROVISION OF FUNDS	PROVISION OF FUNDS (RP-BILLION)
BNI Asset Management	Securities	3,401
BNI Multifinance	Loans, Bank Guarantees, Corporate Cards	166
BNI Life Insurance	Bank Guarantees, Corporate Cards	3
BNI Sekuritas	Bank Guarantees, Corporate Cards	0.4
Total Provision of Funds to Related Parties	Acceptance Bills	0.3
Capital	Individual Loans & Credit Cards	104
LLL (10% of Capital)		3,674
Over (Under) LLL		(8,888)

CHANGES TO LAWS AND REGULATIONS THAT SIGNIFICANTLY IMPACTED THE BANK

PBI No. 22/20/PBI/2020 dated December 22, 2020 concerning Consumer Protection (PBI Consumer Protection), and Bank Indonesia Board of Governors Regulation No. 23/17/PADG/2021 dated September 9, 2021 concerning Procedures for Implementing Bank Indonesia Consumer Protection (PADG Consumer Protection)

EXPLANATION OF CHANGES AND APPLICATION:

1. The Consumer Protection Principles include: equality and fair treatment, openness and transparency, education and literacy, responsible business behavior, protection of consumer assets against misuse, protection of consumer data and/or information, effective handling and resolution of complaints.
2. Operators are required to submit reports related to Consumer Protection to BI including:
 - a. Report on implementation plan education;
 - b. Report on education implementation; and
 - c. Report on handling and settlement of consumer complaints.
3. Operators are required to have a function for handling and resolving Consumer complaints.

IMPACT ON BNI:

BNI has submitted a report to BI and implemented Consumer Protection as stipulated in the PBI and PADG for Consumer Protection.

PBI No. 22/23/PBI/2020 dated December 29, 2020 concerning Payment System (PBI SP)

EXPLANATION OF CHANGES AND APPLICATION:

- The granting of a Payment Service Provider (PJP) license based on the license category consisting of:
 - license category one:** providing information on sources of funds; payment initiation and/or acquiring services; administration of Fund Sources; and remittance services;
 - license category two:** providing information on sources of funds; and payment initiation and/or acquiring services; and/or
 - license category three:** remittance services; and/or others determined by BI.
- Arrangements regarding activity development, product development, and/or cooperation including:
 - The categorization of the risk levels for of activity development, product development, and/or cooperation** including low risk, medium risk, and high risk;
 - If the risk **category is low**, the PJP is required to **submit a report** to BI, meanwhile if it meets the **medium or high risk category**, the PJP is **required to submit an application for approval** to BI;
 - Supporting documents** for fulfilling requirements for **submitting applications for approval** for development, product development and/or cooperation activities, including aspects of operational readiness, system security and reliability, risk management implementation, and/or consumer protection.

IMPACT ON BNI:

BNI as PJP is guided by the provisions as stipulated in the PBI SP.

PADG Bank Indonesia No. 23/3/PADG/2021 dated March 2, 2021 concerning amendment to PADG No. 22/3/PADG/2020 concerning Implementation of Competency Standardization in the Payment System and Rupiah Money Management (PADG SPPUR)

EXPLANATION OF CHANGES AND APPLICATION:

- Completion of guidelines for preparing competency-based training programs and material by the Ministry of Manpower, which has an impact on the need for adjustments to provisions regarding training materials in the payment system and rupiah money management; and
- Completion of competency standardization in the rupiah payment and money management system for non-bank fund transfer operators.

IMPACT ON BNI:

BNI has prepared competency standardization in the rupiah payment and money management system in accordance with PADG SPPUR.

SEOJK No. 12/SEOJK.03/2021 dated March 31, 2021 concerning Commercial Bank Business Plan

EXPLANATION OF CHANGES AND APPLICATION:

- Submission of Business Plans, Business Plan Realization Reports, and Business Plan Supervision Reports online through the OJK reporting system (APOLO);
- Adjustments to the financial report projection format to refer to the Integrated Commercial Bank Report;
- Adjustments to the format based on the latest supervisory needs, including changes in the ratio and types of business activities that are the focus of the credit plan (focusing on certain sectors and/or products); and
- Adjustments to the plan format for product issuance and/or implementation of new activities that are strategic in nature.

IMPACT ON BNI:

BNI has submitted the 2022 RBB in accordance with the SEOJK from OJK.

PBI No. 23/5/PBI/2021 dated May 25, 2021 concerning Monitoring System for Foreign Exchange Transactions against Rupiah, and PADG No. 23/11/PADG/2021 dated June 28, 2021 concerning Monitoring System for Foreign Exchange Transactions Against Rupiah

EXPLANATION OF CHANGES AND APPLICATION:

1. Bank Indonesia applies a Monitoring System for Foreign Exchange Transactions Against Rupiah (SISMONTAVAR) for:
 - a. foreign exchange transactions against rupiah conducted by Interbank for all foreign exchange transaction values against rupiah are conducted through the Foreign Exchange Transaction System;
 - b. foreign exchange transactions against rupiah conducted between Banks and Customers for:
 - spot transactions with a value of at least USD 250,000 or its equivalent;
 - derivative transactions with a minimum value of USD 1,000,000 or its equivalent.
2. Bank Obligations in applying SISMONTAVAR:
 - a. The Bank conducts Inter-Bank foreign exchange transactions against the rupiah between through the Foreign Exchange Transaction System are required by connecting the Foreign Exchange Transaction System with SISMONTAVAR;
 - b. The Bank's foreign exchange transactions against rupiah for customers, requires the Bank to connection its Foreign Exchange Transaction System and/or foreign exchange transaction support systems used in transactions with SISMONTAVAR. The foreign exchange transaction support system is the treasury system and/or settlement system used by the Bank.

IMPACT ON BNI:

BNI has connected the Foreign Exchange Transaction System against Rupiah with BI SISMONTAVAR.

SEOJK No. 16/SEOJK.04/2021 dated June 29, 2021 concerning the Form and Content of the Annual Report of Issuers or Public Companies (SEOJK Annual Report of Issuers)

EXPLANATION OF CHANGES AND APPLICATION:

1. Adjustments to the regulatory concept regarding information disclosure in the Social and Environmental Responsibility (SER) section of the Annual Reports of Issuers or Public Companies to accommodate the substance of the Sustainability Report content and improve the provisions regarding information disclosure in the Annual Reports of Issuers or Public Companies in accordance with the Asean Corporate Governance Scorecard criteria (ACGS);
2. The Annual Report contains an overview of important financial data, share information (if any), reports from the Board of Directors, reports from the Board of Commissioners, profiles of issuers or public companies, management analysis and discussion, Governance of Issuers or Public Companies, social and environmental responsibility of Issuers or Public Companies, audited annual financial reports, and statements from members of the Board of Directors and members of the Board of Commissioners on their responsibility for the Annual Report;
3. Information disclosed in the social responsibility section is a Sustainability Report as referred to in POJK No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.

IMPACT ON BNI:

BNI prepared the 2021 Annual Report with reference to the SEOJK Annual Report of the Issuer.

BI No. 23/6/PBI/2021 dated July 1, 2021 concerning Payment Service Providers (PBI PJP)

EXPLANATION OF CHANGES AND APPLICATION:

1. Activity development, product development, and/or cooperation are categorized according to risk levels consisting of: (1) low risk; (2) moderate risk; and (3) high risk;
2. PJP is required to submit a report on activity development, product development, and/or cooperation to BI, if the activity development, product development, and/or cooperation meets the low risk category, and must request approval if it meets the medium risk or high risk category;
3. PJP providing Funds Sources for administration activities in the form of electronic money issuance are required to record and place float funds as stipulated in PJP's PBI;

4. Obligations of risk management, security standards, information transparency to users, for PJPs that carry out administration activities of Fund Sources through issuance of APMK;
5. PJP is prohibited from: (1) accepting virtual currency used as a source of funds for processing payment transactions; (2) processing payment transactions using virtual currency as a source of funds; and/or; (3) linking virtual currency with payment transaction processing.

IMPACT ON BNI:

BNI has carried out the reporting and/or licensing to BI as stipulated in the PBI PJP.

POJK No. 12/POJK.03/2021 dated July 30, 2021 concerning Commercial Banks

EXPLANATION OF CHANGES AND APPLICATION:

1. POJK for Commercial Banks applies to conventional commercial banks, namely Banks with Indonesian Legal Entities (Bank BHI) and Branch Offices of Banks Domiciled Abroad (KCBLN) with arrangements for Representative Offices of Banks Domiciled Overseas;
2. To achieve the long-term goals of Bank BHI or KCBLN, Bank BHI or KCBLN must prepare a corporate plan for a period of 5 (five) years and submit it to the OJK;
3. A Digital Bank as a BHI Bank that provides and carries out business activities mainly through electronic channels without a physical office other than the head office, or using limited physical offices;
4. Bank BHI's office network consists of the Head Office (KP), Regional Offices (Kanwil), Branch Offices (KC), Sub-Branch Offices (KCP), Functional Offices (KF), and Overseas Offices, and to expand services to customers, Bank BHI can provide Electronic Banking Terminals (TPE);
5. Bank BHI can perform Banking Synergy, which applies to Bank BHI and commercial banks that carry out business activities based on sharia principles, including synergies:
 - a. Banks within the bank business group are:
 - i) Bank BHI as the holding company;
 - ii) Bank BHI as the executor for the holding company; or
 - iii) Bank BHI in a bank business group that is not a holding company or implementing a holding company, with Bank BHI or a commercial bank carrying out business activities based on sharia principles in the structure of a bank business group.
 - b. PSP in the form of Bank BHI with Bank BHI or commercial banks that carry out business activities based on sharia principles; and/or
 - c. Bank BHI as the holding company to non-bank financial services institutions as a subsidiary company.

IMPACT ON BNI:

1. BNI has submitted its Corporate Plan to OJK;
2. The Office Network Report submitted to OJK was suitable;
3. Banking synergy carried out by BNI refers to the POJK for Commercial Banks.

POJK No. 13/POJK.03/2021 dated July 30, 2021 concerning the Implementation of Commercial Bank Products

EXPLANATION OF CHANGES AND APPLICATION:

1. Bank products are grouped into:
 - a. Basic Bank Products: consisting of products, services, and/or fund raising services, fund distribution, and/or other simple activities;
 - b. Advanced Bank Products: consisting of products, services, and/or services other than basic IT-based Bank Products, related to the activities or products of financial service institutions other than banks, require approval or licensing from other authorities, and/or are complex.
2. The Bank shall include a plan for New Bank Products in the Bank Product Operation Plan (RPPB).
3. Mechanism for administering New Advanced Bank Products
 - a. Permission to go through a limited pilot project (piloting review);
 - b. Permission without going through piloting review;
 - c. Permission with notification (instant approval).

IMPACT ON BNI:

1. BNI has submitted the 2022 RPPB to OJK;
2. The licensing mechanism for New Advanced Bank Products refers to the RPPB that has been submitted to the OJK.

POJK No. 17/POJK.03/2021 dated September 10, 2021 concerning the Second Amendment to POJK No. 11/POJK.03/2020 concerning National Economic Stimulus as Impact of the Spread of Corona Virus Disease 2019 (POJK Stimulus COVID-19)

EXPLANATION OF CHANGES AND APPLICATION:

1. Conventional Commercial Banks (BUK) can implement policies that support economic growth stimulus for debtors affected by the spread of COVID-19 until March 31, 2023, which includes an assessment of asset quality based on the accuracy of payments for loan/financing with limits of up to Rp10 billion, determination of the current quality of restructured loans/financing, and determination of the quality of new loans/financing separately from existing facilities;
2. BUK can implement policies that support economic growth stimulus as a result of the spread of COVID-19, including stimulus:
 - a. Provision of Education funds less than 5% of the HC expenditure budget that was originally valid for 2020, 2021 and extended to 2022;
 - b. Determination of the Foreclosed Collateral (AYDA) quality by BUK obtained until March 31, 2020 based on the quality of the collateral taken at the end of March 2020, which was originally valid until March 31, 2022, now extended to March 31, 2023;
 - c. The regulation regarding BUK, including commercial banks with business activities 3 and 4, may fail to meet the capital conservation buffer of 2.5% (two point five percent) of risk-weighted assets, valid until March 31, 2022.

IMPACT ON BNI:

BNI has implemented a stimulus for debtors affected by COVID-19 with reference to the POJK Stimulus COVID-19.

PADG No. 23/25/PADG/2021 dated November 12, 2021 concerning the Implementation of Bank Indonesia-Fast Payment

EXPLANATION OF CHANGES AND APPLICATION:

1. Bank Indonesia-Fast Payment (BI-FAST) is a BI payment system infrastructure to facilitate retail payments that can be accessed at any time.
2. BI-FAST operations are carried out every day 24 (twenty four) hours a day from Monday to Sunday.
3. Services processed through BI-FAST include:
 - a. Individual Loan Transfer (ICT) Services; and
 - b. other services determined by the Operator.
4. In BI-FAST, participants perform liquidity management carried out by participants including the following:
 - a. Liquidity transfer;
 - b. Determination of liquidity limit threshold; and
 - c. Mechanism for supply and transfer of liquidity. Liquidity management is carried out in the Fund Settlement Account (RSD) and/or Fund Settlement Sub-Account (Sub-RSD) of each participant by taking into account the transaction needs of the relevant BI-FAST participants.

IMPACT ON BNI:

BNI as one of the banks participating in BI-FAST participation is guided the provisions as stipulated in the BI-FAST PADG.



PBI No. 23/16/PBI/2021 dated December 17, 2021 concerning the Third Amendment to PBI No. 20/3/PBI/2018 concerning Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, and PADG No. 23/27/PADG/2021 dated December 21, 2021 as the Seventh Amendment to PADG No. 20/10/ PADG/2018 concerning Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units

EXPLANATION OF CHANGES AND APPLICATION:

1. Addition of a demand deposit calculation component for the fulfillment of Statutory Reserves that uses the balance of the Bank's Rupiah Demand Deposit Account at BI-RTGS and BI-FAST Funds sourced from:
 - a. BI-RTGS system for Rupiah Demand Deposit Accounts; and
 - b. Bank Indonesia-Fast Payment system for BI-FAST Funds.
2. BI-FAST funds will be calculated as the basis for meeting the Statutory Reserves shall still refer to the working day cut-off when BI operates the BI-RTGS system.
3. Changing the term "giro service" to "remuneration".
4. Exemption of sanctions on the obligation to fulfill the Statutory Reserves for Conventional Commercial Banks (BUK), Sharia Commercial Banks (BUS), and Sharia Business Units (UUS) that are BI-FAST participants and have provided BI-FAST Funds. The exemption is valid from December 21, 2021 to January 2, 2022.
5. Provisions regarding the fulfillment of Statutory Reserves based on the balance of the Rupiah Demand Deposit Account at BI-RTGS and BI-FAST Funds shall come into force on January 3, 2022.

IMPACT ON BNI:

BNI is guided by the regulation for fulfillment of Statutory Reserves based on the balance of the Rupiah Demand Deposit Account at BI-RTGS and BI-FAST Funds effective on January 3, 2022.

PBI No. 23/17/PBI/2021 dated December 17, 2021 concerning the Third Amendment to PBI No. 20/4/PBI/2018 concerning Macprudential Intermediation Ratios and Macprudential Liquidity Buffers for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units

EXPLANATION OF CHANGES AND APPLICATION:

1. Addition of a demand deposit calculation component for the fulfillment of Current Accounts RIM or Sharia Current Accounts RIM to use the balance of the Bank's Rupiah Current Accounts at BI-RTGS and Bank Indonesia-Fast Payment Funds sourced from:
 - a. BI-RTGS system for Rupiah Demand Deposit Accounts; and
 - b. Bank Indonesia-Fast Payment system for Bank Indonesia-Fast Payment Funds.
2. Calculation of fulfillment of Current Accounts RIM or Sharia Current Accounts RIM is carried out at the end of the day, namely the closing time of the BI-RTGS system operation.
3. Addition of Bank Indonesia-Fast Payment Fund data in articles related to the calculation period for Current Accounts RIM or Sharia Current Accounts RIM and articles on corporate actions, namely merger and consolidation and separation of UUS from BUK.
4. Imposition of sanctions for Conventional Commercial Banks (BUK), Sharia Commercial Banks (BUS), and Sharia Business Units (UUS) violating the obligation to fulfill RIM or Sharia RIM Current Accounts, except for BUK, BUS, and UUS that are Bank Indonesia - Fast Payment participants and have provided Bank Indonesia-Fast Payment Funds. The exemption from the imposition of sanctions is effective from December 21, 2021 until January 2, 2022.
5. Provisions regarding the fulfillment of RIM Demand Deposits or Sharia RIM Current Accounts that have taken into account Bank Indonesia-Fast Payment Funds shall come into force on January 3, 2022.

IMPACT ON BNI:

BNI is guided by the arrangements related to fulfillment of RIM's Current Account which has taken into account the BI Fast Payment Fund which is valid on January 3, 2022.

CHANGES IN ACCOUNTING POLICIES AND THEIR IMPACT ON THE BANK

Amendment to PSAK 1: Presentation of Financial Statements

Explanation of Changes in Applicable Accounting Policies	: Annual PSAK 1 Admentment removes paragraph 123(a) and adds paragraph 123(d) with respect to judgments made by management in the process of applying the entity's accounting policies that could significantly affect the amounts recognized in the financial statements. In addition, this Amendment also adds paragraph PI05A in the Implementation Guidelines (PI)
Impact on BNI	: This amendment does not have a significant impact on BNI & its subsidiaries as its implementation BNI refers to the Chairman of Bapepam-LK Decree, namely Regulation No. VIII.G.7 that regulates the structure of the financial statements of Issuers listed on the Indonesia Stock Exchange.

Amendment to PSAK 22: Business Combination

Explanation of Changes in Applicable Accounting Policies	: This amendment to PSAK 22 clarifies the definition of business with the aim of assisting entities in determining whether a transaction should be accounted for as a business combination or an asset acquisition.
Impact on BNI	: This amendment does not have a significant impact on BNI & its subsidiaries as BNI's accounting policies are already relevant to this amendment.

Amendment to PSAK 48: Impairment of Asset Value

Explanation of Changes in Applicable Accounting Policies	: The Annual PSAK 48 Amendment describes a change in the scope of impaired assets and the write-off of differences with IFRS regarding the difference with paragraph 04(a) of IAS 36.
Impact on BNI	: This amendment does not have a significant impact on BNI & its subsidiaries as BNI's accounting policies are already relevant to this amendment.

PSAK 112: Accounting for Waqf

Explanation of Changes in Applicable Accounting Policies	: This PSAK 112 Amendment regulate the accounting treatment for waqf transactions carried out by both nazhir and wakif by organizations or legal entities. Under this provision, wakif recognizes the delivery of waqf assets as an expense in profit/loss, except for temporary waqf which is presented in an asset account & is restricted in use.
Impact on BNI	: This amendment does not have a material impact on reporting nor has a substantial impact on the accounting policies of BNI & its subsidiaries.

Amendment to PSAK No. 71: Financial Instruments, Amendment to PSAK No. 55: Financial Instruments: Recognition and Measurement, Amendment to PSAK No. 60: Financial Instruments: Disclosures, Amendment to PSAK No. 62: Insurance Contracts and Amendment to PSAK No. 73: Leases

Explanation of Changes in Applicable Accounting Policies	: This amendment describe changes to Benchmark Interest Rate Reform - Phase 2. This amendment allows entities to reflect the effects of transitions from benchmark interest rates, such as Interbank Office Rates (IBORs) to alternative benchmark bank rates without causing an accounting impact that do not provide useful information for financial statement users.
Impact on BNI	: The Bank currently has a number of contracts that refer to USD LIBOR and are valid until later than 2021. The Bank has determined an alternative reference interest rate to replace LIBOR following the recommendations of the working group for each currency. The risks arising from the transition relate primarily to the potential impact of interest rate differences if the related debt and swaps do not switch to the new benchmark interest rate at the same time and/or the interest rate moves by a different amount. Management will continue to monitor this matter and take necessary actions to address related risks and uncertainties in the future.

Information on Business Continuity

MATTERS WITH THE POTENTIAL TO HAVE A SIGNIFICANT IMPACT ON THE BUSINESS CONTINUITY IN 2021

During 2021 BNI did not have any potentially significant matters that could effect affect business continuity. Despite the changes in global conditions that affected the national economy and the banking industry during the COVID-19 pandemic, BNI could anticipate this by instigating the appropriate strategic initiatives so that business continuity could be well maintained, and this has been reflected in its good financial and non-financial performance. Based on these conditions, in 2021 and beyond, BNI will not face any problems related to business continuity.

MANAGEMENT ASSESSMENT ON MATTERS WITH SIGNIFICANT INFLUENCE ON THE BUSINESS CONTINUITY

BNI continuously evaluates the Bank's future business continuity, supported by BNI's current resources. The management assessment is carried out by considering various factors including an analysis of financial and non-financial conditions. This analysis is reflected in the Bank's Health Level assessment. Based on the assessment results, there were no matters with a significant effect on business continuity.

ASSUMPTIONS USED BY MANAGEMENT IN PERFORMING THE ASSESSMENT

Several assumptions taken into consideration by BNI when conducting its business continuity assessment included:

1. BNI's financial system stability experienced an improving trend in line with the gradually improving national economic conditions;
2. BNI's health level has a composite rating of 2 (two) reflecting the Bank's general **healthy** condition meaning it is considered capable of facing significant negative effects from changes in business conditions and other external factors;
3. Good Corporate Governance (GCG) was ranked 2 (two) indicating the Bank's Management has implemented **good** corporate governance.

Credit Risk Management

Economic uncertainty in 2021 as a continuation of the COVID-19 pandemic will have a significant impact on the domestic economy and affect the performance of the banking industry. To deal with this present situation, banks continue to prioritize prudent principles for managing business risks and credit portfolio. BNI's strategy comprised providing loans to customers with good credit quality, applying a very prudent credit process and stringently implementing loan monitoring.

2021 Strategy and Policy

BNI consistently seeks to maximize a sustainable loan risk management policy and strategy. Through the Credit Risk Unit, BNI applied a Credit Risk Management policy and strategies to safeguard the Bank's sustainable loan growth during the Covid-19 pandemic in 2021, which generally begins with the loan disbursement process flow, loan monitoring, up to loan settlement and recovery.

Pipeline Determination and Credit Analysis

In the Business Banking segment, BNI has made improvements to the loan process flow in the Corporate, Medium and Small Business segments. Improvements made to the Corporate and Medium Segments include:

1. Sharpening Business Unit Functions in planning prospect lists, marketing, overall feasibility assessments (including first way out and second way out analysis) and debtor monitoring;
2. Sharpening the function of the Risk Unit in conducting loan risk analysis (deep dive) and identification-mitigation/risk control, as well as analyzing and monitoring information related to loans and industries debitur.

Improvements made to the Small segment include:

1. Relationship Manager (RM) performs prospect list planning, marketing, performs a thorough creditworthiness analysis (including first way out and second way out analysis) and debtor monitoring;
2. RM supervisor, in addition to having a supervisory function, also functions to carry out a more comprehensive loan risk assessments;
3. The Head of the Risk Unit is involved in the pipeline management process, providing input during the loan process, as a validator in the electronic Loan Origination (eLO) system, kredit produktif s.d. Rp3 miliar (di luar KUR dan BWU) being a credit breaker on the committee according to their authority and performing loan monitoring/monitoring functions.

In initiating quality loan growth, the Credit Risk Unit applies Credit Risk Management as its main strategy including:

1. Credit Risk Analysis:
 - a. Balancing the role of business units (SRM and RM) in the Credit Committee;
 - b. Optimizing the role of the risk unit in the four eyes principle.
2. Credit Risk Review:

Conducting periodic reviews initiated by risk unit leaders at Branch, Regional and Head Office levels to sharpen loan quality mapping followed by action plans and action steps.
3. Credit Operation
 - a. Ensuring all fixed asset collateral has been perfectly bound to safeguard the interests of BNI;
 - b. Ensuring the completeness of loan documentation has been running according to the provisions;
 - c. Evaluating the performance of partners profesi.

BNI ha instigated efforts to improve the business banking loan quality in 2021, including the following:

1. Improving risk culture through end-to-end transformation of loan processes and restructuring of non-performing loans through:
 - a. Improving the Pipeline Management process by setting Industry Risk Appetite, Risk Acceptance Criteria and Loan Exposure Limits.
 - b. Developing the Underwriting Process by refining the Credit Committee process in the aspects of authority, membership structure and participation of the Divisions, optimization of the loan origination system and risk assessment tools; and increasing the depth of loan analysis.
 - c. Strengthening the Monitoring Process through disciplined, intensive loan monitoring, as well as optimizing the use of monitoring tools (Early Warning System, Watchlist, and Credit Risk Review)
 - d. Strengthening Loan At Risk (LAR) Management by establishing an LAR Team Organization, LAR Management Foundation and effective LAR Management
 - e. Enhancing the loan risk analytics, through sensitivity analysis and stress testing of loan portfolios affected by Covid-19), review of loan risk methodology and risk-based pricing
 - f. Changing the credit administration function to credit service
2. Improving the capability of Relationship Manager and Credit Risk Manager (CRC/CRM)
 - a. Improving understanding of Corporate Credit Risk Managers (CRC) in line with the specialization of the managed industry in the Corporate Segment.
 - b. Improving the competence and risk awareness of CRC and CRM through training and certification as well as equipping them with adequate market information.
 - c. Improving the effectiveness of Smart Projects (Smart CA, PACE and EWS)

BNI continues to evaluate and improve as well as develop systems and processes to improve the quality of loans disbursed and managed. In the Small Business segment, particularly in the distribution of People's Business Loans (KUR) and BNI Wirausaha (BWU), and BMC up to Rp3 billion, the eLO system supports the acceleration of the loan process. The eLO system continues to be developed, by calibrating the scoring parameters and debtor analysis in line with business needs. In addition to these improvements and developments, pipeline management by RM, and the supervisory function of the direct supervisor are consistently carried out.

BNI has also strengthened the four eyes principle in all lines of loan processing units up to loan decision making through a credit committee consisting of loan severing officers, for both business and risk streams, in accordance with their authority, aimed at maintaining the quality of loans disbursed.

The loan keputusan process is also supported by a loan advisory function that involves the legal unit, compliance unit and loan operations. For loan proposals with a certain limit, it is necessary to conduct loan consultations with the Board of Commissioners.

For consumer loans, risk management continues to be comprehensively and prudently applied as well as continuously improved.

1. Establishing the BNI Griya policy and program to support expansion in segments with low risk, namely employees of selected institutions (SOE/BHMN/ROE, PTN, CASN/ASN, TNI/POLRI, Regulator, Higher Institutions/Government Agencies), payroll customers, Emerald customers, existing borrowers, and selected developers.
2. Establishing policies and programs to support BNI Credit Card's expansion, focusing on SOE, Government institutions, private multinationals, existing customers, higher learning, selected professionals, or applicants that have been customers of BNI for at least six months.
3. Establishing policies and programs to support BNI Fleksi loan expansion to selected partners (Payroll: SOE/ ROE, Government Institutions, Existing Customers, Higher Learning, Private Sector, Retirees).
4. Establishing special policies pertaining to loan expansion during the Covid-19 pandemic period by expanding to selected customers with historically low risk and avoiding sectors that have been affected throughout the pandemic.
5. Differentiating special products to deal with the effects of the Covid-19 pandemic such as the BNI Griya and BNI Fleksi New Normal Program by providing a Principal Grace Period throughout a certain timeframe for selected customers.
6. Optimizing applications to detect risks of fraud or bad incoming applications (Credit Loss Prevention System).
7. Issuing Corrective Action Policy for branches with the highest NPL.

In the event there is a portfolio of non-performing loans in the Corporate, Medium, Small, and Consumer segments, BNI makes efforts to save loans, through collection, remedial (restructuring) and/or recovery activities.

In addition, to avoid corrupt and nepotism (KKN) practices, including gratification in the lending process, BNI has strengthened the Integrity Pact by requiring debtors or prospective debtors to sign an Integrity Pact before signing a loan agreement (PK).

In managing loan risk, BNI continues to make improvements by:

1. Preparing electronic Company Guidelines (e-PP) for loan disbursements;
2. Monitoring the maximum credit limit or LLL and House Limit for large debtors;
3. Applying PSAK 71 in the context of loan risk reserves or CKPN.

Credit Monitoring

BNI monitors the debtor's loans and industry conditions as well as intensively carries out loan collection so as to create quality asset growth. This type of monitoring is carried out to observe the business conditions both indirectly (online) as well as directly, if needed, if they are continuing to adhere to the health protocols, reviewing the debtor's loan eligibility, and monitoring the debtor's loan payment obligations. In principle, this loan monitoring process is based on an assessment of the 3 (three) pillars within the OJK provision on productive asset quality.

In the Business Banking segment, the monitoring process uses a watchlist system, used to monitor the debtor's loan performance and determine the steps needed to prevent the debtor's credit quality deteriorating. BNI also has an Early Warning System (EWS) berbasis web yang merupakan alat monitoring untuk memprediksi kecenderungan debitur Kualitas Kredit Lancar (Golongan 1) menjadi bermasalah dalam kurun waktu 3 (tiga) s.d. 6 (enam) bulan ke depan in place to determine the actions needed to handle the debtors to ensure the credit quality does not deteriorate.

Meanwhile, loan monitoring in the consumer segment is carried out by:

1. Segmenting billing based on credit card behavior score, i.e. historical analysis of transactions and payment of debtor bills.
2. Prioritizing billing based on institution segmentation warning lists for BNI Fleksi.
3. Increasing collection productivity through the Performance Collection application for consumer loan products at centers and branches.

4. Special monitoring for large debtors (maximum credit of more than Rp1 billion).
5. BNI Fleksi and Griya credit monitoring strategies
 - a. Submitting increases in loan quality to centers/branches
 - b. Adjustments to debtor due dates based on payment behavior
 - c. Delivering pending buyback guarantee list to related developer
6. Credit card monitoring strategies, through SMS Blast, letters, visits and telephone calls.

Loan Settlement and Recovery

To strengthen BNI's financial fundamentals and maintain loan quality, efforts to handle non-performing loans are carried out optimally, coupled with a prudent increase in the coverage ratio. In this case, these include loans that has been written off, efforts are also being made to maximize the settlement to minimize the Bank's losses. Efforts to handle non-performing loans are generally taken through two strategies, namely loan recovery and debt settlement.

Loan Recovery is carried out through:

1. Restructuring (Restructuring, Reconditioning, Rescheduling) of debtors that face difficulties in paying their debts but continue to have the prospects and are deemed cooperative;
2. Instalments/Repayment through strategic investors;
3. Voluntarily selling collateral or execution of mortgage rights (including through auction).
4. Kerja sama dengan pihak ketiga untuk meningkatkan efektifitas upaya penyelamatan kredit, baik dengan advisor maupun konsultan hukum.
5. Making efforts to apply a "non-conventional" scheme within the context of recovering problem loans and improving loan quality.

Whereas, a Credit Settlement Strategy is applied to debtors who are considered to have no prospects, including:

1. Credit settlement through strategic investors;
2. Voluntarily sell collateral or execution of mortgage rights (including through auction);
3. Strengthening digitalization by enhancing the BNI Auction Collateral website and application enabling it to be accessed by the general public, to expand and optimize the marketing of non-performing loan collateral;
4. Cooperation with third parties to maximize loan settlement efforts, including with Law Enforcement Officials, advisors, legal consultants;

5. Legal actions through collections towards guarantors over a personal guarantee (PG) and company guarantee (CG), litigation, bankruptcy and civil suits.
6. Efforts to apply a “non-conventional” scheme so as to accelerate the settlement of non-performing loans and improve the chances for a recovery in order to minimize the Bank’s losses.

The handling of distressed loans for consumer loans is carried out through two strategies, namely loan recovery and settlement. The loan recovery and settlement strategy carried out includes:

1. Asset Quality Improvement and Recovery Acceleration Program (PPKA) for debtors facing difficulty fulfilling their obligations but still possess the prospects and are deemed worthy through restructuring and/or special discounts;
2. Consumer Loan Asset Quality Improvement & Recovery Acceleration Program specifically for debtors affected by Covid-19.
3. Optimizing use of buyback guarantee (BNI Griya) and Collateral Website Auction.
4. Optimizing Legal Action Collection (simple suit, Cessie, summons, bankruptcy, and JPN).
5. Loan settlement through NPL debt transfer and write-off (cessie-transfer or sale of bank claims towards debtors or other parties in accordance with the criteria determined by the Bank).
6. Loan settlement through third party cooperation in the sale of distressed collateral assets (Property Agents).

Credit Risk Management Performance in 2021

Through the LaR Management Optimization Team, BNI's loan quality was successfully maintained and improved. Until December 2021, BNI's Gross NPL ratio improved compared to the end of 2020, from 4.25% to 3.70% or by 0.60%. The same can be seen in the LaR ratio (incl. COVID-19) that improved by 5.40% (YoY) from 28.7% in December 2020 to 23.3% in December 2021. With the improvement in loan quality, BNI also recorded a decline in allowance for loan losses of 17.0%.

Credit Risk Management Strategy and Work Plan for 2022

BNI continues its loan quality improvement program by enhancing the risk culture through an end to end credit process transformation program, including a more optimal LAR management strategy. In addition, BNI will continue to intensify the 2021 program, optimize risk management and discipline in the loan process to improve asset quality. For 2022 the Corporate, Medium and Small segment plans additional initiatives as follows:

1. Further development of pipeline management by adding environmental, social and corporate governance (ESG) factors to the industry's risk appetite and risk acceptance criteria;
2. Developing the underwriting process, to include:
 - a. Adding an assessment of the fulfillment of the ESG criteria;
 - b. Enhancement of Credit Application Devices (PAK) based on Smart CA and digital solutions for verification in the form of PACE (Package of Accurate, Convenient and efficient recasting) tools;
 - c. Enhancing of the scoring with IDEAS by using Machine Learning Models, Transaction Behavior, and external data;
 - d. Building a Loan Origination System by integrating all applications in an end-to-end loan process in collaboration with BCG consultants.
3. Strengthening the Monitoring Process by optimizing the use and development of single integrated monitoring tools in collaboration with BCG Consultants (integrating Early Warning System, Watchlist, LaR Zoning, Credit Risk Review and IRS) and using Moody's EWS for the corporate segment as an initial screening to take action against the current condition of the debtor;
4. Strengthening Loan at Risk (LaR) management by implementing 4M (mapping, reducing, avoiding and controlling), strengthening account handovers and accelerating the reduction of LaR with non-conventional efforts.

In addition, BNI continues to develop a backup strategy adjusted to the debtor's risk profile.

The plan and strategy to improve credit quality in the consumer segment in 2022 includes:

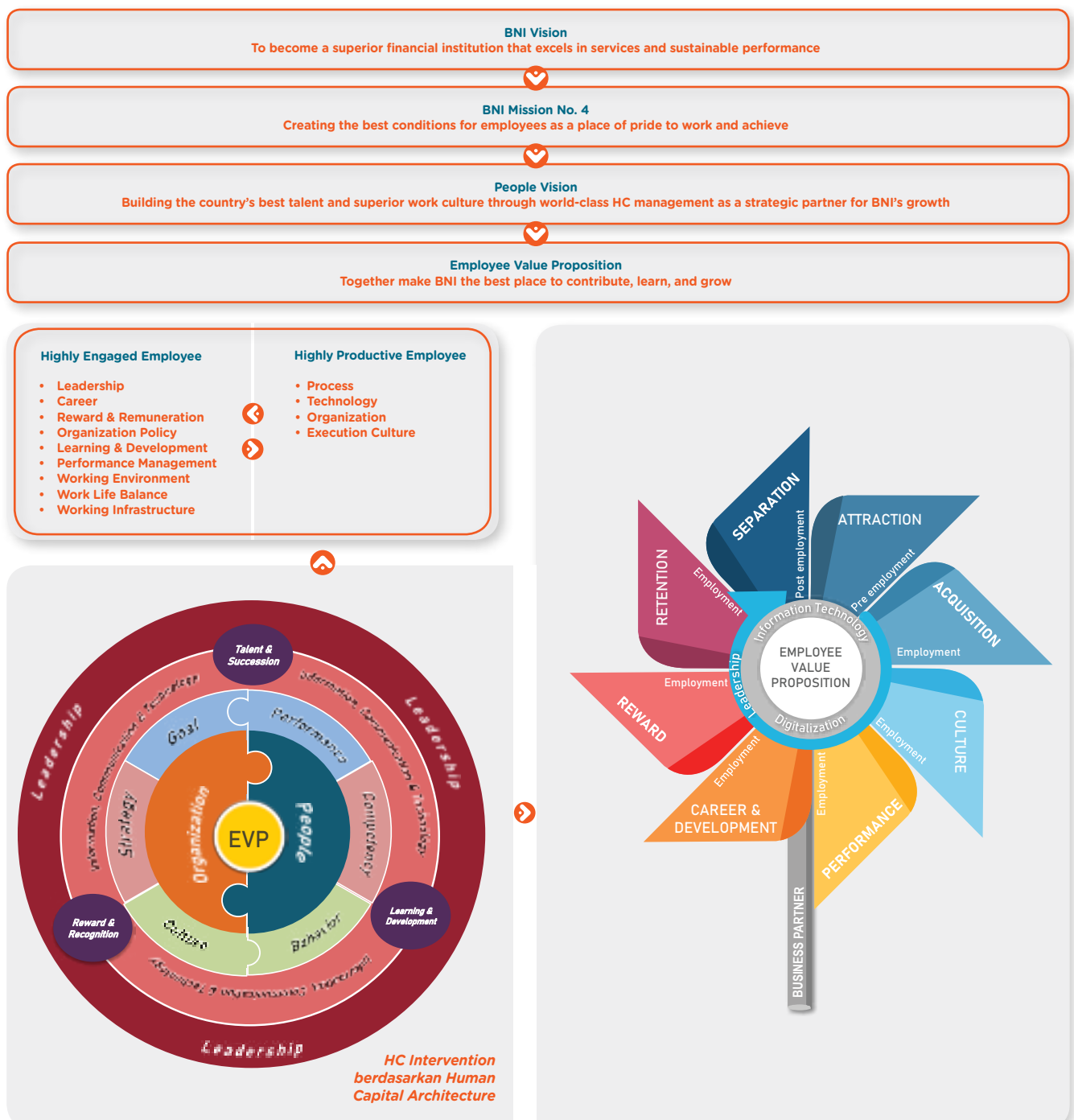
1. Increasing selective business expansion through:
 - a. BNI Griya's expansion focused on highly selected developers based on a developer-rating determination and on selected end users based on the the classification of institutions or industrial sectors;
 - b. The focus of BNI Fleksi Active expansion is on selected institutions based on the determination of the classification of institutions or industrial sectors;
 - c. Improvement of BNI Fleksi Pensiun and Credit Card business through pre-assessment by utilizing customer leads.

2. Improving the risk culture through end-to-end transformation of loan processes and restructuring of non-performing loans
 - a. Simplification of the BNI Griya & BNI Fleksi Credit Process (Regular and Instant Approval) and determination of Risk Acceptance Criteria (RAC) based on developer rating, classification of institutions or industrial sectors;
 - b. Monitoring of binding collateral through a centralized Collateral Alert Decision System (CADS) application.
3. Optimizing Remedial Recovery efforts through:
 - a. Special scoring for debtors in arrears, for rescue actions and loan settlement
 - b. Monitoring new accounts based on the Pareto segmentation of potential arrears (High, Medium, and Low Risk)
 - c. Optimizing recovery in collaboration with third parties (dhi. collection agency)
 - d. Accelerating auctions based on the classification of potential collateral (quadran approach)
4. Strengthening digital capability through innovation:
 - a. Developing Loan Origination System (LOS) interface and enhancement of Digital Verification capability for consumer loans;
 - b. Improving Voice Blast and IVR capabilities with the latest technology (OMNI Channel-based PABX), as well as Collection Robot.
5. Maximizing the strategies implemented in the previous year as follows:
 - a. Optimizing Legal Action Collection (simple lawsuits, Lawyer Summons, cessie, bankruptcy and Attorney);
 - b. Extending Asset Quality Improvement and Recovery Acceleration Program (PPKA) for debtors who have difficulty meeting their obligations but still have prospects and are considered feasible.

Human Capital Management

HUMAN CAPITAL FRAMEWORK

System Thinking is used as a framework in preparing the foundation for human resource management at BNI to support the realization of BNI's vision to become a Financial Institution that excels in Services and Performance in a Sustainable manner. This framework explains thoroughly the management of Human Capital at BNI, including its alignment with BNI's Vision and Mission.



BNI's Human Capital Architecture illustrates all policies. Initiatives and programs related to human capital management must be aligned with the Employee Value Proposition (EVP), namely, "Together make BNI the best place to contribute, learn and grow. Organizations and individuals are shown as interrelated and inseparable entities, organizations with goals to be achieved, strategies to achieve goals, organizational culture as a guide to behaviour. Meanwhile, people (individuals) are expected to perform according to the corporate goals, competencies in line with the strategy, and behavior aligned with culture. All of these can be achieved with the support of a talent development system, a capability development system, and appreciation for the contributions that have been made with the support of leadership and technology as the main infrastructure.

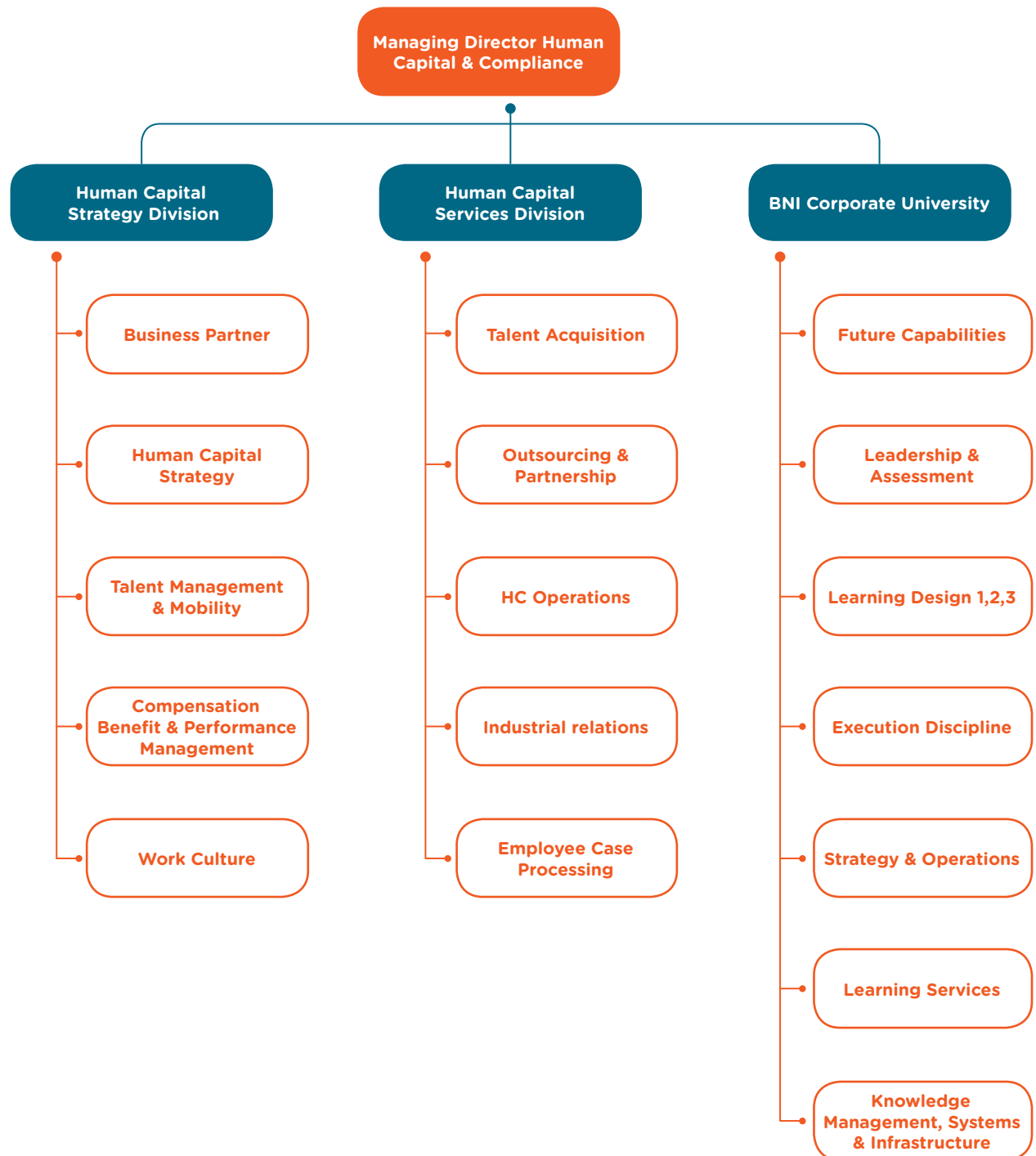
Furthermore, the End to End BNI Human Capital Framework describes the comprehensive human capital management based on the employee life cycle while still based on Human Capital Architecture and EVPs as the estuary. The establishment of this framework aims to illustrate that BNI's human capital management policy covers employees before they join (pre-employment) to when they leave the Company (post-employment). The three main components in the framework include:

1. Talent Life Cycle, like a Ferris wheel symbolizing the employee life cycle starting from talent attraction to talent separation, Human Capital policies including talent attraction, talent acquisition, culture, performance, career & development, rewards, retention, to talent separation;
2. Business Partner, like a stick showing the role as a business partner bringing Human Capital policies to each of their managed units as part of their role as a strategic partner;
3. Leadership is the force that drives the Ferris wheel, showing that each leader is a Human Capital Leader who assures the human resource management policies.

In line with the corporate transformation initiative, HC management is also carried out by preparing a Human Capital management blueprint aligned with the Bank's strategy to encourage sustainable transformation success. The HC Blueprint is part of BNI Transformation and consists of Strategic Directions, Programs, and Enablers that support BNI's HC Architecture.

BNI Human Capital Management Organization Structure

BNI's Human Capital Management is part of the Human Capital and Compliance Sector, led by the Managing Director of Human Capital and Compliance. There are 3 (three) divisions that manage Human Capital at BNI, namely the Human Capital Strategy Division, with the authority to determine HC-related policies and play a role as a strategic partner for the unit. The Human Capital Services Division, with authority to carry out the operationalization HC-related policies, and the BNI Corporate University, with the primary role of developing employee capabilities.



Employee Profiles

Information about employee profiles can be found in the BNI Profile section of this Annual Report.

Realization of Human Capital 2021 Program

The impact of the COVID-19 pandemic in recent years was still being felt in 2021 and created complex challenges for people worldwide, including Indonesia. This spurred the Company to carry out New Way of Working initiatives to stimulate business growth supported by technological developments and greater attention, especially from the Human Capital sector, to ensure the Bank's productivity was maintained without neglecting the health and safety factors for all employees.

BNI believes that Human Capital plays a crucial role in line with the view that Human Capital is the biggest asset that contributes to the Company's success; therefore, BNI's Human Capital management strategy has become the foundation in supporting BNI's strategy. Thus, in 2021 as BNI's response to the pandemic, BNI continued the process of adjusting its Human Capital management strategy to maintain Healthy & Productive Employees, with employee health being the main focus, and taking preventive and curative actions to deal with COVID-19. For example, by implementing and socializing health protocols in the Work Units, providing vaccines, periodic Covid tests, monitoring employee daily health self-checking through the Digi-HC system, carrying out work using a split operation system, working from home, providing care assistance for employees affected by COVID-19 both preventive and curative, providing halfway houses as a place for self-isolation, and developing technology-based tools to support employee productivity, such as Digital Human Capital (Digi-HC) and Learning Management System - BNI Smarter.

HUMAN CAPITAL IMPLEMENTATION STRATEGY 2021

Workforce Planning & Recruitment

In 2021, the workforce planning strategy aimed to ensure employees' availability in functions aligned with BNI's strategy. To ensure the fulfillment of HC needs in line with BNI's business strategy, the recruitment strategy was also carried out through various programs, including

the Officer Development Program (ODP) and Assistant Development Program (ADP) in 2021. This recruitment aimed to maintain talent sustainability both for current and future business needs.

In 2021, BNI recruited 351 employees through the ODP channel. BNI also strengthened the talent acquisition mechanism by perfecting the ODP General policy and opening new ODP channels, including ODP Information Technology, ODP Data Analytics, ODP Digital, and the ODP Global Analyst Program.

In addition to recruiting fresh graduates as prospective employees, BNI also expanded its sourcing channel by targeting students who have a high potential to join BNI. The Early Recruitment Program (ERP) is a special recruitment program carried out at predetermined universities to attract candidates from the best universities. This program offers scholarships to outstanding students, and after a series of rigorous selection processes and after graduation, the participants will immediately join ODP BNI. In 2021, 19 students from universities in Indonesia became ERP participants.

As part of BNI's mission to increase awareness and responsibility of the environment and society, BNI in 2021 remained committed to holding the BNI Bina Apprenticeship Program to provide training and work guidance to the inexperienced workforce through knowledge, skills, and abilities required to compete in the business world. The number of Bina BNI internships in 2021 was 4,671, spread across all BNI operational areas.

As well as the Bina internship program, BNI Corporate University also runs an internship program that collaborates with the campus ecosystem to provide opportunities for students to gain knowledge, hone and deepen the digital skills currently acquired on campus to suit the banking industry, especially for BNI, and others, through the BNI Digital Talent Internship program and other internship programs. Through the BNI internship program initiated by Corporate University, 566 people joined BNI through the Certified Student Internship.

1. Ceritifed Student Internship Program (PMMB) from The Indonesian Human Capital Forum (FHCI) from Ministry of State-Owned Enterprise).
2. Digital Internship Program Graduates Digital Talent Scholarship (DTS) 2020 from the Ministry of Communication & Informatics.
3. Ministry of Education, Culture, Research & Technology; 'Kampus Merdeka' Internship Program.
4. BNI Digital Bootcamp Malang Internship Program, and
5. Individual Internship Programs.

Preparing Employee Capabilities to Face the Present and Future Challenges

The capability development framework implemented at BNI focuses on the learner as the learning center. Employees actively identify and discuss development opportunities with superiors as part of the Individual Development Plan.

To provide learning solutions to increase BNI employees' capabilities, BNI Corporate University delivers learning facilities and infrastructure, including:

1. Learning Program, a learning journey designed to develop BNI employee competencies in the fields of business, leadership, and future capabilities;
2. Learning modules in various formats such as e-books, podcasts, bite-size video learning, e-learning, and gamification;
3. BNI Learning Wallet (BLW), a form of freedom to determine learning through individual learning budgets;
4. Learner's Virtual Assistant (LeVA), an artificial intelligence-based chatbot application that can be accessed by voice and typing commands;
5. BNI Expert Locator, a learning process by connecting BNI internal resource persons who have expertise in various fields with students through communication access that can reach various locations to accelerate the transfer of knowledge process;
6. Daily learning for employees through the DEEP46 program (Daily Exercise for Employee Program 46) in the form of bite-sized modules and questions in various themes tailored to the employee position;
7. BNI Corpu Knowledge Supplement, a knowledge sharing through the BNI CorpuTV YouTube channel;
8. Learning Management System (BNI Smarter), a personalized one-stop learning solution to help employees in their learning activities, starting from identifying competency gaps, required learning marketplaces, and recording employee development gap-fulfillment activities.

BNI Smarter is a Learning Management System application that provides all employee learning needs, including attendance, module access, recording study hours, learning points, and evaluating the learning obtained.

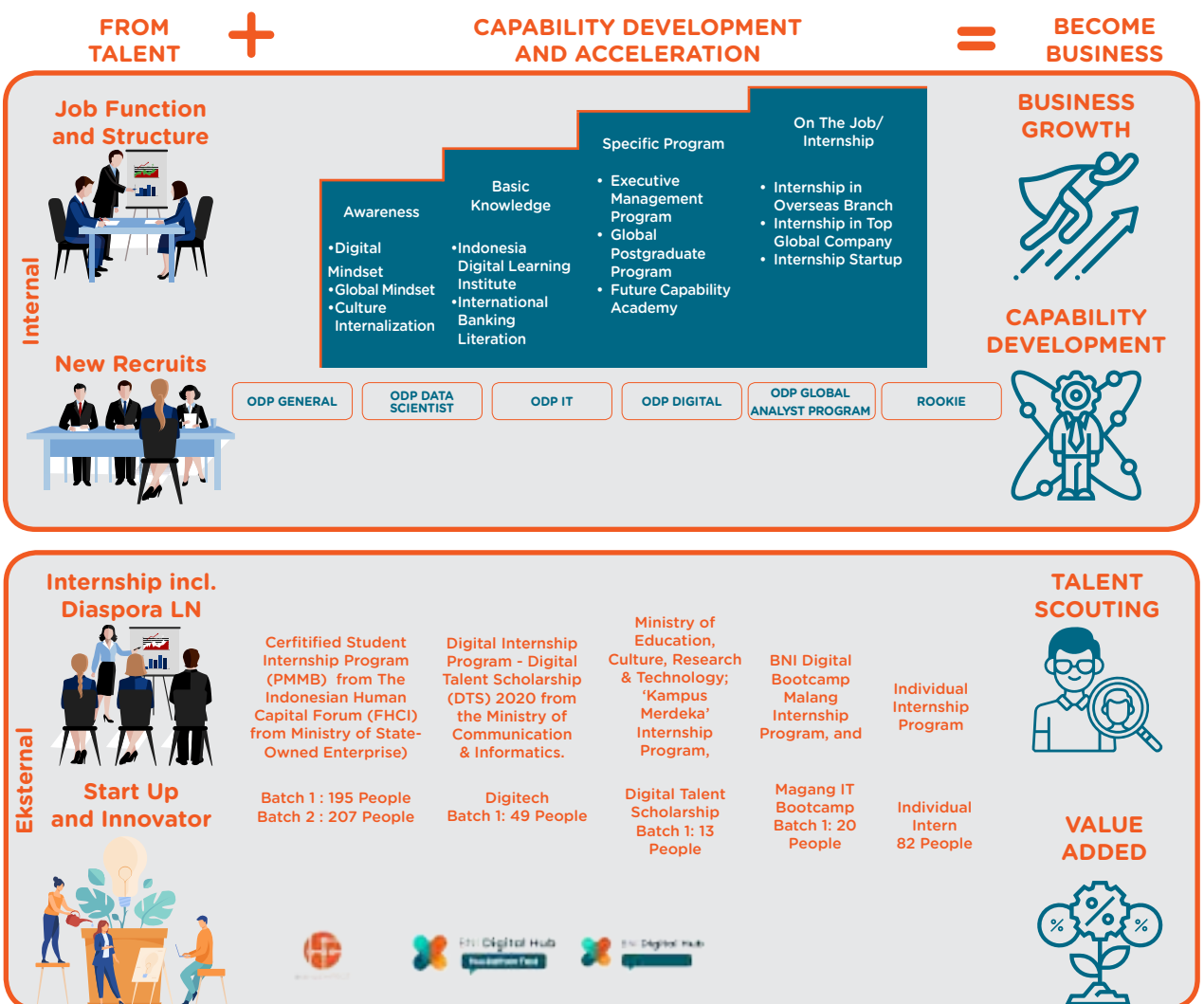
As a form of responsibility commitment for BNI's future capabilities, in 2019, BNI Corporate University established the Future Capability Academy to organize learning programs that can equip BNI Hi-Movers in responding to future challenges, particularly related to digital capabilities and information technology.

The initial intervention from the Future Capability Academy was to change the mindset through a digital transformation mindset program to prepare the employee to support BNI's Transformation. The digital transformation mindset learning program initiative includes the Game Digital Transformation Mindset Learning Game and webinar series. This learning can be accessed through the BNI Corpu TV YouTube channel to reach the employee massively. The digital transformation mindset program aims to make BNI Hi-Movers have learning agility, data influence, innovation, collaboration, and a human-centered mindset.

BNI Corporate University also participated in the BUMN Making Digital Talent program, called Indonesia Digital Learning Institute/IDLI, for instance, Making Digital Talent Program from the Ministry of State-Owned Enterprise (SOE). In 2021, 658 talents participated in the IDLI ready digital assessment, 156% higher than the 2021 target of 1% of the total number of BNI and subsidiary companies employees. This program will continue into 2022 by increasing the target of the BUMN digital talent pool to 5% of the total number of BNI and subsidiary companies employees.

For hard skills development related to the future skill, a series of capability development for upskilling and reskilling has been conducted in the area of Data Analytic&Scientist, Agile Scrum, Digital Product Management, User Interface / User Experience, Digital Marketing, Digital Ecosystem, Strategic Partnerships through Mergers and Joint Ventures, as well as Information & Technology.

BNI Corporate University played an active role in the digital talent development program, collaborating with the Merdeka Campus internship program organized by the Ministry of Education, Culture, Research & Technology. Also cooperates with several institutions, such as the Ministry of Communication & Informatics, Digital Talent Scholarship, the Certified Student Internship Program (PMMB) of the Indonesian Human Capital Forum (FHCI), and Vocational Education Institutions BNI's sourcing channels for sourcing channels talent acquisition.



*As of December 2021.

Preparing Employee Capabilities to Compete Globally

BNI was entrusted to support State-Owned Enterprise go Global, focusing on international banking. Therefore opened up opportunities for BNI to transform globally. To support this global transformation, BNI Corporate University has produced a series of learning journeys, namely the Global Mindset Learning Game and the Global Mindset webinar series, which can be accessed through the BNI CorpU TV YouTube channel, Social Media, Podcast so that it can massively reach all BNI Hi -Movers. The whole series of interventions aim to instill in all BNI Hi-Movers behaviors related to the Global Mindset, including Connect (build broad connections), Create (create innovative creations) and Contribute (make exceptional contributions) globally.

To strengthen the employee capability development to be globally competitive, several learning programs have been designed, including the provision of fundamental knowledge, including the Indonesia Digital Learning Institute (IDLI) and International Banking Literacy programs. Also, the specific development programs such as Executive Management Programs, Global Postgraduate Program, and Future Capability Academy and On the Job/Internship in the form of Internship Overseas Branch, Internship in Top Global Company, and Internship in Start-Up.

Strengthening Sustainable Talent Management Strategies

Aligned with the Company's people vision to build the country's best talent and superior work culture through world-class HC management as a strategic partner for BNI's growth, one of the strategies involved improvements to the Talent Management System.

This ensures the sustainable availability of an agile, competent, and competitive company's digitally and globally oriented talent pipeline and leaders. To support this, the Talent Management programs implemented in 2021 were as follows:

1. Selected Talent Development

This program helps accelerate the capability development in employees who are considered selected talent to increase their readiness level to occupy the positions they are projected to fill in the future. Capability development for the selected comprise hard competencies and soft competencies including leadership competencies are monitored online through the Digi HC application.

2. Career Acceleration

Aligned with the Ministry of SOEs mission and the Company's strategy to facilitate young talent and women who have outstanding capacity and capability to fill company leadership positions, a career acceleration program provided. The program divided into 2 (two) mechanisms namely the Skip and Speed tracks. The Skip track creates a career acceleration path that allows employees to occupy positions without going through the regular career path stages. The Speed track starts a career acceleration path that enables employees to occupy a position earlier than they normally (accelerated).

The selection of employees to occupy leadership positions through the Career Acceleration program is carried out through rigorous selection aimed at ensuring the employees participating in the program are qualified and have the capacity and capability and high learning agility before occupying the targeted position.

3. Global Postgraduate Program

Aligned with BNI's strategy to Go Global, BNI also provides maximum opportunities for employees who want to develop their knowledge with Master's Degree Scholarships Program at the Top 50 Universities worldwide.

Student

Testimonial



Margaretta Shinta Magdalena
LL.M (Master of Law), Berkeley School of Law
University of California, Berkeley

In 2021, I was given the opportunity to continue my education at one of the best universities in the world, the University of California, in Berkeley, even though I had only been with BNI for 4 years since 2017. BNI gives equal opportunities to all its employee to develop themselves through education.

Through BNI's Global Postgraduate Program, I received a full-merit scholarship to support my education at UC Berkeley, where I had the opportunity to develop My capabilities in legal and business knowledge UC Berkeley is located downtown in the Bay Area, on the West Coast making it easy to directly discuss with practitioners and entrepreneurs company development such as venture finance and marketing analytics. Also, although my major is Law, UC Berkeley provided an opportunity for me to participate in business courses in its MBA program (Haas School of Business), helping me get firsthand knowledge from the business side. Currently I am also involved in other student activities including the Berkeley Business Law Journal (BBLJ) and Woman in Technology Law (WiTL). I am also building relationships with international students, to help improve relationships with Indonesian people living in the San Francisco and the Bay Area through the Indonesian Professional Association (IPA SF-Bay Area) and Permas (Indonesian Student Association in the United States).

Currently, I am focusing on business law and technology law, that combines business law with technology and commercial business. In an era of constantly evolving technology and increasingly competitive business financing schemes, I hope that my knowledge will contribute to developing BNI's business.

Student

Testimonial



Fajar Yuda Arafah
LL.M. in Law and Business
Penn Carey Law and The Wharton School of Business
University of Pennsylvania, Unites States

My experience comes from studying for a Master of Law and Business degree at one of the best ivy league campuses in the world, University of Pennsylvania. It was the best experience in my life, and I owe this rewarding experience to BNI Global Postgraduate Program.

I have recently completed my first semester at Penn Carey Law School and the Wharton School of Business, University of Pennsylvania, one of the most beautiful campuses in the United States located in downtown Philadelphia, Pennsylvania. The courses I take focus on Sustainable Finance and Environment, Social and Governance (ESG). These two topics are gaining worldwide attention and I am very fortunate to be able to learn directly from the best professors in their field.

Apart from studying, of course, as a hi-mover, I also have to hone my softskills and build my network. I am currently taking certifications in Financial Modeling and Valuation and the International Commercial Banking and Credit Analyst Program. In addition, I am also a student consultant at the International Bank for Reconstruction and Development (World Bank) for the Asia Pacific Region. All this experience, and my journey, is thanks to the Global Postgraduate Program.

BNI, through the Global Postgraduate Program, provides opportunities for all BNI employees to develop their capabilities and competencies by studying at the Best Universities in the World. Compared to other scholarship programs in Indonesia, in my opinion, this program is one of the best scholarship programs and I really urge my fellow employees to join this program.

Improving Competitiveness Through a Culture of Innovation

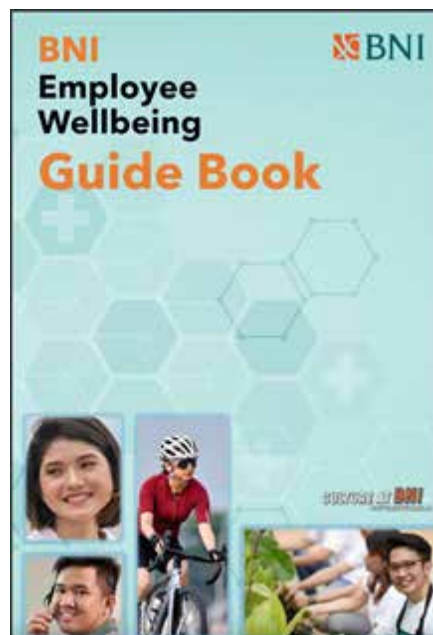
Innovation has become the keyword to ensure BNI's competitive advantage over competitors in this digital era. To foster an employee innovation culture, BNI regularly organizes the BNI Innovation Awards (Binnova) as an annual activity to embody the core values of AKHLAK into the Adaptive value, the Competent and Collaborative, and transformation RACE values in the Agile, Collaborative, and Execution Oriented values. In 2021, more than 300 innovation ideas created by BNI Hi-Movers were collected, and after a rigorous process, eight grand finalists competed in the Binnova Grand Finale held in July 2021. A jury of internal and external parties has been chosen. The winning innovation idea in 2021 is currently in the incubation process before being fully implemented.

Rewards & Recognition

BNI's remuneration strategy aims to increase its effectiveness in attracting, motivating, and retaining talent with superior performance and competence to support the company's vision. BNI's remuneration philosophy is 'For More Benefit We Go'. Implementing the remuneration strategy that is always competitive in the market; steps have been taken to develop a market-orientated remuneration strategy.

As well as the employee remuneration program, this year, BNI also organized a new program entitled Children Scholarship Program, an employee retention program that provides motivation and appreciation and concern for employees and their families through a scholarship program for employees' children who excel academically as well as non-academically. This scholarship program helps create a young generation with High Achievement, High Speed, High Tech, and High Motivation.

Maintaining a Working Environment that Supports Employee Wellbeing



Employee mental and physical health is part of management focus and is often referred to as employee wellbeing. BNI has a campaign slogan, “Healthy and Happy BNI Hi-Movers,” to increase awareness of the importance of health at work for all employees. BNI already has an Employee Wellbeing Guidebook that guides the employee wellbeing at BNI, including the importance of wellbeing, results from pulse check surveys, and programs that can address employee wellbeing problems at BNI, including:

1. #BISASAPA

BISA or Talk Casual, coaching and developing a culture carried out by BNI Hi-Movers. Through BISA, the team can improve the quality of communication with their respective line managers, get to know each other better, solve work problems, and explore their potential and personal problems. SAPA focuses on employee culture in greeting each other using their names and getting used to using the three magic words, namely sorry, please, and thank you.

2. Let's Get it Done

An online meeting policy program that aims to increase the effectiveness of meetings and reduce fatigue due to prolonged online meetings focused on strengthening the purpose of the meeting and its follow-up. So that it is enough to attend one online meeting at a time.

3. Wellness Day

Wellness day is a day devoted to employees to improve the quality of employee well-being. The 10th Sports Day urges all divisions and regions to carry out sports activities together every 10th of the month. The Saturday Self-Care is for doing things you love and includes me-time, and the Sunday Family day is when you spend quality time with the family.

4. 46Society

46Society is a forum with more than 20 communities formed based on the employees' hobbies or interests, and include 46Bikers, 46Cyclist, Mercy46, Plant Lover 46, Gitaswara, BNI Ballers, and others. Each unit is encouraged to participate in monthly activities with the 46Society community, such as Sunday morning rides, bike to work, sports together, etc.

Employee Well-being is monitored every month through a Pulse Check Survey, a survey to employees to measure their level of happiness while working at BNI. This survey is conducted monthly to monitor the employee's level of well-being regular basis.

BNI Digi HC as Super App in Human Capital Management



In 2021, Human Capital Division launched Digi HC 2.0, an improvement on the previous Digi HC application. BNI Hi-Movers use DigiHC as a “personal assistant” to record daily activities, starting from when they get to work, with a daily health survey, and a work plan accompanied by daily realization, and financial information to obtain the latest information related to BNI.

IMPACT OF STRATEGIC HUMAN CAPITAL INITIATIVES

In line with the Human Capital management framework, and to encourage the realization of BNI's vision for highly Engaged and Highly Productive employees, human capital strategies have been instigated. The results can be seen the engagement score 96% which shows an increase from the previous year. Employee turnover in 2021 was 1.6%, a decrease from 1.96% in 2021.

The total number of employees in 2021 stood at 27,177, with employee productivity measured by the earnings per employee indicator showed Rp393 million/employee or an increase of 289% from the previous year.

2021 APPRECIATIONS AND AWARDS

As another means of evaluating the Human Capital management system, BNI also participates in activities that involve external national and international parties. In 2021, appreciations and awards achieved by BNI for its Human Capital management included the following:

NO	EVENT	AWARD
1	Global Council of Corporate University (GCCU) Award 2021	Gold Award on Branding and Durability Category
2	Ministry of Education, Culture, Research and Technology through the Directorate General of Vocational Education	Dunia Usaha Dunia Industri (DUDI) Awards 2021
3	Human Capital & Performance Award 2021 by Business News	The Best Human Capital Team of the Year
4	Human Capital & Performance Award 2021 by Business News	The Best Digital Transformation Strategy
5	Human Capital & Performance Award 2021 by Business News	The Best Learning & Development Strategy
6	Human Capital & Performance Award 2021 by Business News	Human Capital Director of the Year

STRATEGY AND WORK PROGRAM FOR 2022

The Human Capital Architecture, organization and people are interrelated and inseparable parts of achieving a common vision. Therefore, to ensure BNI achieves its targets, an aligned human resource management strategy is needed. The main theme for 2022 is to optimize the role of human capital in supporting the business strategies, through the following initiatives:

1. Optimizing strategic workforce planning to manage human capital, in the short and long term;
2. Strengthening human capital talent management in a sustainable manner to ensure talent readiness is in accordance with BNI's business strategy;
3. Strengthening HC competencies in line with the Bank's business needs by implementing learning activities with the concept of blended learning;
4. Creating a culture of superior performance to encourage increased productivity.

Information Technology Management

BNI is continuing to grow and transform to strengthen its capabilities as a digital bank. Digitalization has been proven will support BNI's business growth by expanding market access and operational efficiency. Efforts to increase digital technology capabilities will see BNI becoming a digital bank that can compete in the 4.0 industrial era.

Through the IT Sector Divisions, namely the Information Technology Strategy and Architecture Division (STI), the Digital Development Division (DGL), the Information Technology Development Division (MTI), the Information Technology Operations Division (OTI), and the Information Security Division (ISU), BNI focuses on various policies and strategic initiatives to improve business processes, system availability IT development for digital enablers, infrastructure, communication networks and services for the Bank's Digital products are in line with the banking industry. IT development, aimed at infrastructure refreshment, both for systems and networks, to support increased transactions and strengthen Information Security capabilities.

Company Strategic Policy 2021



The IT work units play an active role in realizing BNI's strategic policies through vertical alignment, and to support the business/functional teams through horizontal alignment. Direct support carried out included strategic initiatives to increase digital capabilities, optimizing networks and international business solutions, as well as developing the IT HC competencies. The horizontal alignment support for other strategic policies was carried out by fulfilling IT Business Alignment, preparing the IT architecture, as well as developing IT and digital solutions based on initiatives from business units and functional units.

To support increased digital capabilities to meet customer needs and increase CASA & FBI through increased transactions, it was necessary to strengthen the IT work unit organization. In 2021 organizational development was carried out with a focus on digital development, of legacy IT systems development, as well as IT strategy and architecture.

As well as providing ongoing business support, in 2021, the IT sector also prepared technology capabilities to support future business, including the initiation and continuous development of technology-based initiatives, such as increasing open banking capabilities, information security (RASP, threat intelligent, DLP, etc.), Cloud, and optimizing business processes through robotic automation. Ongoing initiatives will continue to be developed into 2022, where IT is expected to support more efficient and customer-oriented business development, collaborate with digital ecosystems.

BNI INFORMATION TECHNOLOGY ADVANTAGES

Some of the advantages BNI has in Information Technology to support business include:

1. Proving Application Programming Interface (API), an open banking platform to facilitate integration and collaboration with third parties including start-ups and fintech companies to use banking services in a safe and real-time manner.
2. BNI has a data center supported by a disaster recovery center to ensure maximum service availability. The BNI data center received Tier III Design Certification in the Tier Certification of Design Documents (TCDD) category and Tier III Facility in the Tier Certification for Constructed Facilities (TCCF) category from the Uptime Institute.

3. BNI's IT sector has units/functions that specifically handle agile digital banking services, as well as units/functions that focus on developing legacy systems. This separation will help provide optimal service, faster time to market, and customer centricity.
4. On July 5, 2021, BNI launched a new version of BNI Mobile Banking, with one of its features called Digital Loan where BNI customers can apply for loans online. In addition, it includes Cardless Withdrawal, QR, Investment, Life Goals, My Credit Card, e-Wallet, and International Remittance.

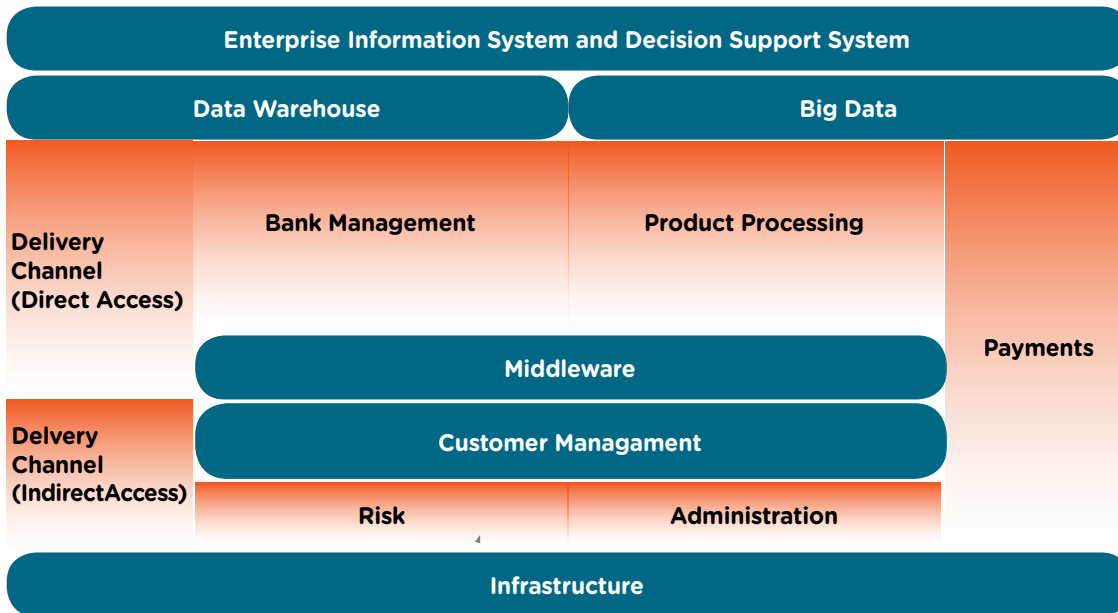


5. Utilization of a cloud-based infrastructure. With the current Covid-19 pandemic condition, the use of the cloud helps R&D Innovation and development sandboxing, and helps the process of changing to new ways of working, through the development of digital solutions using remote and cloud sandboxing.
6. Xpora, a digital solution developed by BNI supports Small and Medium Enterprises (SMEs) to increase their business capacity making them more profitable. Xpora offers a variety of digital services for SMEs, including Go Productive, Go Digital, and Go Global.



UTILIZATION OF INFORMATION TECHNOLOGY

Information Technology Architecture



Information Technology Architecture Landscape applications are grouped as follows:

1. EIS & DSS, is part of the application architecture that provides analytical applications and processes information consisting of Regular Reports, Business Intelligence, Dashboards, and Analytics.
2. Data Warehouse & Big Data, an integrated interface that processes data, by Extract, Transform, Load (ETL) or Extract, Load, Transform (ELT) and data management.
3. Operational Processing, is part of the application architecture that provides BNI business operational applications consisting of 3 (three) sub-sections, namely:
 - a. Product Processing, the Bank's main business operations application.
 - b. Bank Management, an application that supports the Bank's main business operations.
 - c. Customer Management, an application used to manage customer data/Bank user services.
4. Delivery Channel (Direct & Indirect Access), is part of the application architecture that provides applications that facilitate the interaction of the Bank's related parties with direct access, or indirect access by customers.
5. Middleware or Enterprise Application Integration (EAI), is the integration of data/information between applications.
6. External Link, is part of the application architecture that provides applications connected with third parties, both for business to business, and business to Government connections. Payment is a module for

payment transactions, remittances, and transaction settlements.

7. Supporting Business Applications
 - a. Risk, a collection of risk management applications.
 - b. Administration, a collection of administrative applications and their supporters.
8. Infrastructure, an application that supports all Bank business operations related to IT activities.

By referencing this Application Architecture Landscape, standardized IT implementation can be sustainable and produce effective and maximum IT services.

INFORMATION TECHNOLOGY INFRASTRUCTURE

"BNI in providing reliable digital services supports the 3 Data Centers (DC), where 2 are operational Data Centers (DC) that work together to ensure customers receive the best digital service experience, with 1 other Data Center (DC) acting as Disaster Recovery Center (DRC) to provide a sense of security to customers who have put their trust in BNI's digital services".

The BNI data center, supported by the Disaster Recovery Centers, has received Tier III Design Certification in the Tier Certification of Design Documents (TCDD) category, and Tier III Facility has received Tier Certification in the Constructed Facilities (TCCF) category from Uptime Institute.

Data Centers (DC) are a critical aspect for BNI's digital services; BNI's Data Centers (DC) have also adopted High Availability (HA) technology s to minimize service disruptions; reduce downtime; and speed up service return times.

To improve customer service, BNI has developed and refreshed the infrastructure system in the Contact Center service in accordance with BNI Call 1500046's commitment to continuously improve the service quality for BNI customers, and this has been realized by standardizing the process and service quality. Through the BNI Call 1500046 service, customers can receive information, conduct transactions and obtain solutions to any problems, for all banking services at Bank BNI. The purpose of developing the Contact Center Device was to integrate Omni-Channel BNI Call 1500046 (Calls, Email, Fax, Live Chat, Social Media, BNI Call Virtual Assistant Applications, Video Banking, Digital Opening Accounts, Whatsapp Business, ORM Applications, etc) to support the BNI Contact Center strategy.

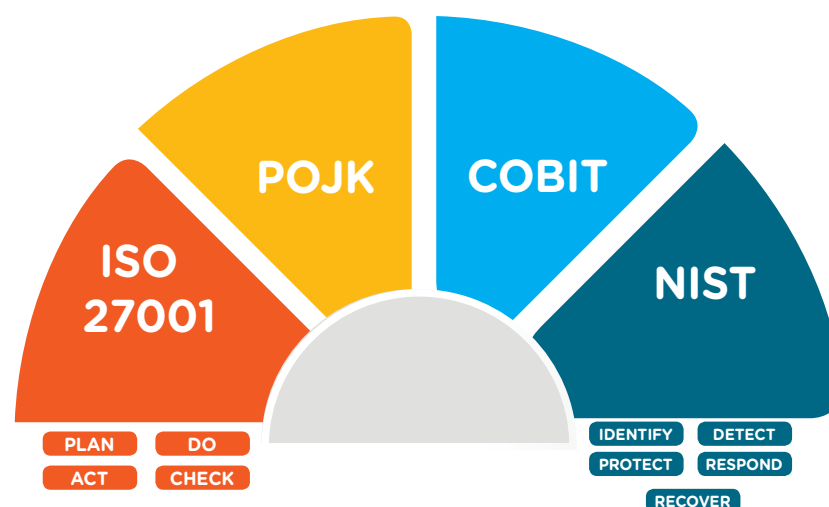
As well as providing reliable Data Centers (DC) they also comply with Risk Management Implementation Governance for the Use of Information Technology by Commercial Banks. The Bank is required to test the Disaster Recovery Plan on all critical applications and infrastructure based on the Business Impact Analysis results; at least 1 (one) time in 1 (one) year by involving Information Technology users. BNI regularly conducts Switch Over and Switch Back (SO-SB), as part of a DRP trial to ensure that Bank provide services to customers in the event of an emergency/disaster situation.

INFORMATION SECURITY CONTROL

In an effort to improve information security, in addition to implementing a variety of safeguards that refer to international standards, BNI has also strengthened special organizations related to cybersecurity, with the Information Security Division playing a role in all BNI information security activities, including in the areas of governance, access control, and business processes, and plays an active role in application development, operational information security life cycle including digital forensics and cyber-crime-related incident management.

Proactive Cybersecurity is an important factor in gaining customer trust so BNI always pays serious attention to continuous development. In implementing cybersecurity, BNI has adopted several international frameworks and applicable regulations.

Information Security Control Schematic



To ensure business continuity from the threat of cybercrime, BNI carries out the following efforts:

1. Constantly implementing governance, regulations and compliance so that information security functions well and in accordance with internal policies, prevailing rules and regulations as well as best practices.
2. Developing security aspects in every application development by applying Secure SDLC framework.
3. Implementing information security architecture for data, applications, endpoints, networks and security perimeters, constantly carried out to ensure that the principles of confidentiality, integrity, and availability function properly.
4. Implementing a multilayer of defense security device based on international standards that is applied in national banks.
5. Proactively monitoring 24x7 against cyber threats.
6. Working together with official state agencies (such as BI, OJK and BSSN), principal security apparatus and other cybersecurity communities to receive information related to threats and weaknesses, latest technology and products as well as receive support in the event an incident occurs.
7. Educating employees to increase awareness of cyber security.
8. Constantly raising awareness through Human Capital competency development programs.
9. Continuously reviewing the implemented security controls and updating them.

In addition to the aforementioned, as well as taking into account the current trends of cyber attacks, which are increasingly widening towards customers, BNI implements several safeguards on the customer side, including:

1. Application of customer protection mechanisms against fraud transactions caused by malware banking and social engineering.
2. Implementation of fake website detection in the name of BNI.
3. Notification mechanism for customer transactions.
4. Continual education to customers about self-protection through password security, internet banking security, mobile banking security, transaction security at ATMs and others.

With the direction of business development towards digital banking, cybersecurity will continue to be developed in guarding banking service innovations so that aspects of customer trust and comfort can always be maintained.

INFORMATION SECURITY AUDIT

During 2021, BNI conducted Information Security Audits through the BNI Internal Audit Unit (IAU), and through a Cybersecurity Maturity Level (CSM) assessment by an external party, the National Cyber and Crypto Agency (BSSN) with the results showing BNI was mature.

IT HC DEVELOPMENT

To be adaptive to changes in the digital era, capabilities need to be adjusted not only in terms of process and technology, but also from the people aspect. With the understanding that the development of Human Capital, as BNI's most important asset, is needed for the future success of the organization, and the IT Work Units train their employees to develop soft skills and hard skills.

Soft skill development includes training in digital leadership, technology presentation skills, as well as communication & negotiation skills. While hard skills includes project management training, IT architecture, programming, CI/CD, secure coding, cloud security, etc.

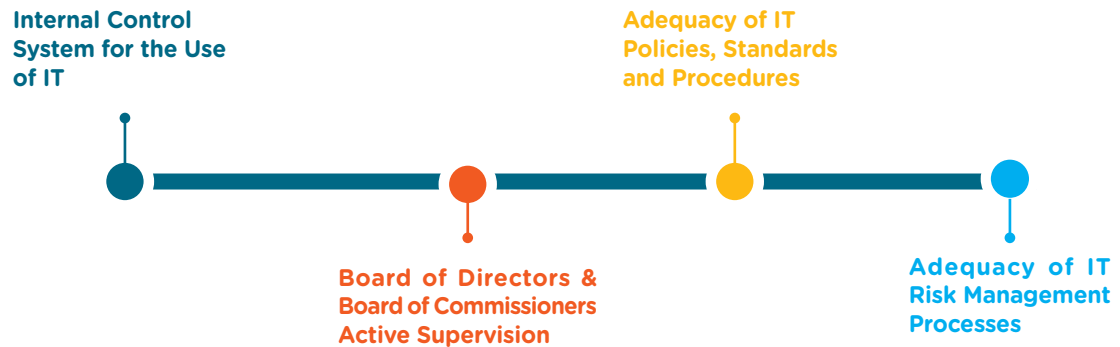
During 2021, BNI's IT employees participated in education and training, both independently through LinkedIn Learning, Google and AWS training, as well as through other training media. In addition, a Digital Mindset Assessment was developed to ascertain whether employees have a digital attitude and orientation to take full advantage of digital technology in their activities, such as digital skills including Internet of Things, Data Science, Cyber Security, Cloud, Product Management, and UI/UX.

IT CERTIFICATION

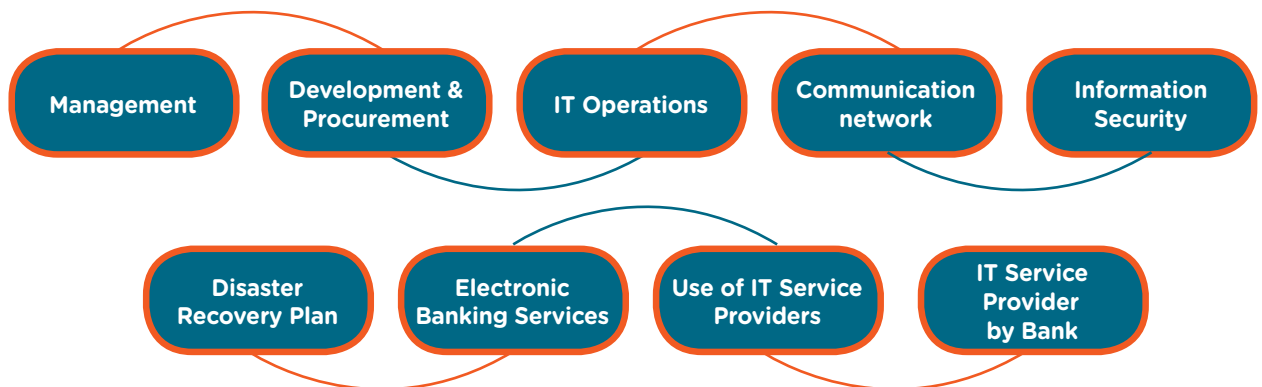
To respond to future challenges, BNI requires a systematic IT HC education and training program to develop IT HC capabilities. In addition, certifications gained by IT HC are also needed to gain national and international recognition of competencies, increase individual credibility, and add new insights that are not obtained in ordinary education and training.

INFORMATION TECHNOLOGY GOVERNANCE

Application of IT governance is carried out by aligning the IT Strategic Plan with the Bank's business strategy, optimizing human capital, utilizing IT, measuring performance, and applying effective risk management by continuing to meet the provisions set by the OJK and Bank Indonesia. Applying IT governance in BNI covers the following areas:



The use of IT in BNI is regulated through policies, standards, and procedures that are applied consistently and continuously in accordance with OJK Regulation No. 38/POJK.03/2016 dated December 1, 2016 and OJK Circular Letter No. 21/SEOJK.03/2017 dated June 6, 2017 concerning Applying Risk Management when Using Information Technology by Banks covering these aspects:



Selection of a good IT governance framework requires a balance between People, Process, and Technology aspects. Based on these considerations, IT governance implemented in BNI adopts various scope of work that is in line with the area of IT services in 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 manages IT in meeting the needs of BNI's stakeholders through the management of its process groups and enablers, where business objectives are mapped to IT objectives, and their achievements and maturity are measured. To fully comply with the Minister of BUMN Regulation No. PER-02/MBU/2013, an IT management assessment (IT Maturity assessment) was carried out by an external consultant and based on the assessment results, BNI's IT Maturity Level has met the minimum needs with a score of 3.62 out of the minimum 3 set. BNI IT uses the COBIT framework as a reference for its governance, due primarily to the synergy between its business objectives and IT objectives, its focus on data and information, flexibility to follow the direction of the Bank's work, and can be used in conjunction with other framework standards.

Information Technology Information Library (ITIL)

The Information Technology Information Library (ITIL) is a standard framework for IT Service Management (ITSM), used by BNI's IT for aligning IT support services to BNI's businesses. ITIL focuses on IT processes, procedures, tasks and service levels to support the Bank's strategy, provide added value, and maintain IT competency levels. With ITIL, BNI's IT operations have established baselines as service benchmarks, as a basis for planning, implementing and measuring their achievements.

International Organization For Standardization 9001 (ISO 9001)

ISO 9001 is a quality management system standard (Quality Management Systems) designed to ensure that BNI meets stakeholder demands while complying with the needs of regulators regarding its products and activities. BNI IT has implemented ISO 9001 since 2007 within the scope of IT Operation and IT Security Management.

BNI's IT has successfully met the requirements to be upgrade ISO 9001:2008 to ISO 9001:2015 by 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 reducing undesirable effects and is always improving the system on an ongoing basis (continuous improvement) to maintain ISO 9001:2015 certification.

AWARDS IN 2021

Various efforts made by the Bank throughout 2021 obtained good results. The Bank has received awards in the IT activities and CyberSecurity fields as follows:

1. Top Digital Implementation 2021 – Level Stars 5, It Works Magazine;
2. Top Leader on Digital Implementation 2021, It Works Magazine;
3. Top CIO on Digital Implementation 2021, It Works Magazine;
4. BNI API Digital Services Award 2021 in the Best Overall Developer Portal category and Community Prize Winner;
5. BNI Mobile Banking - Top Mobile Application Award 2021, in the National Bank Mobile Banking Application category, BNI Credit Card Mobile in the Credit Card Information Application category.

INFORMATION TECHNOLOGY DEVELOPMENT PLAN



To ensure the implementation of the development plan application and to support the corporate plan, BNI has established 4 (four) IT strategic directions, namely New Digital Proposition, Governance Toward Performance, Strive for Operational Excellence, and Innovative and Agile Organization.

New Digital Proposition for the use of IT answers how digitization can bring something of new value to its users. This strategic direction encourages regular digital business value creation, by providing recommendations in the form of adjustments or development of new business models based on emerging IT trends or through digital innovation.

Governance towards Performance to fulfill good governance to encourage optimal performance, including effective prioritization, reliable portfolio management, demand management, and IT planning in line with business needs, as well as good synergy with all units and subsidiaries.

Strive for Operational Excellence to optimize operational excellence through digitization and automation of business processes while enhancing cybersecurity and developing a sustainable operating model consistently.

Innovative and Agile Organizations to obtain an organization that is adaptive to change and has the capability to deliver deliverables quickly, including through a customer-centric innovation culture to meet customer needs accurately and efficiently, with a visionary mindset transformation in IT strategy and planning, as well as implementing agile methodology.

Service Digitalization

DIGITAL INNOVATION

Information technology and digital development including the Internet, Cloud, Big Data, Internet of Things (IoT), and Artificial Intelligence (AI) has triggered industry changes in called the industrial revolution 4.0. This has seen an increasing use in communication networks and the internet, automation processes integrated with AI, decision making using insights obtained from Big Data analysis, optimizing the use of the Cloud for business and personal needs, and connecting various daily devices to the Internet. These developments resulted in a change in consumer behavior that prompted the creation of new, more appropriate business models. To anticipate these changes, digital transformation should be carried out which includes the integration of digital technology into business processes.

One of BNI's efforts to adapt to changing consumer behavior to be more digital is to continue to explore innovations and learn about the latest technology trends in use. To optimize innovations both in terms of technology and business processes, BNI has also used the services of the Independent International Research Institute on an ongoing basis since 2007 to gain references, descriptions, trends, and insights on technology and global industry developments in general and banking in particular.

Several key-technologies have been adopted and have contributed significantly to BNI's digital banking products and services development in recent years. Products supported by this technology include:

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 can be accessed by web-based or mobile app, where its advantages can be divided into three functions, namely Payment Management, Collection Management, and Liquidity Management.

BNI Virtual Account

BNI Virtual Account is a service for providing Virtual Accounts by BNI aimed at assisting customers' financial management when making receipts and/or expenses related to payments or expenses in the pooling accounts. The Virtual Account has a virtual account number that can be used by customers as the transaction account, that is not the same as the real account registered with the customer's CIF. Virtual Accounts affiliated with 1 (one) pooling account act as a source of funds for various types of transactions.

Global Transactional Banking

In line with BNI's vision to become a Global Bank, BNI has developed the Global Transactional Banking program in collaboration with Overseas Branch Offices to use BNIDirect for cash management supported by advisory, and complaint handling at each KCLN. The development of BNIDirect goes global has been successfully live at KCLN Seoul, where all PNBK payment transactions from Immigration in Seoul are paid through BNIDirect in Seoul. BNI also collaborates with several global players such as Amazon Web Services, Apple Distribution International, TikTok, Netflix, Microsoft Regional sales, and Zoom Video Communications as tax payment solution providers in Indonesia.

BNI Trade Online

To support the trade process digitization, BNI has developed BNI Trade Online, an application for the Trade Finance process integrated with BNIDirect. BNI Trade Online is a feature in BNI Direct where customers can carry out trade activities such as Import LC, Export LC, Collection and Financing. With BNI Trade Online, they no longer have to submit requests for trade transactions through BNI branches, but can do it through BNIDirect. In 2021, several system development initiatives to improve features that support trade activities were carried out, including the development of a faster and more efficient BNI TradeOnline registration process so that customer transactions become more flexible.

By the end of 2021, more than 124 customers have used BNI Trade Online services, with the number of transactions reaching more than 2,500. BNI Trade Online transactions included large BNI customers such as the United Tractors Group, Busana Group, and Gudang Garam. BNI Trade Online continues its technological initiatives to explore the potential of BNI's Trade services by adding product features that can be accessed by customers, as well as enhancing existing product features in BNI Trade Online. BNI Trade Online is proof that BNI is also developing along with the changing mindset of BNI Trade customers to the digitalization era providing branchless and paperless service solutions.

BNI Digital Services

BNI is a bank that offers conventional banking services as well as digital-based services currently being adopted by many people. To reach other digital ecosystems, especially those relevant to the current community lifestyle, BNI has developed open banking capabilities through API services that can be linked to e-commerce entities, such as ride-hailing platforms, financial technology (fintech), university startups, BUMN, ministries, and others. Digital initiatives that BNI is implementing include open banking services for products, digital platforms, and expansion of services in an ecosystem based on a business to business to consumer (B2B2C) model.

To support domestic and overseas businesses, BNI's Corporate API service is being expanded to the retail business, enabling BNI to deliver retail API services. For third parties wanting to try the API service, BNI has prepared an API portal (digitalservices.bni.co.id) to test and simulate the integration of banking services with their applications in the BNI sandbox.

Blockchain Research and Development (R&D)

Blockchain is a distributed ledger technology that has the opportunity to become a disruptor in the business world as it can eliminate intermediary functions. This technology can be used to create new business models as well as replace / streamline existing business processes so that they become faster, safer, and cheaper, including in the banking industry.

BNI has carried out RnD using blockchain technology to produce a working prototype, to be integrated with BNI's Loyalty Point platform. BNI Mobile Banking and BNI Digital Services API. Through this integration, customers using BNI Mobile Banking can enroll, receive points when transacting, make Inquiries, Transfers by using merchant points for those that cooperate and are connected to the BNI Blockchain Network. Then BNI Merchants can use it as a burning point or to convert points obtained from customer purchases using the BNI Blockchain Network through the BNI Digital Services API.

Omnichannel Platform

To support service digitization acceleration and facilitate customer banking transactions, in 2021 BNI developed an omnichannel platform to integrate BNI Internet Banking and BNI Mobile Banking digital channels to provide customers have a seamless experience. Features and services developed included Virtual Assistant services, Financial Management, Digital Loans, Entrepreneurship services, and other features.

New Ways of Working

Since the beginning of 2020, with the COVID-19 pandemic and its impact, work patterns have changed from the previous conventional ways, and now the Bank's business activities and the IT team development and support are using new work patterns without the need to go to the office, now known as WFH (Work from Home), and this has had an impact on the BNI IT team. By adapting and adopting remote working & collaboration, cloud-based development and devsecops automation have become the main enablers who follow "new ways of working".

By the end of 2021, more than 238 B2B services were connected to API BNI. Several technological initiatives have been carried out by the IT work unit to explore technology and business process optimization innovations, including:

1. Blockchain Research and Development (R&D)

Blockchain is a distributed ledger technology that has the opportunity to become a disruptor in the business world as it can eliminate intermediary functions. This technology can be used to create new business models or replace existing business processes making them faster, safer, and cheaper, including in the banking industry.

BNI has carried out RnD utilizing blockchain technology which produces a working prototype, and will be integrated with BNI Loyalty Point platforms, BNI Mobile Banking and BNI Digital Services API. With this integration, customers through BNI Mobile Banking can enroll, earn points when transacting, Inquiry Points, Transfer Points, and make purchases using points owned by merchants that collaborate and are connected to the BNI Blockchain Network. Then, BNI Merchants can burn points or convert points obtained from customer purchases by accessing the BNI Blockchain Network through the BNI Digital Services API.

2. Cooperation With Various Fintech and Technology-Based Business Startup.

BNI eCollection

One of the collection management features supported by information technology is the provision of virtual accounts. Virtual account services, both VA debit and VA credit/billing, provides convenience in the digital business ecosystem in providing various digital businesses to their customers. In addition, BNI eCollection is also supported by the API Platform to integrate collection management into the existing and growing digital business ecosystem. This product was successfully implemented in 2017 and transactions continues to increase.

BNI Credit Card Mobile dan My Credit Card di Mobile Banking

BNI credit card service is application-based, to help customers receive their transaction information through smartphones. It includes features such as installment conversions, billpayment lists and information related to BNI Credit Card promos and products.

Credit Card Contactless

BNI Credit Card in collaboration with the Principles allow cardholders to simply tap their BNI Credit Card on EDC machines with the contactless logo. This feature provides more benefits to customers where transactions have become more practical and safer.

End to End Digital Card Acquisition

A credit card application facility or channel using a mobile web service that can be accessed anytime, anywhere using smartphone media through applykartukredit.bni.id using Google Chrome or Safari browsers. This e-form provides the following advantages:

1. Data security for prospective cardholders is directly stored in the system;
2. Credit card applications can be made digitally via a smartphone without the need to meet with sales or come to the branch;
3. Verification, scoring and credit card granting decisions are quick.

BNI Mobile Banking

Banking digitization at BNI is carried out to meet customer needs (customer centric) and provide convenience for customers in conducting end-to-end banking transactions, from user onboarding to transactional processes.

Data Management

Strategy and Policy for 2021

Data management development continues to support BNI's vision to become a financial institution that excels in service and performance in a sustainable manner. In 2021 two (2) key data management strategies were followed to support BNI's achievement of business performance and regulatory compliance, namely; Optimization of Single Source of Truth (SSOT) and Implementation of Advanced Analytics through the use of big data.

During 2021, output deliverables have included leads/ insights/reports and dashboards that have been used by all units to support the business target achievement, and fulfill regulatory reporting requirements. Furthermore, the Data Management & Analytics Division continues to strengthen the Single Source of Truth aspect to improve output quality, and provide added value to the Bank's business.

By implementing advanced analytics strategies using big data, the Data Management & Analytics (DMA) Division supports selective business expansion, sustainable increase in FDI and CASA, and accelerates international business strategies. DMA plays an active role by producing advanced analytics output for business and risk aspects that have made a significant contribution to the wholesale, SME, consumer and subsidiary segments. Advanced analytics outputs can be seen in several priority RACE digital transformation projects that are focussed on driving business growth in each segment.

Innovations in 2021

Facing the digital banking era, DMA continues to focus on and support strategic policies and initiatives to improve digital business processes through Innovations, including the Utilization of Machine Learning with a Descriptive, Diagnostic, and Predictive Analysis approach to generate accurate leads and insights, such as:

1. Customer Segment Leads Upgrade to Emerald and Affluent : Selecting potential customers to upgrade AUM to Emerald and Affluent Segment.
2. Behavior Segmentation: Creating segmentation based on transaction behavior to produce more structured campaigns.
3. Leads to Increase the Number of Users and Usage of Mobile Banking.
4. Profiling and Customer Segmentation: Determining customer segmentation based on transaction patterns.

Strategy and Work Plan for 2022

Data Management & Analytic (DMA) continues to support business growth by improving the quality of deliverables analytics & performance monitoring, as well as by strengthening its data governance functions through the implementation of Master Data Management. Some of the strategies that will focus on the development of data management aspects in 2022 will include:

1. **Implementation of Artificial Intelligence** to support Company initiatives for increasing revenue, as well as providing the right product recommendations;).
2. **Center of Excellence and share knowledge** to support data-based decision-making;
3. **Implementation of Master Data Management** to create a more optimal Single View of Customer as the foundation for customer service improvement initiatives.

Services and Networks

Strategy and Policy in 2021

BNI's Services and Network development during 2021 involved optimizing the office network (outlets), electronic networks, BNI Agen46 and other process improvements, so as to support the achievement of BNI's business and service performance. Strengthening sales management at outlets was also a Company strategy in 2021 to increase solution-based productivity for customers, to improve the Product Holding Ratio (PHR), and to create an ecosystem of customer transactions (closed loop transactions).

Consolidation of 10 (ten) Medium Credit Centers into a Commercial Business Center (SBK), focusing on improving loan quality and healthy medium business expansion. In addition in 2021, BNI also optimized its Small Credit Centers (SKC) to direct them to new business strategies as SME Business Centers (SBE), to work more optimally on the small loan segment and business potential.

For the expansion of BNI's overseas network, in 2021 BNI was in the process of establishing Representative Offices in Amsterdam and in Los Angeles. In 2022, BNI will continue to expand its overseas network to several other potential countries, such as in the Australian region.

In line with the aspiration to serve customers with integrated solutions, especially for overseas customers, BNI has adopted a policy that focuses on Indonesia-related businesses. One of the strategies is to add BNI service points overseas by establishing a Representative Office. In August 2021, BNI received approval from OJK to open Representative Offices in Amsterdam and Los Angeles. Furthermore, the permit for the establishment of the Representative Office Amsterdam from the local regulator was received in December 2021. The next stage is preparation for the physical opening of the office. While the opening of an office in Los Angeles is still in the licensing process.

2021 Performance

The Bank's strategies and policies helped to produce loan growth in 2021 of Rp581.5 trillion. This was due to a quality expansion strategy, and applying the precautionary principle so that Non-Performing Loans (NPL) fell to 3.7%, offset by a decrease in CKPN to Rp18.2 trillion. BNI also implemented a selective expansion strategy in low risk sectors, or for top tier customers in corporations, as well as major players in each region. BNI also carried out restructuring and remedial measures for troubled debtors who still had the potential for financial and operational improvement, while still paying attention to fulfilling the 3 pillars set by OJK. Absolute NPL (Banks only) decreased from Rp23.5 trillion in 2020 to Rp21.5 trillion in 2021, with the Gross NPL ratio at 3.7% in 2021 and the Net NPL at 0.7% in 2021. BNI continued its commitment to maintaining the quality of loans even during the Covid-19 pandemic.

Strategy and Work Plan for 2022

BNI will continue its loan quality improvement program by enhancing the risk culture through an end to end loan process transformation program, including introducing a more optimal LAR management strategy. In addition, BNI will continue and intensify the 2021 programs, optimizing risk management, with discipline in the loan process in an effort to improve asset quality. In 2022 the Corporate, Medium and Small segment's additional initiatives include:

1. Further development of pipeline management by adding environmental, social and governance (ESG) factors to the industry's risk appetite and risk acceptance criteria.
2. Development of the underwriting process, including:
 - a. Adding ESG criteria fulfillment assessments



- b. Enhancing the Loan Application Devices (PAK) based on Smart CA and digital solutions for verification through PACE (Package of Accurate, Convenient and Efficient recasting) tools.
- c. Enhancing the loan scoring with IDEAS through Machine Learning Models, Transaction Behavior, and external data.
- d. Building a Loan Origination System by integrating all applications in the end-to-end loan process in collaboration with BCG consultants.
- 3. Strengthening the Monitoring Process by optimizing the use and development of single integrated monitoring tools in collaboration with BCG Consultants (integrating Early Warning System, Watchlist, LaR Zoning, Credit Risk Review and IRS) and using Moody's EWS for the corporate segment as an initial screening to take action against current debtors.
- 4. Strengthening Loan At Risk (LAR) management by implementing the 4Ps (mapping, reducing, avoiding and controlling), strengthening account hand overs and accelerating LAR reduction with non-conventional efforts.

In addition, BNI continues to have a backup strategy that is adjusted to the debtor's risk profile.

In an increasingly competitive and fast-paced banking industry in today's digital era, BNI is committed to transforming banking services to meet increasingly complex customer demands.

In 2022, BNI will focus on transforming its office network towards outlet and service business digitization, simplification and optimization through:

1. Relocating 78 (seventy eight) outlets to potential areas as a strategy to deal with shifting business centers.
2. Rationalizing 97 (ninety seven) outlets consisting of 3 (three) Sub-Branch Offices, 46 (forty six) Cash Offices, 47 (forty seven) Payment Points and 1 (one) Money Changer by merging outlets through clustering/consolidating/simplifying as a consolidation strategy to focus on increasing the coverage area to optimize business potential and productivity. In 2021, BNI will continue to encourage the Optimization of Outlet Business (OBO) for Sub-Branch Offices (KCP) by given them authority to make loan decisions, supported by digital processing capabilities.
3. In addition, BNI will add 104 (one hundred and four) BNI DigiCS as part of the electronic network to support business and service outlets and relocate 1,043 (eight hundred and sixty four) ATM-CRM-BNI DigiCS.

BNI will focus on increasingly modern banking services by improving business processes and simplifying branch services based on customer digital expectations with service tools such as BNI DigiCS, T-Care and Self Service Passbook Printers.

BNI Contact Center

BNI Contact Center as a touch point always strives to provide the best service by providing speed, convenience, and cheap services for customers to get information, conduct transactions and obtain solutions for any problems. By prioritizing a better Customer Experience, BNI Contact Center provides services through an integrated Omni Channel platform equipped with high flexibility and agile technology.

STRATEGIES, POLICIES AND WORK PROGRAMS IN 2021

Strategy, Policy and Work Program in 2021

In 2021, the Covid-19 pandemic continued with restrictions on large-scale community activities, which created its own challenges to the acceleration of digital transformation and the public's need for digital banking services.

BNI continued to adjust its digital transformation to move BNI beyond a traditional bank towards becoming a financial service provider providing all-digital services. To deliver service excellence, BNI carried out massive digital transformation across all lines, both in terms of improving internal processes, preparing HC with the mindset and digital skills, providing services and products supported by high-tech digital channels and digitizing the Contact Center services.

The increasing customer need for banking through digital channels made the shift to digital faster. The BNI Contact Center prepared and developed the contact center service into an Omni Channel by refreshing the Contact Center system to improve service quality and strengthen BNI's e-channel capabilities. In addition, the BNI Contact Center continued to make improvements to Online Request Management, an application for recording requests for information, transactions, and customer complaints, integrating it into all BNI touch points to create a better customer journey and customer experience.

BNI Contact Center digitization was achieved in the BNI Call Virtual Assistant application to provides convenience for customers and non-customers using Android/iOS, to get information on BNI products and services as well as the latest general information, such as the location of ATMs, petrol stations, restaurants, tourist attractions, together with promotional information that is useful for customers. Continuing to improve the BNI Call Virtual Assistant application, the BNI Contact Center added transaction features and digital complaint settlement monitoring. With the addition of these features, customers can gain easy and convenient access to improve their experience at the BNI Call 1500046 service.

The BNI Contact Center also continued to optimize and improve digital services and social media to provide fast, accurate, inexpensive and easily accessible services to customers. Requests for information and complaint handling through Live Chat and Social Media digital services are available directly by BNI Contact Center officers so that customers feel the same experience as communicating directly by telephone. To increase customer engagement and loyalty when interacting, BNI continued to make improvements in response time with more millennial conversational humanization so that it became the customer preferable digital channel service when interacting with banks.

To support digital transformation, BNI Contact Center is ready to Leap Higher by providing beyond services to customers by continuously improving the system and providing HC with a digital mindset and the digital skills with the Millennial, Digital and Fun spirit, by continuously improving HC capabilities in a sustainable manner.

BNI Contact Center's commitment to deliver service excellence to BNI customers was also realized through process and service quality standardization by obtaining ISO 9001:2015 Certification in 2016 that is updated every year.

Collaborating with value chains and business units, BNI Contact Center actively plays a role in conveying the voice of customers by providing insights on improving superior products, features and services to customers, including providing feedback to product owners concerning customer complaints; monitoring the Service Level Agreement (SLA) for complaint settlement; adjusting internal provisions to changes in legislation, and refining the customer complaint handling applications, resulting in the SLA achievement for customer complaint settlement in 2021 reaching 99.68%.

In addition to playing a role as a point of contact for customers and non-customers, BNI Contact Center also contributes as a data source to strengthen opportunities for increasing income in the Consumer and Retail Segments through referral and cross selling programs so that BNI Call 1500046 becomes a point of contact for providing service solutions. and integrated sales.

Strategy and Policy in 2021

Superior and excellent services Innovations continued to be carried out through fast-moving digital banking transformation. To support this, BNI established a Corporate Plan following the BEYOND Traditional Financial Services strategy with a focus on business expansion through the development of digital business models and ecosystems, which included focusing on increasing digital capabilities to meet customer needs, sustainable business expansion, and optimizing Human Capital to support the bank's business.

In line with BNI's Corporate Plan, the BNI Contact Center also applied 3 (three) strategies with the aim of producing customer centric quality and service standards and capable of being the foundation for accelerating business achievements, and digital service transformation at all BNI customer touch points, as follows:

1. "Business Accelerator" Services, services as a competitive advantage in accelerating BNI's business achievements in the consumer banking and business banking sectors.
2. Digital Services, namely digital-based services including:
 - a. Digital Mindset, instilling a digital mindset to officers in charge of dealing with customers;
 - b. Data Analytics Optimization, optimizing "Big Data" with the aim of achieving business and service targets;
 - c. Sustainable Process Improvement, business process improvements and continuous service automation.
3. Beyond Services, services that provide added value for customers, including:
 - a. Services that exceed customer expectations;
 - b. Services that delivers above the industry average;
 - c. Services that delivers a new experience for customers.

PERFORMANCE IN 2021

The BNI Contact Center strategies, policies and work programs throughout 2021 resulted in national and international achievements. Achievements achieved during 2021 included:

1. BNI Contact Center gaining the top position in 3 (three) categories, namely Call Center, Phone Banking and Service Prima Contact Center based on the Bank Service Excellent Monitor (BSEM) survey results from Marketing Research Indonesia (MRI).
2. Winning 11 (eleven) medals in the 16th Annual Best in Asia Pacific - Contact Center World competition in the following categories:

• The Best Customer Service Manager	: Gold Medal
• The Best Crisis Management Campaign	: Silver Medal
• The Best Customer Service Profesional Agent	: Silver Medal
• The Best Contact Center Operasioanl Manager	: Silver Medal
• The Best Recruitment Campaign	: Silver Medal
• The Best Contact Center Design	: Silver Medal
• The Best Employee Wellness Program	: Silver Medal
• The Best Technology Innovation	: Silver Medal

- The Best Contact Center Support Professional : Bronze Medal
 - The Best Use of Social Media in Contact Center : Bronze Medal
 - The Best Organization CX : Bronze Medal
3. Winning 11 (eleven) medals at The Best Contact Center Indonesia 2021 competition the following categories:
- The Best Employee Engagement : Platinum Medal
 - The Best Digital Media : Platinum Medal
 - The Best Customer Experience : Gold Medal
 - The Best Technology Innovation : Gold Medal
 - The Best Agent English : Gold Medal
 - Best The Best Agent digital : Gold Medal
 - Quality Assurance : Gold Medal
 - The Best Agent Inbound : Silver Medal
 - The Best Supervisor : Bronze Medal
 - Best The Best Team Leader Inbound : Bronze Medal
 - The Best Team Leader Inbound : Bronze Medal
4. Winning 1 (one) Gold medal in the Asia Pacific Call Center competition in The Best Employee Engagement category.
5. Positioning BNI Call 1500046 has become the benchmark for Contact Center Services in Indonesia. BNI Contact Center has proven that it is the benchmark of choice for banking and non-banking Contact Centers in Indonesia. Throughout 2021, 5 (five) companies performed benchmarking against the BNI Contact Center.

INNOVATIONS IN 2021

To strengthen the digital banking services capabilities, BNI Contact Center carried out sustainable development through innovations in 2021 to improve customer experience.

1. Conversation Platform

BNI already has BNI Virtual Assistant assets, namely a mobile application that has chatbot capabilities that can handle customer requests for product/service information needs, and transaction support. BNI Virtual Assistant has been integrated with live agents so that customer service through this mobile application has become very effective and beneficial for BNI. To optimize the BNI Virtual Assistant application, the BNI Contact Center developed a conversational platform so that the BNI Virtual Assistant application became a complaint handling and marketing medium for BNI and customers in communicating/promoting its products and services in a personalized manner, based on a customer transaction behavior analysis.

2. Online Request Management Application Improvement

Optimizing the Online Request Management (ORM) application at all BNI touch points shortens the business processes and has an impact on accelerating the settlement of customer complaints. The BNI Contact Center is continuing to make improvements to the Online Request Management (ORM) application to create a customer journey where customers receive the same experience as when interacting at all BNI touch points.

3. REFRESHMENT CONTACT CENTER

Supporting Bank BNI's vision "To become a financial institution that excels in service and sustainable performance" as well as accelerating digital transformation, BNI Contact Center is upgrading the Contact Center system to the Omni Channel platform. Strengthening technology capabilities through the Refreshment Contact Center application platform with its High Availability and agile technology services to accommodate the needs of individual and non-individual customers.

STRATEGY AND WORK PLAN FOR 2022

To improve sustainable digital capabilities and accelerate the shifting process to digital 2022, strategic plans are in place for the BNI Contact Center, namely:

- Preparing superior HC with the digital mindset and digital skills as one of the main keys to shifting to digital in BNI Contact Center services;
- Continuously improving customer experience by conducting studies and lessons learned on customer complaints to be delivered to the value chain;
- Optimizing digital services by shifting call services to digital services and optimizing the Conversation Platform capability at BNI Contact Center to improve the customer experience, and to create a customer journey when interacting with the Bank;
- Developing Whatsapp for Business as a fast, cheap and easy choice in digital service channels to interact either through chat bots or directly with BNI Call officers;
- Optimizing the BNI Call Virtual Assistant with a self-service feature so customers can directly submit complaints, and implementing the Click to Call (VoIP) feature as a medium for customers to contact BNI Call via the internet.

One of the Bank's strategic steps will be in creating a sustainable business, and BNI Contact Center is committed to always maintaining and improving service quality by making continuous improvements through innovations that focus on customer centricity to improve the customer experience.

Service Quality Function

BNI SERVICE QUALITY ACHIEVEMENTS

Against growing competition in the banking business, BNI is consistently improving its services quality based on customer needs, especially during the covid-19 pandemic that affected the global and national economic dynamics and impacted BNI's business. In response, the Service Quality Division (SQU) continues to support BNI's Vision to become a superior financial institution that excels in services and sustainable performance by creating quality services that provide excellent service at all times at all levels of society, to achieve BNI Wide business performance and to build a Good Corporate Image.

Responding to the banking industry services trend based on customer expectations in the NEW NORMAL pattern, as a result of the COVID-19 pandemic, the SQU Division has launched 3 (three) strategy steps to provide superior and competitive service excellence, namely:



BNI AWARDS FOR PROVIDING EXCELLENCE SERVICE AT EVERY TOUCH POINT

As one of the Company's strategic steps to improving sustainable business, BNI is committed to maintaining and improving service quality to achieve customer satisfaction and loyalty. BNI's hard work has not only resulted in a superior performance, but has also received appreciation from independent institutions as the voice of customers. BNI's achievements include:

1. The Best Government Bank in Banking Service Excellence Award 2021 from Infobank Magazine and Marketing Research Indonesia (MRI);
2. Ranked #1 in Call Center in Banking Service Excellence Award 2021 from Infobank Magazine and Marketing Research Indonesia (MRI);
3. Rank #1 Overall Contact Center in Banking Service Excellence Award 2021 from Infobank Magazine and Marketing Research Indonesia (MRI);



4. Ranked #1 for CRM in Banking Service Excellence Award 2021 from Infobank Magazine and Marketing Research Indonesia (MRI);
5. Ranked #1 in Mobile Banking from Infobank Magazine and Marketing Research Indonesia (MRI);
6. Ranked #1 in Phone Banking from Infobank Magazine and Marketing Research Indonesia (MRI);
7. Ranked #2 in Digital Branch from Infobank Magazine and Marketing Research Indonesia (MRI);
8. Rank #2 Overall Digital Channel from Infobank Magazine and Marketing Research Indonesia (MRI);
9. Rank #3 Opening Account Via Website from Infobank Magazine and Marketing Research Indonesia (MRI);
10. Rank #3 Overall E-Banking from Infobank Magazine and Marketing Research Indonesia (MRI);
11. 1Rank #4 Overall plus Digital from Infobank Magazine and Marketing Research Indonesia (MRI);
12. Grade Diamond in the Regular Banking category as a Bank that always provides the best service to customers from Carre Center for Customer Satisfaction and Loyalty (CCSL).

Service Program Initiatives and Development

Digital Service On Customer Centricity

To shift conventional services and business processes to automation and digital-based services, BNI optimizes data analytics and digitization. The strategy is delivered through:

1. **Direct Voice of Customer (Customer Feedback)**
One of the measuring tools used in the management of Customer Experience Management.
2. **Optimization of CCTV Monitoring Tools**
Scheme for monitoring officer activities in the service process to customers (real play) through CCTV analysis at Branches/Outlets (sampling).
3. **BNI Service Rating**
Development of the BNI Service Rating application to improve the quality and validity of data for customer feedback.
4. **ELVIS 3.0**
Development of the E-Roleplay Video Integrated System (ELVIS) application to support roleplay activities to increase the capabilities of outlet officers and service performance.
5. **Service Experience Index (SEI) Automat**
An SEI data entry system with website-based and online data archive storage.

Service as Business Accelerator

To create sustainable business opportunities that have an impact on the Company's income achievement, BNI carried out various programs and innovations by prioritizing service as the business driving force. BNI strengthened the service function as a booster to improve the Business Banking and Consumer Retail performance achievement.

1. **BNI Digital Assistant (BDA) Competency**

Increased BDA officers competencies and education in product knowledge, communications, selling and advisory skills, as well prioritizing BDA in all Branch Offices.

2. **Frontliners Business Mindset**

A changing mindset program to increase selling skills for Customer Service and Tellers to support BNI's business achievements.

3. **Branch Selling Competition**

A Cross-Selling and Up-Selling activity to increase business and service support to support BNI's business target achievements.

4. **New Service Experience Index 2021**

Measuring and monitoring service quality performance in all outlets covering service, business and operational aspects as a strategy to accelerate business at outlets.

5. **SOP and Guidelines for Monitoring Data Quality Standards for CS**

A system and mechanism for monitoring Standard Cleansing Data.

6. **Monitoring Mobile Banking Data Leads**

(Increase in Existing Customer Transactions)
Implementing a monthly Customer Service activity monitoring scheme to provide information and education to mobile banking users according to data leads when customers visit outlets (walk in) or through calls and WA.

7. **Productivity Monitoring Tools & ATM Transactions**

Using ATM performance data as a basis for analyzing, monitoring and reporting processes in all regions.

8. **Realtime Monitoring Activation and Trial MB**

Using Data Icons to provide trial & activation data for BNI Mobile banking as a basis for outlets to increase digital transactions.

9. **SOPs for Personalizing Expired Debit Card Services**

As guidelines and SOPs for Branches/Outlets to provide personalized services to BNI customers to replace expired BNI debit cards before maturity.

10. SOPs for Agen 46 Service

Guidelines and Service Standards for Agen46 that can be used as the basis for running an agency business (Standards for Social Assistance transaction services, Withdrawals, Deposits, Transfers, Payments).

11. Guidelines for Monitoring Securities Inventory Services

As a mechanism and standard for recording stock inventories for passbooks, debit cards, PINs, cheques/BGs, Bilyet Deposits, Stamps, both incoming and outgoing.

Strengthen Service Culture

To strengthen the service culture of Personalized, Flexible, Customer Centric and to Create business, in accordance with BNI ICE Services values (Integrity, Continuous Improvement, Energy), BNI implemented the following Programs/Projects:

1. Customer Satisfaction Survey (CSS)

A means of determining and measuring BNI customers satisfaction levels, both external customers and internal customers, on the service quality provided by each Division/Unit. The Voice of Customer results from CSS are valuable input for BNI to make customer service quality improvements.

2. Service Culture Campaign & Recognition

A culture campaign for internal BNI employees (between divisions/units/regions/branches) in the form of e-flyers/e-brochures or short educational videos packaged in an attractive, light, simple and easy to digest way.

3. Social Media Monitoring Tools

Customer complaint monitoring system on social media using tools that present data more comprehensively.

Covid-19 Service Standards

During the COVID-19 pandemic, we all had to adapt our daily lives. This also applied to BNI in implementing service standards whereby all employees were encouraged to always take preventive measures to prevent the spread of the COVID-19 virus: (Wearing Masks, Keeping a safe Distance, Washing Hands, Staying Away from Crowds, Reducing Mobility). BNI is still committed to providing the best service through features, programs, promos and other transaction conveniences, as the pandemic is still ongoing.

Branch Operational Services during the COVID-19 Pandemic

Service excellence is a fundamental aspect that must be shown and maintained by every employee. Quality services are proof that BNI wants to position itself as a Company that is ever-present to serve all levels of society, and BNI wants to continue to provide value-added solutions to its customers. BNI's efforts to strengthen its business network will lead to public trust helping the Company improve its performance.

Frontliners, as the vanguard of BNI who always struggled to work, always faithfully served, provided solutions for every customer of various backgrounds, even during this pandemic, are required to prioritize a good impression and service while focussing on professional values at work, as well as acting as a service accelerators, will contribute to the Branch/Outlet business improvement by meeting customer needs (Service as Business Accelerator).

The key to creating customer satisfaction that leads to trust and loyalty begins with a good impression and service quality from BNI service officers. Loyal customers are strategic assets that provide long-term added value.

Implementation of Health Protocol Standards

The SQU Division was responsible for instigating policies on service standards at Branch Offices/Outlets for health protocols during the pandemic, as the Company's compliance with central and local Government regulations or policies, plus BNI's social care for the community in preventing the transmission of Covid 19. BNI management continues to oversee all frontend and backend officer health protocols activities including:

1. Checking Vaccination Status by scanning the Peduli Lindungi application QR Code

In an effort to reduce the number of COVID-19 cases, BNI requires every employee and visitor to scan their QR Code at every entry and exit point to the banking hall. All employees and visitor are required to scan the QR Code to ascertain the vaccination status.

2. Protocol for the use of Personal Protective Equipment (PPE) at each Branch Office/Outlet

- Masks, gloves, hand sanitizers, thermo guns by all frontliners are mandatory and must be used during service operational hours;
- Spraying disinfectant in the banking hall and all work areas;
- Installation of droplet acrylic boards in all Branch Offices/Outlets to maintain customer comfort when communicating and transacting with officers;
- Tissues and hand sanitizers to facilitate customers using the ATMs;
- All marketing officers are encouraged to use online communication media when conducting marketing or advisory services to customers (adjusted according to customer conditions). The officers make appointments (meeting schedule and location) with due regard to the local area PSBB if the customer still wants to meet face-to-face.

3. Implementation of Social/Physical Distancing

BNI has implemented standards for limiting banking hall capacity and queuing management as a strategy for managing the number of customer queuing based on the Covid 19 protocols, as a reference or basis to manage Branches/Outlets customers arriving so it runs in a proper and orderly manner according to the v protocols.

Banking Hall Capacity Limit

Policies related to Covid 19 preventive measures have also been carried out by imposing restrictions on the number of customer queues in the banking hall. The maximum capacity of the banking hall can only be 50% of the normal capacity. If the queue exceeds the maximum capacity, each Branch Office/Outlet is allowed to add chairs and tents outside the banking hall. The number of seats in the waiting areas can be adjusted to the outlet's condition and needs by observing the physical distancing provisions of at least 1 meter.

Queue Management Operations

- There are 2 types of queue numbers to manage customers, namely arrival queue numbers and transaction queue numbers;
- Arrival queue numbers are used to regulate customers to remain in the same order as when they arrived at an Outlet/Branch;

- The arrival queue numbers can only be given by the Security Officer to the Customer 30 (thirty) minutes before the Outlet opens, the Security Guard is not allowed to give the arrival queue number before the required hour;
- Arrival queue numbers are only applied before service operating hours. After the Outlet is open and during service operational hours, the arrival queue number is not applied, and customers are simply given a transaction queue number;
- The transaction queue number given by the security guard during service operating hours is related to the type of customer transaction, and will be directed to the appropriate CS/Teller officer.

4. Optimization of Security Officers

As one a Customer touch point, all Branch and Outlet Security Officers in the BNI Regions are required to inform customers that BNI provides security and convenience for transactions at Branch Offices/Outlets by applying strict COVID-19 protocol discipline.

- Security guards are responsible for directing customers to wear masks if they want to transact in the BNI area, both in the banking hall and at ATMs;
- The customer's body temperature is measured before entering the banking hall (max. 37.5°C);
- Implementation of physical distancing rules (maintain a minimum distance of 1 meter);
- Customer queue management;
- Education for customers to use e-channels as an alternative medium for transactions.

5. Optimization of BNI Digital Assistant (BDA) Officers

So that customers can still make transactions and avoid crowded Branch queue conditions, all BDA officer at the Branch Office/Outlet are required to educate customers on the use of BNI e-channels as an alternative transaction media so that customers can transact without having to go to the branch/ outlets.

- e-channel education to customers;
- Directing customers to transfer transactions using e-channels;
- Inviting and helping customers to experience BNI e-channel.

6. Awareness and Education of Branch Operational Services during the COVID-19 Era

As a Company step to educate and provide information related to BNI's health protocols to ensure customer convenience, as well as a form of the Company's compliance with regulations, and BNI's concern for community financial activities during the Covid 19 pandemic, BNI through the Service Quality Division (SQU) also ensures that all Branch Offices/Outlets become enablers of the Covid 19 protocol education process for customers. This educational process is carried out by providing all Branch Offices/Outlets with communication facilities or media, including announcement posters, banners, and screen monitors in the banking hall.

Educational content created, includes:

- E Booklet of Branch Service Operations during the Covid 19 Period;
- Educational Videos on New Normal Branch Service Operations;
- Educational Videos on Health Protocol Implementation at Branch Offices;
- Educational Videos on Social Assistance Distribution during the Covid 19 Period;
- Animated Videos of switching transaction to E-Channel, and others.





2021
Performance



Management
Report



Company
Profile



Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



Good Corporate
Governance



Social & Environmental
Responsibility



ESG
Commitment



Financial
Statements





Anthony Sinisuka GINTING



Accept the challenge so you can feel the joy of victory.

- George S. Patton



Capital & Risk Management Practices

416 Capital

421 Risk Management Practices

CAPITAL



CAPITAL

Capital is a source of financial support for the overall implementation of the Bank's activities. Capital acts as a buffer to absorb unexpected losses, and as a safety net in crisis conditions to enable the Bank to survive and be sustainable. The amount of capital provided depends on the level of risks faced by the Bank. Sufficient capital adequacy increases stakeholder confidence.



BNI prepares a Capital Plan based on reviews and assessments of the capital adequacy requirements, business needs, and combines it with a review of the latest economic developments. The Capital Plan is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. The Bank always compares its financial targets and capital adequacy with the risk level through the capital planning process. Likewise, business expansion is based on the capital adequacy and the Bank's liquidity requirements.

The capital requirements are planned and discussed on a regular basis with the support of data and analysis. BNI's capital policy is prepared by taking into account business potential and the continuous application of the precautionary principle, as well as to ensure BNI has strong capital and a good capital structure to support the business expansion development strategies of the Bank and its subsidiaries, and covers the risks inherent in managing the business, to maintain business continuity in the future without reducing the optimization of value for shareholders.

Capital management policies are also used as a guide to identify internal and external sources of capital. The capital policy is set to meet the regulator's capital adequacy requirements and to ensure that the Bank's capital structure is efficient.

In accordance with OJK Regulation (POJK) No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks, the Bank's capital consists of Core Capital (Tier-1) and Supplementary Capital (Tier-2).

1. Core Capital (Tier 1)

Core capital is the Bank's capital comprising of: Core Capital (Common Equity Tier 1 - CET 1) and Supplementary Core Capital (Additional Tier 1). The main core capital includes paid in capital and additional capital reserve (a disclosed reserve). Supplementary capital reserves consist of additional factors: agio, contributed capital, general reserves, previous years income, current year net profit, excess adjustments due to financial statement translation, paid in capital funds, warrants issued as Bank shareholders' incentives, share options, other comprehensive income and fixed assets revaluation and deduction factors, and disagio: previous years losses, current year losses, negative adjustments due to financial statement translation, other comprehensive income, negative differences between regulatory provisions and allowance for impairment losses of earning assets, negative differences on adjustment of fair value on financial instruments in the trading book and total adjustments based on accounting standards as well as non productive differences in translation of financial statements, other comprehensive income, minus the difference between Allowances for Asset Losses (PPA) of earning assets and Allowances for Losses Impairment Value (CKPN) of earning assets, less difference between the amount of adjustment to the valuation results of financial instruments in the Fair Value Profit and Loss (FVTPL) and the amount of adjustment based on financial accounting standards and non-productive regulatory provision.

2. Supplementary Capital (Tier 2)

Supplementary Capital (maximum 100% of core capital) including capital instruments in the form of shares or in other forms that meet the agio or disagio requirements originating from the issuance of capital instruments are classified as complementary capital and general PPA reserves on earning assets that must be calculated with a maximum amount of 1.25% of RWA Credit Risk and Reserve Purposes.

In 2021, BNI's core and complementary capital amounted to Rp125.62 trillion, an increase compared Rp103.15 trillion in 2020, as in 2021 there was additional inorganic capital following the issuance of Additional Tier 1 (AT 1) amounting to Rp8.55 trillion, and the issuance of Tier 2 subordinated debt securities amounting to Rp7.26 trillion (equivalent to US\$500 million).

BNI Capital Structure Table

CAPITAL COMPONENTS	DECEMBER 31, 2021	DECEMBER 31, 2020
	INDIVIDUAL	INDIVIDUAL
I. Core Capital (Tier 1)	112,685,137	96,480,892
1. Core Capital/Common Equity Tier 1 (CET 1)	104,133,637	96,480,892
1.1 Paid-Up Capital (after Treasury Stock)	8,847,332	8,975,358
1.2 Disclosed Reserve *)	111,164,661	96,010,982
1.2.1 Additional Factors	111,460,975	96,164,626
1.2.1.1 Other Comprehensive Income	17,271,556	16,904,127
1.2.1.1.1 "Excess in notes to financial statements"	-	23,542
1.2.1.1.2 Potential profit from increasing the fair value of financial assets measured at fair value through other comprehensive income	1,888,400	2,410,284
1.2.1.1.3 "Fixed assets revaluation surplus balance"	15,383,156	14,470,301
1.2.1.2 Other disclosed reserves	94,189,419	79,260,499
1.2.1.2.1 Agio	19,633,585	14,568,468
1.2.1.2.2 General reserves	2,778,412	2,778,412
1.2.1.2.3 Past years profits	61,091,049	59,158,424
1.2.1.2.4 Current year profits	10,686,373	2,755,195
1.2.1.2.5 Paid-up capital funds	-	-
1.2.1.2.6 Others	-	-
1.2.2 Deduction Factors	(296,314)	(153,645)
1.2.2.1 Other comprehensive income	(16,875)	-
1.2.2.1.1 Deficit in notes to financial statements	(16,875)	-
1.2.2.1.2 Potential loss from impairment of fair value of financial assets measured at fair value through other comprehensive income	-	-
1.2.2.2 Other disclosed reserves	(279,439)	(153,645)
1.2.2.2.1 Disagio	-	-
1.2.2.2.2 Past years losses	-	-
1.2.2.2.3 Current year loss	-	-
1.2.2.2.4 "Deficit between Provisions of Asset Allowance (PPA) and Allowance for Impairment Losses (CKPN) of productive assets"	-	-
1.2.2.2.5 Deficit in the amount of adjustments to the fair value of financial instruments in the Trading Book	-	-
1.2.2.2.6 PPA of non-productive assets that must be established	(279,439)	(153,645)
1.2.2.2.7 Others	-	-
1.3 Non-Controlling Interests that can be calculated	-	-
1.4 Common Equity Tier 1 Deduction Factors *)	(15,878,356)	(8,505,448)
1.4.1 Deferred tax calculation	(6,162,409)	(4,558,072)
1.4.2 Goodwill	-	-
1.4.3 All other intangible assets	-	-

BNI Capital Structure Table

CAPITAL COMPONENTS	DECEMBER 31, 2021	DECEMBER 31, 2020
	INDIVIDUAL	INDIVIDUAL
1.4.4 Participation that is calculated as a deduction factor	(9,715,947)	(3,947,376)
1.4.5 Lack of capital in insurance subsidiary	-	-
1.4.6 Securitization exposures	-	-
1.4.7 Other common equity tier 1 deduction factors	-	-
1.4.7.1 Placement of funds in AT 1 instruments and/ or Tier 2 at other banks	-	-
1.4.7.2 Cross ownership in other entities that is obtained based on transfer by law, grant, or probate grant	-	-
1.4.7.3 Exposures with settlement risk - Non Delivery Versus Payment		
1.4.7.4 Exposure in subsidiaries engaging in business activities according to sharia principles (if any)		
2. Additional Tier 1 Capital (AT 1) *)	8,551,500	-
2.1 Instruments that fulfill AT 1 requirement	8,551,500	-
2.2 Agio/Disagio	-	-
2.3 Additional Tier 1 Deduction Factors *)	-	-
2.3.1 Placement of funds in AT 1 instruments and/or Tier 2 at other banks	-	-
2.3.2 Cross ownership in other entities that is obtained based on transfer by law, grant, or probate grant	-	-
II. Tier 2 Capital	12,930,896	6,664,575
1. Capital instruments in the form of shares or other forms that fulfill Tier 2 requirements	6,090,646	53,333
2. Agio/Disagio	-	-
3. General reserves of PPA for productive assets that must be established (the highest is 1.25% of Credit Risk RWA)	6,840,250	6,611,241
4. Tier 2 Capital Deduction Factors *)	-	-
4.1 Sinking Fund	-	-
4.2 Placement of funds in Tier 2 instruments at other banks	-	-
4.3 Cross ownership in other entities that is obtained based on transfer by law, grant, or probate grant	-	-
TOTAL CAPITAL	125,616,033	103,145,466

To support business expansion and maintain market share and to comply with the provisions of Financial Services Authority regarding the Capital Adequacy Ratio (CAR) in accordance with the Risk Profile and buffer capital, adequate capital is required

Therefore, BNI strives to continue to strengthen its capital by increasing organic core capital, in this case mainly by increasing retained earnings and inorganic profits through rights issues and the issuance of subordinated debt instruments (sub debt).

BNI's capital has referred to regulations and is in accordance with Pillar 1 of Basel II, namely for calculating the Minimum Capital Adequacy Requirement (KPMM) for Credit Risk, Market Risk and Operational Risk based on Risk Weighted Assets (RWA).

The RWA calculation method for Credit Risk uses the Standardized Approach, while for Market Risk the RWA calculation method uses the Standard Method, and the RWA calculation method for Operational Risk uses the Basic Indicator Approach.

For risks not considered in the RWA, including Credit Concentration Risk, Interest Rate Risk on the Banking Book, Liquidity Risk, Legal Risk, Strategic Risk, Compliance Risk and Reputation Risk, they are calculated in the Bank's Risk Profile.

Referring to OJK Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Adequacy Requirement for Commercial Banks (KPPM), that banks are required to provide minimum capital based on the Risk Profile, the minimum capital requirement is calculated using the following risk profile ratings:

RISK PROFILE SCORE	CAR
1	8%
2	9% s.d <10%
3	10% s.d <11%
4 and 5	11% s.d <14%

In addition to the obligation to provide minimum capital according to the Risk Profile, starting in January 2016 BNI was also required to establish additional capital as a buffer following the criteria determined by the Financial Services Authority. Additional buffer capital consists of Capital Conservation Buffer, Countercyclical Buffer, and Capital Surcharge for Systemic Banks. However, based on FSA letter No. S-13/D.03/ 2020 on June 23, 2020 regarding the advanced stimulus policy package for COVID-19, the obligation to fulfill the Capital Conservation Buffer is temporarily eliminated until March 31, 2022. KPPM based on the Risk profile position as at June 2021 and additional buffer capital of 11.30%, valid as at February 2022.



RISK MANAGEMENT PRACTICES



RISK MANAGEMENT APPLICATION BASIS

Risk management functions to protect capital and to optimize returns against risk. The large business scale, the wide operational coverage, and the increasing business volume require BNI to implement an integrated risk management pattern to identify, measure, monitor, and control all risk exposures.



In its business practices, BNI develops innovative products and services sustainably which is supported by digital technology and reliable networks. BNI consistently implements a Risk Management process in every business process and operational activities that lead BNI to become a sound and sustainable bank.

BNI's Risk Management is based on national and international regulations, including Financial Authority Regulations (POJK), Financial Authority Circular Letters (SEOJK), Bank Indonesia Regulations (PBI), Bank Indonesia Circular Letters (SEBI), and Basel Committee on Banking documents. Supervision (BCBS).

Several regulations related to the Bank's Risk Management include:

1. Implementation of Risk Management.

- a. OJK Regulation No. 18/POJK.03/2016 dated March 16, 2016, concerning the Implementation of Risk Management for Commercial Banks.
- b. OJK Circular Letter No. 34/SEOJK.03/2016 dated September 1, 2016, concerning the Implementation of Risk Management for Commercial Banks.

2. Implementation of Consolidated Risk Management with Subsidiaries.

- a. OJK Regulation No. 38/POJK.03/2017 dated July 12, 2017, concerning the Implementation of Consolidated Risk Management for Banks that Exercise Control over Subsidiaries.
- b. OJK Circular Letter No. 43/SEOJK.03/2017 dated July 19, 2017, concerning Prudential Principles and Reports for the Implementation of Consolidated Risk Management for Sub-holding Banks.

3. Implementation of Integrated Risk Management.

- a. OJK No. 17/POJK.03/2014 dated November 18, 2014, concerning the Implementation of Integrated Risk Management for Financial Conglomerates.
- b. OJK Regulation No. 26/POJK.03/2015 dated December 4, 2015 concerning Integrated Minimum Capital Adequacy Requirements for Financial Conglomerates;
- c. OJK Circular No. 14/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Risk Management for Financial Conglomerates.

4. Risk Management for Commercial Bank Products and Activities, including:

- a. OJK Regulation No. 57/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Risk Management by Commercial Banks Performing Excellent Customer Service;
- b. OJK Regulation No. 7/POJK.03/2016 dated 26 January 2016 concerning Prudential Principles for Implementing Structured Product Activities for Commercial Banks, as amended by OJK Regulation No. 6/POJK.03/2018 dated April 19, 2018;
- c. OJK Regulation No. 12/POJK.03/2018 dated August 6, 2018 concerning the Implementation of Digital Banking Services by Commercial Banks;
- d. OJK Regulation No. 12/POJK.01/2017 dated March 16, 2017 concerning the Implementation of Anti-Money Laundering and Prevention of Terrorism Financing Programs in the Financial Services Sector, as amended by OJK Regulation No. 23/POJK.01/2019;

- e. OJK Regulation No. 39/POJK.03/2019 dated December 19, 2019 concerning the Implementation of Anti-Fraud Strategy in Commercial Banks;
- f. OJK Regulation No. 38/POJK.03/2016 dated December 01, 2016 concerning the Implementation of Risk Management in the Information Technology Used by Commercial Banks, as amended by OJK Regulation No. 13/POJK.03/2020 dated March 24, 2020;
- g. OJK Regulation No. 13/POJK.03/2021 dated July 30, 2021 concerning Commercial Bank Products Operation;
- h. OJK Circular No. 33/SEOJK.03/2016 dated September 1, 2016 concerning the Implementation of Risk Management in Banks Conducting Marketing Cooperation Activities with Insurance Companies (Bancassurance);
- i. OJK Circular Letter No.4/SEOJK.03/2017 dated January 16, 2017 concerning the Implementation of Risk Management in Banks Conducting Mutual Funds Activities;
- j. OJK Circular No. 11/SEOJK.03/2017 dated March 17, 2017 concerning Prudential Principles for Commercial Banks Delegating Part of the Work to Other Parties;
- k. OJK Circular No. 21/SEOJK.03/2017 dated June 6, 2017 concerning the Application of Risk Management in the Information Technology Used by Commercial Banks;
- l. OJK Circular No. 32/SEOJK.03/2017 dated 22 July 2017 concerning the Anti-Money Laundering and Prevention of Terrorism Financing Program in the Financial Services Sector.

5. Internal Control System.

- a. OJK Regulation No. 1/POJK.03/2019 dated January 29, 2019 concerning the Implementation of the Internal Audit Function in Commercial Banks;
- b. OJK Circular No. 13/SEOJK.03/2017 dated March 17, 2017 concerning the Implementation of Good Corporate Governance in Commercial Banks;
- c. OJK Circular No. 35/SEOJK.03/2017 dated July 7, 2017 concerning Guidelines for Internal Control System Standards in Commercial Banks.

GENERAL IMPLEMENTATION OF RISK MANAGEMENT

To implement effective Risk Management, both for BNI individually and in a Consolidated and Integrated manner with Subsidiaries, BNI's risk management implementation includes:

1. **Pillar 1.** Active supervision by the Board of Directors and the Board of Commissioners;
2. **Pillar 2.** Adequacy of risk management policies and procedures and determination of risk limits;
3. **Pillar 3.** Adequacy of the identification, measurement, monitoring, and risk control processes as well as the risk management information system;
4. **Pillar 4.** Comprehensive internal control system.

Pillar 1. Active Supervision by the Board of Directors and the Board of Commissioners

1. Supervision by the Board of Commissioners
Active supervision by the Board of Commissioners is carried out by:
 - a. Approving BNI's risk management policies including strategies and risk management frameworks, as determined by the level of risk taken (Risk Appetite) and the risk tolerance for quantitative and qualitative Risk Appetite;
 - b. Evaluating risk management policies and strategies at least once a year, or in the event there are changes in factors that significantly affect BNI's business activities;
 - c. Evaluating the Board of Directors responsibilities and providing improvement directives on the implementation of BNI's risk management policies on a regular basis;
 - d. Ensuring that risk management policies and processes are implemented effectively and are integrated into the overall BNI risk management process.

The Board of Commissioners has established a Risk Monitoring Committee as stipulated in the Risk Monitoring Committee Charter. The committee's duties include:

- a. Evaluating conformity between risk management policies and the implementation of Bank policies;
- b. Monitoring and evaluating the Risk Management Committee and the Risk Management Work Unit duties, in order to provide recommendations to the Board of Commissioners;
- c. Carrying out certain other tasks related to the Risk Monitoring Committee function and scope of duties, assigned by the Board of Commissioners.

In carrying out its supervisory function on BNI's Risk Management and Integrated Risk Management, BNI's Board of Commissioners is assisted by the Risk Monitoring Committee (KPR), the Audit Committee, and the Integrated Governance Committee.

The Board of Commissioners' active supervision in the approval and evaluation of the General Risk Management Policy prepared by the Board of Directors. The Board of Commissioners periodically evaluates the risk management policies through the Board of Commissioners' Meeting forum (Radikom), inviting the Board of Directors to attend the Risk Monitoring Committee (KPR) meetings, and through improvement recommendations submitted in the minutes.

2. Board of Directors Supervision
The Board of Directors active monitoring is performed by:
 - a. Preparing written and comprehensive Risk Management policies, strategies and frameworks including overall and Risk Type Risk limits, taking into account the risk appetite and risk tolerance according to Bank's conditions, and taking into account the impact of Risk on capital adequacy. After obtaining approval from the Board of Commissioners, the Board of Directors establishes policies, strategies, and the Risk Management framework;
 - b. Preparing, determining, and updating procedures and tools to identify, measure, monitor, and control Risk;
 - c. Preparing and establishing transaction approval mechanisms, including those that exceed the limits and authority for each level of position.
 - d. Evaluating and/or updating Risk Management policies, strategies, and frameworks at least once a year or more frequently in the event there are significant changes in factors affecting the Bank's business activities, Risk exposure, and/or Risk profile;
 - e. Determining BNI's organizational structure, including clear authorities and responsibilities at every position level related to the risk management implementation;
 - f. Responsibility for implementing Risk Management policies, strategies, and frameworks that have been approved by the Board of Commissioners, and evaluating and providing guidance based on reports submitted by the Risk Management Work Unit (SKMR), including Risk profile reports;

- g. Ensuring all material risks and impacts caused by such risks have been followed up, and submitting regular accountability reports to the Board of Commissioners, including reports on developments and problems related to material risks together with corrective measures that have been, are being, and will be taken;
- h. Ensuring the implementation of corrective measures taken for problems or irregularities in the Bank's business activities found by the Internal Audit Unit (SKAI);
- i. Developing a Risk Management culture including Risk awareness at all organization levels, including adequate communication to all organization levels on the importance of effective internal control;
- j. Ensuring the adequacy of resource support to manage and control the Risks;
- k. Ensuring the Risk Management function has been applied independently, as reflected in separation of functions between the SKMR conducting the identification, measurement, monitoring, and risk control, with the work unit performing and completing transactions.

In carrying out its effective risk management function, the Board of Directors is assisted by the Risk Management Work Unit (SKMR) that doubles as the Integrated Risk Management Work Unit (SKMRT). Supervision is carried out through Board of Directors Meetings (Radisi), and Meetings by the Risk Management & Anti Fraud Committee (KRA) Risk Management Sub-Committee (RMC), Anti-Fraud Sub-Committee (KAF), Credit Policy Committee Meetings (KKP) and Credit Procedures Committee (KPP) and the Integrated Risk Management Committee (KMRT).

Pillar 2. Adequacy of Risk Management Policies and Procedures and Establishment of Risk Limits

The Risk Management Policy is a written directive for implementing risk management, and needs to be in line with the vision, mission, and strategic plan and be focused more on relevant risks in BNI's business activities, and be prepared by taking into account the risk appetite, risk tolerance and determination of limits.

BNI's Risk Management Policies include:

1. General Risk Management Policy.
2. Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Compliance Risk, Legal Risk, Strategic Risk, and Reputation Risk Management Policies.
3. General Policy on Integrated Risk Management and Integrated Capital
4. Guidelines for Internal Control Systems.

The Risk Management Procedures elaborate the Risk Management Policy's implementation rules and are used as risk management implementation references for each Risk Management Unit and all BNI organizational units, and is adequately documented. The detailed provisions of each procedure are regulated in the technical instructions (Juknis).

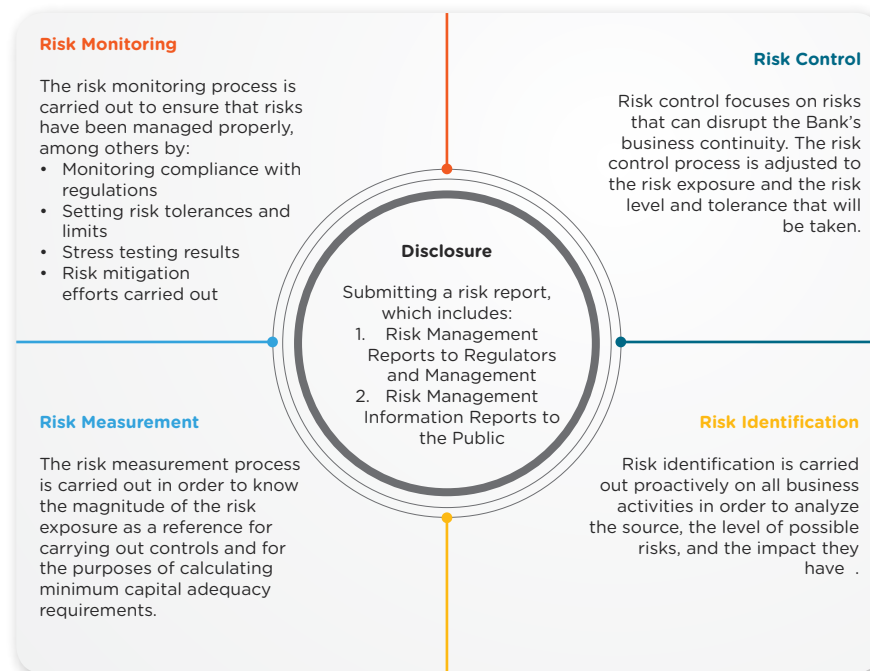
Evaluations and/or updates to the BNI Risk Management Policies and Procedures are carried out periodically or in the event of significant changes affecting BNI's business activities.

As one of its risk control methods, BNI also has a risk limit, to define the threshold for determining the level of risk mitigation intensity performed by management.

The BNI risk limits cover limits per risk (credit risk, market risk, and liquidity risk), limits per functional activity as well as overall limits. The policies, procedures, and risk limits are periodically reviewed with approved up to the Board of Directors through committee meetings or circulation to the Board of Directors according to the level of authority.

Pillar 3. Adequacy of Risk Identification, Measurement, Monitoring, and Controlling Processes, and Risk Management Information System

The BNI's Risk Management processes includes identification, measurement, monitoring and risk control of 8 (eight) risk types, carried out on an ongoing basis against all material risk factors, and supported by the Risk Management Information System, as described as follows:



Policies concerning risk identification, measurement, monitoring, and control processes for 8 (eight) types of risk (credit, market, liquidity, operational, legal, strategic, compliance, and reputation risks) are stipulated in the Risk Management Policy per risk type; while the Risk Management process Integrated with the BNI Financial Conglomerate is stipulated in the Integrated Risk Management General Policy (KUMRT).

1. Risk Identification

The risk identification process is proactively carried out in all business activities to analyze the sources, possible risk levels, and their impact.

Matters to be considered in the risk identification process are as follows:

- a. Identification of all risks carried out regularly;
- b. Having a method or system to identify risks in all BNI products and business activities;
- c. Specifically identifying risks for new products and activities, before new products/activities are introduced or implemented.

2. Risk Measurement

The risk measurement process is carried out to determine the amount of risk exposure as a reference for risk control and to calculate the Minimum Capital Adequacy Requirement.

Risk measurement is carried out both quantitatively and/or qualitatively according to the measurement method established by the regulator or by using an internal method developed by BNI based on best risk measurement practices. To anticipate extreme conditions, risk measurement at BNI is also complemented by stress testing for credit risk, market risk, and liquidity risk.

Matters to be considered in the risk measurement process are as follows:

- a. The scope of risk measurement should at least measure the sensitivity, tendency, individual risk factors, overall risk exposure per risk by taking into account the correlation and all risks inherent in bank transactions and products;
- b. The risk measurement method can be implemented quantitatively and/or qualitatively by using the methods established by the regulator or those developed internally;

- c. The measurement method is adjusted to the provisions of the applicable regulators;
- d. The internal methods used for measuring credit risk, market risk, and operational risk must take into account the Regulators' requirements, including requirements for use, backtesting, validation, and documentation;
- e. Risk measurement is carried out by the Risk Management Unit in coordination with the Risk Management Work Unit;
- f. BNI's Individual risk measurement is carried out on 8 (eight) risk types, while for the BNI Financial Conglomerate it is carried out on 10 (ten) risk types. To report the Minimum Capital Adequacy Requirement (KPMM) to regulators, BNI risk measurement is carried out individually against 3 (three) main risks: credit risk, market risk, and operational risk. Meanwhile, the integrated KPMM calculation is carried out by comparing the total actual capital of the Financial Services Institutions (FSI) members of the Financial Conglomerate with the minimum total capital that must be met by the FSI members of the BNI Financial Conglomerate.

Risk measurement is carried out regularly with the measurement results reported to the Regulator as part of the Risk Profile and KPMM BNI reporting individually as well as the Integrated Risk Profile and Integrated KPMM of the BNI Financial Conglomerate.

3. Risk Monitoring

The risk monitoring process ensures the risk management performance by monitoring the established risk mitigation and limits.

Matters to be considered in the risk monitoring process are as follows:

- a. Risk monitoring includes monitoring of the amount of risk exposure, risk tolerance, limit compliance, and stress testing results as well as consistency in the implementation of established policies and procedures;

- b. Risk monitoring is carried out by both the Operational Unit and the Risk Management Unit;
- c. Monitoring results are presented in reports that are submitted periodically to external (Regulator) and internal (Management) parties.

Risk monitoring is conducted both by the Operational Unit (risk-taking unit) as the risk owner and by the risk control unit, with the monitoring results presented in regular reports including Loan Portfolio Report, Market Risk and Liquidity Risk Monitoring Report, Expense Reports Operational Risk, Operational Risk Self-Assessment Feedback Report, Internal Risk Report, Risk Profile Report, Bank Soundness Report, and Minimum Capital Adequacy Requirement (KPMM) Report.

4. Risk Control

The risk control process is carried out primarily to manage risks that could interfere with BNI's business continuity.

Matters to be considered in the risk control process are as follows:

- a. The risk control system refers to the established policies and procedures;
- b. The risk control process is adjusted to the risk exposure as well as the level of risk to be taken (risk appetite) and risk tolerance;
- c. The mechanism for hedging and risk mitigation is carried out by the Operational Unit in collaboration with the Risk Management Unit.

Risk control strategies implemented include the following:

- a. Risk Acceptance
For risk types that are processively impossible to intervene in to prevent or improve the situation, where the potential risks will be accepted as a consequence of the bank taking advantage of business opportunities, with the consideration that the existing risks are still within the Bank's limits/tolerance. However, strict controls are required to be exercised if this risk control strategy is implemented.

**b. Risk Avoidance**

Risk avoidance is carried out to prevent BNI from experiencing an unacceptable risk, or to prevent an increase in existing risk exposures. Risk avoidance is chosen if the potential profit from a business activity is smaller than the possible risk exposure.

c. Risk Transfer

In the risk transfer strategy, existing risks inherent in the business activities are transferred to other parties. One of the most common methods of risk transfer is the use of insurance services or outsourcing.

d. Risk Mitigation

Risk control will be optimal if efforts are made to reduce existing risks. Risk mitigation is intended to minimize losses triggered by external factors, as well as events within the bank. One of the alternatives to press and reduce risk is through increased control and improvement of work systems and procedures.

5. Risk Management Information System

The Risk Management information system is required to support the identification, measurement, monitoring, and risk control processes.

a. Risk Data Management

Risk data management is used to ensure the level of availability, accuracy, and timeliness of the distribution of risk management information/reports as well as relevant parties in the Risk management report.

b. Risk Management Reporting

The Risk Management Reporting to certain parties must consider the following matters:

- i) The frequency of reports adjusted to the needs of relevant parties; therefore, they can provide adequate information for decision-makers;
- ii) The reports contain information on total risk exposure, monitoring of material risks, setting limits, compliance with policies and procedures, achieving business performance, and implementing risk management.

The effectiveness of BNI's Risk Management Information System includes the following:

- a. Information availability that is accurate, complete, informative, timely, and accessible to the Board of Commissioners, the Board of Directors, and related units of Risk Management to assess, monitor, and mitigate risks faced by BNI, both overall and by risk type.;
- b. The effectiveness of Risk Management includes the policies, procedures, and determination of risk limits;
- c. Information availability on the results (realization) of Risk Management compared to the targets set by BNI following risk management policies and strategies.

Several risk management applications have been prepared to support the risk management processes in a good, accurate and timely manner, including the Internal Rating System, Scoring System, Operational Risk Toolkit (New PERISKOP), and Market & Liquidity Risk Management Applications.

BNI has prepared risk management solutions that are in line with the IT Strategic Plan, including the following:

- a. Preparing front-end applications for credit risk, market risk, and operational risk;
- b. Preparing data storage and information systems;
- c. Setting up the Capital Calculation Engine.

Before implementing a new risk management information system, tests are carried out to ensure that the processes and outputs produced have gone through the development, testing, and reassessment processes effectively and accurately.

Pillar 4. Complete Internal Control System

The application of BNI's Internal Control System is developed and implemented using the Three Lines of Defense model consisting of:

#1 RISK TAKING UNIT OR 1ST LINE OF DEFENSE	#2 RISK CONTROL UNIT OR 2ND LINE OF DEFENSE	#3 RISK ASSURANCE OR 3RD LINE OF DEFENSE
<p>Risk Owner, responsible for the risks taken, execution and results (Day to day risk management & control)</p> <ol style="list-style-type: none"> 1. Responsible for managing and controlling risks inherent in day-to-day business activities or functions; 2. Identifying, measuring, mitigating, monitoring and reporting risks inherent in business activities/functions in accordance with the strategies/policies/risk parameters set by the 2nd line of defense. 	<p>Risk Control, responsible for developing the Bank's risk management framework, policies, principles and methodology</p> <ol style="list-style-type: none"> 1. Preparing proposals for risk management strategies and policies, including risk appetite & limits; 2. Developing frameworks, policies, principles, tools, methodologies and risk management standards; 3. As a risk oversight unit, carrying out aggregation and overall risk reporting; 4. Advising or providing recommendations to the 1st line of defense on implementing risk policies according to authority; 5. Escalating issues/important decisions to Senior Management/Directors and/or Risk Management Committee and Anti Fraud, Risk Management Sub-Committee and/or Integrated Risk Management Committee (Risk Management Committees). 	<p>Risk Assurance, responsible for independently evaluating the effectiveness of risk management and internal control implementation</p> <ol style="list-style-type: none"> 1. Conducting independent and periodic internal audits on the risk management and internal control; 2. Preparing corrective action recommendations and monitoring their implementation; 3. Reporting the audit results to the Audit Committee and key stakeholders according to their authority.

The Risk Owner as the first line of defense/Risk-Taking Unit and manages the risks inherent in the business and day- to-day functions. The Bank's Risk Management Division, Policy Governance Division, and Compliance Division acts as the second line of defense/Risk Control Unit.

The Internal Audit Unit (IAU) acts as a third line of defense/Risk Assurance Unit, and is responsible to the President Director and is tasked with independently assessing the suitability of the risk management implementation processes, and the internal control system with established policies and procedures and the Regulator's provisions.

BNI's Internal Control System has been effective and efficient with the implementation of separation of functions between the Risk-Taking Unit and the Risk Control Unit as well as the Risk Assurance Unit.

SPECIFIC IMPLEMENTATION OF RISK MANAGEMENT

There are 8 (eight) risk profiles managed by BNI as the Bank and 10 (ten) risk profiles managed by the Bank as a Financial Conglomerate, namely credit risk, market risk, liquidity risk, operational risk, legal risk, reputation risk, strategic risk, risk compliance, intra-group transaction risk, and insurance risk.

CREDIT RISK

A risk arising from the failure of other parties to fulfill their obligations to the Bank, including risks due to debtor failure, credit concentration risk, counterparty credit risk, and settlement risk.

Credit Risk Management

The emergence of the COVID-19 pandemic significantly changed to the global and domestic economies. It also had an impact on the performance and quality of bank lending in Indonesia in general. Although still in a condition of high uncertainty, BNI continues to adapt and strives to continue to grow by applying selective loan expansion. BNI has also instigated efforts to improve the loan quality by applying an end to end loan process. As of the end of 2021, BNI disbursed loans amounting to Rp581.5 trillion, an increase of 5.4% YoY from Rp545.1 trillion. BNI's loan disbursements are mainly to the Corporate segment, and the small business segment, which includes the People's Business Loan (KUR) program, and the consumer business segment, which is mostly home ownership and payroll loans.

During the COVID-19 pandemic, BNI was one of the banks that actively supported the Government's efforts to reduce the impact of the COVID-19 pandemic, through the National Economic Recovery (PEN) program and loan restructuring. Government fund placements in the framework of PEN in phase 2 at BNI was Rp7.5 trillion. Of the PEN credit distribution target BNI has disbursed loans amounting to Rp28 trillion, equivalent of 3.7 times the PEN fund, and above the target of Rp22.5 trillion. BNI's disbursed loans to the MSME segment amounting to Rp24.26 trillion or 86.64% of the total loan disbursement in the context of PEN. In addition for the Government PEN fund placement, BNI also disbursed other PEN programs such as Guaranteed Non-KUR KMK of Rp4.36 trillion, Guaranteed Corporate Loans of Rp383.2 billion, and Government Interest Subsidy of Rp80.8 billion. BNI

loans restructured with the COVID-19 stimulus during 2021 amounted to Rp79.9 trillion or 14.2% of the total loans. Based on the debtor credit risk classification, BNI's COVID-19 loan restructuring was dominated by the Medium Risk category at 61%, followed by the Low Risk category at 23% and High Risk at 16% of the total COVID-19 credit restructured loans. Most of the debtors receiving the COVID-19 credit restructuring facility came from the Construction sector at 19.9%, the Manufacturing Industry sector at 17.6%, the Provision of Accommodation, and Food and Drink sector at 12.6% and the Wholesale and Retail Trade sector at 13.4%. Based on this scheme, BNI's COVID-19 restructured loans were dominated with the Term Extension scheme at 30.67%, and the reduction of loan interest rates at 20.34%. BNI also used several other schemes such as adding loan facilities, reducing interest arrears, or a combination of several restructuring schemes. The restructuring programs were implemented so that business debtors could survive and recover from the impact of the COVID-19 pandemic. To maintain the Bank's ability to absorb risks arising and to anticipate uncertain economic conditions, BNI is gradually increasing the Bank's absorption ratio.

Currently, BNI is developing concepts and mechanisms for implementing a more prudent, measurable end-to-end loan process with consistent and disciplined control in an effort to build a better loan risk culture, which includes:

1. Establishing selective expansion guidelines to direct the loan portfolio to sectors that in a stronger position during the COVID-19 Pandemic;
2. Establishing Risk Acceptance Criteria that considers Environmental, Social and Governance (ESG) factors at the debtor level and at the industrial level (Industry Risk Acceptance). Establishing an aggressive, selective and quality BNI expansion. This is intended so that BNI can expand and still maintain loan quality;
3. Implementing a better control mechanism for debtors to ensure that monitoring tools are implemented consistently, with a discipline and quality, so that BNI can determine the right action plan for each debtor and monitor its implementation;
4. Implementing faster and earlier remedial actions to accelerate performance improvements of debtors with potential problems and to mitigate potential risks;

5. Conducting regular and in-depth loan training to increase loan knowledge and capabilities as well as increase awareness of risk culture.

Governance and Organization

A four eyes principles in BNI's loan process has been implemented in the Credit Committee's loan approval process. The Credit Committee is a forum with credit decision officials with the authority to decide proposed loans and follows the established limits. The Credit Committee members consist of the business units and the business risk unit officers. The business units and business risk units act as the first line of defense (risk owner) in managing and controlling credit risk in the daily operations of the units.

The Enterprise Risk Management Division (ERM) and Policy Governance Division (PGV) act as the second line of defense and prepares a credit infrastructure, including developing credit policies and procedures, setting limits on credit approval authority, preparing rating and scoring systems, monitoring credit portfolios together with the business units, and preparing other necessary tools to support lending activities.

The Internal Audit Unit (IAU), as the third line of defense, actively maintains the credit portfolio's quality through immediate post reviews by checking debtors following the first funding process. IAU also checks debtors using a sampling method to maintain the quality of debtors funded. To ensure the implementation of a high-quality sustainable credit process, the immediate post-review function will continue to be improved.

Process

The credit risk management process is implemented across the entire credit process, starting with credit marketing until the loans are paid off. This process is continuous in the value chain activity, and begins with strategy determination and planning, customer insight, portfolio planning, product development, credit processing, credit administration, intensive monitoring, and portfolio optimization.

Policies and Procedures

The Credit Policies and Procedures are formulated as the basis for implementing the credit process activities, so loan quality can be maintained while considering the business targets set. BNI has a Bank Credit Policy (KPB), which was decided by the Credit Policy Committee Forum (KKP) and approved by the Board of Commissioners. The KPB has been translated into Credit Company Guidelines by the Credit Procedure Committee Forum (KPP).

Additionally, BNI has a Credit Risk Management Policy in the form of Credit Risk Management Procedures. The Credit policies and procedure and Credit Risk Management have been standardized in line with the Company Guidelines. The Company Guidelines currently used are available in the form of an online manual, namely BNI e-PP (electronic Company Guidelines).

To respond to the loan restructuring stimulus program, BNI has prepared instructions for implementing a stimulus scheme for debtors affected by COVID-19 in accordance with OJK Regulation No. 11 of 2020 and OJK Regulation No. 48 of 2020. In the application of OJK Regulation No. 17 - 2021, BNI has also made adjustments to the instructions for implementing the stimulus scheme for debtors affected by COVID-19 including adding more detailed substance related to risk management that must be carried out by the Bank when implementing the restructuring extension, such as (a) Criteria for eligible debtors to receive an extension; (b) Adequacy of CKPN formation; (c) Prerequisites for Dividend Distribution; and (d) Stress Testing on the impact of restructuring the Bank's capital and liquidity.

CREDIT RISK MANAGEMENT PROCESS



For the operational activities for individual customers, the credit risk management process is carried out by the Business Units and the Business Risk Units, including the stages of identification (including verification of data accuracy), measurement (use of credit analysis tools), monitoring (through regular customers visits and review ratings), and control (such as by setting limits, covenants, and mitigant factors).

For the entire portfolio, loan monitoring and reporting is carried out periodically by Management through the Loan Portfolio Report. Also, loan concentration is monitored, whether it is concentrated in certain economic sectors or concentrated in certain segments. Periodically in the Risk Management & Anti-Fraud Committee Forum, the Risk Management Sub Committee (KRA-RMC) evaluates the target achievements, determines steps, and coordinates follow-up improvements, and evaluates the effectiveness of corrective measures.

To improve loan quality, BNI has developed a more prudent, measurable end-to-end loan process improvement mechanism with consistent and disciplined controls in an effort to build a stronger credit risk culture.

The most basic effort to improve loan quality is through strengthening the risk culture by improving the way of working/behavior in loan extensions and managing credit risk management. The most important risk behaviors to be improved by all employees are increasing the Level of Care, Communication, Openness, Cooperation, and Tolerance.

The end-to-end process improvement is divided into 3 (three) activities, namely:

1. Pipeline Management
Acquiring quality and good debtors by establishing an implementation mechanism by Industry Class as the Portfolio Guideline to direct the loan portfolio to a stronger and healthier sectors; and by implementing the Risk Acceptance Criteria when screening prospective debtors to ensure that prospective debtors are in accordance with BNI's Risk Appetite;
2. Underwriting
Conducting comprehensive debtor assessments, through the Risk Acceptance Criteria in the underwriting process; and establishing parameters for a sound credit structure for the selected sectors to mitigate potential risks;
3. Monitoring
Obtaining good quality and sustainable loans, through better control mechanisms to ensure monitoring tools are implemented consistently, with discipline and quality.

Tools and Methods

To support the business process operations and credit risk management, BNI uses credit risk management tools at the individual and portfolio levels. For individual loan exposure in the business banking segment, BNI has a rating model in its internal rating system, while for the consumer segment there is a debtor scoring system to help analyze the quality of debtors in the credit process.

To prevent the Bank's portfolios from being concentrated on certain debtors and economic sectors, credit limits have been established according to risk appetite and risk tolerance, while to anticipate exceedances of BMPK, BNI has set house limits with more prudent limits than BMPK limits by following the regulatory provisions.

To regulate the loan portfolio composition, BNI has a Loan Exposure Limit (LEL) which serves to limit the risk of concentration of loan exposure in each economic sector and each business segment, and serves as a guideline for loan expansion for one year. For industrial risk assessment, BNI implements the Industry Risk Rating (IRR) and financial ratio standards as factors in assessing the quality of debtors from the industry side.

As part of measuring credit risk and anticipating changes in macro factors that may have an impact on the Company, BNI regularly conducts stress testing of credit risk to assess the changes in loan portfolios and the impact on the Bank and its ability to overcome these conditions.

To integrate documentation in the credit process, BNI uses the e-PAK application for corporate loans to assist in the end-to-end credit processes with documentation carried out by integrating several existing tools.

Establishment of Allowance for Impairment Losses (CKPN)

The establishment of Allowance For Impairment Losses (CKPN) in BNI follows the the Statement of Financial Accounting Standards (PSAK) number 71: Financial Instruments as the accounting standard governing financial instruments that became effective as of January 1, 2020.

PSAK 71 requires the inclusion of information relating to past events, current conditions, and forecasts of future economic conditions. The projected change in loan losses must reflect changes in the related conditions in one period. The calculation for the recognition of Expected Credit Loss- ECL requires a forward-looking estimation of Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD).

Following these accounting requirements, the coverage of financial assets assessed for the calculation of Expected Loss or Allowance Impairment Losses (CKPN) based on PSAK 71 is as follows:

1. Financial assets, as debt instruments, are measured at amortized cost or fair value through other comprehensive income (FVOCI) including loans and debt securities;
2. Loan commitments issued are not measured at fair value through profit and loss (FVTPL);
3. Financial guarantee contracts issued that fall within the scope of PSAK 71 and are not measured in FVTPL.

The calculation of impairment value is carried out through two methods, namely individual or collective impairment.

1. Individual Value Impairment

Based on PSAK 71, ECL for individual credit is calculated using a Discounted Cash Flow method that considers the existing forward-looking scenarios based on 3 (three) scenarios: fair, optimistic and pessimistic economic conditions.

2. Collective Value Impairment

Value Impairment using the collective methodology and is applied to portfolios that not meet the criteria for individual portfolios. The collective value Impairment uses the PD, LGD, and EAD components

The definition of default used in the calculation of Probability of Default and Loss Given Default for loan portfolios, besides following the regulatory regulations concerning the Assessment of Asset Quality of Commercial Banks and future changes, BNI also uses a definition of default or Past Due of more than 90 days, with an internal rating default, or Collectibility of more than 3. For non-credit portfolios, the definition of default refers to the regulation concerning the Assessment of Asset Quality of Commercial Banks and rating assessments published by external rating agencies.

Based on the general approach to calculating impairment in PSAK 71, 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 have a significant increase in credit risk compared to the risk level from the initial recognition, or have a low credit risk at the reporting date. For these assets, ECL calculation will apply for a maximum of 12 months or following the remaining tenor.
2. Stage 2: includes financial instruments that experience an increase in credit risk from the initial recognition (except for credit risks at the reporting date classified as low) but that experience or qualify for default. For these assets, ECL calculation will apply over the remaining tenor, or follow the expected remaining tenor. ECL lifetime is the expected credit loss from all default events that may occur during the estimated life of the financial instrument.
3. Stage 3: includes financial instruments that are shown to be objectively impaired at the reporting date. This stage consists of debtors in default.

Probability of Default (PD)

Probability of Default (PD) is the main component in calculating CKPN and in assessing the potential default of a debtor group based on indicators of earning asset quality for each asset. To fulfill the principles of PSAK 71, PD needs to be established into a transition that has a time dimension known as PD forward-looking.

PD forward-looking defines the potential of default not limited to 1 year but up to the longest tenor held by the bank. PD forward-looking will be distributed each year/month of the projected tenor of the facility. This distribution is known as the PD forward-looking term structure.

PD forward-looking term structure is required for the calculation of CKPN according to the stage in each facility. In generating PD values, BNI uses 3 approaches based on the availability of portfolio data, namely the Vasicek Model, the Bayesian Scalar Model, and the Matrix Transition Model.

Loss Given Default (LGD)

In calculating CKPN PSAK 71, the estimated value of Loss Given Default (LGD) considers BNI recovery data from default accounts. There are 2 (two) LGD segments, namely secured LGD and unsecured LGD. Secured LGD consists of the Appreciated Model, the Depreciation Model, and the Static Model. While the Unsecured LGD consists of the discounted difference in the debit model.

In the LGD calculation, there is a Recovery Secured component, which is a recovery covered by collateral or the LGD portion of the collateral recovery that has been discounted according to the workout period. Unsecured recovery is the recovery derived from cash discounted recoveries according to the workout period. Direct costs are those that arise during the billing or guarantee execution process.

Collateral recovery/recovery secured is divided into 3 types, namely appreciated collateral, depreciated collateral, and static collateral. Determination and management/changing of rules to classify the collateral segmentation into the three types of collateral is carried out periodically.

For the unsecured recovery rate calculation, the population being observed includes accounts that have experienced defaults but are still in default status until the end of the cut-off modeling period and have default ages exceeding the workout 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 flows of the relevant 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 outstanding balances before default.

EAD modeling is carried out based on the characteristics of the related financial instruments, divided into several categories, namely installment loans, revolving loans, 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 reused if a principal debt is paid;
2. The funding mechanism can be carried out without a credit analysis mechanism.

Expected Credit Loss (ECL)

Broadly speaking, 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, the measurement of allowance for impairment losses on financial assets is carried out for a maximum of ECL 12 months.

Application of PSAK 71 during COVID-19 Pandemic

Referring to OJK letter No.S-7/D.03/2020, dated April 14, 2020, concerning the Implementation of PSAK 71 and PSAK 68 during the COVID-19 Pandemic, BNI has identified debtors who have been performing well but whose performance has decreased due to COVID-19,

and has implemented a restructuring scheme based on the assessment results, and have classified debtors who received a restructuring scheme in stage 1 where no additional CKPN was needed, and has carried out ongoing identification and monitoring, and establish CKPN if the debtors in the restructuring scheme perform well at first, but are expected to decline from the impact of COVID-19 starting and will be unable to recover after the restructuring/impact of COVID-19 is ended.

Disclosure of net receivables and details of impairment allowance changes for Bank Only and Bank consolidated are presented in the following tables: Table 2.1.a, Table 2.1.b, Table 2.2.a, Table 2.2.b, Table 2.3.a, Table 2.3.b, Table 2.4.a, Table 2.4.b, Table 2.5.a, Table 2.5.b, Table 2.6.a, and Table 2.6.b

Disclosure of Net Receivables by Region, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		NET RECEIVABLES BY AREA					
		SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA DAN PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables	-	341	25	249,608,909	19,678,302	269,287,577
2	Public Sector Entities Receivables	5,717,890	1,468,481	15,733,271	58,722,427	1,089,812	82,731,881
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	5,701	5,701
4	Bank Receivables	153,001	41,693	574,286	44,148,413	7,326,208	52,243,601
5	Loans Secured by Residential Property	3,129,317	2,645,901	5,978,449	2,588,303	133	14,342,103
6	Loans Secured by Commercial Real Estate	1,764,573	1,399,136	2,097,523	11,266,880	-	16,528,112
7	Employee/Retiree Loans	37,956	25,854	66,394	25,937	4,857	160,998
8	Micro Business, Small Business, and Retail Portfolio Receivables	27,523,079	23,103,830	40,142,689	29,866,833	868	120,637,299
9	Corporate Receivables	61,307,685	35,591,772	73,100,329	170,862,613	28,433,077	369,295,476
10	Past Due Receivables	733,154	376,346	1,667,536	1,512,777	319,759	4,609,572
11	Other Assets	3,155,582	2,148,529	4,383,858	39,587,882	315,733	49,591,584
TOTAL		103,522,237	66,801,883	143,744,360	608,190,974	57,174,450	979,433,904



(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY AREA					
	SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA AND PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL
	(9)	(10)	(11)	(12)	(13)	(14)
	-	-	-	163,601,616	17,914,600	181,516,216
	7,147,488	1,046,412	16,772,316	62,321,791	771,268	88,059,275
	-	-	-	-	-	-
	224,271	403,002	546,551	48,283,066	5,563,525	55,020,415
	2,982,065	2,610,707	5,552,868	2,326,923	-	13,472,563
	1,385,468	1,642,329	2,677,478	11,809,125	-	17,514,400
	59,268	36,546	98,970	44,412	5,040	244,236
	23,245,262	19,057,407	33,737,546	25,829,796	525	101,870,536
	58,159,546	31,304,383	67,726,425	173,537,730	27,498,246	358,226,330
	1,060,082	609,358	1,300,214	2,109,185	602,965	5,681,804
	3,003,953	2,075,838	4,134,656	44,414,194	292,343	53,920,984
	97,267,403	58,785,982	132,547,024	534,277,838	52,648,512	875,526,759

Disclosure of Net Receivables by Region, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021						
		NET RECEIVABLES BY AREA						
		SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA DAN PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
1	Government Receivables	-	341	25	249,608,909	19,678,302	269,287,577	
2	Public Sector Entities Receivables	5,717,890	1,468,481	15,733,271	58,722,427	1,089,812	82,731,881	
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	5,701	5,701	
4	Bank Receivables	154,747	41,693	580,383	44,431,242	7,326,208	52,534,273	
5	Loans Secured by Residential Property	3,129,317	2,645,901	5,978,449	2,588,303	133	14,342,103	
6	Loans Secured by Commercial Real Estate	1,764,573	1,399,136	2,097,523	11,266,880	-	16,528,112	
7	Employee/Retiree Loans	38,481	25,854	70,169	21,637	4,857	160,998	
8	Micro Business, Small Business, and Retail Portfolio Receivables	27,524,497	23,103,830	40,151,453	30,713,787	868	121,494,435	
9	Corporate Receivables	61,315,814	35,591,773	73,303,657	170,051,250	28,433,077	368,695,571	
10	Past Due Receivables	733,448	376,346	1,667,536	1,512,483	319,759	4,609,572	
11	Other Assets	3,155,583	2,148,528	4,383,858	49,225,463	315,733	59,229,166	
TOTAL		103,534,350	66,801,883	143,966,324	618,142,381	57,174,450	989,619,389	

(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY AREA					
	SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA AND PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL
	(9)	(10)	(11)	(12)	(13)	(14)
	-	-	836	163,600,780	17,914,600	181,516,216
	7,149,459	1,046,892	16,778,815	60,301,956	771,268	86,048,390
	-	-	-	-	-	-
	224,939	403,247	547,656	32,633,570	5,563,525	39,372,937
	2,982,065	2,610,707	5,552,868	2,326,924	-	13,472,564
	1,385,468	1,642,329	2,677,478	11,809,126	-	17,514,401
	59,728	36,546	100,224	42,697	5,040	244,235
	23,251,998	19,057,483	33,845,538	25,415,165	525	101,570,709
	58,169,189	31,304,384	67,952,228	174,367,702	27,498,246	359,291,749
	1,060,082	609,358	1,300,214	2,109,185	602,965	5,681,804
	3,003,952	2,075,837	4,134,655	45,500,761	292,342	55,007,547
	97,286,880	58,786,783	132,890,512	518,107,866	52,648,511	859,720,552

Disclosure of Net Receivables by Remaining Contract Period, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		NET RECEIVABLES BY REMAINING CONTRACT PERIOD					
		< 1 YEAR	> 1 YEAR - 3 YEARS	> 3 YEARS - 5 YEARS	> 5 YEARS	NON-CONTRACTUAL	TOTAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables	118,712,165	22,197,011	30,133,595	96,077,449	2,167,357	269,287,577
2	Public Sector Entities Receivables	29,252,729	11,302,676	12,440,620	22,499,884	7,235,972	82,731,881
3	Multilateral Development Banks and International Institutions Receivables	5,701	-	-	-	-	5,701
4	Bank Receivables	34,521,048	5,330,127	53,858	10,747,835	1,590,733	52,243,601
5	Loans Secured by Residential Property	134,902	714,112	1,260,388	12,232,701	-	14,342,103
6	Loans Secured by Commercial Real Estate	2,433,704	1,980,973	5,715,217	6,398,218	-	16,528,112
7	Employee/Retiree Loans	4,916	17,263	14,809	124,010	-	160,998
8	Micro Business, Small Business, and Retail Portfolio Receivables	9,444,948	22,742,206	32,654,264	46,800,855	8,995,026	120,637,299
9	Corporate Receivables	147,477,535	36,353,281	61,858,999	116,706,685	6,898,976	369,295,476
10	Past Due Receivables	2,008,836	485,857	550,204	1,546,713	17,962	4,609,572
11	Other Assets	-	-	-	816,615	48,774,969	49,591,584
TOTAL		343,996,484	101,123,506	144,681,954	313,950,965	75,680,995	979,433,904



(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY REMAINING CONTRACT PERIOD					
	< 1 YEAR	> 1 YEAR - 3 YEARS	> 3 YEARS - 5 YEARS	> 5 YEARS	NON-CONTRACTUAL	TOTAL
	(9)	(10)	(11)	(12)	(13)	(14)
	72,909,114	12,378,162	13,539,478	43,084,526	39,604,937	181,516,217
	37,418,001	9,543,524	11,703,708	22,385,171	7,008,871	88,059,275
	-	-	-	-	-	-
	36,185,421	5,238,339	566,669	492,115	12,537,872	55,020,416
	120,146	893,362	1,110,914	11,348,141	-	13,472,563
	2,814,322	4,320,361	2,309,606	8,070,111	-	17,514,400
	4,455	21,774	28,927	189,063	16	244,235
	7,999,296	18,212,355	26,234,832	39,358,295	10,065,759	101,870,537
	139,402,322	37,449,277	55,303,566	118,866,707	7,204,457	358,226,329
	1,933,640	429,879	428,033	2,835,949	54,302	5,681,803
	-	-	-	-	53,920,984	53,920,984
	298,786,717	88,487,033	111,225,733	246,630,078	130,397,198	875,526,759

Disclosure of Net Receivables by Remaining Contract Period, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		NET RECEIVABLES BY REMAINING CONTRACT PERIOD					
		< 1 YEAR	> 1 YEAR - 3 YEARS	> 3 YEARS - 5 YEARS	> 5 YEARS	NON-CONTRACTUAL	TOTAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables	118,712,165	22,197,011	30,133,595	96,077,449	2,167,357	269,287,577
2	Public Sector Entities Receivables	29,253,192	11,329,705	12,454,815	22,499,884	7,194,285	82,731,881
3	Multilateral Development Banks and International Institutions Receivables	5,701	-	-	-	-	5,701
4	Bank Receivables	34,781,314	5,343,429	59,154	10,747,835	1,602,541	52,534,273
5	Loans Secured by Residential Property	134,902	714,112	1,260,388	12,232,701	-	14,342,103
6	Loans Secured by Commercial Real Estate	2,433,704	1,980,973	5,732,125	6,381,310	-	16,528,112
7	Employee/Retiree Loans	9,470	59,426	85,014	7,088	-	160,998
8	Micro Business, Small Business, and Retail Portfolio Receivables	9,448,564	22,755,498	32,656,768	46,800,855	9,832,750	121,494,435
9	Corporate Receivables	147,656,366	36,719,778	62,044,797	116,733,713	5,540,917	368,695,571
10	Past Due Receivables	2,008,836	485,857	550,204	1,546,713	17,962	4,609,572
11	Other Assets	-	-	-	816,615	58,412,551	59,229,166
TOTAL		344,444,214	101,585,789	144,976,860	313,844,163	84,768,363	989,619,389



(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY REMAINING CONTRACT PERIOD					
	< 1 YEAR	> 1 YEAR - 3 YEARS	> 3 YEARS - 5 YEARS	> 5 YEARS	NON-CONTRACTUAL	TOTAL
	(9)	(10)	(11)	(12)	(13)	(14)
	72,909,534	12,378,907	13,539,478	43,084,526	39,603,771	181,516,216
	37,419,460	9,571,468	11,754,591	22,385,171	4,917,700	86,048,390
	-	-	-	-	-	-
	20,476,329	5,256,164	601,025	492,115	12,547,304	39,372,937
	120,146	893,362	1,110,914	11,348,142	-	13,472,564
	2,814,322	4,320,361	2,309,606	8,070,112	-	17,514,401
	7,629	31,329	48,129	157,132	16	244,235
	8,039,213	18,464,453	26,332,586	39,358,295	9,376,162	101,570,709
	139,545,417	37,843,730	55,536,984	118,897,927	7,467,691	359,291,749
	1,933,640	429,879	428,033	2,835,949	54,303	5,681,804
	-	-	-	-	55,007,547	55,007,547
	283,265,690	89,189,653	111,661,346	246,629,369	128,974,494	859,720,552

Disclosure of Net Receivables by Economic Sector, Bank Only

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
December 31, 2021							
1	Agriculture, Forestry, and Fisheries	-	5,375,259	-	-	-	
2	Mining and Extracting	-	1,072,984	-	-	-	
3	Processing Industry	-	11,730,732	-	19,284	-	
4	Electricity, Gas, Hot Water and Cold Water	-	4,057,711	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	6,930	-	-	-	
6	Construction	-	17,268,469	-	-	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	5,469,963	-	-	-	
8	Transportation & Warehousing	-	8,657,694	-	-	-	
9	Accommodation and Restaurants	-	-	-	-	-	
10	Information and Communications	-	960,251	-	-	-	
11	Finance and Insurance Activities	5,560,418	2,044,696	-	52,224,317	-	
12	Real Estate	1	264,472	-	-	-	
13	Professional, Science, and Technical Activities	-	-	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	20,573	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	261,080,777	78,726	-	-	-	
16	Education	25	-	-	-	-	

(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	-	-	10,849,804	39,065,639	368,657	-
	-	-	43,769	13,814,288	107,228	-
	-	-	4,024,186	86,901,208	693,484	-
	-	-	25,427	18,370,970	3,789	-
	-	-	43	31,375	6	-
	-	-	474,248	31,771,561	316,387	-
	267	-	26,284,610	47,071,386	1,118,740	-
	-	-	616,967	26,507,512	101,217	-
	-	-	2,803,940	13,244,824	411,773	-
	-	-	68,430	2,940,028	11,226	-
	-	-	5,403	1,140,963	13	-
	14,042,822	-	1,201,967	11,962,463	423,317	-
	-	-	-	-	-	-
	1,092,350	-	93,497	930,525	32,929	-
	-	-	336	1,083,771	-	-
	-	-	76,637	1,185,340	1,002	-

Disclosure of Net Receivables by Economic Sector, Bank Only

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
17	Human Health and Social Activities	-	3,085	-	-	-	
18	Arts, Entertainment, and Recreation	-	5,222	-	-	-	
19	Other Services Activities	-	30,915	-	-	-	
20	Household Activities as Employer	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	
22	Non-Business	-	28,118	-	-	14,342,103	
23	Others	2,646,356	25,656,081	5,701	-	-	
TOTAL		269,287,577	82,731,881	5,701	52,243,601	14,342,103	
December 31, 2020							
1	Agriculture, Forestry, and Fisheries	-	4,953,235	-	-	-	
2	Mining and Extracting	-	1,182,747	-	-	-	
3	Processing Industry	-	15,320,587	-	580	-	
4	Electricity, Gas, Hot Water and Cold Water	-	4,407,046	-	-	-	
5	Water Management, Waste Management, Garbage Management and Recycling	-	94,866	-	-	-	
6	Construction	-	16,235,292	-	-	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	4,439,872	518,608	-	-	-	
8	Transportation & Warehousing	-	9,673,863	-	-	-	
9	Accommodation and Restaurants	-	12,654	-	-	-	

(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	-	-	459,324	1,863,095	3,139	-
	-	157	431,511	616,778	10,804	-
	-	931	2,554,843	3,651,751	63,968	-
	-	-	17,987	6,828	711	-
	-	-	-	8,164	-	-
	1,365,828	157,268	66,247,012	9,095,491	558,920	-
	26,845	2,642	4,357,358	58,031,516	382,262	49,591,584
	16,528,112	160,998	120,637,299	368,295,476	4,609,572	49,591,584
	-	-	8,147,189	44,084,937	224,670	-
	-	-	43,756	13,187,649	131,307	-
	521,787	-	3,946,558	71,994,228	2,328,409	-
	-	-	34,922	16,431,686	93,422	-
	-	-	752	353,709	2,011	-
	400	-	419,192	30,272,003	317,928	-
	551	-	20,228,744	45,596,055	872,762	-
	-	-	597,425	26,342,101	169,503	-
	-	-	2,324,093	13,421,858	302,918	-

Disclosure of Net Receivables by Economic Sector, Bank Only

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
10	Information and Communications	-	4,702	-	-	-	
11	Finance and Insurance Activities	9,811,835	4,123,963	-	55,019,836	-	
12	Real Estat	-	38,183	-	-	-	
13	Professional, Science, and Technical Activities	-	5,134	-	-	-	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	49,369	-	-	-	
15	Government, Defense, and Mandatory Social Security Administration	79,156,470	5,878,861	-	-	-	
16	Education	-	-	-	-	-	
17	Human Health and Social Activities	-	861	-	-	-	
18	Arts, Entertainment, and Recreation	-	19,009	-	-	-	
19	Other Services Activities	-	-	-	-	-	
20	Household Activities as Employer	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	
22	Non-Business	3	2	-	-	11,193,659	
23	Others	88,108,037	25,540,293	-	-	2,278,904	
TOTAL		181,516,217	88,059,275	-	55,020,416	13,472,563	

(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	-	-	290	12,804	82	-
	-	-	8,623	1,492,006	6,404	-
	6,399,284	-	537,815	8,486,610	99,191	-
	860,411	-	72,312	1,141,060	13,337	-
	8,273,975	-	695,370	10,972,789	128,249	-
	-	-	991	185,769	-	-
	-	-	73,962	1,070,553	184	-
	-	-	383,869	3,759,264	2,547	-
	-	-	2,028,243	5,097,643	201,982	-
	-	-	-	-	-	-
	-	-	20,892	10,816	-	-
	-	-	-	7,880	-	-
	1,432,959	240,080	57,189,371	8,889,427	466,870	-
	25,033	4,155	5,116,168	55,415,482	320,027	53,920,984
	17,514,400	244,235	101,870,537	358,226,329	5,681,803	53,920,984

Disclosure of Net Receivables by Economic Sector, Bank Consolidated with Subsidiaries

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY
(1)	(2)	(3)	(4)	(5)	(6)	(7)
December 31, 2021						
1	Agriculture, Forestry, and Fisheries	-	5,375,259	-	-	-
2	Mining and Extracting	-	1,072,984	-	-	-
3	Processing Industry	-	11,730,732	-	19,284	-
4	Electricity, Gas, Hot Water and Cold Water	-	4,057,712	-	-	-
5	Water Management, Waste Management, Garbage Management and Recycling	-	6,930	-	-	-
6	Construction	-	17,309,693	-	-	-
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	-	5,470,426	-	-	-
8	Transportation & Warehousing	-	8,657,694	-	-	-
9	Accommodation and Restaurants	-	-	-	-	-
10	Information and Communications	-	960,251	-	-	-
11	Finance and Insurance Activities	5,560,418	2,044,696	-	52,514,989	-
12	Real Estat	1	264,472	-	-	-
13	Professional, Science, and Technical Activities	-	-	-	-	-
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	-	20,573	-	-	-
15	Government, Defense, and Mandatory Social Security Administration	261,080,777	78,726	-	-	-
16	Education	25	-	-	-	-
17	Human Health and Social Activities	-	3,085	-	-	-
18	Arts, Entertainment, and Recreation	-	5,222	-	-	-

(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	-	6,144	10,850,264	39,079,918	368,657	-
	-	795	44,502	13,922,075	107,228	-
	-	2,316	4,027,620	85,648,550	693,484	-
	-	3,428	25,427	18,390,633	3,789	-
	-	6	43	31,409	6	-
	16,908	602	476,336	31,908,407	316,387	-
	267	355	26,287,627	47,149,919	1,118,446	-
	-	1,360	620,710	26,691,618	101,481	-
	-	395	2,804,329	13,244,824	411,773	-
	-	151	68,845	2,960,447	11,256	-
	-	100,998	5,883	1,141,912	13	-
	14,027,134	86	1,203,737	12,025,132	423,317	-
	-	-	-	-	-	-
	1,091,130	7	93,635	935,400	32,929	-
	-	196	336	1,083,770	-	-
	-	1,041	76,908	1,195,015	1,002	-
	-	319	460,081	1,863,095	3,139	-
	-	170	431,521	618,194	10,804	-

Disclosure of Net Receivables by Economic Sector, Bank Consolidated with Subsidiaries

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
19	Other Services Activities	-	30,915	-	-	-	
20	Household Activities as Employer	-	-	-	-	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	
22	Non-Business	-	28,118	-	-	14,342,103	
23	Others	2,646,356	25,614,393	5,701	-	-	
TOTAL		269,287,577	82,731,881	5,701	52,534,273	14,342,103	
December 31, 2020							
1	Agriculture, Forestry, and Fisheries	-	4,972,214	-	1,812	-	
2	Mining and Extracting	-	1,186,030	-	962	-	
3	Processing Industry	20	15,322,791	-	1,184	-	
4	Electricity, Gas, Hot Water and Cold Water	520	4,413,797	-	3,253	-	
5	Water Management, Waste Management, Garbage Management and Recycling	11	95,012	-	70	-	
6	Construction	46	16,264,852	-	352	-	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	4,439,888	525,696	-	3,344	-	
8	Transportation & Warehousing	49	9,681,987	-	1,955	-	
9	Accommodation and Restaurants	16	12,902	-	-	-	
10	Information and Communications	-	4,706	-	1	-	
11	Finance and Insurance Activities	9,812,045	4,126,979	-	39,358,298	-	
12	Real Estat	22	38,332	-	335	-	
13	Professional, Science, and Technical Activities	3	5,154	-	45	-	

(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	-	1,005	2,554,901	3,660,137	63,968	-
	-	-	18,325	8,754	711	-
	-	-	-	8,164	-	-
	1,365,828	38,982	67,084,737	9,095,491	558,920	-
	26,845	2,642	4,358,668	58,032,707	382,262	59,229,166
	16,528,112	160,998	121,494,435	368,695,571	4,609,572	59,229,166
	-	2,153	8,179,532	44,158,564	224,670	-
	-	327	62,562	13,225,904	131,307	-
	521,787	1,030	4,001,456	72,361,144	2,328,409	-
	-	4,405	84,967	16,507,304	93,422	-
	-	95	1,829	355,337	2,011	-
	400	2,869	469,349	30,429,230	317,928	-
	551	4,308	20,260,520	45,673,839	872,762	-
	-	3,364	687,104	26,441,315	169,503	-
	-	1,271	2,330,279	13,433,718	302,918	-
	-	2	334	12,852	82	-
	18,740	11,008	23,297	1,618,578	6,404	-
	6,391,564	255	552,005	8,497,467	99,191	-
	859,373	34	74,219	1,142,520	13,337	-

Disclosure of Net Receivables by Economic Sector, Bank Consolidated with Subsidiaries

NO.	ECONOMIC SECTOR	GOVERNMENT RECEIVABLES	PUBLIC SECTOR ENTITIES RECEIVABLES	MULTILATERAL DEVELOPMENT BANKS AND INTERNATIONAL INSTITUTIONS RECEIVABLES	BANK RECEIVABLES	LOANS SECURED BY RESIDENTIAL PROPERTY	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	29	49,561	-	433	-	
15	Government, Defense, and Mandatory Social Security Administration	79,156,470	5,879,372	-	195	-	
16	Education	31	6	-	92	-	
17	Human Health and Social Activities	-	866	-	205	-	
18	Arts, Entertainment, and Recreation	192	19,009	-	155	-	
19	Other Services Activities	-	-	-	-	-	
20	Household Activities as Employer	-	-	-	246	-	
21	International Agencies and Other Extra-International Agencies Activities	-	-	-	-	-	
22	Non-Business	3	2	-	-	11,193,659	
23	Others	88,106,871	23,449,122	-	-	2,278,905	
TOTAL		181,516,216	86,048,390	-	39,372,937	13,472,564	



(in million Rupiah)

	LOANS SECURED BY COMMERCIAL REAL ESTATE	EMPLOYEE/ RETIREE LOANS	MICRO BUSINESS, SMALL BUSINESS, AND RETAIL PORTFOLIO RECEIVABLES	CORPORATE RECEIVABLES	PAST DUE RECEIVABLES	OTHER ASSETS
	(8)	(9)	(10)	(11)	(12)	(13)
	8,263,993	330	713,716	10,986,827	128,249	-
	-	45	1,849	187,521	-	-
	-	783	77,195	1,071,374	184	-
	-	574	384,144	3,759,264	2,547	-
	-	731	2,028,928	5,103,919	201,982	-
	-	-	-	-	-	-
	-	33	21,481	12,280	-	-
	-	-	-	7,880	-	-
	1,432,959	206,464	56,499,774	8,889,427	466,870	-
	25,034	4,154	5,116,169	55,415,485	320,028	55,007,547
	17,514,401	244,235	101,570,709	359,291,749	5,681,804	55,007,547

Disclosure of Receivables and Provisioning by Region, Bank Only

PORTFOLIO CATEGORY	DECEMBER 31, 2021						
	NET RECEIVABLES BY AREA						
	SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA DAN PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL	
(2)	(3)	(4)	(5)	(6)	(7)		
Receivables	105,516,966	64,340,420	148,823,972	524,869,184	54,287,331	897,837,873	
Impaired Receivables (Stage 2 and Stage 3)							
a. Not Yet Due	96,126,215	61,387,330	128,613,676	236,625,425	23,708,373	546,461,020	
b. Already Due	3,220,042	956,243	7,948,035	10,189,017	263,680	22,577,018	
Allowances for Impairment Losses - Stage 1	682,055	225,721	1,357,756	2,440,029	37,447	4,743,008	
Allowances for Impairment Losses - Stage 2	4,629,542	3,452,412	6,282,091	8,459,097	1,422,603	24,245,745	
Allowances for Impairment Losses - Stage 3	4,797,519	3,577,678	6,510,029	8,766,024	1,474,220	25,125,471	
Written-off receivables	1,445,761	816,693	2,272,980	6,687,177	4,665,624	15,888,235	

Disclosure of Receivables and Provisioning by Region, Consolidated with Subsidiaries

PORTFOLIO CATEGORY	DECEMBER 31, 2021						
	NET RECEIVABLES BY AREA						
	SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGARA DAN PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL	
(2)	(3)	(4)	(5)	(6)	(7)		
Receivables	105,530,693	64,340,420	149,080,262	527,414,081	54,287,331	900,652,787	
Impaired Receivables (Stage 2 and Stage 3)							
a. Not Yet Due	96,126,215	61,387,330	128,613,676	236,625,425	23,708,373	546,461,020	
b. Already Due	3,220,042	956,243	7,948,035	10,189,017	263,680	22,577,018	
Allowances for Impairment Losses - Stage 1	689,609	228,221	1,372,792	2,467,051	37,861	4,795,533	
Allowances for Impairment Losses - Stage 2	4,636,909	3,457,905	6,292,087	8,472,557	1,424,867	24,284,325	
Allowances for Impairment Losses - Stage 3	4,798,543	3,578,441	6,511,417	8,767,894	1,474,535	25,130,830	
Written-off receivables	1,445,761	816,693	2,272,980	6,687,177	4,665,624	15,888,235	

(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY AREA					
	SUMATERA AND KALIMANTAN	SULAWESI, BALI & NUSA TENGGERA AND PAPUA	JAWA (EXCL. JAKARTA AND BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL
	(8)	(9)	(10)	(11)		(12)
	96,864,716	56,033,149	133,750,944	451,820,040	50,780,590	789,249,439
	70,421,159	46,724,224	96,766,548	262,211,438	52,164,432	528,287,801
	2,732,021	1,027,657	5,788,888	12,995,230	955,176	23,498,972
	652,611	474,037	986,114	1,326,592	256,036	3,695,390
	2,361,385	754,338	3,004,529	6,322,534	-	12,442,786
	2,179,848	837,001	5,485,439	17,087,187	1,081,623	26,671,099
	1,060,399	765,464	2,521,079	2,454,483	14,081	6,815,506

(in million Rupiah)

	DECEMBER 31, 2020					
	NET RECEIVABLES BY AREA					
	SUMATERA DAN KALIMANTAN	SULAWESI, BALI & NUSA TENGGERA DAN PAPUA	JAWA (EXCL. JAKARTA DAN BANTEN)	JAKARTA & BANTEN	OVERSEAS BRANCH OFFICE	TOTAL
	(8)	(9)	(10)	(11)		(12)
	96,884,193	56,033,950	134,094,432	453,312,644	50,785,643	791,110,862
	70,421,159	46,724,224	96,766,548	262,211,438	52,164,432	528,287,801
	2,732,021	1,027,657	5,788,888	12,995,230	955,176	23,498,972
	674,239	489,747	1,018,794	1,370,555	264,521	3,817,857
	2,439,642	779,337	3,104,100	6,532,064	-	12,855,144
	2,252,089	864,739	5,667,228	17,653,461	1,117,468	27,554,986
	1,060,399	765,464	2,521,079	2,454,483	14,081	6,815,506

Disclosure of Receivables and Provisioning by Economic Sector, Bank Only

NO.	ECONOMIC SECTOR	RECEIVABLES	IMPAIRED RECEIVABLES	
			NOT YET DUE	ALREADY DUE
(1)	(2)	(3)	(4)	(5)
December 31, 2021				
1	Agriculture, Forestry, and Fisheries	58,638,251	57,974,354	663,897
2	Mining and Extracting	16,045,451	15,326,672	718,779
3	Processing Industry	121,306,447	101,025,223	7,588,862
4	Electricity, Gas, Hot Water and Cold Water	23,365,551	21,056,719	525,446
5	Water Management, Waste Management, Garbage Management and Recycling	34,439	33,601	838
6	Construction	55,194,311	53,186,023	1,246,426
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	86,367,528	78,448,827	4,838,788
8	Transportation & Warehousing	38,578,359	35,750,785	369,895
9	Accommodation and Restaurants	18,454,296	17,370,752	1,075,999
10	Information and Communications	5,013,229	3,965,227	41,026
11	Finance and Insurance Activities	34,946,831	5,070,803	139,544
12	Real Estate	30,565,203	28,987,116	1,578,087
13	Professional, Science, and Technical Activities	-	-	-
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	2,774,562	2,631,311	143,251
15	Government, Defense, and Mandatory Social Security Administration	241,750,403	24,108,148	-
16	Education	1,285,520	1,248,245	2,947
17	Human Health and Social Activities	2,340,623	2,331,069	9,554
18	Arts, Entertainment, and Recreation	1,071,122	1,011,728	59,394
19	Other Services Activities	6,629,115	6,261,528	367,587
20	Household Activities as Employer	26,650	25,235	1,415
21	International Agencies and Other Extra-International Agencies Activities	8,149	8,149	-
22	Non-Business	93,649,830	83,773,979	2,362,470
23	Others	59,792,003	7,519,879	188,458
Total		897,837,873	547,115,373	21,922,664

(in million Rupiah)

	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 1	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	WRITTEN-OFF RECEIVABLES
	(6)	(7)		(8)
	309,768	1,583,502	1,640,957	1,393,103
	84,763	433,301	449,023	552,603
	640,826	3,275,831	3,394,690	3,492,664
	123,433	630,977	653,871	7,782
	182	930	964	11
	291,575	1,490,500	1,544,581	485,710
	456,254	2,332,320	2,416,945	4,755,389
	203,798	1,041,793	1,079,593	526,470
	97,489	498,351	516,433	421,889
	26,483	135,380	140,292	68,414
	184,614	943,725	977,967	5,410
	161,467	825,401	855,349	2,071,332
	-	-	-	-
	14,657	74,926	77,645	188,026
	1,277,095	6,528,371	6,765,245	-
	6,791	34,715	35,975	2,580
	12,365	63,208	65,501	5,014
	5,658	28,925	29,975	10,842
	35,020	179,017	185,512	67,103
	141	720	746	76
	43	220	228	-
	494,724	2,528,975	2,620,736	1,706,315
	315,863	1,614,659	1,673,244	127,502
	4,743,008	24,245,745	25,125,471	15,888,235

Disclosure of Receivables and Provisioning by Economic Sector, Bank Only

NO.	ECONOMIC SECTOR	RECEIVABLES	IMPAIRED RECEIVABLES	
			NOT YET DUE	ALREADY DUE
(1)	(2)	(3)	(4)	(5)
December 31, 2020				
1	Agriculture, Forestry, and Fisheries	59,824,453	59,132,920	691,533
2	Mining and Extracting	15,738,357	14,598,213	1,140,144
3	Processing Industry	105,307,338	99,696,997	7,644,039
4	Electricity, Gas, Hot Water and Cold Water	21,454,955	20,934,139	520,816
5	Water Management, Waste Management, Garbage Management and Recycling	461,840	450,629	11,211
6	Construction	49,154,024	47,952,198	1,201,825
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	78,473,479	73,076,087	5,397,392
8	Transportation & Warehousing	38,617,884	37,701,470	916,414
9	Accommodation and Restaurants	18,523,340	17,306,079	1,217,260
10	Information and Communications	18,770	18,325	445
11	Finance and Insurance Activities	39,507,526	6,278,861	177,795
12	Real Estat	16,888,217	16,148,420	739,796
13	Professional, Science, and Technical Activities	2,270,691	2,171,223	99,469
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	21,835,674	20,879,152	956,522
15	Government, Defense, and Mandatory Social Security Administration	76,811,452	10,895,272	-
16	Education	1,174,305	1,173,418	887
17	Human Health and Social Activities	4,562,935	4,556,209	6,726
18	Arts, Entertainment, and Recreation	7,872,423	7,363,016	509,407
19	Other Services Activities	-	-	-
20	Household Activities as Employer	32,559	32,559	-
21	International Agencies and Other Extra-International Agencies Activities	7,866	7,866	-
22	Non-Business	82,230,964	80,144,734	2,086,230
23	Others	148,480,387	7,770,014	181,061
Total		789,249,439	528,287,801	23,498,972

(in million Rupiah)

	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 1	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	WRITTEN-OFF RECEIVABLES
	(6)	(7)		(8)
	463,194	1,982,082	816,606	311,146
	46,455	193,727	939,697	26,775
	394,223	2,146,719	11,964,377	1,115,469
	46,311	85,031	330,253	15,417
	5,976	50,209	-	332
	334,976	2,230,029	1,053,237	291,111
	654,397	1,588,266	4,688,333	2,094,026
	114,595	1,005,175	1,103,968	343,460
	19,233	5,061	67,429	360,258
	160,783	934,936	1,296,829	167
	12,790	78,202	137,292	12,978
	152,604	636,494	151,086	231,874
	73,462	182,528	1,098,382	31,176
	23,107	112,419	220,657	299,802
	8	-	-	-
	7,139	25,619	678	274
	33,833	392,204	152,912	9,838
	3,920	3,027	5,806	61,751
	61,535	137,079	175,638	-
	554	653	-	173
	98	-	-	-
	828,423	652,660	1,360,630	83
	257,774	664	1,107,288	1,609,396
	3,695,390	12,442,786	26,671,099	6,815,506

Disclosure of Receivables and Provisioning by Economic Sector, Consolidated with Subsidiaries

NO.	ECONOMIC SECTOR	RECEIVABLES	IMPAIRED RECEIVABLES	
			NOT YET DUE	ALREADY DUE
(1)	(2)	(3)	(4)	(5)
December 31, 2021				
1	Agriculture, Forestry, and Fisheries	58,662,225	57,974,354	663,897
2	Mining and Extracting	16,158,171	15,326,672	718,779
3	Processing Industry	121,435,190	101,025,223	7,588,862
4	Electricity, Gas, Hot Water and Cold Water	23,385,423	21,056,719	525,446
5	Water Management, Waste Management, Garbage Management and Recycling	39,939	33,601	838
6	Construction	55,404,775	53,186,023	1,246,426
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	86,460,020	78,448,827	4,838,788
8	Transportation & Warehousing	39,453,785	35,750,785	369,895
9	Accommodation and Restaurants	18,455,597	17,370,752	1,075,999
10	Information and Communications	4,375,938	3,965,227	41,026
11	Finance and Insurance Activities	36,795,100	5,070,803	139,544
12	Real Estate	31,003,550	28,987,116	1,578,087
13	Professional, Science, and Technical Activities	-	-	-
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	2,411,676	2,631,311	143,251
15	Government, Defense, and Mandatory Social Security Administration	241,750,621	24,108,148	-
16	Education	1,296,590	1,248,245	2,947
17	Human Health and Social Activities	2,341,782	2,331,069	9,554
18	Arts, Entertainment, and Recreation	1,114,396	1,011,728	59,394
19	Other Services Activities	6,597,988	6,261,528	367,587
20	Household Activities as Employer	28,927	25,235	1,415
21	International Agencies and Other Extra-International Agencies Activities	8,149	8,149	-
22	Non-Business	93,649,831	83,773,979	2,362,470
23	Others	59,823,114	7,519,879	188,458
TOTAL		900,652,787	547,115,373	21,922,664

(in million Rupiah)

	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 1	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	WRITTEN-OFF RECEIVABLES
	(6)	(7)		(8)
	313,199	1,586,022	1,641,307	1,393,103
	85,702	433,990	449,118	552,603
	647,922	3,281,044	3,395,414	3,492,664
	124,800	631,981	654,011	7,782
	184	931	964	11
	294,804	1,492,872	1,544,910	485,710
	461,306	2,336,031	2,417,461	4,755,389
	206,055	1,043,451	1,079,823	526,470
	98,568	499,144	516,543	421,889
	26,777	135,596	140,322	68,414
	186,658	945,227	978,175	5,410
	163,255	826,714	855,532	2,071,332
	-	-	-	-
	14,819	75,045	77,661	188,026
	1,291,238	6,538,759	6,766,687	-
	6,866	34,770	35,982	2,580
	12,502	63,308	65,515	5,014
	5,721	28,971	29,981	10,842
	35,407	179,301	185,551	67,103
	142	721	746	76
	44	220	228	-
	500,203	2,533,000	2,621,295	1,706,315
	319,361	1,617,228	1,673,601	127,502
	4,795,533	24,284,325	25,130,830	15,888,235

Disclosure of Receivables and Provisioning by Economic Sector, Consolidated with Subsidiaries

NO. ECONOMIC SECTOR		RECEIVABLES	IMPAIRED RECEIVABLES		
			NOT YET DUE	ALREADY DUE	
December 31, 2020					
1	Agriculture, Forestry, and Fisheries	59,953,366	59,132,920	691,533	
2	Mining and Extracting	15,799,989	14,598,213	1,140,144	
3	Processing Industry	105,469,776	99,696,997	7,644,039	
4	Electricity, Gas, Hot Water and Cold Water	21,595,548	20,934,139	520,816	
5	Water Management, Waste Management, Garbage Management and Recycling	464,866	450,629	11,211	
6	Construction	49,394,234	47,952,198	1,201,825	
7	Wholesale and Retail Trade; Car and Motorcycle Repair & Maintenance	78,597,800	73,076,087	5,397,392	
8	Transportation & Warehousing	38,820,269	37,701,470	916,414	
9	Accommodation and Restaurants	18,542,922	17,306,079	1,217,260	
10	Information and Communications	18,869	18,325	445	
11	Finance and Insurance Activities	40,203,347	6,278,861	177,795	
12	Real Estat	16,914,025	16,148,420	739,796	
13	Professional, Science, and Technical Activities	2,274,161	2,171,223	99,469	
14	Lease and Lease without Option Rights, Labor, Travel Agents, and Other Business Support Activities	21,869,042	20,879,152	956,522	
15	Government, Defense, and Mandatory Social Security Administration	76,814,814	10,895,272	-	
16	Education	1,179,271	1,173,418	887	
17	Human Health and Social Activities	4,563,994	4,556,209	6,726	
18	Arts, Entertainment, and Recreation	7,880,462	7,363,016	509,407	
19	Other Services Activities	-	-	-	
20	Household Activities as Employer	34,891	32,559	-	
21	International Agencies and Other Extra-International Agencies Activities	7,866	7,866	-	
22	Non-Business	82,230,964	80,144,734	2,086,230	
23	Others	148,480,388	7,770,013	181,061	
TOTAL		791,110,863	528,287,801	23,498,973	

(in million Rupiah)

	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 1	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	ALLOWANCES FOR IMPAIRMENT LOSSES - STAGE 3	WRITTEN-OFF RECEIVABLES
	478,544	2,047,769	844,467	311,146
	47,995	200,148	971,759	26,775
	407,287	2,217,862	12,372,589	1,115,469
	47,846	87,849	341,521	15,417
	6,174	51,873	-	332
	346,078	2,303,933	1,089,172	291,111
	676,084	1,640,902	4,848,294	2,094,026
	118,393	1,038,487	1,141,634	343,460
	19,870	5,229	69,729	360,258
	166,112	965,921	1,341,075	167
	13,214	80,794	141,977	12,978
	157,661	657,588	156,241	231,874
	75,897	188,577	1,135,858	31,176
	23,873	116,144	228,186	299,802
	8	-	-	-
	7,376	26,468	701	274
	34,954	405,201	158,129	9,838
	4,049	3,128	6,004	61,751
	63,575	141,622	181,631	-
	572	675	-	173
	101	-	-	-
	855,877	674,289	1,407,053	83
	266,317	686	1,118,966	1,609,396
	3,817,857	12,855,144	27,554,986	6,815,506

Disclosure of Detailed Changes in Allowances for Impairment Losses (CKPN), Bank Only

NO.	DESCRIPTION	DECEMBER 31, 2021			DECEMBER 31, 2020		
		STAGE 1	STAGE 2	STAGE 3	STAGE 1	STAGE 2	STAGE 3
(1)	(2)	(3)	(4)	(5)	(6)	(8)	(9)
1	Beginning Balance of CKPN	4,548,320	13,144,399	28,140,135	3,630,260	6,613,567	21,097,433
2	Establishment (Recovery) of CKPN in the current period (Net)	211,867	11,177,976	6,353,885	2,575,580	4,517,216	13,942,803
	a. Establishment of CKPN in the current period	1,142,201	13,195,673	9,973,777	2,398,590	4,369,725	13,939,526
	b. Recovery of CKPN in the current period	(930,334)	(2,017,697)	(3,619,892)	176,989	147,491	3,278
3	CKPN used for written off receivables in the current period	(20,671)	(62,803)	(9,421,329)	(9,542)	(50,202)	(9,709,804)
4	Other establishment (recovery) in the current period	3,492	(13,826)	52,780	(605,892)	(201,964)	1,009,819
Ending Balance of CKPN		4,743,008	24,245,745	25,125,471	5,590,406	10,878,617	26,340,252

Disclosure of Detailed Changes in Allowances for Impairment Losses (CKPN), Bank Consolidated with Subsidiaries

NO.	DESCRIPTION	DECEMBER 31, 2021			DECEMBER 31, 2020		
		STAGE 1	STAGE 2	STAGE 3	STAGE 1	STAGE 2	STAGE 3
(1)	(2)	(3)	(4)	(5)	(6)	(8)	(9)
1	Beginning Balance of CKPN	4,598,689	13,165,314	28,146,137	1,410,160	2,569,014	8,195,214
2	Establishment (Recovery) of CKPN in the current period (Net)	214,213	11,195,762	6,355,240	953,817	1,737,652	5,543,151
	a. Establishment of CKPN in the current period	1,154,850	13,216,670	9,975,904	940,107	1,712,676	5,463,476
	b. Recovery of CKPN in the current period	(940,637)	(2,020,908)	(3,620,664)	13,710	24,977	79,676
3	CKPN used for written off receivables in the current period	(20,900)	(62,903)	(9,423,338)	(3,468)	(18,247)	(3,529,148)
4	Other establishment (recovery) in the current period	3,531	(13,848)	52,791	(152,180)	(50,727)	253,633
Ending Balance of CKPN		4,795,533	24,284,325	25,130,830	2,208,329	4,237,693	10,462,850



Credit Risk Measurement Using Standard Approaches

1. Scoring Mechanism using External Rating Agencies
Following the OJK Circular Letter (SEOJK) No. 42/SEOJK.03/2016 dated September 28, 2016, BNI uses External Ratings for the Calculation of Risk-Weighted Assets (RWA), including:
 - a. The Bank only rating, so that even though it is in one business group, the rating of a company cannot be used to determine the risk weight of another company;
 - b. Domestic ratings (Pefindo and Fitch Indonesia) to determine the risk weighting of receivables in Rupiah, while international ratings (Moody's, S&P, and Fitch) are used to determine the risk weighting of receivables in foreign currencies;
 - c. The determination of the risk weighting of claims in the form of securities is based on the related securities rating (issue rating). If the securities do not have a rating, the risk weighting shall be based on the risk weighting of the claims without a rating. The determination of risk weighting for claims in the form of other than securities is based on the debtor rating (issue rating). In the case of claims other than securities that do not have a rating, the risk weighting is based on the risk weighting of the claims without a rating;
 - d. Short-term rating is used to determine the risk weighting of short term securities issued by parties included in the scope of Claims on Banks or Claims on Corporations. If the short-term receivables do not have a short-term rating, the risk weighting shall use the long-term rating;
 - e. If exposure has more than one qualifying rating, the rating used is the second-lowest risk weighting. In this case, there are only two ranks, so the lowest one is used.

Portfolio Categorization by Scoring Mechanism.

The determination of risk weighting based on the exposure rating as mentioned above is only applied to the following portfolio categories:

1. Claims on the Governments of other countries;
2. Claims on Public Sector Entities;
3. Claims on Multilateral Development Banks and International Institutions;
4. Claims on Banks (Long Term and Short Term);
5. Claims on Corporations (Long Term and Short Term).

Composition per credit risk exposure per Risk-Weighting (%) as at December 31, 2021 is based on the most recent rating issued by the rating agency.

Rating Agency Used

The list of recognized rating agencies and ratings is as follows:

1. Fitch Ratings;
2. Moody's Investor Service;
3. Standard and Poor's;
4. PT Fitch Ratings Indonesia;
5. PT Pemeringkat Efek Indonesia.

Net Receivables by Portfolio Category and Rating Scale, Bank Only

PORTFOLIO CATEGORY	DECEMBER 31, 2021					
	RATING AGENCY	LONG-TERM RATING				
	STANDARD AND POOR'S	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
	FITCH RATINGS	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
	MOODY'S	AAA	AA1 S.D AA3	A1 S.D A3	BAA1 S.D BAA3	BA1 S.D BA3
	PT. FITCH RATINGS INDONESIA	AAA (IDN)	AA+(IDN) S.D AA-(IDN)	A+(IDN) S.D. A-(IDN)	BBB+(IDN) S.D BBB-(IDN)	BB+(IDN) S.D BB-(IDN)
	PT PEMERINGKAT EFEK INDONESIA	IDAAA	IDAA+ S.D IDAA-	IDA+S.D IDA A-	ID BBB+ S.D ID BBB-	ID BB+ S.D ID BB-
(2)	(3)	(4)	(5)	(6)	(7)	(8)
Government Receivables		9,222,003	3,061,440	537,313	255,860,778	606,042
Public Sector Entities Receivables		11,042,436	10,391,727	4,055,625	2,701,098	175,019
Multilateral Development Banks and International Institutions Receivables		-	-	-	-	-
Bank Receivables		4,907,972	2,329,064	403,236	2,056,759	67,854
Loans Secured by Residential Property						
Loans Secured by Commercial Real Estate						
Employee/Retiree Loans						
Micro Business, Small Business, and Retail Portfolio Receivables						
Corporate Receivables		-	641,234	326,497	442,509	2,264,115
Past Due Receivables						
Other Assets						
Total		25,172,411	16,423,465	5,322,671	261,061,144	3,113,030



(in million Rupiah)

NET RECEIVABLES							NO RATING	TOTAL
SHORT-TERM RATING								
B+ S.D B-	LESS THAN B-	A-1	A-2	A-3	LESS THAN A-3			
B+ S.D B-	LESS THAN B-	F1+ S.D F1	F2	F3	LESS THAN F3			
B1 S.D B3	LESS THAN B3	P-1	P-2	P-3	LESS THAN P-3			
B+(IDN) S.D B-(IDN)	LESS THAN B-(IDN)	F1+(IDN) S.D F1(IDN)	F2(IDN)	F3(IDN)	LESS THAN F3(IDN)			
ID B+ S.D ID B-	LESS THAN IDB-	IDA1	IDA2	IDA3 S.D ID A4	LESS THAN IDA4			
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
-	-	-	-	-	-	-	269,287,576	
39,419	-	-	-	-	-	54,326,558	82,731,882	
-	-	-	-	-	-	5,701	5,701	
-	-	-	-	-	-	42,478,717	52,243,602	
1,126,072	39,419	-	-	-	-	364,455,630	369,295,476	
1,165,491	39,419	-	-	-	-	461,266,606	773,564,237	

Net Receivables by Portfolio Category and Rating Scale, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2020					
		RATING AGENCY	LONG-TERM RATING				
		STANDARD AND POOR'S	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		FITCH RATINGS	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		MOODY'S	AAA	AA1 S.D AA3	A1 S.D A3	BAA1 S.D BAA3	BA1 S.D BA3
		PT. FITCH RATINGS INDONESIA	AAA (IDN)	AA+(IDN) S.D AA-(IDN)	A+(IDN) S.D. A-(IDN)	BBB+(IDN) S.D BBB-(IDN)	BB+(IDN) S.D BB-(IDN)
		PT PEMERINGKAT EFEK INDONESIA	IDAAA	IDAA+ S.D IDAA-	IDA+ S.D ID A-	ID BBB+ S.D ID BBB-	ID BB+ S.D ID BB-
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables		7,075,737	5,930,165	716,125	167,794,188	-
2	Public Sector Entities Receivables		20,669,392	10,235,855	11,442,812	8,400,853	95,004
3	Multilateral Development Banks and International Institutions Receivables		-	-	-	-	-
4	Bank Receivables		4,982,794	2,064,858	558,276	1,525,213	-
5	Loans Secured by Residential Property						
6	Loans Secured by Commercial Real Estate						
7	Employee/Retiree Loans						
8	Micro Business, Small Business, and Retail Portfolio Receivables						
9	Corporate Receivables		241,639	1,969,417	7,082,582	1,751,527	2,367,046
10	Past Due Receivables						
11	Other Assets						
TOTAL			32,969,562	20,200,295	19,799,795	179,471,781	2,462,050

(in million Rupiah)

NET RECEIVABLES							NO RATING	TOTAL
SHORT-TERM RATING								
	B+ S.D B-	LESS THAN B-	A-1	A-2	A-3	LESS THAN A-3		
	B+ S.D B-	LESS THAN B-	F1+ S.D F1	F2	F3	LESS THAN F3		
	B1 S.D B3	LESS THAN B3	P-1	P-2	P-3	LESS THAN P-3		
	B+(IDN) S.D B-(IDN)	LESS THAN B-(IDN)	F1+(IDN) S.D F1(IDN)	F2(IDN)	F3(IDN)	LESS THAN F3(IDN)		
	ID B+ S.D ID B-	LESS THAN IDB-	IDA1	IDA2	IDA3 S.D ID A4	LESS THAN IDA4		
(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	
	-	-	-	-	-	-	181,516,215	
	-	299,094	-	-	-	-	88,059,276	
	-	-	-	-	-	-	-	
	-	-	-	-	-	-	55,020,414	

Net Receivables by Portfolio Category and Rating Scale, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		RATING AGENCY	LONG-TERM RATING				
		STANDARD AND POOR'S	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		FITCH RATING	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		MOODY'S	AAA	AA1 S.D AA3	A1 S.D A3	BAA1 S.D BAA3	BA1 S.D BA3
		PT. FITCH RATINGS INDONESIA	AAA (IDN)	AA+(IDN) S.D AA-(IDN)	A+(IDN) S.D. A-(IDN)	BBB+(IDN) S.D BBB-(IDN)	BB+(IDN) S.D BB-(IDN)
		PT PEMERINGKAT EFEK INDONESIA	IDAAA	IDAA+ S.D IDAA-	IDA+S.DID A-	ID BBB+ S.D ID BBB-	ID BB+ S.D ID BB-
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables		9,222,002	3,061,440	537,313	255,860,776	606,042
2	Public Sector Entities Receivables		11,042,436	10,391,727	4,055,625	2,701,098	175,019
3	Multilateral Development Banks and International Institutions Receivables		-	-	-	-	-
4	Bank Receivables		4,907,972	2,329,064	403,236	2,056,759	67,854
5	Loans Secured by Residential Property						
6	Loans Secured by Commercial Real Estate						
7	Employee/Retiree Loans						
8	Micro Business, Small Business, and Retail Portfolio Receivables						
9	Corporate Receivables		-	641,234	326,497	442,509	2,264,115
10	Past Due Receivables						
11	Other Assets						
TOTAL			25,172,410	16,423,465	5,322,671	261,061,142	3,113,030

(in million Rupiah)

NET BILL								
	SHORT-TERM RATING						NO RANK	TOTAL
	B+ S.D B-	LESS THAN B-	A-1	A-2	A-3	LESS THAN A-3		
	B+ S.D B-	LESS THAN B-	F1+ S.D F1	F2	F3	LESS THAN F3		
	B1 S.D B3	LESS THAN B3	P-1	P-2	P-3	LESS THAN P-3		
	B+(IDN) S.D B-(IDN)	LESS THAN B-(IDN)	F1+(IDN) S.D F1(IDN)	F2(IDN)	F3(IDN)	LESS THAN F3 (IDN)		
	ID B+ S.D ID B-	LESS THAN IDB-	IDA1	IDA2	IDA3 S.D ID A4	LESS THAN IDA4		
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	-	-	-	-	-	-	-	269,287,573
	39,419	-	-	-	-	-	54,326,558	82,731,882
	-	-	-	-	-	-	5,701	5,701
	-	-	-	-	-	-	42,769,388	52,534,273
	1,126,072	39,419	-	-	-	-	363,855,724	368,695,570
	1,165,491	39,419	-	-	-	-	460,957,371	773,254,999

Net Receivables by Portfolio Category and Rating Scale, Bank Consolidated with Subsidiaries

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		RATING AGENCY	LONG-TERM RATING				
		STANDARD AND POOR'S	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		FITCH RATING	AAA	AA+ S.D AA-	A+ S.D A-	BBB+ S.D BBB-	BB+ S.D BB-
		MOODY'S	AAA	AA1 S.D AA3	A1 S.D A3	BAA1 S.D BAA3	BA1 S.D BA3
		PT. FITCH RATINGS INDONESIA	AAA (IDN)	AA+(IDN) S.D AA-(IDN)	A+(IDN) S.D. A-(IDN)	BBB+(IDN) S.D BBB-(IDN)	BB+(IDN) S.D BB-(IDN)
		PT PEMERINGKAT EFEK INDONESIA	IDAAA	IDAA+ S.D IDAA-	IDA+S.D ID A-	ID BBB+ S.D ID BBB-	ID BB+ S.D ID BB-
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Government Receivables		7,075,737	5,930,165	716,125	167,794,188	-
2	Public Sector Entities Receivables		20,669,392	10,235,855	11,442,812	8,400,853	95,004
3	Multilateral Development Banks and International Institutions Receivables		-	-	-	-	-
4	Bank Receivables		4,982,794	2,064,858	558,276	1,525,213	-
5	Loans Secured by Residential Property						
6	Loans Secured by Commercial Real Estate						
7	Employee/Retiree Loans						
8	Micro Business, Small Business, and Retail Portfolio Receivables						
9	Corporate Receivables		241,639	1,969,417	7,082,582	1,751,527	2,367,045
10	Past Due Receivables						
11	Other Assets						
TOTAL			32,969,562	20,200,295	19,799,795	179,471,781	2,462,049

(in million Rupiah)

NET BILL								
	SHORT-TERM RATING						NO RANK	TOTAL
	B+ S.D B-	LESS THAN B-	A-1	A-2	A-3	LESS THAN A-3		
	B+ S.D B-	LESS THAN B-	F1+ S.D F1	F2	F3	LESS THAN F3		
	B1 S.D B3	LESS THAN B3	P-1	P-2	P-3	LESS THAN P-3		
	B+(IDN) S.D B-(IDN)	LESS THAN B-(IDN)	F1+(IDN) S.D F1(IDN)	F2(IDN)	F3(IDN)	LESS THAN F3 (IDN)		
	ID B+ S.D ID B-	LESS THAN IDB-	IDA1	IDA2	IDA3 S.D ID A4	LESS THAN IDA4		
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	-	-	-	-	-	-	-	181,516,215
	-	299,094	-	-	-	-	34,905,380	86,048,390
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	30,241,795	39,372,936
	472,882	-	-	-	-	-	345,406,657	359,291,749
	472,882	299,094	-	-	-	-	410,553,832	666,229,290

Counterparty Credit Risk

Counterparty credit risk is a part of the overall credit risk. Counterparty credit risk is the risk due to the counterparty's failure before the final settlement of cash flows for the transaction. It is influenced by both business conditions and fair value or market value factors, for example in derivatives, repos or reverse repo transactions.

Types of risk mitigation instruments from counterparty credit risk received by the Bank includes:

1. Cash deposited in the bank;
2. Demand deposits, savings, or deposits issued by banks;
3. Indonesian Government securities and State Sharia Securities.

Each counterparty has a different limit and to determine the limit amount for each counterparty, the Counterparty Limit Application Package (CLAP) is used. The counterparty limits assessment is carried out by the Corporate Credit Risk Division and is reviewed periodically or adjusted to the needs as influenced by the business dynamics and the risk level of each counterparty.

For capital adequacy calculation by considering the RWA calculation using the Standard approach, an additional RWA calculation for credit risk from the Counterparty Risk is prepared by including the CVA (Credit Valuation Adjustment) component.

1. Derivative Transactions

Derivative transactions conducted by the Bank are generally Forward, Cross Currency Swap (CCS), and Interest Rate Swap (IRS) transactions. The Bank's customers who conduct derivative transactions must have a transaction limit assigned by the Business Unit and Risk Unit. The derivative transaction policy also determines the minimum marginal deposit to be deposited by customers according to the type and inherent risk in the derivative transaction. Disclosure of counterparty's credit risk for derivative transactions is presented in Table 3.2.a Counterparty Credit Risk: Derivative Transactions.

Disclosure of Counter-Party Credit Risk: Derivative Transactions

	A	B	C	D	E	F
	REPLACEMENT COST (RC)	POTENTIAL FUTURE EXPOSURE (PFE)	EEPE	ALPHA USED FOR CALCULATION OF REGULATORY EAD	NET RECEIVABLES	ATMR
1 SA-CCR (for derivative)	9,070,524	677,704		1,4	13,647,520	2,941,626
2 Internal Model Method (for derivative and SFT)					N/A	N/A
3 Basic approach for credit risk mitigation (for SFT)					N/A	N/A
4 Comprehensive approach for credit risk mitigation (for SFT)						
5 VaR for SFT					N/A	N/A
Total						2,941,626

Disclosure of Counter-Party Credit Risk: Credit Valuation Adjustment (CVA) Capital Charge

INDONESIA	A	B
	NET RECEIVABLES	ATMR
Total portfolios based on Advanced CVA capital charge		N/A
1 a. (i) VaR component (incl. 3× multiplier)		N/A
2 b. (ii) Stressed VaR component (incl. 3× multiplier)		N/A
3 All Portfolios in accordance with Standardised CVA Capital Charge		
Total in accordance with CVA Capital Charge		93,026

Disclosure of Counter-Party Credit Risk: Derivative Transaction by Risk Weighting

RISK WEIGHTING	A	B	C	D	E	F	G	H	I
PORTFOLIO CATEGORY	0%	10%	20%	50%	75%	100%	150%	OTHERS	TOTAL NET RECEIVABLES
Indonesia									
Government and Central Bank Receivables	4,342								4,342
Public Sector Entities Receivables				428,876					428,876
Multilateral Development Banks and International Institutions Receivables									-
Other Bank Receivables			13,108,893						13,108,893
Securities Company Receivables									-
Corporate Receivables						105,409			105,409
Micro Business, Small Business, and Retail Portfolio Receivables									-
Other Assets									-
Total	4,342	-	13,108,893	428,876	-	105,409	-	-	13,647,520

- Repo and Reverse Repo Transactions
 BNI only conducts Repo and Reverse Repo transactions with the underlying assets of the Republic of Indonesia Government Securities (Government Securities).

Credit Risk Mitigation by Using Standard Approach

In the credit process, the collateral received can be in the form of objects financed by credit (movable objects or immovable objects), as well as objects that are not financed (personal guarantees or corporate guarantees). Credit collateral must meet the criteria, including having economic value, marketable, transferable, and having a juridical value.

Credit Risk Mitigation Application by Using the Standard Approach

The main types of collateral received for credit risk mitigation are objects financed by the Bank. Meanwhile, as a supplement, the Bank can receive additional collateral. The types of primary and additional collateral can be grouped into:

- Collateral, in the form of physical assets (land, buildings, machinery, equipment, etc.) and financial assets (cash collateral, marginal deposits, gold, receivables, debentures and other securities). In the credit risk mitigation technique, physical assets are not counted as a credit risk mitigation technique.

2. Guarantees, received from the Government of the Republic of Indonesia, Correspondent Banks, and Insurance Companies. In the credit risk mitigation technique, guarantees counted are only guarantees issued by parties included within the category of Claims to the Government of Indonesia, Claims to Governments of Other Countries, Claims to Banks and guarantee/insurance institutions by taking into account the fulfillment of warranty requirements and guarantee issuers.
3. Credit insurance, issued by insurance companies by considering the insurance policy requirements fulfillment, insurance issuers and portfolio categories for insurance recipient.

BNI regulates the policies, procedures and processes to assess and manage collateral based on the type of exposure and financing scheme. The collateral adequacy

assessment received considers the cash equivalent value existence. For credit exposure (loan), collateral valuation must be conducted periodically at least every 24 months by an independent appraiser, or carried out by internal appraisal staff who are independent from the loan disbursement process.

In addition to mitigation techniques in the form of collateral, BNI also uses guarantees/collateral and credit insurance. Analysis of main parties providing guarantees/collateral is a part of credit worthiness analysis and credit risk mitigation. The guarantee providers include: (1) Government of the Republic of Indonesia's SOE's in the electricity sector for financing KMK subsidized bailouts and syndicated KI, (2) Credit Insurance Companies which are State-Owned Enterprises for financing of Kredit Usaha Rakyat disbursed by BNI.

Net Receivables By Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Only

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
A. Balance Sheet Exposure							
1	Government Receivables	247,901,425	72,645	-	-	-	-
2	Public Sector Entities Receivables	-	21,434,163	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	10,300,581	-	-	-	-
5	Loans Secured by Residential Property	-	1,718,903	2,401,978	10,221,222	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9	Corporate Receivables	-	641,234	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-



(in million Rupiah)

DECEMBER 31, 2021						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	877,258	-	257,834	-		710,992	56,879
	49,831,759	-	175,019	39,419		26,801,684	2,144,135
	-	-	-	-		-	-
	16,160,511	-	67,854	-		10,204,043	816,323
	-	-	-	-		4,519,017	361,521
	-	-	16,528,112	-		16,457,457	1,316,597
	160,998	-	-	-		80,456	6,436
	-	120,326,470	-	-		66,619,554	5,329,564
	373,096	-	344,773,662	1,165,491		343,077,421	27,446,194
	-	-	167,518	4,442,053		6,681,838	534,547

Net Receivables By Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Only

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
11	Other Assets	13,644,153	-	-	-	-	-
Total Balance Sheet Exposures		261,545,578	34,167,526	2,401,978	10,221,222	-	-
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions							
1	Government Receivables	4,887	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	784	-	-	-	-
5	Loans Secured by Residential Property	-	-	-	-	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9	Corporate Receivables	-	-	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-
Total Administrative Account Transactions Exposures		4,887	784	-	-	-	-
C. Counterparty Credit Risk Exposure							
1	Government Receivables	20,173,527	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	2,294,351	14,950,677	-	-	-	-
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
6	Corporate Receivables	-	-	-	-	-	-
Total Counterparty Credit Risk Exposure		22,467,878	14,950,677	-	-	-	-

(in million Rupiah)

DECEMBER 31, 2021						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	-	-	33,677,821	2,269,610		37,082,236	2,966,579
	67,403,622	120,326,470	395,647,820	7,916,573		512,234,698	40,978,775
	-	-	-	-		-	-
	10,822,646	-	-	-		5,411,323	432,906
	5,701	-	-	-		2,851	228
	8,468,843	-	-	-		4,234,578	338,766
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	310,829	-	-		233,121	18,650
	-	-	22,236,585	-		22,226,325	1,778,106
	-	-	-	-		-	-
	19,297,190	310,829	22,236,585	-		32,108,198	2,568,656
	-	-	-	-		-	-
	428,876	-	-	-		214,438	17,155
	-	-	-	-		-	-
	-	-	-	-		2,621,779	209,742
	-	-	-	-		-	-
	-	-	105,409	-		105,409	8,433
	428,876	-	105,409	-		2,941,626	235,330

Net Receivables By Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Only

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
(1)	(2)	(16)	(17)	(18)	(19)	(20)	(21)
A. Balance Sheet Exposure							
1	Government Receivables	179,829,607	716,125	-	-	-	-
2	Public Sector Entities Receivables	-	30,905,246	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	21,013,831	-	-	-	-
5	Loans Secured by Residential Property	-	1,934,001	2,367,931	9,170,631	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9	Corporate Receivables	-	2,211,057	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-
11	Other Assets	16,905,798	-	-	-	-	-
Total Balance Sheet Exposures		169,562,689	34,842,702	2,474,892	9,763,761	-	-
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions							
1	Government Receivables	-	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	9,764,902	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	-	-	-	9,212,558	-
5	Loans Secured by Residential Property	-	-	-	-	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	297,302
9	Corporate Receivables	-	-	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-
Total Administrative Account Transactions Exposures		145,407	355,040	-	-	-	-

(in million Rupiah)

DECEMBER 31, 2020						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	(22)	(23)	(24)	(25)	(26)	(27)	(28)
	970,483	-	-	-		426,922	34,154
	54,749,045	-	95,004	299,094		33,688,719	2,695,098
	-	-	-	-		-	-
	14,212,280	-	-	-		10,452,989	836,239
	-	-	-	-		4,436,519	354,921
	224,541	-	17,289,859	-		16,970,684	1,357,655
	244,235	-	-	-		180,369	14,430
	32,508,767	69,335,829	-	-		66,043,428	5,283,474
	29,620,584	-	327,442,659	472,882		335,400,166	26,832,013
	-	-	1,307,601	4,374,203		9,074,512	725,961
	-	-	32,850,166	2,131,322		33,336,043	2,666,883
	76,251,118	88,057,904	382,678,715	8,105,379		510,010,351	40,800,828
	-	-	-	-		-	-
	-	-	-	-		5,481,722	438,538
	-	-	-	-		-	-
	-	-	-	-		4,496,441	359,715
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	-	-		213,261	17,061
	21,236,128	-	19,032,526	-		19,032,526	1,522,602
	-	-	-	-		-	-
	19,814,311	284,348	19,032,526	-		29,223,950	2,337,916

Net Receivables By Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Only

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
(1)	(2)	(16)	(17)	(18)	(19)	(20)	(21)
C. Counterparty Credit Risk Exposure							
1	Government Receivables	-	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	2,010,885,27	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	-	-	-	-	-
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	25,941,13
6	Corporate Receivables	-	-	-	-	-	-
Total Counterparty Credit Risk Exposure		2,671,494	6,552,977	-	-	-	-



(in million Rupiah)

DECEMBER 31, 2020						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
(22)	(23)	(24)	(25)	(26)	(27)	(28)	
	-	-	-	-	-	-	
	-	-	-	-	248,398	19,872	
	-	-	-	-	-	-	
	-	-	-	-	1,310,595	104,848	
	-	-	-	-	396,369	31,710	
	512,846,37	-	328,592,94	-	328,593	26,287	
	496,797	528,493	328,593	-	2,283,956	182,716	

Net Receivables by Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
A. Balance Sheet Exposure							
1	Government Receivables	247,901,425	72,645	-	-	-	-
2	Public Sector Entities Receivables	-	21,434,163	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	10,300,581	-	-	-	-
5	Loans Secured by Residential Property	-	1,718,903	2,401,978	10,221,222	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9	Corporate Receivables	-	641,234	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-
11	Other Assets	13,644,153	-	-	-	-	-
Total Balance Sheet Exposures		261,545,578	34,167,526	2,401,978	10,221,222	-	-
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions							
1	Government Receivables	4,887	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	784	-	-	-	-
5	Loans Secured by Residential Property	-	-	-	-	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9	Corporate Receivables	-	-	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-

(in million Rupiah)

DECEMBER 31, 2021						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	877,258	-	257,833	-		710,992	56,879
	49,831,759	-	175,018	39,419		26,801,685	2,144,135
	-	-	-	-		-	-
	16,160,511	-	358,526	-		10,349,378	827,950
	-	-	-	-		4,519,017	361,521
	-	-	16,528,112	-		16,457,457	1,316,597
	160,998	-	-	-		80,456	6,436
	-	120,326,470	857,136	-		67,262,406	5,380,992
	373,096	-	344,173,754	1,165,491		343,077,421	27,398,201
	-	-	167,518	4,442,053		6,681,838	534,547
	-	-	43,315,408	2,269,610		51,238,968	4,099,117
	67,403,622	120,326,470	405,833,305	7,916,573		526,579,712	42,126,375
	-	-	-	-		-	-
	10,822,646	-	-	-		5,411,323	432,906
	5,701	-	-	-		2,851	228
	8,468,843	-	-	-		4,234,578	338,766
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	310,829	-	-		233,121	18,650
	-	-	22,236,585	-		22,226,325	1,778,927
	-	-	-	-		-	-

Net Receivables by Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Total Administrative Account Transactions Exposures		4,887	784	-	-	-	-
C. Counterparty Credit Risk Exposure							
1	Government Receivables	20,173,527	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	2,294,351	14,950,677	-	-	-	-
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
6	Corporate Receivables	-	-	-	-	-	-
Total Counterparty Credit Risk Exposure		22,467,878	14,950,677	-	-	-	-

(in million Rupiah)

DECEMBER 31, 2021						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
(9)	(10)	(11)	(12)	(13)	(14)	(15)	
19,297,190	310,829	22,236,585	-		32,118,459	2,569,477	
-	-	-	-	-	-	-	
428,876	-	-	-	-	214,438	17,155	
-	-	-	-	-	-	-	
-	-	-	-	-	2,990,135	239,211	
-	-	-	-	-	-	-	
-	-	105,409	-		105,409	8,433	
428,876	-	105,409	-		3,309,982	264,799	

Net Receivables by Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
		(16)	(17)	(18)	(19)	(20)	(21)
A. Balance Sheet Exposure							
1	Government Receivables	179,829,607	716,125	-	-	-	-
2	Public Sector Entities Receivables	-	30,905,246	-	-	-	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	21,013,831	-	-	-	-
5	Loans Secured by Residential Property	-	1,934,001	2,367,931	9,170,631	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	0,025	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	0,290	-	-	-	-	-
9	Corporate Receivables	-	2,211,057	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-
11	Other Assets	16,905,798	-	-	-	-	-
Total Balance Sheet Exposures		196,735,405	56,780,260	2,367,931	9,170,631	-	-
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions							
1	Government Receivables	-	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	9,764,902	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	-	-	-	9,212,558	-
5	Loans Secured by Residential Property	-	-	-	-	-	-
6	Loans Secured by Commercial Real Estate	-	-	-	-	-	-
7	Employee/Retiree Loans	-	-	-	-	-	-
8	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	297,302
9	Corporate Receivables	-	-	-	-	-	-
10	Past Due Receivables	-	-	-	-	-	-

(in million Rupiah)

DECEMBER 31, 2020						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	(22)	(23)	(24)	(25)	(26)	(27)	(28)
	970,483	-	16	-		628,467	50,277
	54,749,045	-	95,004	299,094		34,096,491	2,727,719
	-	-	-	-		-	-
	14,212,280	-	-	-		13,456,168	1,076,493
	-	-	13	-		4,180,851	334,468
	224,541	-	17,289,859	-		17,480,190	1,398,415
	244,235	-	0,026	-		122,117	9,769
	32,508,767	69,335,829	3	-		55,090,074	4,407,206
	29,620,584	-	327,442,659	472,882		353,251,960	28,260,157
	-	-	1,307,601	4,374,203		8,439,239	675,139
	-	-	32,850,1667	2,131,322		36,047,150	2,883,772
	132,529,936	69,335,829	373,094,308	7,277,502		522,792,708	41,823,417
	-	-	-	-		-	-
	-	-	-	-		5,481,722	438,538
	-	-	-	-		-	-
	-	-	-	-		4,496,441	359,715
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	-	-		-	-
	-	-	17,773	-		226,591	18,335
	21,236,128	-	19,046,716	-		19,030,683	1,522,676
	-	-	-	-		-	-

Net Receivables by Risk Weighting After Calculating Credit Risk Mitigation Impact, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY						
		0%	20%	25%	35%	40%	45%
		(16)	(17)	(18)	(19)	(20)	(21)
Total Administrative Account Transactions Exposures		-	-	-	-	18,977,459	297,302
C. Counterparty Credit Risk Exposure							
1	Government Receivables	-	-	-	-	-	-
2	Public Sector Entities Receivables	-	-	-	-	2,010,885	-
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4	Bank Receivables	-	-	-	-	-	-
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	25,941
6	Corporate Receivables	-	-	-	-	-	-
Total Counterparty Credit Risk Exposure		-	-	-	-	2,010,885	25,941



(in million Rupiah)

DECEMBER 31, 2020						ATMR	CAPITAL COST
NET RECEIVABLES AFTER CALCULATING CREDIT RISK MITIGATION IMPACT							
	50%	75%	100%	150%	OTHERS		
	(22)	(23)	(24)	(25)	(26)	(27)	(28)
	21,236,128	284,348	19,064,489	-		29,235,437	2,339,264
	-	-	-	-		-	-
	-	-	-	-		248,398	19,872
	-	-	-	-		-	-
	-	-	-	-		1,310,595	104,848
	-	-	-	-		396,369	31,710
	512,846	-	328,593	-		328,593	26,287
	512,846	528,493	328,593	-		2,283,956	182,716

Net Receivables and Credit Risk Mitigation Technique, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021						
		PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED	
			COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) = (3)- [(4)+(5)+(6)+(7)]	
A. Balance Sheet Exposure								
1	Government Receivables	249,109,162	-	-	-		249,109,162	
2	Public Sector Entities Receivables	71,480,360	182,720	-	-		71,297,640	
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-		-	
4	Bank Receivables	26,528,946	8,365	-	-		26,520,581	
5	Loans Secured by Residential Property	14,342,103	8,614	-	-		14,333,489	
6	Loans Secured by Commercial Real Estate	16,528,112	70,655	-	-		16,457,457	
7	Employee/Retiree Loans	160,998	86	-	-		160,912	
8	Micro Business, Small Business, and Retail Portfolio Receivables	120,326,470	12,192,948	-	27,309,436		80,824,086	
9	Corporate Receivables	346,953,483	1,697,445	-	604,492		344,651,546	
10	Past Due Receivables	4,609,572	99,187	-	-		4,510,385	
11	Other Assets	49,591,583	-	-	-		49,591,584	
Total Balance Sheet Exposures		899,630,789	14,260,020	-	27,913,928		857,456,842	
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions								
1	Government Receivables	4,887	-	-	-		4,887	
2	Public Sector Entities Receivables	10,822,646	-	-	-		10,822,646	
3	Multilateral Development Banks and International Institutions Receivables	5,701	-	-	-		5,701	
4	Bank Receivables	8,469,627	-	-	-		8,469,627	
5	Loans Secured by Residential Property	-	-	-	-		-	
6	Loans Secured by Commercial Real Estate	-	-	-	-		-	

(in million Rupiah)

	DECEMBER 31, 2020					
	PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED
		COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS	
	(9)	(10)	(11)	(12)	(13)	(14) = (9)-[(10)+(11)+(12)+(13)]
	181,516,216	-	-	-	-	181,516,216
	86,048,390	5,458	-	-	-	86,042,932
	-	-	-	-	-	-
	35,226,111	78	-	-	-	35,226,033
	13,472,563	7,163	-	-	-	13,465,400
	17,514,400	34,210	-	-	-	17,480,190
	244,235	-	-	-	-	244,235
	101,844,595	10,733,867	-	26,922,207	-	64,188,521
	359,747,182	615,273	-	1,094,157	-	358,037,752
	5,681,804	7,556	-	-	-	5,674,247
	51,887,286	-	-	-	-	51,887,286
	853,182,782	11,403,605	-	28,016,364	-	813,762,813
	28,108	-	-	-	-	28,108
	9,764,902	-	-	-	-	9,764,902
	-	-	-	-	-	-
	9,331,515	-	-	-	-	9,331,515
	-	-	-	-	-	-
	-	-	-	-	-	-

Net Receivables and Credit Risk Mitigation Technique, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021						
		PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED	
			COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) = (3)- [(4)+(5)+(6)+(7)]	
7	Employee/Retiree Loans	-	-	-	-		-	
8	Micro Business, Small Business, and Retail Portfolio Receivables	310,829	-	-	-		310,829	
9	Corporate Receivables	22,236,585	-	-	-		22,236,585	
10	Past Due Receivables	-	-	-	-		-	
Total Administrative Account Transactions Exposures		41,850,275	-	-	-		41,850,275	
C. Counterparty Credit Risk Exposure								
1	Government Receivables	20,173,527	19,940,947	-	-		232,580	
2	Public Sector Entities Receivables	428,876	-	-	-		428,876	
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-		-	
4	Bank Receivables	17,245,028	1,841,783	-	-		15,403,245	
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-		-	
6	Corporate Receivables	105,409	-	-	-		105,409	
Total Counterparty Credit Risk Exposure		37,952,840	21,782,730	-	-		16,170,110	
TOTAL (A+B+C)		979,433,904	36,042,750	-	27,913,928	-	915,477,227	



(in million Rupiah)

	DECEMBER 31, 2020					
	PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED
		COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS	
	(9)	(10)	(11)	(12)	(13)	(14) = (9)-[(10)+(11)+(12)+(13)]
	-	-	-	-	-	-
	297,302	-	-	-	-	297,302
	21,236,128	-	-	-	-	21,236,128
	-	-	-	-	-	-
	40,657,954	-	-	-	-	40,657,954
	8,012,001	8,008,274	-	-	-	3,727
	2,010,885	-	-	-	-	2,010,885
	-	-	-	-	-	-
	22,877,508	654,089	-	-	-	22,223,418
	25,941	-	-	-	-	25,941
	512,846	-	-	-	-	512,846
	33,439,182	8,662,364	-	-	-	24,776,818
	927,279,918	20,065,969	-	28,016,364	-	879,197,585

Net Receivables and Credit Risk Mitigation Technique, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021						
		PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED	
			COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) = (3)- [(4)+(5)+(6)+(7)]	
A. Balance Sheet Exposure								
1	Government Receivables	249,109,161	-	-	-		249,109,161	
2	Public Sector Entities Receivables	71,480,359	182,720	-	-		71,297,639	
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-		-	
4	Bank Receivables	26,819,618	8,365	-	-		26,811,253	
5	Loans Secured by Residential Property	14,342,103	8,614	-	-		14,333,489	
6	Loans Secured by Commercial Real Estate	16,528,112	70,655	-	-		16,457,457	
7	Employee/Retiree Loans	160,998	86	-	-		160,912	
8	Micro Business, Small Business, and Retail Portfolio Receivables	121,183,606	12,192,948	-	27,309,436		81,681,222	
9	Corporate Receivables	346,353,575	1,697,445	-	604,492		344,051,638	
10	Past Due Receivables	4,609,571	99,187	-	-		4,510,384	
11	Other Assets	59,229,171	-	-	-		59,229,171	
Total Balance Sheet Exposures		909,816,274	14,260,020	-	27,913,928		867,642,326	
B. Commitments/Contingency Liabilities Exposure in Administrative Account Transactions								
1	Government Receivables	4,887	-	-	-		4,887	
2	Public Sector Entities Receivables	10,822,646	-	-	-		10,822,646	
3	Multilateral Development Banks and International Institutions Receivables	5,701	-	-	-		5,701	
4	Bank Receivables	8,469,627	-	-	-		8,469,627	
5	Loans Secured by Residential Property	-	-	-	-		-	
6	Loans Secured by Commercial Real Estate	-	-	-	-		-	



(in million Rupiah)

		DECEMBER 31, 2020					
		PORTION SECURED	PORTION SECURED BY			PORTION UNSECURED	
			COLLATERAL	GUARANTEE	CREDIT INSURANCE		
		(9)	(10)	(11)	(12)	(13)	(14) = (9)-[(10)+(11)+(12)+(13)]
		181,516,232	-	-	-		181,516,232
		86,048,395	5,458	-	-		86,042,938
		-	-	-	-		-
		35,226,112	78	-	-		35,226,034
		13,472,576	7,163	-	-		13,465,413
		17,514,400	34,210	-	-		17,480,190
		244,235	-	-	-		244,235
		101,844,598	10,733,867	-	26,922,207		64,188,524
		366,284,914	615,273	-	1,094,157		364,575,484
		5,681,804	7,556	-	-		5,674,247
		51,887,287	-	-	-		51,887,287
		859,720,552	11,403,605	-	28,016,364		820,300,583
		28,108	-	-	-		28,108
		9,764,902	-	-	-		9,764,902
		-	-	-	-		-
		9,331,515	-	-	-		9,331,515
		-	-	-	-		-
		-	-	-	-		-

Net Receivables and Credit Risk Mitigation Technique, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021						
		PORTION SECURED	PORTION SECURED BY					PORTION UNSECURED
			COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS		
7	Employee/Retiree Loans	-	-	-	-	-		
8	Micro Business, Small Business, and Retail Portfolio Receivables	310,829	-	-	-	310,829		
9	Corporate Receivables	22,236,585	-	-	-	22,236,585		
10	Past Due Receivables		-	-	-	-		
Total Administrative Account Transactions Exposures		41,850,275	-	-	-	-	41,850,275	
C. Counterparty Credit Risk Exposure								
1	Government Receivables	20,173,527	19,940,947	-	-	232,580		
2	Public Sector Entities Receivables	428,876	-	-	-	428,876		
3	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-		
4	Bank Receivables	17,245,028	1,841,783	-	-	15,403,245		
5	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-		
6	Corporate Receivables	105,409	-	-	-	105,409		
Total Counterparty Credit Risk Exposure		37,952,840	21,782,730	-	-	-	16,170,110	
TOTAL (A+B+C)		989,619,389	36,042,750	-	27,913,928	-	925,662,711	



(in million Rupiah)

		DECEMBER 31, 2020					
		PORTION SECURED	PORTION SECURED BY				PORTION UNSECURED
			COLLATERAL	GUARANTEE	CREDIT INSURANCE	OTHERS	
		-	-	-	-	-	-
		297,302	-	-	-	-	297,302
		21,236,128	-	-	-	-	21,236,128
		-	-	-	-	-	-
		40,657,954	-	-	-	-	40,657,954
		8,012,001	8,008,274	-	-	-	3,727
		2,010,885	-	-	-	-	2,010,885
		-	-	-	-	-	-
		22,877,508	654,089	-	-	-	22,223,418
		25,941	-	-	-	-	25,941
		512,846	-	-	-	-	512,846
		33,439,182	8,662,364	-	-	-	24,776,818
		933,817,689	20,065,969	-	28,016,364	-	885,735,355

Asset Securitization

BNI's securitization activities are limited to ownership.

RWA for Credit Risk Calculation using Standard Approach

RWA for Credit Risk Calculation by Standard Approach - Consolidated Banks are included in Tables 1 - 7.

Table 1. Asset Exposure in Balance Sheet, except Securitization Exposure

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Government Receivables	249,109,161	710,992	710,992	173,476,105	628,467	628,467
	a. Government of Indonesia Receivables	243,196,739	-	-	164,506,888	-	-
	b. Other Country Government Receivables	5,912,422	710,992	710,992	8,969,217	628,467	628,467
2.	Public Sector Entities Receivables	71,480,359	29,436,859	26,801,685	76,283,488	29,216,766	29,214,037
3.	Multilateral Development Banks and International Institutions Receivables	-	-	-	-	-	-
4.	Bank Receivables	26,819,618	10,353,561	10,349,378	22,811,394	8,826,137	8,826,098
	a. Short-term Receivables	5,552,098	1,110,419	1,110,419	2,028,339	405,668	405,668
	b. Long-term Receivables	21,267,520	9,243,142	9,238,959	20,783,055	8,420,469	8,420,430
5.	Loans Secured by Residential Property	14,342,103	4,521,703	4,519,017	13,472,564	4,183,186	4,180,847
6.	Loans Secured by Commercial Real Estate	16,528,112	16,528,112	16,457,457	17,514,399	17,514,399	17,480,189
7.	Employee/Retiree Loans	160,998	80,499	80,456	244,235	122,118	122,118
8.	Micro Business, Small Business, and Retail Portfolio Receivables	121,183,606	90,887,705	67,262,406	102,725,336	77,044,002	55,750,628
9.	Corporate Receivables	346,353,576	346,240,376	342,477,515	338,511,055	333,437,359	332,028,900
10.	Past Due Receivables	4,609,571	6,830,598	6,681,838	5,681,803	8,450,541	8,439,239
	a. Receivables secured by residential property	167,518	167,518	167,479	144,328	144,328	144,264
	b. Receivables not secured by residential property	4,442,053	6,663,080	6,514,359	5,537,475	8,306,213	8,294,975
11.	Other Assets	59,229,166		51,238,968	53,995,272		38,855,903
	a. Cash, gold, and commemorative coins	13,683,476		-	16,906,284		-

Table 1. Asset Exposure in Balance Sheet, except Securitization Exposure

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
	b. Equity participation (other than a deduction factor to capital)	9,903,090		14,854,635	1,754,968		2,632,452
	i. Temporary equity participation as part of credit restructuring	-		-	-		-
	ii. Equity participation in non-listed financial institutions	9,903,090		14,854,635	1,754,968		2,632,452
	iii. Equity participation listed financial institutions	-		-	-		-
	c. Fixed assets and inventory - net	26,669,792		26,669,792	26,534,253		26,534,253
	d. Foreclosed Collateral (AYDA)	1,483,466		2,225,199	1,778,862		2,668,293
	e. Inter-Office - net	10,234		10,234	-		-
	f. Others	7,479,108		7,479,108	7,020,905		7,020,905
TOTAL		909,816,270	556,829,372	526,579,711	804,715,651	479,422,974	495,526,424

Table 2. Commitment/Contingency Liabilities Exposure in Administrative Account Transactions, except Securitization Exposure

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Government Receivables	4,888	-	-	28,108	-	-
	g. Government of Indonesia Receivables	4,888	-	-	28,108	-	-
	h. Other Country Government Receivables	-	-	-	-	-	-
2.	Public Sector Entities Receivables	5,701	2,851	2,851	-	-	-
3.	Multilateral Development Banks and International Institutions Receivables	8,469,628	4,234,579	4,234,579	9,331,515	4,630,070	4,630,070

Table 2. Commitment/Contingency Liabilities Exposure in Administrative Account Transactions, except Securitization Exposure

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4.	Bank Receivables	785	157	157	118,957	23,791	23,791
	a. Short-term Receivables	8,468,843	4,234,422	4,234,422	9,212,558	4,606,279	4,606,279
	b. Long-term Receivables	10,822,646	5,411,323	5,411,323	9,764,902	4,882,451	4,882,451
5.	Loans Secured by Residential Property	22,236,585	22,236,585	22,226,325	21,236,128	21,236,128	21,223,050
6.	Loans Secured by Commercial Real Estate	310,829	233,122	233,122	297,302	222,977	222,977
7.	Employee/Retiree Loans	-	-	-	-	-	-
8.	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
9.	Corporate Receivables	-	-	-	-	-	-
10.	Past Due Receivables	-	-	-	-	-	-
	a. Receivables secured by residential property	-	-	-	-	-	-
	b. Receivables not secured by residential property	-	-	-	-	-	-
TOTAL		41,850,277	32,118,459	32,108,199	40,657,955	30,971,626	30,958,548

Table 3. Exposures Causing Credit Risk Due to the Counterparty's Failure (Counterparty Credit Risk)

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Government Receivables	20,169,185	-	-	8,012,001	-	-
	a. Government of Indonesia Receivables	20,169,185	-	-	8,012,001	-	-
	b. Other Country Government Receivables	-	-	-	-	-	-
2.	Public Sector Entities Receivables	-	-	-	-	-	-
3.	Multilateral Development Banks and International Institutions Receivables	4,136,134	1,515,532	-	3,737,293	1,672,420	-

Table 3. Exposures Causing Credit Risk Due to the Counterparty's Failure (Counterparty Credit Risk)

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
4.	Bank Receivables	1,841,783	368,357	-	654,089	130,818	-
	a. Short-term Receivables	2,294,351	1,147,176	-	3,083,204	1,541,602	-
	b. Long-term Receivables	-	-	-	-	-	-
5.	Micro Business, Small Business, and Retail Portfolio Receivables	-	-	-	-	-	-
6.	Corporate Receivables	-	-	-	-	-	-
TOTAL		24,305,319	1,515,532	-	11,749,294	1,672,420	-

Table 4. Exposure to Credit Risk due to Failure in Settlement (Settlement risk)

NO	TYPE OF TRANSACTION	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Delivery versus payment	0		0	0		0
	a. Capital Cost 8% (5-15 days)	0		0	0		0
	b. Capital Cost 50% (16-30 days)	0		0	0		0
	c. Capital Cost 75% (31- 45 days)	0		0	0		0
	d. Capital Cost 100% (more than 45 days)	0		0	0		0
2.	Non-delivery versus payment	0	0	0	0	0	0
TOTAL		0	0	0	0	0	0

Table 5. Exposure to Securitization

NO	TYPE OF TRANSACTION	DECEMBER 31, 2021		DECEMBER 31, 2020	
		CAPITAL REDUCING FACTORS	RWA	CAPITAL REDUCING FACTORS	RWA
(1)	(2)	(3)	(4)	(5)	(6)
1.	RWA on Securitization Exposure calculated using the External Rating Base Approach (ERBA) Method		0		0
2.	RWA on Securitization Exposure calculated using the Standardized Approach (SA) Method		14,397		32,292
3.	Securitization Exposure as a Deduction factor to Core Capital	0		0	
TOTAL		0	14,397	0	32,292

Table 6. Exposure to Derivatives

NO	PORTFOLIO CATEGORY	DECEMBER 31, 2021			DECEMBER 31, 2020		
		NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM	NET RECEIVABLES	RWA BEFORE CRM	RWA AFTER CRM
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Government Receivables	4,342		-	-		-
	a. Government of Indonesia Receivables	4,342		-	-		-
	b. Other Country Government Receivables	-		-	-		-
2.	Public Sector Entities Receivables	428,876		214,438	2,010,884		1,005,442
3.	Multilateral Development Banks and International Institutions Receivables	-		-	-		-
4.	Bank Receivables	13,108,893		2,621,779	19,794,303		3,958,861
	a. Short-term Receivables	13,108,893		2,621,779	19,794,303		3,958,861
	b. Long-term Receivables	-		-	-		-
5.	Micro Business, Small Business, and Retail Portfolio Receivables	-		-	25,942		19,457
6.	Corporate Receivables	105,409		105,409	512,847		512,847
7.	Weighted exposure from Credit Valuation Adjustment (CVA risk weighted assets)			93,026			577,710
TOTAL		13,647,520		3,034,652	22,343,976		6,074,316

Table 7. Total Measurement of Credit Risk (1+2+3+4+5+6)

		DECEMBER 31, 2021	DECEMBER 31, 2020
Total RWA Credit Risk	(A)	561,736,959	532,591,579
Deduction factors of Credit Risk RWA:	(B)	-	-
The excess difference between PPKA's general reserve for earning assets that must be calculated and 1.25% RWA for Credit Risk			
Total RWA Credit Risk (A) - (B)	(C)	561,736,959	532,591,579
Total Capital Deduction Factor	(D)	-	-

MARKET RISK

Represents the risk of loss in balance sheet and off-balance sheet positions and derivative transactions due to changes in overall market conditions, Market variables managed by BNI consist of interest rates, exchange rates including derivative transactions and changes in option prices,

Most of the Trading Book's Market Risk is sourced from Domestic and Overseas Branch Offices Treasury business activities, Meanwhile the Banking Book's Market Risk, specifically the Interest Rate Risk in Banking Book and Net Open Position (PDN) is sourced from all company activities, BNI always monitors and manages market risks continuously and closely,

Governance and Organization

To achieve an effective and independent market risk management, Treasury business activities are divided into 3 (three) areas, namely front office, middle office, and back office, Front office acts as a business unit seeking to achieve business targets by executing business activities and dealing with customers, However, as a part of the internal control system, front office also functions as the first line of defense and will try to limit and anticipate market risks due to changes in exchange rates and interest rates in accordance with predetermined limits, In conducting its activities, Treasury business is limited by Risk Appetite and Risk Limit proposed by the Bank's Risk Management Division to the Risk Management Committee and the Anti Fraud Risk Management Sub-Committee (KRA-RMC), Treasury transaction limits are proposed by the Policy Governance Division through the Credit Procedure Committee (CPC) whilst the counterparty limit is assigned by the Business Risk Unit,

The Bank's Risk Management Division as the second line of defense conducts a surveillance function towards market and compliance with risk limits for market, authority and counterpart risk, It also validates fixing prices, checking the fairness of prices for treasury transactions and investigating off-market events and reviewing limit usage, Furthermore, to complement the existing market risk management function, BNI also has a Middle Office that monitors, controls and reports risks on Treasury transactions,

The back office function is under the Operations Division and carries out activities for confirmation, accounting and Treasury transactions settlement,

Policies and Procedures

To support the business targets, while still paying attention to the precautionary principle, BNI has Corporate Guidelines for Treasury and International Business, In addition, for effective Market Risk management, BNI is guided by the Guidelines,

Market Risk Management Company, The Company Guidelines contain management and methodologies as well as market risk management models, and are compiled and reviewed and validated periodically by the Bank's Risk Management Division,

Process

Market risk identification, measurement, surveillance and control are executed by units independently from the business unit, Market Risk identification is mainly conducted on every new product or activity, BNI measures Market Risk by using the Standard and Internal Methods, The Standard Method is used to calculate the Minimum Capital Adequacy Requirement (CAR) for Market Risk whilst the daily Market Risk management is used for the Internal Value at Risk Method,

Portfolio coverage calculated within CAR by using the Standard Method is a trading book portfolio for interest rate risk as well as trading and banking book portfolios for domestic exchange rate risk and overseas branch offices.

The Bank's individual market risk exposures, consolidated with its Subsidiaries using the standard method are shown in the following table:

Table 7.1. RWA Market Risk by Using Standardized Method Bank Only and Consolidated (in million Rupiah)

NO,	TYPE OF RISKS	DECEMBER 31, 2021				DECEMBER 31, 2020			
		INDIVIDUAL		CONSOLIDATED		INDIVIDUAL		CONSOLIDATED	
		CAPITAL EXPENSE	RWA	CAPITAL EXPENSE	RWA	CAPITAL EXPENSE	RWA	CAPITAL EXPENSE	RWA
(1)	(2)	(3)	(4)	(5)	(6)	(3)	(4)	(5)	(6)
1	Interest Rate Risk	47,361	592,017	54,131	676,633	26,927	336,588	31,664	395,806
	a. Specific Risk	-	-	5,038	62,970	-	-	4,738	59,221
	b. General Risk	47,361	592,017	49,093	613,663	26,927	336,588	26,927	336,584
2	Exchange Rate Risk	90,428	1,130,355	88,985	1,112,314	235,259	2,940,737	234,744	2,934,306
3	Equity Risk	-	-	2,070	25,876	-	-	-	-
4	Commodity Risk	-	-	-	-	-	-	-	-
5	Option Risk	-	-	-	-	-	-	-	-
TOTAL		137,790	1,722,372	145,186	1,814,823	262,186	3,277,325	266,409	3,330,112

For internal purposes, BNI also conducts calculations using an Internal method. Calculations of CAR using the Internal method is done by calculating the Value at Risk (VaR), which is the value that represents the maximum potential risk of losses on the Bank due to market movements affecting the Bank's risk exposure in normal market conditions. To arrive at the VaR value, the method uses an Historical Simulation.

Domestic market value exposures (Risk at Risk) and Overseas Branch Offices are monitored daily and results submitted to Management on a weekly and monthly basis. The price valuation policy currently used for actively traded instruments is mark-to-market, whilst the valuation method for lower actively traded instruments uses fair prices from independent sources.

The Bank's individual and consolidated market risk exposures using the internal model (value at risk) are shown in the following table:

Table 7.2. Market Risk using Internal Method (Value at Risk/VaR) (in million Rupiah)

NO	TYPE OF RISKS	DECEMBER, 31 2021				DECEMBER, 31 2020			
		AVERAGE VAR	MAXIMUM VAR	MINIMUM VAR	END OF PERIOD VAR	AVERAGE VAR	MAXIMUM VAR	MINIMUM VAR	END OF PERIOD VAR
1	Interest Rate Risk	262,989	349,525	208,105	222,667	310,174	385,424	71,198	285,917
2	Exchange Rate Risk	17,694	61,618	4,700	20,916	23,937	86,543	3,707	23,837
3	Option Risk	-	-	-	-	-	-	-	-
Total		280,683	411,143	212,805	243,584	334,111	471,967	74,905	309,754

Interest Rate Risk in the Banking Book (IRRBB) is the Risk due to movements in market interest rates that are contrary to Banking Book position, and has the potential to impact the Bank's present and future capital and income.

Risks in the overall banking book portfolio are periodically monitored in accordance with the measurement methods set by the regulator, namely monitoring the Net Open Position (NOP) for exchange rate risk and interest rate risk in the banking book, with the results submitted to management through Risk Management and Anti Fraud Committee Forum and Asset & Liability Sub-Committee (KRA-ALCO).

Disclosure Reports of interest rate risk exposure in the Banking Book (IRRBB) individually and consolidated are shown in the following tables:

Table 7.3.a Interest Rate Risk Exposure in the Banking Book Bank Only Position
December 2021 IDR and USD Currency

(in million Rupiah)

PERIOD	EVE		NII	
	T	T-1	T	T-1
Parallel Up	3,151,824	1,598,873	(2,243,892)	(1,427,659)
Parallel Down	(5,053,042)	(3,442,646)	3,070,193	1,552,034
Steepener	22,486	(282,624)		
Flattener	10,304	(115,659)		
Short Rate Up	1,344,634	771,421		
Short Rate Down	(3,999,530)	(3,640,399)		
Absolute Negative Maximum Value	5,053,042	3,640,399	2,243,892	1,427,659
Tier 1 Capital (for Δ EVE) or Projected Income (for Δ NII)	112,685,137	109,652,985	41,345,816	40,617,254
Maximum amount divided by Tier 1 capital (for Δ EVE) or Projected Income (for Δ NII)	4.48%	3.32%	5.43%	3.51%

T = Report Period of December 2021

T - 1 = Report Period of September 2021

Application of Risk Management for Interest Rate Risk in the Banking Book, Bank Only

QUALITATIVE ANALYSIS

- 1 Interest Rate Risk in the Banking Book, hereinafter abbreviated as IRRBB, represents current and future risks against the Bank's capital and profitability, arising from interest rate movements in the market which have an impact on the Banking Book position.

The IRRBB includes gap risk arising from the term structure of the banking book instruments; the risk basis that describes the impact of the relative changes in interest rates of financial instruments that are valued using different interest rate curves; option risk arising from financial derivative positions or from the element of option risk inherent in financial instruments.

Application of Risk Management for Interest Rate Risk in the Banking Book, Bank Only

QUALITATIVE ANALYSIS

- 2 The Bank manages IRRBB exposure using economic value and earnings based measures. In the application 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 in monitoring interest rate risks that arise.
For the purpose of controlling and mitigating interest rate risk in the banking book, the Bank has determined both quantitative control in the form of the application of limits and risk appetite. The Bank also conducts qualitative risk control such as management strategies, risk transfers through the Funds Transfer Pricing (FTP) mechanism and also a hedging strategy.

Application of Risk Management for Interest Rate Risk in the Banking Book, Bank Only

QUALITATIVE ANALYSIS

- 3 The IRRBB calculation is done quarterly and subsequently becomes part of the Risk Profile, Bank Soundness Self Assessment, Quantitative Information on Risk Exposure, and Disclosure of Risk Management Practices.

To measure IRRBB exposure, the Bank uses economic value and earnings as a basis for measurement methods. Measurement of 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 the Bank caused by interest rate movements. For now, the Bank measures changes in EVE as the maximum decrease of the economic value of banking books in the six standard interest scenarios defined by the Basel Committee on Banking Supervision (BCBS) and OJK as stated in SEOJK IRRBB no SEOJK/12/2018.

The measurement of bank earnings (earning-based measure) looks at the estimated changes in net interest income, hereinafter abbreviated as NII (net interest income) which is caused by the movement of interest rates in the market for a certain period. For this reason, the Bank measures the change in NII as a maximum decrease from NII if there is a scenario of an increase or decrease in interest rates in parallel as defined by the Basel Committee on Banking Supervision (BCBS) and SEOJK IRRBB no SEOJK/12/2018, compared to planning Bank finance for a period of 12 months.

- 4 In measuring EVE, BNI uses the standardized approach of SEOJK IRRBB no SEOJK/12/2018, where the interest rate shock scenario used includes:
1. Parallel shock up;
 2. 2) Parallel shock down;
 3. Steepener shock, with a combination of short rates down and long rates up;
 4. Flatten shock with a combination of short rates up and long rates down;
 5. Short rates shock up; and
 6. Short rates shock down.
- In measuring NII, the Bank uses the standardized approach of SEOJK IRRBB no SEOJK/12/2018, where the interest rate shock scenario used includes:
1. Parallel shock up;
 2. Parallel shock down;
- Going forward, in controlling risk, BNI will also evaluate IRRBB exposure by using an internal stress scenario to measure EVE and NII.

Application of Risk Management for Interest Rate Risk in the Banking Book, Bank Only

QUALITATIVE ANALYSIS

- 5 There are no methodological differences or modeling assumptions in the framework of the calculations used in the internal management system. In other words, the Bank uses the Standardized Approach as a reference in the calculation of IRRBB as for internal management purposes.

- 6 The Bank currently has a hedging instrument in the form of an Interest Rate Swap (IRS) to offset potential losses if there is potential loss on AFS securities. The Bank also conducts daily MTM on the IRS instrument.

- 7 a. For the EVE method, the Bank calculates all cash flows from the principal and interest payments which include the commercial margin (client rate) discounted by the risk free rate at the reporting date;
- b. Bank uses a portfolio replication model and/or uniform slotting method in determining the slotting and repricing maturities for NonMaturity Deposits (NMDs) by taking into account the caps and provisions for the average time period as stated in the IRRBB SEOJK . The bank has interest rate exposure from Non-Maturity Deposits (NMDs) positions that come from wholesale and retail customers. To manage this interest rate risk, BNI carries out a two-stage modeling in accordance with the terms of the SEOJK IRRBB. In the first stage, BNI analyzes the change in volume to determine the portion of NMD that is stable in the sense that it has a small possibility for customers to withdraw. In the second stage, BNI measures the proportion of core deposits from stable NMD that customers will not withdraw even if there is a large market interest change while the Bank does not adjust the intended NMD interest. The main dimensions affecting the maturity of core NMDs are deposit interest elasticity against changes in market interest rates,

volatility in deposit volumes and other factors including customer behaviour and macroeconomics. By taking into account the limitations of NMD modelling that apply to the Standardized Approach, the Bank determines the distribution and average maturity of repricing maturity by using a replicating portfolio approach and/or uniform slotting method, depending on the availability and reliability of data for each relevant NMD category, currently consists of wholesale NMD, transactional retail NMD and non-transactional retail NMD. Modelling parameters are based on historical observations, statistical analysis and management judgment

Application of Risk Management for Interest Rate Risk in the Banking Book, Bank Only

QUALITATIVE ANALYSIS

- c. The Bank carries out risk modelling or estimation to determine the prepayment rate of fixed interest loans and early withdrawal rates for time deposits, if this risk is not adequately mitigated, for example by imposing a fine. In estimating prepayment rates, the Bank uses statistical methods based on historical data in analysing accelerated loan repayment rates. Some key dimensions that affect customer repayment rates include: market interest rates, lending rates, nominal loans, and several other factors. On the other hand, to estimate the early withdrawal rate, the Bank uses the Exponential Weighted Moving Average (EWMA) method. This model assumes that the results of tomorrow's projections are influenced by current and past data. Some main dimensions that affect the level of customer withdrawals include: deposit rates, nominal deposits and several other factors.
- d. There are no other assumptions used by BNI other than the assumptions set by the FSA Circular on IRRBB.
- e. BNI calculates the IRRBB for each material currency and then aggregates it. The aggregation methodology is done by simple addition.

QUALITATIVE ANALYSIS

- 1 The average term for adjusting interest rates (repricing maturity) for Rupiah includes:
 1. Wholesale for 1.06 years
 2. Transactional Retail for 3.30 years
 3. Non-Transactional Retail for 1.56 years

The average time period for interest rate adjustment (repricing maturity) for USD includes:

1. Wholesale for 0.96 years
2. Transactional Retail for 3.66 years
3. Non-Transactional Retail for 1.44 years

- 2 The longest period of interest rate adjustment (repricing maturity) for Rupiah includes:
 1. Wholesale for a period of 5 years
 2. Transactional Retail for a period of 5 years
 3. Non-Transactional Retail for a period of 5 years

The longest period of repricing maturity for USD is:

1. Wholesale for a period of 5 years
2. Transactional Retail for a period of 5 years
3. Non-Transactional Retail for a period of 5 years

Table 7.4.a Interest Rate Risk Exposure in the Banking Book Consolidated with Subsidiaries Position of December 2021

(in million Rupiah)

PERIOD	EVE		NII	
	T	T-1	T	T-1
Parallel Up	3,186,316	1,630,734	-2,228,139	-1,420,611
Parallel Down	-5,091,711	-3,478,658	3,054,440	1,544,986
Steepener	-7,210	-310,565		
Flattener	43,719	-84,519		
Short Rate Up	1,386,407	810,164		
Short Rate Down	-4,047,592	-3,685,464		
Absolute Negative Maximum Value	5,091,711	3,685,464	2,228,139	1,420,611
Tier 1 Capital (for Δ EVE) or Projected Income (for Δ NII)	114,051,566	102,155,436	41,639,377	40,760,676
"Maximum amount divided by Tier 1 capital (for Δ EVE) or Projected Income (for Δ NII)"	4.46%	3.61%	5.35%	3.49%

Application of Risk Management for Interest Rate Risk in the Banking Book, Consolidated with Subsidiaries

QUALITATIVE ANALYSIS

- 1 Interest Rate Risk in the Banking Book, hereinafter abbreviated as IRRBB, represents current and future risks against capital and profitability of the Bank and Subsidiary Companies due to the movement of interest rates in the market which affects the position of the Banking Book.

Included in the IRRBB is the gap risk arising from the term structure of the banking book instruments; the risk basis that describes the impact of the relative changes in interest rates of financial instruments that are valued using different interest rate curves; option risk arising from financial derivative positions or from the element of option risk inherent in financial instruments.

- 2 BNI and its Subsidiaries manage IRRBB exposures using the economic value approach and earnings-based measures. As a segregation of duty application, there is a separation between the unit that manages 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, BNI and its Subsidiaries set controls both quantitatively in the form of the application of limits and risk appetite. BNI and its Subsidiaries also carry out qualitative risk control such as management strategies, risk transfers through the Funds Transfer Pricing (FTP) mechanism and also a hedging strategy.

- 3 The IRRBB calculation is done quarterly which and then become part of the Risk Profile, Bank Soundness Self-Assessment, Quantitative Risk Exposure Information, and Disclosure of Risk Management Practices. In measuring the IRRBB exposure, BNI and its Subsidiaries use economic values and earnings as the basis for the measurement method. Measurement of the 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 the Bank and Subsidiaries due to movements in interest rates. For now, the Bank and Subsidiaries measure changes in EVE as the maximum reduction of the economic value of banking books in the six standard interest scenarios defined by the Basel Committee on Banking Supervision (BCBS) and OJK as stated in SEOJK IRRBB no SEOJK/12/2018.

The measurement of bank earnings refers to the estimated changes in net interest income, hereinafter abbreviated as NII (net interest income) which is caused by the movement of interest rates in the market for a certain period. For this, the Bank and Subsidiaries measure the change in NII as a maximum decrease from NII if there is a scenario of an increase or decrease in interest rates in parallel as defined by the Basel Committee on Banking Supervision (BCBS) and SEOJK IRRBB no SEOJK/12/2018, compared to financial planning Bank and Subsidiaries for a period of 12 months.

QUALITATIVE ANALYSIS

- 4 In measuring EVE, BNI and its Subsidiaries use the standardized approach of SEOJK IRRBB no SEOJK/12/2018, where the interest rate shock scenario used includes:
 1. parallel shock up;
 2. parallel shock down;
 3. steepener shock, with a combination of short rates down and long rates up;
 4. flattener shock, with a combination of short rates up and long rates down;
 5. Short rates shock up; and
 6. Short rates shock down.
 In measuring NII, the Bank and Subsidiaries use the standardized approach SEOJK IRRBB no SEOJK/12/2018, where the interest rate shock scenario used includes:
 1. parallel shock up;
 2. parallel shock down;
 In the future, to control risk, BNI and its Subsidiaries will also evaluate IRRBB exposures by using internal stress scenarios to measure EVE and NII.
- 5 There are no methodological differences or modeling assumptions in the framework of the calculations used in the internal management system. In other words, the Bank and Subsidiary Companies use the Standardized Approach as a reference in the calculation of IRRBB as for internal management purposes
- 6 BNI currently has a hedging instrument in the form of an Interest Rate Swap (IRS) to offset potential losses that arise if there are potential losses on AFS securities. The Bank also conducts daily MTM on the IRS instrument.
- 7
 - a. Regarding the EVE method, BNI and its Subsidiaries calculate all cash flows from the principal and interest payments which include the commercial margin (client rate) discounted by the risk free rate at the reporting date
 - b. The Bank uses a portfolio replication model and/or uniform slotting method in determining the slotting and repricing maturities for NMDs by taking into account the caps and provisions for the average time period as stated in the IRRBB SEOJK.

The Bank has interest rate exposure from Non-Maturity Deposits (NMDs) positions that come from wholesale and retail customers. To manage this interest rate risk, BNI carries out a two-stage modeling in accordance with the terms of the SEOJK IRRBB. In the first stage, BNI analyzes the change in volume to determine the portion of NMD that is stable in the sense that it has a small possibility for customers to withdraw. In the second stage, BNI

QUALITATIVE ANALYSIS

measures the proportion of core deposits from stable NMD that customers will not withdraw even if there is a large market interest change while the Bank does not adjust the intended NMD interest.

The main dimensions affecting the maturity of core NMDs are deposit interest elasticity against changes in market interest rates, volatility in deposit volumes and other factors including customer behaviour and macroeconomics.

By taking into account the limitations of NMD modelling that apply to the Standardized Approach, the Bank determines the distribution and average maturity of repricing maturity by using a replicating portfolio approach and/or uniform slotting method, depending on the availability and reliability of data for each relevant NMD category, currently consists of wholesale NMD, transactional retail NMD and non-transactional retail NMD. Modelling parameters are based on historical observations, statistical analysis and management judgment.

QUALITATIVE ANALYSIS

- c. The Bank and Subsidiaries carry out risk modelling or estimation to determine the prepayment rate of fixed interest loans and early withdrawal rates for time deposits, if this risk is not adequately mitigated, for example by imposing a fine.

In estimating prepayment rates, the Bank and Subsidiaries use statistical methods based on historical data in analysing accelerated loan repayment rates. Some key dimensions that affect customer repayment rates include: market interest rates, lending rates, nominal loans, and several other factors.

On the other hand, to estimate the early withdrawal rate, the Bank and Subsidiaries use the Exponential Weighted Moving Average (EWMA) method. This model assumes that the results of tomorrow's projections are influenced by current and past data. Some main dimensions that affect the level of customer withdrawals include: deposit rates, nominal deposits and several other factors.

- d. There are no other assumptions used by BNI and Subsidiaries other than the assumptions set by the FSA Circular on IRRBB.
- e. BNI and subsidiaries calculate the IRRBB for each material currency and then aggregates it. The aggregation methodology is done by simple addition.

QUANTITATIVE ANALYSIS

- 1 The average term for adjusting interest rates (repricing maturity) for Rupiah includes:
1. Wholesale for 1.47 years
 2. Transactional Retail for 2.39 years
 3. Non-Transactional Retail for 1.61 years

The average time period for interest rate adjustment (repricing maturity) for USD includes:

1. Wholesale for 1.59 years
2. Transactional Retail for 1.81 years
3. Non-Transactional Retail for 1.34 years

- 2 The longest period of interest rate adjustment (repricing maturity) for Rupiah includes:
1. Wholesale for a period of 5 years
 2. Transactional Retail for a period of 5 years
 3. Non-Transactional Retail for a period of 5 years

The longest period of repricing maturity for USD is:

1. Wholesale for a period of 5 years
2. Transactional Retail for a period of 5 years
3. Non-Transactional Retail for a period of 5 years

Devices and Methods

To support business processes and in line with market risk management, BNI uses market risk management tools. The Bank also receives market data from Reuters, Bloomberg and other independent sources. Limits set to manage potential Market Risk losses in the Treasury Division and Overseas Branch Offices include the following:

1. Value at Risk Limit (VaR Limit), the maximum potential loss that might occur at a certain time in the future with a certain confidence level;
2. Stress Value at Risk Limit (Stress VaR Limit), a market risk measurement adjusted to abnormal conditions in the market or maximum potential losses when the market is abnormal;
3. Budget Loss Limit, to limit the realization of losses in business activities;
4. Management Action Trigger (MAT), a limitation to take action on the risk of changes in the value of the loss (early warning signal). MAT supplies the loss limit in the form of a certain percentage of the loss limit;
5. Purchase of securities limit, used to limit the concentration of corporate securities purchases based on rating and type of currency;
6. Asset and liability repricing gap Limit (Interest Rate Risk in Banking Book), to limit interest rate risk in the banking book;
7. Nominal open position limit, the maximum nominal open position that a dealer can hold;
8. Absolute PDN internal limit, the maximum PDN management limit.

Steps to strengthen market risk management to face changes in economic conditions throughout 2021 included closely monitoring the market movements that could potentially have an impact on the Bank, including exchange rates, interest rates, share prices, and commodity prices. To determine the potential impact on the Bank, a Scenario Analysis and Stress Testing was carried out periodically and incidentally. The Periodic Stress Testing used scenarios that referenced the Regulator's provisions and the Bank's internal scenario. Whereas the Incidental Stress Testing and Scenario Analysis scenarios were adjusted to the macroeconomic

factors and market factors conditions at the time. Each Overseas Branch Office also performed Stress Testing in accordance with internal regulations and the local regulator's provisions. The stress testing results were used to prepare a Contingency Plan so that any risks occurring could be limited and managed properly.

LIQUIDITY RISK

The risk due to the inability to meet obligations due to cash flow funding sources and/or high quality liquid assets.

Liquidity risk relates to the possibility of the Bank being unable to meet short-term obligations to depositors, investors and creditors, as well as to fulfill of minimum statutory reserves due to limited access to funding or inability to liquidate assets held at reasonable prices.

Liquidity risk management aims to minimize the possibility of the Bank's inability to obtain cash flow funding sources, and to build the strength of structural liquidity in the bank's balance sheet to support sustainable long-term growth.

Governance and Organization

Liquidity Risk Management is executed by the Bank's Risk Management Division (RMD), Treasury Division (TRS), and Overseas Branch Offices. Liquidity Risk Policies and Procedures are prepared by the ERM Division, and implemented by the TRS Division and all Foreign Branch Offices for their liquidity strategies management. The RMD Division also monitors liquidity management carried out by the TRS Division.

Policies and Procedures

The RMD Division has a Liquidity Risk Policy including the Liquidity Risk Management Guidelines, which are further elaborated into the Liquidity Risk Management Procedures that contain liquidity risk management guidelines including:

1. Availability of Liquid Tools: Cash, Statutory Reserves (GWM), Secondary Reserve, Tertiary Reserve, Early Warning Indicators, Contingency Plans for Head Office and Overseas Branch Offices Liquidity;
2. Liquidity Risk Measurement: Liquidity Ratio Cash Flow Projections, Maturity Profiles, Liquidity Coverage Ratio, Stress testing;

3. Liquidity Risk Monitoring;
4. Liquidity Risk Control;
5. Liquidity Limit Assignment: BNI Wide Cash Limit, Ideal Secondary Reserve limit, Maturity Profile limit and Foreign Currency Credit limit based on Foreign Currency liquidity availability.

Process

In managing liquidity, as well as managing primary reserves (cash and reserve requirements), BNI also maintains secondary reserves to ensure liquidity at a safe level. As a secondary reserve, BNI maintains a tertiary reserve. Limit assignment and surveillance through the BNI Wide Cash limit, the Ideal Secondary Reserve limit, the Maturity Profile limit, and the Foreign Currency Credit limit, based on the Availability of Funds conducted periodically by the ERM Division. Whereas the availability of the primary reserve is monitored daily, weekly and monthly by the TRS Division and the ERM Division.

Devices and Methods

For managing liquidity risk, BNI uses daily cash flow projections and monthly maturity profiles, either contractual or behavioral in order to determine appropriate and accurate strategies to anticipate future bank liquidity conditions.

Disclosure of the Bank's individual and consolidated Rupiah and Foreign Exchange Maturity Profile is shown in the following tables.

Table 9.1.a Rupiah Maturity Profile, Bank Only

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		BALANCE	MATURITY DATES				
			≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I. Balance Sheet							
A. Assets							
1.	Cash	13,209,873	13,209,873	-	-	-	-
2.	Placement with Bank Indonesia	91,937,803	91,937,803	-	-	-	-
3.	Placement with other banks	337,839	287,839	-	-	50,000	-
4.	Marketable Securities	89,525,495	1,653,479	3,794,367	3,139,009	2,298,058	78,640,582
5.	Loans Provided	427,983,392	20,797,429	34,843,305	28,846,345	24,662,120	318,834,192
6.	Other Receivables	36,643,707	23,511,475	4,821,872	3,547,229	145,375	4,617,756
7.	Others	44,370,543	3,473,747	4,170,501	4,396,830	2,105,352	30,224,112
Total Asset		704,008,650	154,871,644	47,630,045	39,929,413	29,260,905	432,316,643
B. Liabilities							
1.	Third Party Fund	609,113,027	62,235,142	58,592,491	27,829,541	14,990,158	445,465,695
2.	Liabilities with Bank Indonesia	4,809	-	-	-	-	4,809
3.	Liabilities with other banks	1,470,248	1,351,939	26,105	1,654	6,081	84,470
4.	Securities Issued	2,999,839	-	-	-	2,999,839	-
5.	Received Loans	76	-	-	-	-	76
6.	Other Liabilities	3,432,944	2,039,304	859,600	534,040	-	-
7.	Others	19,184,297	15,176	87,245	41,438	22,320	19,018,117
Total Liabilities		636,205,241	65,641,562	59,565,440	28,406,673	18,018,399	464,573,167
Differences of Asset and Liabilities in Balance Sheet		67,803,409	89,230,082	(11,935,395)	11,522,740	11,242,506	(32,256,524)
II. Administrative Account							
A. Administrative Account Receivables							
1.	Commitment	41,900,980	17,239,632	13,963,958	5,425,410	5,271,980	-
2.	Contingency	14,496,454	14,496,454	-	-	-	-
Total Administrative Account Receivables		56,397,434	31,736,086	13,963,958	5,425,410	5,271,980	-
B. Administrative Account Liabilities							
1.	Commitment	72,323,033	21,253,582	7,331,901	3,762,366	2,805,161	37,170,022
2.	Contingency	32,852,189	8,021,175	4,739,177	4,770,086	6,338,296	8,983,454
Total Administrative Account Liabilities		105,175,221	29,274,757	12,071,078	8,532,453	9,143,457	46,153,477
Differences of Receivables and Liabilities in Administrative Accounts		(48,777,787)	2,461,329	1,892,880	(3,107,043)	(3,871,477)	(46,153,477)
Differences [(IA-IB)+(IIA-IIB)]		19,025,622	91,691,411	(10,042,515)	8,415,697	7,371,029	(78,410,001)
Cumulative Differences			91,691,411	81,648,896	90,064,593	97,435,623	19,025,622

(in million Rupiah)

	DECEMBER 31, 2020					
	BALANCE	MATURITY DATES				
		≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	>12 MONTH
	(3)	(4)	(5)	(6)	(7)	(8)
	16,201,423	16,201,423	-	-	-	-
	52,947,283	52,947,283	-	-	-	-
	1,462,515	1,187,465	100,000	175,050	-	-
	65,312,250	2,736,528	2,980,775	1,486,850	1,447,386	56,660,711
	411,044,969	68,392,460	34,502,827	33,299,221	26,704,313	248,146,148
	24,865,015	11,687,087	6,485,190	6,331,939	358,111	2,688
	30,410,764	669,930	603,535	219,318	-	28,917,981
	602,244,219	153,822,176	44,672,327	41,512,378	28,509,810	333,727,528
	518,763,352	130,380,153	66,126,163	5,266,851	5,201,449	311,788,736
	6,587	-	-	-	-	6,587
	2,182,076	1,675,620	136,322	364,869	3,434	1,831
	3,099,528	-	-	-	-	3,099,528
	76	-	-	-	-	76
	2,915,930	987,645	1,674,632	251,316	2,337	-
	17,436,886	158,723	125,305	9,980	9,856	17,133,022
	544,404,435	133,202,141	68,062,422	5,893,016	5,217,076	332,029,780
	57,839,784	20,620,035	(23,390,095)	35,619,362	23,292,734	1,697,748
	29,457,261	15,613,407	8,185,688	3,947,260	1,710,906	-
	10,169,154	10,169,154	-	-	-	-
	39,626,415	25,782,561	8,185,688	3,947,260	1,710,906	-
	58,899,633	21,212,250	7,689,495	4,249,654	4,084,427	21,663,807
	33,938,348	13,391,970	4,179,782	3,552,360	4,204,493	8,609,743
	92,837,981	34,604,220	11,869,277	7,802,014	8,288,920	30,273,550
	(53,211,567)	(8,821,659)	(3,683,589)	(3,854,754)	(6,578,014)	(30,273,550)
	4,628,217	11,798,376	(27,073,684)	31,764,608	16,714,720	(28,575,802)
		11,798,376	(15,275,308)	16,489,300	33,204,020	4,628,217

Table 9.1.b. Rupiah Maturity Profile, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	DECEMBER 31, 2021					
		BALANCE	MATURITY DATES				
			≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I. Balance Sheet							
A. Assets							
1.	Cash	13,249,214	13,249,214	-	-	-	-
2.	Placement with Bank Indonesia	91,937,803	91,937,803	-	-	-	-
3.	Placement with other banks	1,277,042	1,187,839	-	-	89,203	-
4.	Marketable Securities	109,106,240	10,653,480	3,794,367	3,719,754	2,298,058	88,640,582
5.	Loans Provided	428,982,115	20,797,429	34,843,305	29,845,068	24,662,120	318,834,192
6.	Other Receivables	36,643,707	23,511,475	4,821,872	3,547,229	145,375	4,617,756
7.	Others	33,590,140	3,473,747	4,170,501	4,396,830	1,324,949	20,224,112
Total Asset		714,786,261	164,810,987	47,630,045	41,508,881	28,519,705	432,316,643
B. Liabilities							
1.	Third Party Fund	608,772,423	62,235,142	58,592,491	27,829,541	14,990,158	445,125,091
2.	Liabilities with Bank Indonesia	4,809	-	-	-	-	4,809
3.	Liabilities with other banks	1,470,248	1,351,939	26,105	1,654	6,081	84,470
4.	Securities Issued	3,086,515	-	-	-	3,086,515	-
5.	Received Loans	781,164	-	-	-	-	781,164
6.	Other Liabilities	1,774,162	380,522	859,600	534,040	-	-
7.	Others	34,649,211	80,090	487,245	2,041,438	3,022,320	29,018,117
Total Liabilities		650,538,532	64,047,693	59,965,440	30,406,673	21,105,075	475,013,651
Differences of Asset and Liabilities in Balance Sheet		64,247,729	100,763,294	(12,335,395)	11,102,208	7,414,630	(42,697,008)
II. Administrative Account							
A. Administrative Account Receivables							
1.	Commitment	41,900,980	17,239,632	13,963,958	5,425,410	5,271,980	-
2.	Contingency	14,496,454	14,496,454	-	-	-	-
Total Administrative Account Receivables		56,397,434	31,736,086	13,963,958	5,425,410	5,271,980	-
B. Administrative Account Liabilities							
1.	Commitment	72,323,033	21,253,582	7,331,901	3,762,366	2,805,161	37,170,022
2.	Contingency	32,852,188	8,021,175	4,739,177	4,770,086	6,338,296	8,983,454
Total Administrative Account Liabilities		105,175,221	29,274,757	12,071,078	8,532,452	9,143,457	46,153,477
Differences of Receivables and Liabilities in Administrative Accounts		(48,777,787)	2,461,329	1,892,880	(3,107,042)	(3,871,477)	(46,153,477)
Differences [(IA-IB)+(IIA-IIB)]		15,469,942	103,224,623	(10,442,515)	7,995,166	3,543,153	(88,850,485)
Cumulative Differences			103,224,623	92,782,107	100,777,273	104,320,427	15,469,942

(in million Rupiah)

	DECEMBER 31, 2020					
	BALANCE	MATURITY DATES				
		≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	>12 MONTH
	(3)	(4)	(5)	(6)	(7)	(8)
	16,592,216	16,592,216	-	-	-	-
	58,486,145	55,643,804	741,975	1,146,795	953,571	-
	2,496,150	2,187,465	100,000	208,685	-	-
	96,145,515	8,535,712	4,186,375	3,286,807	3,267,174	76,869,448
	412,241,782	69,589,273	34,502,827	33,299,221	26,704,313	248,146,148
	24,942,469	11,764,541	6,485,190	6,331,939	358,111	2,688
	32,423,868	1,933,034	853,535	469,318	-	29,167,981
	643,328,145	166,246,045	46,869,902	44,742,765	31,283,169	354,186,265
	533,926,851	134,655,982	66,858,077	5,648,484	6,105,851	320,658,457
	6,587	-	-	-	-	6,587
	2,359,331	1,852,875	136,322	364,869	3,434	1,831
	3,084,986	-	-	-	-	3,084,986
	1,140,384	-	-	-	-	1,140,384
	2,993,384	1,065,099	1,674,632	251,316	2,337	-
	32,653,345	158,723	125,305	9,980	9,856	32,349,481
	576,164,868	137,732,679	68,794,336	6,274,649	6,121,478	357,241,726
	67,163,277	28,513,366	(21,924,434)	38,468,116	25,161,691	(3,055,461)
	29,457,261	15,613,407	8,185,688	3,947,260	1,710,906	-
	10,285,841	10,285,841	-	-	-	-
	39,743,102	25,899,248	8,185,688	3,947,260	1,710,906	-
	60,442,053	22,754,670	7,689,495	4,249,654	4,084,427	21,663,807
	34,020,267	13,473,130	4,179,782	3,552,360	4,204,493	8,610,502
	94,462,320	36,227,800	11,869,277	7,802,014	8,288,920	30,274,309
	(54,719,219)	(10,328,552)	(3,683,589)	(3,854,754)	(6,578,014)	(30,274,309)
	12,444,059	18,184,814	(25,608,023)	34,613,362	18,583,677	(33,329,771)
		18,184,814	(7,423,209)	27,190,152	45,773,829	12,444,059

Tabel 9.2.a. Pengungkapan Profil Maturitas Valas Bank secara Individual

NO.	PORTFOLIO CATEGORY	30 DESEMBER 2021					
		BALANCE	MATURITY DATES				
			≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I. Balance Sheet							
A. Assets							
1.	Cash	434,274	434,274	-	-	-	-
2.	Placement with Bank Indonesia	47,065,988	46,353,363	712,625	-	-	-
3.	Placement with other banks	20,203,845	9,851,143	-	-	16,761	10,335,942
4.	Marketable Securities	33,897,490	4,669,561	4,654,311	4,153,307	2,606,682	17,813,630
5.	Loans Provided	109,382,892	5,223,969	6,027,026	4,770,967	7,920,243	85,440,687
6.	Other Receivables	7,798,711	4,165,037	1,379,528	1,538,728	715,418	-
7.	Others	68,286,721	159,300	119,479	43,057	-	67,964,885
Total Asset		287,069,921	70,856,646	12,892,968	10,506,059	11,259,104	181,555,143
B. Liabilities							
1.	Third Party Fund	120,240,817	40,346,690	10,449,719	1,766,768	1,579,291	66,098,349
2.	Liabilities with Bank Indonesia	1,569,043	1,569,043	-	-	-	-
3.	Liabilities with other banks	11,748,806	8,465,600	1,873,064	712,240	123,769	574,133
4.	Securities Issued	-	-	-	-	-	-
5.	Received Loans	31,592,861	402,847	671,407	2,350,166	7,385,432	20,783,010
6.	Other Liabilities	5,752,509	2,522,693	588,115	1,578,179	307,997	755,525
7.	Others	65,446,796	336,145	4,188,753	525,946	-	60,395,952
Total Liabilities		236,350,832	53,643,018	17,771,057	6,933,300	9,396,488	148,606,969
Differences of Asset and Liabilities in Balance Sheet		50,719,089	17,213,628	(4,878,089)	3,572,760	1,862,616	32,948,174
II. Administrative Account							
A. Administrative Account Receivables							
1.	Commitment	29,703,692	25,352,974	3,882,965	467,753	-	-
2.	Contingency	14,771,975	14,771,975	-	-	-	-
Total Tagihan Rekening Administratif		44,475,667	40,124,949	3,882,965	467,753	-	-
B. Total Administrative Account Receivables							
1.	Commitment	66,388,530	33,215,052	15,965,964	9,562,501	6,355,304	1,289,709
2.	Contingency	24,808,856	2,273,217	1,561,276	2,374,866	7,236,564	11,362,934
Total Administrative Account Liabilities		91,197,386	35,488,269	17,527,240	11,937,367	13,591,868	12,652,643
Differences of Receivables and Liabilities in Administrative Accounts		(46,721,719)	4,636,680	(13,644,275)	(11,469,614)	(13,591,868)	(12,652,643)
Differences [(IA-IB)+(IIA-IIB)]		3,997,370	21,850,308	(18,522,364)	(7,896,854)	(11,729,252)	20,295,531
Cumulative Differences			21,850,308	3,327,944	(4,568,910)	(16,298,161)	3,997,370

(in million Rupiah)

	DECEMBER 31, 2020					
	BALANCE	MATURITY DATES				
		≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	>12 MONTH
	(3)	(4)	(5)	(6)	(7)	(8)
	677,157	677,157	-	-	-	-
	32,920,165	29,477,912	3,442,253	-	-	-
	16,875,127	15,284,737	22,002	-	1,568,387	-
	27,943,018	1,481,615	1,300,089	1,411,772	429,930	23,319,613
	97,932,530	5,754,866	6,367,867	4,733,951	4,179,931	76,895,915
	6,959,276	2,335,841	1,845,847	1,389,208	1,060,831	327,550
	309,553	76,025	254,235	73,594	28	(94,328)
	183,616,826	55,088,152	13,232,293	7,608,525	7,239,108	100,448,748
	113,448,932	37,688,858	9,540,962	9,141,099	2,349,385	54,728,629
	440,254	440,254	-	-	-	-
	6,717,435	4,914,483	1,284,001	312,725	206,226	-
	-	-	-	-	-	-
	42,872,116	2,497,781	-	574,476	9,522,795	30,277,064
	5,511,524	1,120,235	1,130,126	329,023	2,932,141	-
	1,304,068	7,461	92,941	11,676	-	1,191,991
	170,294,329	46,669,071	12,048,030	10,368,998	15,010,546	86,197,684
	13,322,497	8,419,081	1,184,264	(2,760,474)	(7,771,438)	14,251,065
	25,296,673	21,965,939	3,315,224	5,620	9,891	-
	15,389,940	15,389,940	-	-	-	-
	40,686,613	37,355,878	3,315,224	5,620	9,891	-
	50,090,626	28,392,902	11,367,279	6,119,014	3,005,660	1,205,771
	23,501,524	2,172,692	1,492,222	2,269,834	6,916,534	10,650,242
	73,592,150	30,565,594	12,859,501	8,388,848	9,922,194	11,856,013
	(32,905,537)	6,790,284	(9,544,277)	(8,383,228)	(9,912,303)	(11,856,013)
	(19,583,040)	15,209,365	(8,360,014)	(11,143,701)	(17,683,742)	2,395,052
		15,209,365	6,849,352	(4,294,350)	(21,978,092)	(19,583,040)

Table 9.2.b Foreign Currency Maturity Profile, Bank Consolidated with Subsidiaries

NO.	PORTFOLIO CATEGORY	30 DESEMBER 2021					
		BALANCE	MATURITY DATES				
			≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
I. Balance Sheet							
A. Assets							
1.	Cash	434,384	434,384	-	-	-	-
2.	Placement with Bank Indonesia	47,065,992	46,354,989	711,003	-	-	-
3.	Placement with other banks	20,261,722	9,908,656	-	-	16,762	10,336,304
4.	Marketable Securities	34,032,474	4,803,519	4,654,474	4,153,452	2,606,774	17,814,255
5.	Loans Provided	103,159,229	5,224,152	6,027,237	4,771,135	7,920,520	79,216,185
6.	Other Receivables	7,418,884	3,785,082	1,379,576	1,538,782	715,444	-
7.	Others	39,079	39,079	-	-	-	-
Total Asset		212,411,764	70,549,861	12,772,291	10,463,370	11,259,499	107,366,744
B. Liabilities							
1.	Third Party Fund	120,396,187	40,348,105	10,450,086	1,766,830	1,579,346	66,251,820
2.	Liabilities with Bank Indonesia	1,569,060	1,569,060	-	-	-	-
3.	Liabilities with other banks	11,416,806	8,133,485	1,873,129	712,265	123,773	574,154
4.	Securities Issued	15,664,697	-	-	-	-	15,664,697
5.	Received Loans	31,592,858	401,750	671,430	2,350,248	7,385,691	20,783,739
6.	Other Liabilities	5,752,507	2,522,578	588,136	1,578,235	308,007	755,552
7.	Others	1,387,069	336,157	126,877	525,964	-	398,071
Total Liabilities		187,779,185	53,311,135	13,709,658	6,933,543	9,396,818	104,428,032
Differences of Asset and Liabilities in Balance Sheet		24,632,579	17,238,726	(937,367)	3,529,827	1,862,682	2,938,712
II. Administrative Account							
A. Administrative Account Receivables							
1.	Commitment	30,121,319	25,770,449	3,883,102	467,769	-	-
2.	Contingency	14,771,969	14,771,969	-	-	-	-
Total Administrative Account Receivables		44,893,289	40,542,418	3,883,102	467,769	-	-
B. Administrative Account Liabilities							
1.	Commitment	67,003,040	33,216,217	15,966,524	9,562,837	6,355,527	1,901,935
2.	Contingency	24,808,858	2,273,296	1,561,331	2,374,949	7,236,818	11,362,464
Total Administrative Account Liabilities		91,811,898	35,489,514	17,527,855	11,937,785	13,592,345	13,264,399
Differences of Receivables and Liabilities in Administrative Accounts		(46,918,610)	5,052,904	(13,644,753)	(11,470,016)	(13,592,345)	(13,264,399)
Differences [(IA-IB)+(IIA-IIB)]		(22,286,031)	22,291,630	(14,582,120)	(7,940,190)	(11,729,663)	(10,325,687)
Cumulative Differences			22,291,630	7,709,509	(230,680)	(11,960,343)	(22,286,031)

(in million Rupiah)

	DECEMBER 31, 2020					
	BALANCE	MATURITY DATES				
		≤1 MONTH	>1 MONTH TO 3 MONTH	>3 MONTH TO 6 MONTH	>6 MONTH TO 12 MONTH	>12 MONTH
	(3)	(4)	(5)	(6)	(7)	(8)
	731,831	731,831	-	-	-	-
	34,143,649	30,477,912	3,517,253	148,484	-	-
	17,383,055	15,284,737	22,002	-	2,076,315	-
	28,318,570	1,481,615	1,300,089	1,411,772	429,930	23,695,165
	97,932,530	5,754,866	6,367,867	4,733,951	4,179,931	76,895,915
	6,959,276	2,335,841	1,845,847	1,389,208	1,060,831	327,550
	309,553	76,025	254,235	73,594	28	(94,328)
	185,778,464	56,142,826	13,307,293	7,757,009	7,747,036	100,824,300
	113,644,890	37,688,858	9,540,962	9,141,099	2,349,385	54,924,587
	440,254	440,254	-	-	-	-
	6,667,534	4,864,582	1,284,001	312,725	206,226	-
	-	-	-	-	-	-
	42,872,116	2,497,781	-	574,476	9,522,795	30,277,064
	5,511,524	1,120,235	1,130,126	329,023	2,932,141	-
	1,370,192	7,461	92,941	11,676	-	1,258,115
	170,506,510	46,619,170	12,048,030	10,368,998	15,010,546	86,459,766
	15,271,954	1,259,264	1,259,264	(2,611,990)	(7,263,510)	14,364,535
	25,296,673	21,965,939	3,315,224	5,620	9,891	-
	15,389,940	15,389,940	-	-	-	-
	40,686,613	37,355,878	3,315,224	5,620	9,891	-
	50,090,626	28,392,902	11,367,279	6,119,014	3,005,660	1,205,771
	23,501,524	2,172,692	1,492,222	2,269,834	6,916,534	10,650,242
	73,592,150	30,565,594	12,859,501	8,388,848	9,922,194	11,856,013
	(32,905,537)	6,790,284	(9,544,277)	(8,383,228)	(9,912,303)	(11,856,013)
	(17,633,583)	16,313,940	(8,285,014)	(10,995,217)	(17,175,814)	2,508,522
		16,313,940	8,028,927	(2,966,291)	(20,142,105)	(17,633,583)

The maturity profile calculation is in accordance with the regulator's provisions and does not include the maturity profiles of subsidiaries engaged in insurance. One of the strengths of BNI risk monitoring process is the availability of information on the Bank's liquidity profile. This information is available in the LDAP Executive Information Management (EIS) application, which provides information on funds and loans development on a daily basis, so that daily cash flow profiles and monthly maturity profiles can be generated, and can be used as a system for monitoring and managing bank liquidity risk.

Early Warning Indicators

Early warning indicators are set out in the Secondary Reserve indicators as normal conditions, moderate conditions or tight conditions for both Rupiah and foreign currencies, including trends in the BI 7 Days Reverse Repo Rate, JIBOR, LIBOR, average interest rates of Competitors' Bank Deposits or Credit Default Swap (CDS) spreads that rise significantly according to specified limits, trends in foreign exchange reserves dropping significantly in accordance with established limits, trends in dominant customer funds that tend to decrease significantly based on the established limits. The ideal SR assignment in moderate or tight conditions is considered if one of the conditions/indicators or parameters is exceeded.

Assignments are conducted by the ERM Division based on the above indicators and data obtained from the TRS Division as a business unit. The assignments will apply a moderate or tight Liquidity Contingency Plan (LCP) of Ideal SR. The indicators above are reviewed periodically according to the development of external and internal conditions in line with national, regional and global economic developments.

Liquidity Stress Testing

To determine the liquidity resilience in a crisis period, periodic liquidity stress testing is executed. Stress testing scenarios are performed by using specific bank scenarios in (Idiosyncratic Scenarios), and stress scenarios in the market (Market Wide Scenarios). Idiosyncratic Scenarios use the assumption that banks are in liquidity problems due to loss of investor/depositor confidence in the banks.

While the Market Wide Scenario uses an assumption that there is a disruption to the market/financial system as a whole that results in bank operations disruption. The stress testing results of these scenario will be used to develop a liquidity funding plan so that risks can be limited and managed properly.

Liquidity Adequacy Ratio

To improve short-term liquidity resilience, the Bank manages its Liquidity Coverage Ratio (LCR) by maintaining adequate High Quality Liquid Assets (HQLA) to meet liquidity needs for the next 30 (thirty) days in a stress scenario that enable the Bank to maintain the liquidity adequacy ratio at more than 100% both individually (Bank only) or consolidated with subsidiaries.

Tabel 9.3.a Disclosure of Liquidity Coverage Ratio PT Bank Negara Indonesia (Persero) Tbk Consolidated with Subsidiaries Position : December 2021

	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)		244,160,712
CASH OUTFLOW		
2 Retail deposits and deposits from Micro and Small Business	448,348,414	33,771,666
a. Stable deposit/funding	221,263,509	11,063,175
b. Less Stable deposit/funding	227,084,906	22,708,491

Tabel 9.3.a Disclosure of Liquidity Coverage Ratio PT Bank Negara Indonesia (Persero) Tbk Consolidated with Subsidiaries Position : December 2021

	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
3	Funding from corporate customers, consist of:	77,150,478
	291,742,734	
a.	Operational deposits	38,367,822
b.	Non-operational deposit and/or other non- operational liabilities bersifat non- operasional	38,782,656
c.	Marketable securities (bank issued debt notes)	-
4	Secured funding	140,111
5	Additional requirement, consisting of:	31,285,941
	52,166,177	
a.	Cash outflow on derivative transaction	23,709,327
b.	Cash outflow on additional liquidity	-
c.	Cash outflow on lost funding	-
d.	Cash outflow on withdrawal of commitments of loan and liquidity facility	22,775
	227,748	
e.	Cash outflow on other contractual liability related to lending	-
f.	Cash outflow on other lending contingencies	639,441
	21,314,704	
g.	Other contractual cash outflows	6,973,781
	6,973,781	
TOTAL CASH OUTFLOW		142,348,197
CASH INFLOW		
6	Secured lending	-
	34,503,978	
7	Claims from counterparty	11,016,368
	20,263,097	
8	Other cash inflows	25,273,609
	26,885,463	
TOTAL CASH INFLOW		36,289,977
		TOTAL ADJUSTED VALUE1
TOTAL HQLA		244,160,712
NET CASH OUTFLOWS		106,058,219
LCR (%)		230.21%

Note:

1. Adjusted values calculated after application of haircuts, run-off rate, and inflow rate as well as maximum limit of HQLA components, such as maximum limit on HQLA Level 2B and HQLA Level 2 as well as maximum limit on cash inflow that can be calculated in the LCR.

Individual LCR Qualitative Assessment Consolidated with Subsidiaries

ANALYSIS

1. Consolidated LCR position in December 2021 is 230.69%, above the required provision, which is 85% until March 31, 2022
2. Consolidated LCR in December 2021 increased 10.99% compared to Consolidated LCR in November 2021 from 219.70% to 230.69%, due to an increase in HQLA of Rp20.05 trillion. The increase in HQLA was mainly due to an increase in securities issued by the central government and BI by 10.06 trillion
3. The composition of HQLA as of December 2021 was dominated by Level 1 HQLA at 99.10%. Meanwhile, Level 2A HQLA was 0.81% and Level 2B was 0.09%, still under the maximum Level 2A HQLA required.
4. Consolidated bank liquidity can be well maintained in order to comply with regulatory requirements and to support bank business activities.

In addition, to determine the long-term liquidity stability, the Bank manages its Net Stable Funding Ratio (NSFR). NSFR aims to reduce liquidity risk related to long-term funding sources, and requires the Bank funds its activities with adequate stable funding sources in order to mitigate the risk of funding difficulties in the future. The Bank manages its NSFR in accordance with the regulator's provisions, for Bank only and consolidated, at a minimum 100%.

Tabel 9.3.b Disclosure of the Liquidity Coverage Ratio of Bank Consolidated with Subsidiaries

	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)		244,497,704
CASH OUTFLOW		
2 Retail deposits and deposits from Micro and Small Business	448,348,414	33,771,666
a. Stable deposit/funding	221,263,509	11,063,175
b. Less Stable deposit/funding	227,084,906	22,708,491
3 Funding from corporate customers, consist of:	291,742,734	77,150,478
a. Operational deposits	183,937,946	38,367,822
b. Non-operational deposit and/or other non- operational liabilities bersifat non- operasional	107,804,788	38,782,656
c. Marketable securities (bank issued debt notes)	-	-
4 Secured funding		140,111

Tabel 9.3.b Disclosure of the Liquidity Coverage Ratio of Bank Consolidated with Subsidiaries

	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
5 Additional requirement, consisting of:	52,225,559	31,345,324
a. Cash outflow on derivative transaction	23,709,327	23,709,327
b. Cash outflow on additional liquidity	-	-
c. Cash outflow on lost funding	-	-
d. Cash outflow on withdrawal of commitments of loan and liquidity facility	227,748	22,775
e. Cash outflow on other contractual liability related to lending	-	-
f. Cash outflow on other lending contingencies	21,314,704	639,441
g. Other contractual cash outflows	6,973,781	6,973,781
TOTAL CASH OUTFLOW		142,407,579
CASH INFLOW		
6 Secured lending	34,535,285	15,654
7 Claims from counterparty	20,320,275	11,044,957
8 Other cash inflows	27,063,917	25,362,836
TOTAL CASH INFLOW	81,919,477	36,423,447
TOTAL ADJUSTED VALUE1		
TOTAL HQLA		244,497,704
NET CASH OUTFLOWS		105,984,132
LCR (%)		230.69%

Description:

1 Adjusted values are calculated after the imposition of the haircut, the run-off rate, and the acceptance rate (inflow rate) as well as the maximum limit for HQLA components, for example the maximum limit for HQLA Level 2B and HQLA Level 2 and the limit maximum cash inflows that can be taken into account in the LCR.

Analysis of the Bank's LCR Development Consolidated with Subsidiaries**ANALYSIS**

- Consolidated LCR for December 2021 position of 230.69% above the required conditions of 85% until March 31, 2022
- Consolidated LCR in December 2021 increased by 10.99% compared to November 2021 Consolidated LCR from 219.70% to 230.69%, due to an increase in HQLA of 20.05 T. The increase in HQLA was mainly due to an increase in securities issued by the central government and BI by Rp. 10.06 T
- The composition of HQLA as of December 2021 is dominated by HQLA Level 1 at 99.10%. Meanwhile, HQLA Level 2A is 0.81% and Level 2B is 0.09%, still below the maximum required HQLA Level 2A.
- Consolidated bank liquidity can be maintained properly in order to meet regulatory requirements and to support bank business activities.

In addition, to determine long-term liquidity resilience, the Bank manages the Net Stable Funding Ratio (NSFR). The NSFR aims to reduce liquidity risk related to funding sources for a longer period of time by requiring Banks to fund their activities with adequate stable sources of funds in order to mitigate the risk of funding difficulties in the future. The Bank manages the NSFR ratio in accordance with the provisions of the Regulator, both individually (Bank only) and in consolidation with subsidiary companies, which is at least 100%.

Table 9.4.a Disclosure of Net Stable Funding Ratio PT Bank Negara Indonesia (Persero) Tbk - Bank Only
Position : December 2021

DESCRIPTION		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	
ASF Components						
1	Capital:	125,616,706	-	-	-	125,616,706
2	Capital as CAR POJK	125,616,706	-	-	-	125,616,706
3	Other capital components	-	-	-	-	-
4	Deposits from individual customers and funding from micro and small business customers:	337,840,601	73,947,105	3,308,733	1,068,321	416,164,761
5	Stable deposits	132,122,427	50,861,231	1,875,311	864,792	185,723,761
6	Less stable deposits	205,718,173	23,085,874	1,433,423	203,530	230,441,000
7	Funding from corporate customers:	88,020,988	35,501,337	16,448,729	28,536,913	168,507,967
8	Operational funding	88,020,988	-	-	-	88,020,988
9	Other funding from corporate customers	-	35,501,337	16,448,729	28,536,913	80,486,979
10	Liabilities with inter-dependent asset match	-	-	-	-	-
11	Other liabilities:	282,274	-	153,996	-	436,271
12	NSFR for derivative liabilities		-	-	-	
13	Equity and liability components other than the above category	282,274	-	153,996	-	436,271
14	Total ASF					710,725,704
RSF Components						
15	Total HQLA for the calculation of NSFR	-	-	-	5,790,810	5,790,810
16	Deposit with other financial institutions for operational purposes	1,762,513	3,163,247	32,632	10,624,902	15,583,294
17	Loans in Current and Special Mention Category (Performing) and marketable securities	-	49,745,653	9,050,839	266,877,529	325,674,020
18	To financial institutions secured by HQLA Level 1		-	-	-	-
19	To financial institutions secured by non-HQLA Level 1 and unsecured loan to financial institutions	-	586,594	406,054	7,024,736	8,017,383

**Table 9.4.a Disclosure of Net Stable Funding Ratio PT Bank Negara Indonesia (Persero) Tbk - Bank Only
Position : December 2021**

DESCRIPTION	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	
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:		44,636,165	6,918,630	213,831,809	265,386,604
21 Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk		44,636,165	6,918,630	213,831,809	265,386,604
22 Loans secured with unpledged residential properties, including those that:		4,522,895	1,601,154	34,957,127	41,081,176
23 Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk		4,522,895	1,601,154	34,957,127	41,081,176
24 Marketable Securities not under pledge, not in default, and not classified as HQLA, including shares traded at the stock exchange		-	125,000,00	11,063,856,37	11,188,856
25 Assets with inter-dependent liability match	-	-	-	-	-
26 Other assets:	38,110,318	30,373,415	1,350,005	48,275,404	118,109,142
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)		-	-	-	-
29 NSFR of derivative assets		403,607	211,962	-	615,569
30 NSFR of derivative liabilities before deduction of variation margin		-	-	-	-
31 All other assets not included in the above categories**)	38,110,318	29,969,808	1,138,043	48,275,404	117,493,573
32 Off-Balance sheets accounts		1,781,599	999,458	373,750	3,154,806
33 Total RSF					468,312,072
34 Net Stable Funding Ratio (%)					151.76%

NSFR Qualitative Assessment - Bank Only

ANALYSIS

1. NSFR for the position in December 2021 is 151.76%, above the required provision at 100%.
2. NSFR position in December 2021 compared to NSFR position in September 2021 increased from 146.64% to 151.76%. Both in terms of Total Stable Funding Available (ASF) and in terms of Total Stable Funding Required (RSF) both experienced an increase. However, the increase in Total Available Stable Funding (ASF) of Rp44.75 T was greater than the increase in Total Required Stable Funding (RSF) of IDR Rp14.15 T.
3. The increase in Total Available Stable Funding (ASF) was dominated by an increase in deposits originating from individual customers and funding from micro and small business customers by Rp22.85 T and an increase in funding from Corporate customers by Rp18.96 T. Meanwhile The increase in the Total Required Stable Funding (RSF) was dominated by an increase in Loans with Current and Special Mention Categories and Securities amounting to Rp.Rp10.23 T.
4. There are liabilities that are dependent on certain assets of Rp1.83 T in the form of repo transactions.

Tabel 9.4.b Disclosure of Net Stable Funding Ratio PT Bank Negara Indonesia (Persero) Tbk Consolidated with Subsidiaries Position : December 2021

DESCRIPTION		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	
ASF Components						
1	Capital:	126,305,568	-	-	-	126,305,568
2	Capital as CAR POJK	126,294,531	-	-	-	126,294,531
3	Other capital components	11,038	-	-	-	11,038
4	Deposits from individual customers and funding from micro and small business customers:	337,840,601	73,947,105	3,308,733	1,068,321	416,164,761
5	Stable deposits	132,122,427	50,861,231	1,875,311	864,792	185,723,761
6	Less stable deposits	205,718,173	23,085,874	1,433,423	203,530	230,441,000
7	Funding from corporate customers:	88,020,988	35,501,337	16,448,729	28,536,913	168,507,967
8	Operational funding	88,020,988	-	-	-	88,020,988
9	Other funding from corporate customers	-	35,501,337	16,448,729	28,536,913	80,486,979
10	Liabilities with inter-dependent asset match	-	-	-	-	-
11	Other liabilities:	330,846	-	282,850	653,906	1,267,603
12	NSFR for derivative liabilities		-	-	-	
13	Equity and liability components other than the above category	330,846	-	282,850	653,906	1,267,603
14	Total ASF					712,245,899
RSF Components						
15	Total HQLA for the calculation of NSFR	-	-	-	5,790,810	5,790,810
16	Deposit with other financial institutions for operational purposes	1,768,416	3,185,747	32,632	10,624,902	15,611,698

Tabel 9.4.b Disclosure of Net Stable Funding Ratio PT Bank Negara Indonesia (Persero) Tbk Consolidated with Subsidiaries Position : December 2021

DESCRIPTION	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	
17 Loans in Current and Special Mention Category (Performing) and marketable securities	-	49,786,713	9,101,374	267,404,498	326,292,585
18 To financial institutions secured by HQLA Level 1	-	-	-	-	-
19 To financial institutions secured by non-HQLA Level 1 and unsecured loan to financial institutions	-	586,594	406,054	7,024,736	8,017,383
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:		44,677,225	6,969,165	214,358,779	266,005,169
21 Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk		44,677,225	6,969,165	214,358,779	266,005,169
22 Loans secured with unpledged residential properties, including those that:		4,522,895	1,601,154	34,957,127	41,081,176
23 Meet the qualification for 35% or less risk weighted in accordance with SE OJK on RWA Credit Risk		4,522,895	1,601,154	34,957,127	41,081,176
24 Marketable Securities not under pledge, not in default, and not classified as HQLA, including shares traded at the stock exchange		-	125,000,00	11,063,856	11,188,856
25 Assets with inter-dependent liability match	-	-	-	-	-
26 Other assets:	38,232,442	30,375,724	1,351,385	48,362,878	118,322,428
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)		-	-	-	-
29 NSFR of derivative assets		403,607	211,962	-	615,569
30 NSFR of derivative liabilities before deduction of variation margin		-	-	-	-
31 All other assets not included in the above categories**)	38,232,442	29,972,117	1,139,423	48,362,878	117,706,860

Tabel 9.4.b Disclosure of Net Stable Funding Ratio PT Bank Negara Indonesia (Persero) Tbk Consolidated with Subsidiaries Position : December 2021

DESCRIPTION	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	
32 Off-Balance sheets accounts		1,781,599	999,458	373,750	3,154,806
33 Total RSF					469,172,328
34 Net Stable Funding Ratio (%)					151.81%

Consolidated NSFR Qualitative Assessment

ANALYSIS

1. Consolidated NSFR as of December 2021 position was 151.81% above the required condition of 100%.
2. Consolidated NSFR position as of December 2021 compared to Consolidated NSFR position in September 2021 rose from 146.69% to 151.81%. The increase in the Consolidated NSFR position in December 2021 was due to an increase in Total Available Stable Funding (ASF) and was dominated by an increase in deposits from individual customers and funding to micro and small business customers and an increase in funding to corporate customers.
3. On the RSF side, the increase in the Total Required Stable Funding was caused by Loans in the Current and Special Mention (performing) categories and Securities.
4. There were liabilities dependent on certain assets of Rp1.83 trillion in the form of repo transactions

OPERATIONAL RISK

Operational risk occurs due to insufficient or malfunctioning internal processes, human error, system failure, or external interferences that affects the Bank's operations. Operational Risk Occurrence includes risk events inherent in every business and operational process carried out by the Bank and can drive Reputation Risk, Legal Risk, Compliance Risk, and other Risks if not managed properly.

In tandem with the increasing diversity and complexity of products and banking activities offered to customers, rapid systems development and supporting technologies, as well as increasing customer expectations for services provided by the Bank, operational risk management is of paramount importance.

Governance and Organization

Operational risk management governance has been implemented by BNI with all domestic and overseas business and support units playing the role of Risk Owner or Risk Taker, as the first line of defense. They are supported by the second line of defense carried out by the Bank's Risk Management Division, Compliance Division, and the Policy Governance Division as the Risk Control Unit, and the third line of defense, the Internal Audit Unit as the Risk Assurance Unit.

Policies and Procedures

The Bank's Risk Management Division has Guidelines for Operational Risk Management to support the operational risk management application in all domestic and overseas units, including:

1. Domestic Operational Risk Management Policy;
2. Operational Risk Management Policy for Overseas Branches.

These policies explain in more detail the Standard Operating Procedures as well as prudent technical transaction and operational guidelines to execute daily business activities including:

1. Domestic Operational Risk Management Procedures;
2. Operational Risk Self Assessment (SA) Procedures;
3. Overseas Branches Operational Risk Self Assessment Manual;
4. Loss Event Database (LED) Procedures ;
5. Procedure for Key Risk Indicators (KRI) Implementation;
6. Bookkeeping Operational Risk Expense Accounts (BRO) Guidelines

Process

BNI's operational risk management comprises 5 (five) main sustainable processes: identification, assessment, measurement, surveillance and control.

1. Risk Identification

The operational risk identification mechanism is conducted by applying a Macro Process Mapping Assessment to each unit's work processes/activities to capture potential operational risks by using an interview method (one on one meeting).

2. Risk Assessment

Is conducted by each unit risk owner through operational risk self assessment methods including assessing the impact, frequency, control and causes of risk.

3. Risk Measurement

Corresponding to the Regulator's rules, the operational risk measurement currently uses the Basic Indicator Approach (BIA).

For calculating the RWA capital cost and operational risk, the Bank currently uses the BIA BIA method based on OJK Circular No. 24/SEOJK.03/2016 concerning RWA Calculation for operational risk using the Basic Indicator Approach (BIA).

The following table shows RWA capital charges and operational risk using the Basic Indicator Approach (BIA) method based on OJK, as mentioned above.

Disclosure of Operational Risk Quantitative, Bank Only (in million Rupiah)

NO.	APPROACH USED	DECEMBER 31, 2021			DECEMBER 31, 2020		
		GROSS INCOME (LAST 3 YEAR AVERAGE)	CAPITAL COST	ATMR	GROSS INCOME (LAST 3 YEAR AVERAGE)	CAPITAL COST	ATMR
1	Basic Indicator Approach	46,538,345	6,980,752	87,259,398	43,976,836	6,596,525	82,456,568
Total		46,538,345	6,980,752	87,259,398	43,976,836	6,596,525	82,456,568

Disclosure of Operational Risk Quantitative, Bank Consolidated with Subsidiaries (in million Rupiah)

NO.	APPROACH USED	DECEMBER 31, 2021			DECEMBER 31, 2020		
		GROSS INCOME (LAST 3 YEAR AVERAGE)	CAPITAL COST	ATMR	GROSS INCOME (LAST 3 YEAR AVERAGE)	CAPITAL COST	ATMR
1	Basic Indicator Approach	49,063,444	7,359,517	91,993,958	46,155,289	6,923,293	86,541,168
Total		49,063,444	7,359,517	91,993,958	46,155,289	6,923,293	86,541,168

4. Risk Monitoring

Risk Monitoring is carried out by all units as the first line of defense against major risks for ongoing activities. The Bank's Risk Management Division also conducts evaluations and reports/feedback on risk assessments based on the self-assessment results and the realization of operational risk losses incurred, including:

- Feedback report for all divisions/units/regions/branches;
- Monthly Report on Operational Risk Surveillance for the Board of Directors;
- Operational Risk Profile Report.

5. Risk Management

The operational risk mitigation mechanism is reflected in the internal control process by implementing 4 (four) mitigation strategies, namely avoid, reduce, transfer and receive, with the aim of minimizing losses due to malfunctioning internal processes, human factors, systems and technology, as well as external events. The four mitigation strategies are contained in the Operational Risk mitigation procedures and includes control procedures, transaction settlement, accounting, asset and custodian storage, product supply and fraud prevention.

Devices and Methods

To assist the operational risk management processes in all work units, BNI has developed a web-based Operational Risk Management tool called the New PERISKOP (Operational Risk Toolkit). New PERISKOP plays a very important role, namely socializing Risk Culture and increasing Risk Awareness of the 4 (four) main processes in operational risk management, and using these tools in Risk Control Self Assessments (RCSA), Loss Event Database (LED) and Key Risk Indicators (KRI), and Business Continuity Management (BCM).

PERISKOP	
Modul Self Risk Control Self Assessment (RCSA)	Risk Control Self Assessment (SA) is a series of activities carried out independently by each unit (risk owner) to identify any potential operational risks in the unit, look for causes, measure potential losses (impact and frequency) that may arise and find solutions to resolve them. A control assessment is carried out for each risk that affects the Inherent Risk score. The RCSA results provide an overview of the potential risks faced by the unit for the next 6 (six) months based on historical data from the previous 6 (six) months.
Loss Event Database (LED) Module	A database of all financial losses including actual losses and near misses since the event occurred until completion due to operational risks that occurred in all Bank units. Loss data collected through the LED module, in addition to being used for better operational risk management and to prevent similar cases occurring, is also used as the basis for RWA operational risk calculation to calculate capital requirements to cover operational risk using the Revised Standardized Approach method, which will start to be implemented in 2023.
Key Risk Indicator (KRI) Module	Key Risk indicators are a measure to identify potential operational risk losses inherent in products and activities early and provide an early warning signal if they exceed a certain previously assigned threshold to monitor operational risk exposure and the Bank's control effectiveness.

BUSINESS CONTINUITY MANAGEMENT

Disruptions or disasters due to natural factors, human actions, or system failures can occur in BNI's critical business functions causing BNI's business activities and services disruption.

To anticipate such events, BNI has implemented Business Continuity Management (BCM) in all domestic and overseas units, which is expected to minimize operational risks in the event of an emergency or disaster.

The implementation of this policy is in line with the Regulator's regulations requiring banks to conduct risk control processes to manage risks that could endanger the banks' business continuity as well as in line with the Basel II documents requirements that requires banks to have business continuity management and contingency plans to ensure the banks' ability to continue operating and limit losses in the event of a disruption to its business activities. In addition to Regulator and Basel II regulations, for Overseas Branch Offices, BCM is implemented by complying with BCM regulations in the local country.

Governance and Organization

In disaster conditions, BNI has established a Crisis Management Team (CMT) and Emergency Task Force (ETF) comprising of Senior Executives/Highest Management Units as the coordinator with the highest level of authority. The CMT will become active if the Executive Management Team (EMT) as the highest leader of the CMT declares a disaster/emergency situation.

BNI has the infrastructure required to implement BCM in the Disaster Recovery Center (DRC), Dual Center (DC), Alternative Locations to the BCM Building and a Command Center, which are routinely managed for readiness.

Policies and Procedures

For Business Continuity Management (BCM), BNI has established:

1. Domestic Business Continuity Management (BCM) Policy;
2. Domestic Business Continuity Management (BCM) Procedures;
3. Overseas Branches Business Continuity Management (BCM) Policy;
4. Overseas Branches Business Continuity Management (BCM) Procedures;
5. Crisis Management Protocol (CMP) Policy;
6. Business Continuity Management (BCM) Building Governance Procedures.

Process

Each step of the Recovery and Restoration Strategy is monitored and reported to the Crisis Management Team (CMT) until conditions are declared normal again. To ensure a level of readiness and evaluation of Business Continuity Management (BCM), BNI carries out system tests on critical divisions/units every 3 (three) months, and site visits and disaster management simulations for the BCM in all operational units, which are conducted routinely every year to ascertain the readiness level of each unit, in terms of organization and BCM infrastructure.

The routine evaluations and testing results can be seen in the systematic and directed handling to face disasters whether caused by humans, nature, or systems, so that BNI's operational activities at the disaster site remain operational to a certain degree even though some of the facilities and infrastructure supporting business activities may have been disrupted.

In 2021, BNI implemented BCM to handle emergency conditions due to the Corona Virus Disease 2019 (COVID-19) outbreak, which included activating CMT and ETF organizations, implementing the processes and infrastructure to support the business during the disaster period, as regulated in the following BNI BCM Policies and Procedures,;

1. CMT and EFT Activation

As of March 16, 2020, BNI activated the Crisis Management Team (CMT) at the Head Office and the Emergency Task Force (ETF) in all organizational units to focus on COVID-19 Pandemic handling;

2. HC Implementation

- a. Implementation of Work From Home (WFH), adjustment for working and operational hours, and socialization and education on handling COVID-19;
- b. Implementation of vaccines for all employees and their families;
- c. Preparation of Isolation Houses for employees and families affected by COVID-19;
- d. Regular disinfectant spraying in all BNI buildings;
- e. Use of the Pedulilindungi application for employees and customers/guests in all BNI buildings.

3. Operations Implementation during Disaster Conditions

- a. Divisions/Units/Regions/Branches have a Business Impact Analysis to assess critical activities required to maintain business continuity, including Shift and Split Operations, and preparing alternative locations for critical units;
- b. Closure of outlets that meet certain criteria.

4. Business Implementation during Disaster Conditions

- a. Conducting stress tests on the impact of COVID-19 on the loan portfolio and preparing stimulus policies for debtors affected by COVID-19 in accordance with regulatory provisions.

LEGAL RISK

Is a risk caused by weaknesses in the juridical aspects, due to the existence of lawsuits, and the unavailable supporting laws and regulations or weaknesses of the engagement such as not fulfilling the legal requirements of the contract and incomplete binding.

Governance and Organization

Legal risk management is carried out by the Legal Division under an active supervision of the Managing Director Human Capital and Compliance. In conducting its legal risk management, the Legal Division works closely with the Legal Management Unit or staff handling legal functions in the Divisions/Units/Regional Offices or other organizational units where the Legal Field Work Unit functions as a 'legal watch', and provides analysis/legal advice to organizational units and/or employees at all organizational levels to minimize the possibility of negative impacts from weaknesses in the legal aspects, absence and/or changes in legislation and litigation processes. For legal risk management, the Legal Division works closely with the Bank's Risk Management Division to regularly assess and monitor the Legal Risk Management implementation.

Policies and Procedures

Legal risk management implementation refers to the Company's Guidelines for Legal Risk Management and other policies relating to legal risk management.

To establish an appropriate Legal Risk Management policy, the Legal Division and the Bank's Risk Management Division conduct periodic evaluations, and update legal risk control policies and procedures periodically, in accordance with the prevailing laws and regulations.

Process

To carry out its Legal Risk control function, BNI has instigated a legal risk management policy through the following process flow:

1. Identifying legal risks regularly and continuously.
The process of legal risk identification is conducted by analyzing all sources of legal risk, and are carried at least against the legal risks of BNI's products and business activities, as well as the legal risks of new products and activities through a legal risk management control process before being introduced or carried out;
2. Executing Legal Risk measurements by using a comparative parameter between the case value being faced against BNI's capital, indicators of litigation factors, engagement weakness factors and factors of absence or changes in legislation in Legal Risks identification. Legal Risk measurement results are reflected in the Legal Risk Profile;
3. Legal Risk monitoring by evaluating inherent legal risk exposures especially those that are material or have an impact on BNI's capital. The surveillance results, including legal risk exposures evaluations are compiled in the Legal Risk Management Information System (Legal Risk SIM) that produces periodic legal risk exposure reports (monthly, quarterly and annually) including any necessary follow-up;
4. The Legal Risk control process is mainly used for activities that could endanger BNI's business continuity. Legal Risk control process, and is carried out by:
 - a. Conducting assessments in the form of juridical studies in the event there are new products and/or new activities or there are additions/changes to the BNI product features;
 - b. Providing legal advice and/or legal assistance in the event there is a Legal Risk in the operational activities;

- c. Conducting periodic reviews of the standard agreement format, especially the loan agreement, to ensure compliance with the laws and regulations and other applicable provisions;
- d. Conducting periodic reviews of contracts and agreements between BNI and other parties, by reassessing the effectiveness of the enforcement process to check the validity of rights in existing contracts and agreements, especially for non-standard agreements or agreements that have not been standardized in the BNI Company Guidelines;
- e. Conducting intensive monitoring of legal issues, especially lawsuits on the basis of Acts Against the Law involving the Bank as a Defendant or Co-defendant.

STRATEGIC RISK

A risk that is caused by the incorrect establishment and implementation of the Bank's strategy, incorrect business decision making or the Bank is not responsive to external changes.

Governance and Organization

Strategic Risk Management is carried out by the Strategic Planning Division, under the active supervision of the President Director and the Budgeting & Financial Control Division under the active supervision of the Managing Director Finance.

Strategic Risk Management is carried out through a series of strategic planning processes in the form of planning and budgeting including aligning corporate strategy with unit strategies and cascading bank wide targets into unit targets as outlined in the planning document.

Strategic planning documents include:

1. Corporate Plan, compiled once every 5 (five) years;
2. General Directors' Policy (KUD), compiled once a year;
3. Bank Business Plan (RBB), compiled once a year;
4. Business Plan, compiled once a year.

The mechanism for strategic planning document preparation begins with Corporate Plan preparation as an assigned targets reference and the Board of Directors General Policy strategy, which are used as a guide in preparing the Bank's Business Plan.

The Board of Directors' General Policy and the Bank's Business Plan will also be a reference for the Operational Planning preparation, as outlined in the Business Plan for Divisions, Regions and Branches/Centers. Regional

Business Plans will be a reference for the preparation of Branch/Center Business Plans. This mechanism will ensure that the strategy alignment process is maintained starting from the corporate level to the lowest unit (branch).

The Corporate Plan documents must be reviewed annually to adjust to business environment changes.

The Board of Directors' General Policy Documents and Bank Business Plans, Business Plan Units are reviewed in Semester I, or even in a shorter time period if there are significant environmental changes.

Policies and Procedures

Strategic risk management refers to the Strategic Risk Management Guidelines, Policies and Procedures including Procedures for Product Development and New Activities.

Process

For the Strategic Risk control function, BNI has instigated a strategic risk management policy with the following process flows:

1. Identifying Strategic Risk regularly and continuously.
The process of identifying strategic risk is carried out by identifying strategic risk factors inherent in every functional activity that has a potential to harm BNI, for example due to inappropriate policies, lack of responsiveness towards changes that occur, implementation of policies that are not according to plan, or not being implemented in accordance with a predetermined schedule;
2. Conducting Strategic Risk measurements using 4 (four) parameters: suitability with business environment conditions strategy; high risk and low risk strategy; the Bank's business position towards competitors; and achieving the Bank's Business Plan (RBB). The detailed strategic risk profile assessment is outlined in the strategic risk profile report based on the BNI Risk Profile Assessment Policies and Procedures;
3. Monitoring Strategic Risk by observing the experience of past losses caused by strategic risk and/or deviations in the application of the strategic plan.
For the bank wide scope, BNI has established a working unit that analyzes and monitors realization vs. targets in the Strategic Planning Division for the strategy and Budgeting, and in the Financial Control Division for financial targets.

For the Divisions/Units, supporting units and/or other certain other units are appointed to analyze and monitor the realization vs. the target implementation of the Division/Unit strategies periodically.

The mechanism to monitor the achievement of a predetermined business plan is carried out by comparing the following targets to business realization:

- a. Bankwide performance and strategy monitoring, conducted monthly;
- b. Division performance monitoring, conducted is on a quarterly basis;
- c. The Company and all units performance monitoring is carried out every semester through the Business Meeting forum at the Head Office and Regional Offices.

4. The Strategic Risk control process is carried out by comparing actual results with expected results to ensure that the risks taken are still within tolerance limits, and reporting significant deviations to the Board of Directors. The risk control system is approved and regularly reviewed by the Board of Directors to ensure its suitability on an ongoing basis.

The strategic risk control mechanism is executed on the monitoring results using the following factors:

- a. Achievement of BNI's performance compared to the proportional targets and the current year target monthly in the Board of Directors' meeting (Radisi), who can take strategic actions to manage strategic risk;
- b. Business Plan Realization Strategies for each Division/Unit so that problems can be identified in the application of strategies and work programs, to be immediately corrected so that the financial targets set can be achieved quarterly;
- c. Realization vs. target of the Bank's Business Plan is reported to the Financial Services Authority (OJK) on a quarterly basis;
- d. The Company and all units performance achievement is conducted semi-annually through the Business Meeting forum at the Head Office and Regional Offices.

The Board of Directors regularly monitors the strategies and target achievements in the Bank's Business Plan (RBB). If any are not on target, the Board of Directors requests the relevant unit to instigate improvements.

COMPLIANCE RISK

A risk caused by the Bank not complying with or not implementing the laws and regulations and other applicable provisions. Compliance risk management is carried out through the consistent application of an internal control system.

Governance and Organization

Compliance Risk Management is carried out by the Compliance Division (KPN), under the active supervision of the Managing Director Human Capital and Compliance.

Policies and Procedures

Compliance Risk Management refers to the Compliance Risk Management Guidelines and other related Policies and Procedures including Compliance Policies, Anti-Fraud Policies, Anti-Money Laundering and Prevention of Terrorism Financing Procedures, Compliance Charter, Conflict of Interest Policies, Gratuity Control Program Policies, and Whistleblowing System Policies.

Process

To contribute to a healthy and sustainable growth of in BNI's business, the Compliance Division assists the Managing Director Human Capital and Compliance in implementing the compliance function and conducts compliance of the risk management processes including Compliance Risk Management, through:

1. Compliance risk Identification is carried out to recognize all types of inherent risks in all functional activities that have the potential to harm BNI, including 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 amount (volume) and materiality of BNI's non-compliance with internal policies and procedures, provisions and/or regulations as well as sound business ethics and practices.
2. Compliance Risk Measurement is conducted by using indicators/parameters in the form of:
 - a. The type and significance of violations committed;
 - b. Frequency of violations of regulations (BNI compliance track record);
 - c. Violations of certain financial transaction provisions.

As part of compliance risk measurement, indicators/parameters as well as the weighting and ratios used to measure compliance risk profiles are determined by the Compliance Division by considering input from the

Board of Directors, Bank Risk Management Division (ERM) and other Units as well as the regulator's provisions.

Compliance risk profile assessment details are outlined in the compliance risk profile report based on the BNI Risk Profile Assessment Procedure. Compliance Risk Assessment is carried out by conducting compliance assessments or testing with policies that will be/have been applied, new products/activities, with compliance opinions on transactions to be carried out by BNI.

3. Compliance Risk Monitoring and Compliance Risk reporting is carried out by the Board of Directors at any time whenever a Compliance Risk occurs or periodically on the:
 - a. Maximum Lending Limit;
 - b. Net Open Position;
 - c. Minimum Mandatory Giro in rupiah and foreign exchange;
 - d. Establishment of Allowance for Earning Assets;
 - e. Non-performing loans;
 - f. Minimum Capital Adequacy Ratio;
 - g. Report obligations to external parties;
 - h. Implementation of Bank commitments to external parties;
 - i. Compliance Risk Level;
 - j. Bank Composite Risk Rating.
4. Compliance Risk Control is carried out by taking ex-ante (preventive) actions to ensure policies, regulations, systems and procedures, as well as business activities carried out by BNI are in accordance with OJK and Bank Indonesia (BI) provisions and the prevailing laws and regulations, to ensure BNI's compliance with commitments made by the Bank to Regulators (OJK and BI) and/or other authorized supervisory authorities. Compliance Risk Control is carried out on existing domestic and overseas organizational units. BNI must ensure that it has an adequate level of compliance with statutory regulations in the domestic BNI branch offices.

REPUTATION RISK

A risk caused by negative publications related to business activities or negative perceptions of the Bank.

Governance and Organization

Reputation risk management is carried out by the Corporate Communication and Secretariat Division (KMP) under the active supervision of President Director. News management and crisis management on communications, and monitoring of opinions/comments in the news media or social media is carried out by Corporate Communications Division. Customer complaint management is carried out in collaboration with the BNI Contact Center (BCC).

Policies and Procedures

Reputation risk management refers to the Reputation Risk Management Guidelines and other related Policies and Procedures.

Process

The Corporate Communication and Secretariat Division assists the President Director in carrying out the reputation risk management functions and processes including the following:

1. Reputation Risk identification is carried out using several data/or information sources including mass media reporting, BNI's website and analysis of social media networks, customer complaints through customer service or through mass media and social media, and customer satisfaction survey questionnaires.

BNI must record and administer every event related to Reputation Risk, including the amount of potential losses caused by the incident referred to in its data administration. Recording and administering data is arranged in a statistical manner so it can be used to project potential losses in a certain period and activity. Each data and/or information group is handled differently according to the impact of reputational risk it causes.

2. Measurement of Reputation Risk, carried out by using the following indicators:

- a. Frequency, Materiality and Negative News Exposure on BNI.

Frequency, type of media, and materiality of negative reporting on BNI, including the Bank management, by determining the following measurements and indicators:

- i) Frequency and scale of negative coverage on BNI and Subsidiaries in print and online media;
- ii) Materialization of negative coverage assessed based on BNI's follow-up in response to negative coverage.

- b. For Customer Complaints' frequency and materiality, the measurements and indicators are:

- i) Frequency of customer complaints;
- ii) Settlement of Customer Complaints;
- iii) Materiality of customer complaints.

- c. Frequency and materiality of Business Ethics Violations/generally accepted business norms, measurements and indicators, including:

- i) Frequency and scale of negative reporting related to Financial Information Transparency;
- ii) Frequency and scale of negative reporting related to BNI business cooperation with other stakeholders.

3. Reputation Risk Monitoring, on a bank wide basis, is conducted by the Corporate Communication and Secretariat Division (KMP), by reporting existing Reputation Risks to the Board of Directors at the incident time of the incident and periodically, and includes the necessary follow-up actions.

Monitoring of news management and communications crisis management, monitoring of opinions/comments on news media or social media, as well as the selection of strategies to respond to opinions emerging in social media are executed in coordination with the Corporate Communication & Secretariat Division (KMP). Customer complaints are conducted in collaboration with the BNI Contact Center (BCC).

Daily, weekly, monthly, quarterly and yearly evaluation for BNI's reputational risks, set forth in the Media Monitoring Report.

4. Reputation Risk Control

BNi immediately follows up and resolves customer complaints and lawsuits that can increase Reputation Risk exposure, and has also developed mechanisms to execute effective reputation risk control measures.

Generally, reputation risk management is conducted through 2 (two) ways, namely:

- a. To prevent events driving a reputation risk;
- b. To restore BNI's reputation post to an event creating reputation risk.

Mitigation of Reputation Risk and events creating Reputation Risk are executed by considering the materiality of the problem and the costs. Nevertheless, the Reputation Risk may be accepted as long as it is still in accordance with the Risk level taken.

Risk control efforts include:

- a. Standardizing public relations/media relations staff competence in the Corporate Communications Division, branch offices/regional offices in gain the ability and sensitivity to respond to developing issues and opinions.
- b. Establishing a Service Level Agreement (SLA) as a standard for responding to customer complaints. Reputation Risk Management during crises is conducted through established Crisis Contingency Plan standards that are applied when crises occur from a mild to severe scale. The Crisis Contingency Plan consists of:
 - i) Problems or chronological review;
 - ii) Information flow;
 - iii) Person in charge assignment;
 - iv) Authority and spokesperson establishment;
 - v) Crisis management activities schedule;
 - vi) Alternative communication strategies;
 - vii) Evaluation.



2021
Performance



Management
Report



Company
Profile



Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



Good Corporate
Governance



Social & Environmental
Responsibility



ESG
Commitment



Financial
Statements



INTEGRATED RISK MANAGEMENT IN BNI'S FINANCIAL CONGLOMERATE

BNI's Business Group Structure

1. BNI Legal Entity

Based on the share ownership composition, 60% of the shares are owned by the Government of the Republic of Indonesia whilst the remaining 40% are owned by the public, both individual, institutional, domestic and foreign shareholders. Ownership by the Government of the Republic of Indonesia is represented by the Ministry of SOEs, while for foreign public ownership through foreign institutions. Domestic ownership includes mutual funds, pension funds, foundations, companies, insurance, other domestic institutions and individual ownership.

2. Ultimate Shareholders

The majority ownership of BNI shares is with the Ministry of SOE as a representation of the Government of the Republic of Indonesia in the General Meeting of Shareholders with 60% ownership.

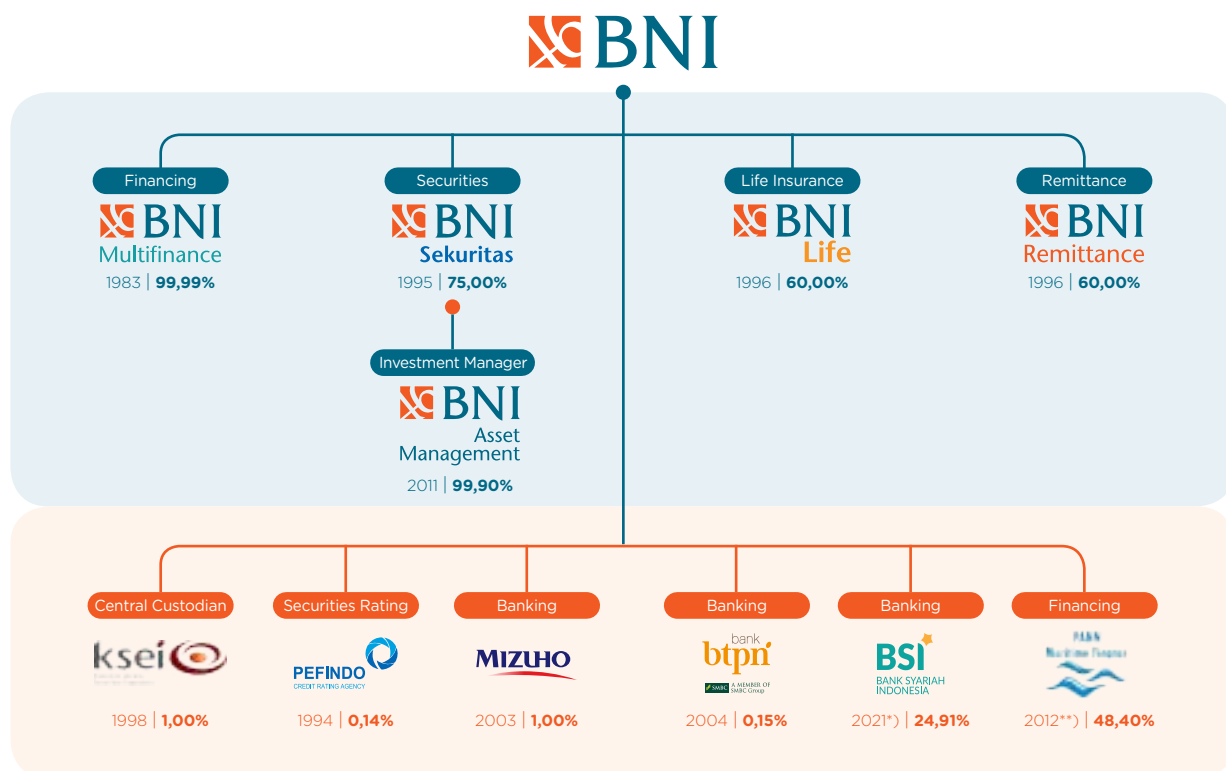
3. Sister Company

POJK No. 17/POJK.03/2014 dated November 18, 2014 article 6 states that sister companies are Financial Services Institutions (FSI) that are institutionally separated and/or legally but are owned and/or controlled by the same controlling shareholder.

BNI's majority controlling shareholder is the Government of the Republic of Indonesia who also acts as the majority owner of other SOE companies engaged in the Financial Services Institution industry. However, based on POJK, the relationship between the FSI owned and controlled directly by the Central Government of the Republic of Indonesia are excluded from the notion of a Financial Conglomerate, so that Himbara banks are not sister companies of BNI.

4. BNI's Business Group structure consists of 4 (four) Subsidiaries with majority ownership and as the controlling entity, 1 (one) subsidiary of a subsidiary with majority ownership as an indirect controlling entity, and 6 (six) financial services institutions with minority ownership and not as a controller.

The BNI Business Group structure is as follows:



In accordance with POJK No. 17/POJK.03/2014 concerning Integrated Risk Management for Financial Conglomerates (FC), Financial Services Institutions (FSI) included in the FC include FSI banks, insurance and reinsurance companies, securities companies and/or financing companies, including the subsidiary of a subsidiary company.

The BNI Financial Conglomerate structure is determined based on the suitability of the Subsidiary's business types with the OJK provisions and the significance of inclusion for each of the FSI Subsidiaries in BNI's FC.

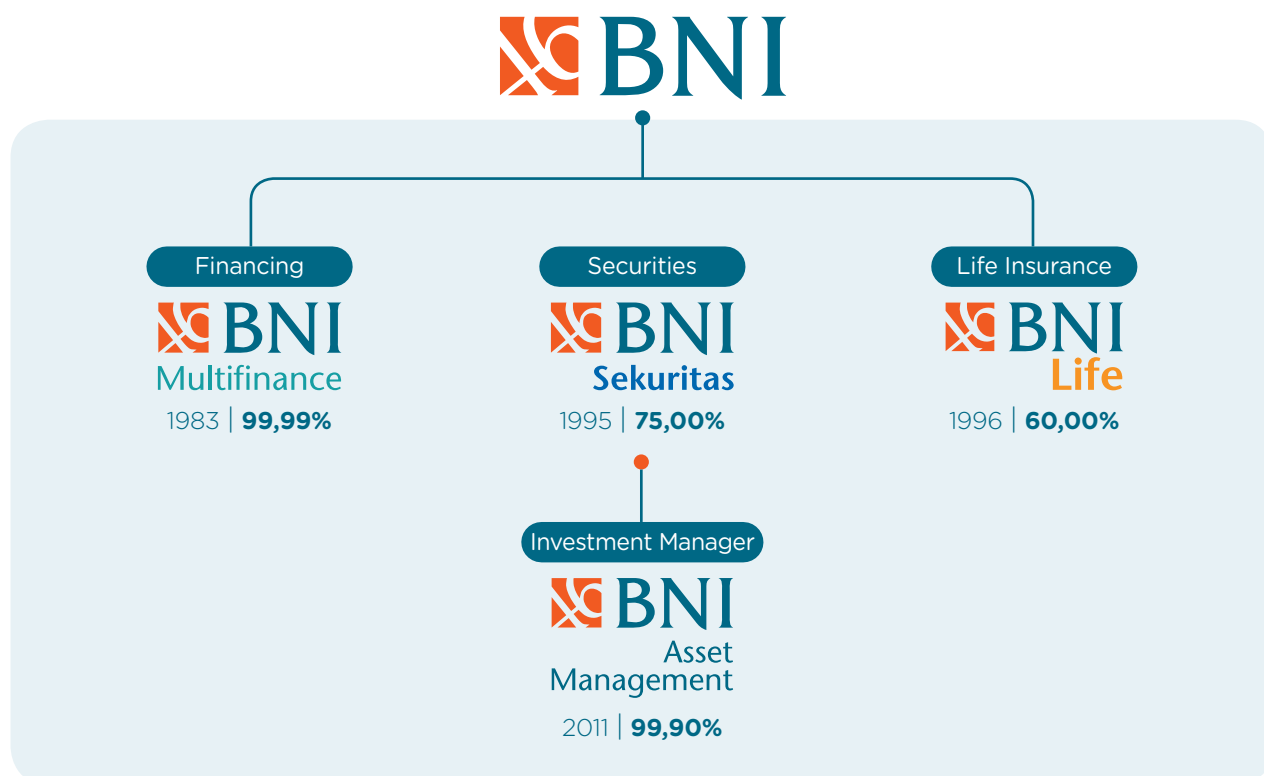
BNI's Financial Conglomerate Structure comprises:

1. Main Entity: PT Bank Negara Indonesia (Persero) Tbk.
2. FSI members of the Financial Conglomerate:
 - a. PT BNI Multifinance;
 - b. PT BNI Sekuritas;
 - c. PT BNI Life Insurance;
 - d. PT BNI Asset Management.

As of December 31, 2021, BNI's share ownership in each FSI member of BNI FC, was:

1. BNI Multifinance 99.99%;
2. BNI Sekuritas 75.00%;
3. BNI Life 60.00%;
4. BNI Asset Management 99.90%.

The following shows the BNI Financial Conglomerate Structure:



Transactions between the Bank with Related Parties Within BNI's Financial Conglomerate

1. Financial Relations

To assess material financial relationships in the intra-group relationship between FSI in BNI FC, based on the value of BNI's financial transactions with FSI members of BNI FC as well as amongst FSI members in BNI FC, including transactions: investments, bank guarantees, loans, securities, and demand deposits. The contribution of intra-group transaction value between FSI to total transactions is as follows:

ENTITY	INTER-GROUP CONNECTION				
	BNI	BNIL	BNIMF	BNIS	BNIAM
BNI		1.36%	2.20%	5.82%	13.03%
BNIL	0.70%		0.04%		0.001%
BNIMF	0.17%	0.09%		0.02%	
BNIS	72.59%	0.70%			3.15%
BNIAM	0.13%				

FSI Financial Transaction Linkage in BNI FC

2. Equity Capital

Based on POJK No. 36/POJK.03/2017 dated July 12, 2017 concerning Prudential Principles in Equity Participation Activities, Equity Participation is bank funds investment in the form of shares in companies engaged in finance, including investment in mandatory convertible bonds or certain types of transactions that result in the Bank owning or will own shares in a company engaged in finance.

The Value of Equity Participation between FSI in the BNI Financial Conglomerate as of December 31, 2021 is as follows:

Value of investments in FSI in the BNI Financial Conglomerate as at December 31, 2021

COMPANY	DATE	%	NOMINAL
PT BNI Multifinance	April 8, 1983	99.99%	298.413.99
PT BNI Sekuritas	April 12, 1996	75.00%	324.850.00
BNI Remittance Ltd	November 19, 1996	100.00%	10.009.56
PT BNI Life Insurance	November 28, 1996	60.00%	394.267.10
PT Kustodian Sentra Efek Indonesia	September 24, 1998	1.00%	300.00
PT Pemeringkat Efek Indonesia	April 21, 1994	0.14%	143.00
PT Bank Mizuho Indonesia	October 13, 2003	1.00%	75.374.69
PT Bank Tabungan Pensiunan Nasional	February 18, 2004	0.15%	37.342.20
PT Bank Syariah Indonesia	March 22, 2021	24.91%	7.984.951.22
PT PANN Maritime Finance	Year 1974	48.40%	260.560.00

Financial support between FSIs in BNI Financial Conglomerate

GIVEN	RECEIVER	TOTAL NOMINAL	RP BILLION	%
BNI	BNI Multifinance	645,515,298,937	645,52	2.20%
BNI	BNI Life	397,323,099,136	397,32	1.36%
BNI	BNI Sekuritas	1,705,648,000,000	1,705,65	5.82%
BNI	BNI AM	3,819,306,822,653	3,819,31	13.03%
BNI AM	BNI	37,504,706,345	37,50	0.13%
BNI Life	BNI	205,168,397,051	205,17	0.70%
BNI Life	BNI AM	295,908,366	0,30	0.001%
BNI Life	BNI Multifinance	10,996,374,354	11,00	0.04%
BNI Multifinance	BNI	48,561,810,214	48,56	0.17%
BNI Multifinance	BNI Life	25,719,975,000	25,72	0.09%
BNI Multifinance	BNI Sekuritas	7,249,000,000	7,25	0.02%
BNI Sekuritas	BNI	21,269,481,440,423	21,269,48	72.59%
BNI Sekuritas	BNI Life	204,569,000,000	204,57	0.70%
BNI Sekuritas	BNI AM	924,460,392,953	924,46	3.15%

INTEGRATED RISK MANAGEMENT IMPLEMENTATION

BNI's Financial Conglomerate needs to pay attention to all inherent risks in the Financial Conglomerate that can affect the business continuity.

1. BNI's Financial Conglomerate Risk Types include:

In implementing Integrated Risk Management, BNI as the Main Entity and all FSI members of the BNI's Financial Conglomerate are required to manage 10 (ten) Risk types, namely:

a. Credit Risk

Risk due to the debtor and/or other parties' failure to fulfill obligations to the Financial Conglomerate.

b. Market Risk

Risk arising from adverse movement in market variables from the portfolio held by the Financial Conglomerate.

c. Liquidity Risk

Risk arising due to the inability of the Financial Conglomerate to meet obligations due from cash flow funding sources and/or from high quality liquid assets pledged, without disrupting the financial activities and conditions of the Financial Conglomerate.

d. Operational Risk

Risk resulting from inadequate and/or malfunctioning internal processes, human error, system failures, and/or external events affecting the Financial Conglomerate operations.

e. Legal Risk

Risk due to lawsuits and/or weaknesses in juridical aspects. The weaknesses in the juridical aspects are due to the lack of knowledge/understanding of laws and/or laws and regulations, the absence of supporting legislation, or agreement weaknesses such as non-fulfillment of conditions for the validity of agreements and binding of imperfect collateral.

f. Strategic Risk

Risk arising due to inaccuracy in making and/or implementing strategic decisions and failure to anticipate changes in the business environment.

g. Compliance Risk

Risk arising due to not complying with and/or not implementing the provisions and regulations.

h. Reputation Risk

Risk arising due to stakeholder's declining confidence due to negative perceptions both for the Financial Services Institution in the Financial Conglomerate and for the Financial Conglomerate as a whole.

i. Intra-Group Transaction Risk

Risk arising due to dependency of an entity directly or indirectly by other entities in a Financial Conglomerate to fulfil obligations of a written or unwritten agreements, followed by a fund transfer or not a fund transfer.

j. Insurance Risk

Risk arising due to insurance companies' failure to meet obligations to policyholders as a result of an inadequacy in the risk selection process (underwriting), determination of premiums (pricing), the use of reinsurance, and/or claim handling.

2. BNI Financial Conglomerate's Potential Losses

To ascertain the potential losses faced by the BNI Financial Conglomerate, an Integrated Risk Profile assessment was carried out. Based on the Integrated Risk Profile Self-Assessment results of 10 types of Risk position as at the December 31, 2021 position, the BNI Financial Conglomerate risk profile rating was 2 (Low to Moderate), meaning the possibility of losses faced by the Financial Conglomerate as a whole is low for a certain period of time in the future. The composite quality of Risk Management is adequate, although there are minor weaknesses that need management attention, and these weaknesses can be resolved in normal business activities.

3. Risk Mitigation

BNI as the Main Entity conducts integrated risk control, especially risks that could endanger the business continuity of the Financial Conglomerate.

Integrated Risk control methods are conducted by:

a. Risk limits Setting, namely:

- i) Overall Risk Limit (integrated limit for the BNI Financial Conglomerate);
- ii) Limits for each risk type;
- iii) Risk Limit for each FSI member in the BNI Financial Conglomerate with risk exposure.

b. Approval or escalation mechanism in case of exceeding the Risk Limit as a whole.

c. Feedback/corrective action mechanism for the results of monitoring the Integrated Risk Profile.



Praveen JORDAN



The winning secret is constant and consistent management.

- Tom Landry

Good Corporate Governance

548	Application of Good Corporate Governance Principles	701	Information On Majority and Controlling Shareholders	901	Bank's Strategic Plan
560	Good Corporate Governance Structure and Mechanism	703	Organs and Committees Under the Board of Commissioners	905	Reporting Transparency
564	General Meeting of Shareholders	762	Board of Directors Supporting Organs	913	Equal Treatment for All Shareholders
582	Board of Commissioners	815	Independent External Auditors	913	Conflict of Interest Policy (Including Insider Trading)
600	Independent Commissioners	819	Risk Management	914	Shares and Bonds Buyback
602	Board of Directors	847	Internal Control System	915	Management Of State Officials' Assets Reports (LHKPN)
620	Board of Directors Performance Assessment	854	Legal Cases	916	Transparency of Financial and Non-Financial Conditions
621	Members of the Board of Commissioners and Board of Directors Composition Diversity Policy	863	Administrative Sanctions	917	Transparency of Customer Complaints Procedures and Customer Dispute Settlement
635	Good Corporate Governance Assessment	876	Anti Money Laundering (APU) and Prevention of Terrorism Funding (PPT)	920	Bad Corporate Governance Practices
646	Board of Commissioners' and Board of Directors' Remuneration	879	Protection Of Creditors' Rights	921	Implementation of Integrated Governance
662	Board of Commissioners and Board of Directors Meetings	879	Anti Corruption Program	932	Corporate Governance Aspects and Principles Implementation In Accordance With Financial Services Authority Regulations Otoritas Jasa Keuangan
699	Affiliated Relationships	880	Company Code Of Ethics	944	Implementation of the Asean Corporate Governance Scorecard
		883	Anti-Gratification & Anti-Bribery Policy		
		887	Violation Reporting System		
		890	Internal Fraud		
		891	Provision Of Funds To Related Parties And Large Exposure		
		892	Providing Loans to Related Parties		
		893	Provision Of Funds For Social And Political Activities		
		894	Procurement of Goods and/or Services		

Application of Good Corporate Governance Principles



BNI places Good Corporate Governance (GCG) as the foundation for the formation of a strong Bank system, structure and culture to support the success and sustainability of the Bank's business as well as changes in the business environment in achieving the Bank's value for stakeholders. Therefore, the Bank believes that GCG implementation needs to be carried out on an ongoing basis and not just in compliance with applicable standards and laws and regulations.

The implementation of strong GCG practices in the Bank is reflected in all aspects of the Bank's business activities, from decision-making, relationships with business partners to the Bank's operations, and they are consistently and continuously based on the basic GCG principles. Good GCG implementation reduces risks that may have an impact to ensure the Bank's continuity is maintained.

CORPORATE GOVERNANCE PRINCIPLES

Corporate Governance involves a series of mechanisms designed to direct the Company management to act in a professional manner based on GCG principles. GCG implementation is carried out to optimize the Company's long term value for shareholders and other stakeholders, while still paying attention to the Bank's stakeholder interests, and is based on laws and regulations and business ethics values that are upheld by the Bank's management and employees.

In practice, GCG can increase the Company's value by optimizing its potential so that the Bank remains competitive and can maintain its existence by achieving the Bank's goals. In addition, business risk monitoring

and assessment looks to reduce risks that can harm the Bank, maximize performance improvement, and develop a work culture within the Bank. For this reason, the Bank believes that improving the quality of GCG implementation is important in supporting effective and sustainable business activities.

As a company engaged in the financial sector, BNI is committed to implementing prudential banking principles and consistently prioritizing ethics and integrity in the Bank's management with the aim of encouraging performance improvements, guaranteeing the fulfillment of the stakeholders rights, and improving compliance with generally accepted laws and regulations in the banking industry and the Capital Market. By developing GCG in line with the best practices on an ongoing basis, the Bank is continuously encouraged to build a reliable internal control and risk management system. In addition, consistent GCG development can boost the Bank's performance and increase shareholder value to the maximum as a form of protection and fair treatment to shareholders and other stakeholders.

BNI bases the GCG implementation effectiveness on 3 (three) governance aspects, namely governance structure, governance process and governance outcome. Governance Structure is related to the adequacy of Governance Structure and Infrastructure so that the process of implementing good governance principles produces outcomes in line with stakeholder expectations. The corporate governance structure includes the Board of Commissioners, Board of Directors, Committees and Company Work Units. The governance infrastructure includes policies and procedures, management information systems as well as the main tasks and functions of each organizational structure.

Meanwhile, the Governance Process relates to the effectiveness of implementing the Good Governance principles, supported by the adequacy of the Corporate Governance structure and infrastructure so as to produce outcomes that meet of all the stakeholders' expectations.

The resulting Governance Outcomes that meet stakeholder expectations are achieved through the process of implementing Good Governance principles, supported by adequate governance structures and infrastructure. The Governance Outcome is the final result of the Governance Process implementation and adequate support from the Governance structure. The existence

of problems in the Governance structure can cause weaknesses in the Governance Process. On the other hand, the existence of weaknesses in the Governance Process will have an impact on the Governance Outcome.

The Board of Commissioners, Board of Directors and all employees are committed to building a healthy banking system that can grow sustainably by applying GCG management principles. These principles serve as a reference for responsible decision making, avoiding conflicts of interest, optimizing performance, and increasing accountability. Improving the GCG principles implementation quality is carried out by all BNI Hi-Movers who are expected to be able to maximize business activities in all aspects, including integrated with the subsidiaries. By following the banking industry and financial services industry Best Practices for Good Corporate Governance implementation development, and as a state-owned bank listed on the capital market, BNI understands that the GCG implementation and development will deliver enormous benefits for BNI. For its GCG implementation and development, BNI has guidelines when carrying out its business activities so they are always in line with the goals and needs of each stakeholder. Harmony between stakeholders and BNI fosters an attitude of mutual trust and a conducive attitude within the Bank, and will lead to an increase in the quality of work excellence and professionalism in every BNI Hi-Movers.

BNI is committed to implementing GCG based on strong integrity ensuring that GCG principles are implemented at all levels of the organization and implemented in all BNI activities that affect banking operations so they can run consistently and sustainably. BNI's GCG practices implementation refers to the GCG basic principles, namely Transparency, Accountability, Responsibility, Independence, Equality and Fairness. The application of these principles within BNI has been agreed upon by the Board of Commissioners, Board of Directors, management and all BNI Hi-Movers in order to create a Bank that continues to grow and is globally competitive, and is strong and survives in running its business.

BNI's GCG implementation principles are as follows:

GCG PRINCIPLES	DESCRIPTION
Transparency	<ol style="list-style-type: none"> 1. The Bank discloses information in a timely, adequate, clear, accurate and comparable manner and can be accessed by stakeholders according to their rights. 2. The Bank discloses information which includes but is not limited to the vision, mission, business objectives, Bank strategy, financial condition, composition and compensation for the management, Controlling Shareholders, executive officers, risk management, internal supervision and control systems, compliance status, systems and implementation of good corporate governance as well as material information and facts that can influence investors' decisions. 3. The principle of openness shall observe provisions on bank secrecy, position secrets and personal rights in accordance with applicable regulations. 4. Bank policies must be written and communicated to stakeholders and those entitled to obtain information about the policy.
Accountability	<ol style="list-style-type: none"> 1. The Bank sets business goals and strategies accountable to stakeholders. 2. The Bank establishes a check and balance system in the management of the Bank. 3. The Bank has performance measures of all organizational organs based on agreed measurements and in line with the Company's values (Corporate Culture Values), the Bank's business goals and strategies and has a rewards and punishment system. 4. The Bank must ensure that all of the Bank's organizational organs are competent in accordance with their responsibilities and understand their role in implementing good corporate governance.
Responsibility	<ol style="list-style-type: none"> 1. The Bank adheres to the prudential bank practices and ensures compliance with applicable regulations. 2. The Bank as a good corporate citizen cares about the environment and carries out social responsibility fairly.
Independence	<ol style="list-style-type: none"> 1. The Bank avoids improper domination by any stakeholder and shall not be affected by unilateral interests and shall be free from conflict of interest. 2. The Bank makes decisions objectively and shall be free from any pressure from any party.
Fairness	<ol style="list-style-type: none"> 1. The Bank takes into account the interests of all stakeholders the principles of equality and fairness (equal treatment). 2. The Bank provides opportunities for all stakeholders to provide input and convey opinions for the Bank's interests as well as open access to information in accordance with the principle of openness.

FOUNDATION FOR CORPORATE GOVERNANCE IMPLEMENTATION

For implementing GCG within the Bank, BNI refers to the relevant regulations, Corporate Governance guidelines issued by national and international institutions, as well as best practices applicable in Indonesia and internationally to support a standard and measurable Corporate Governance. BNI's GCG not only adheres to regulatory compliance, but also is a form of the Bank's internal awareness in making BNI a healthy company and a manifestation of its corporate strategy and culture that is continuously maintained and refined.

For the GCG implementation GCG in all lines of business, BNI complies with the following provisions and guidelines:

1. 1992 Law No. 7 concerning Banking, as amended by 1998 Law No. 10, and as partially amended by 2020 Law No. 11 concerning Job Creation;
2. 2007 Law No. 40 concerning Limited Liability Companies, as as partially amended by 2020 Law No. 11 concerning Job Creation;
3. Minister of State for State-Owned Enterprises (SOEs) Regulation No. PER-01/MBU/2011 concerning Good Corporate Governance Implementation in SOEs, as amended by the Minister of State for SOEs Regulation No. PER-09/MBU/2012;
4. Minister of SOEs Regulation No. PER-02/MBU/02/2015 concerning Requirements and Procedures for Appointment and Dismissal of Members of the Board of Commissioners and Supervisory Board of SOEs, as amended by the Minister of SOEs Regulation No. PER-10/MBU/10/2020;
5. Minister of SOEs Regulation No. PER-03/MBU/2012 concerning Guidelines for the Appointment of Members of the Board of Directors and Members of the Board of Commissioners of SOE Subsidiaries, as amended by of the Minister of SOEs Regulation No. PER-04/MBU/06/2020;
6. Minister of SOEs Regulation No. PER-11/MBU/11/2020 concerning Management Contracts and Annual Management Contracts for SOE Directors;
7. Minister of SOEs Regulation PER-11/MBU/07/2021 concerning Requirements, Procedures for Appointment, and Dismissal of Members of the Board of Directors of SOEs;

8. Minister of SOEs Circular Letter No. 2/MBU/07/2019 concerning Clean Management of 2021 through the Implementation of Prevention of Corruption, Collusion and Nepotism, and Handling Conflicts of Interest and Strengthening Internal Control;
9. Minister of SOEs Letter No. S-289/MBU/04/2020 dated April 28, 2020 concerning the Arrangement of the Board of Directors and Board of Commissioners in Subsidiaries and Affiliates of Consolidated SOEs;
10. Financial Services Authority Regulation (POJK) No. 55/POJK.03/2016 concerning Implementation of Good Corporate Governance for Commercial Banks;
11. Peraturan OJK No. 35/POJK.04/2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik;
12. POJK No. 18/POJK.03/2014 concerning Implementation of Integrated Governance for Financial Conglomerates;
13. Financial Services Authority Regulation No. 17/POJK.03/2014 concerning Implementation of Integrated Risk Management for Financial Conglomerates;
14. Financial Services Authority Regulation No. 33/POJK.04/2014 concerning Board of Directors and Board of Commissioners of Issuers or Public Companies;
15. Financial Services Authority Regulation No. 26/POJK.03/2015 concerning Integrated Minimum Capital Adequacy Requirements (KPM) for Financial Conglomerates;
16. Financial Services Authority Regulation No. 56/PPOJK.04/2015 concerning the Internal Audit Unit Establishment and Charter;
17. Financial Services Authority Regulation No. 27/POJK.03/2016 concerning the Fit and Proper Test for the Main Parties of Financial Services Institutions;
18. Financial Services Authority Regulation No. 46/POJK.03/2017 concerning Implementation of the Compliance Function in Commercial Banks;
19. Financial Services Authority Regulation No. 1/POJK.03/2019 concerning Implementation of the Internal Audit Function in Commercial Banks;
20. Financial Services Authority Regulation No. 45/POJK.03/2020 concerning Financial Conglomerates;
21. Financial Services Authority Regulation No. 12/POJK.03/2021 concerning Commercial Banks;
22. POJK No. 21/POJK.04/2015 concerning Implementation of Public Company Governance Guidelines;
23. POJK No. 29/POJK.04/2016 concerning Annual Reports of Issuers or Public Companies;
24. POJK No. 4/POJK.03/2016 concerning Soundness Level Assessment for Commercial Bank;
25. POJK No. 8/POJK.04/2015 concerning Issuers or Public Companies Websites;
26. SEOJK No. 16/SEOJK.04/2021 concerning Disclosure of Information or Material Facts by Issuers or Public Companies;
27. SEOJK No. 30/SEOJK.04/2016 concerning Annual Report Form and Content for Issuers or Public Companies;

28. SEOJK No. 13/SEOJK.03/2017 concerning Good Corporate Governance Implementation in Commercial Banks;
29. SEOJK No. 15/SEOJK.03/2015 concerning Integrated Governance Implementation in Financial Conglomerates;
30. SEOJK No. 14/SEOJK.03/2015 concerning Integrated Risk Management Implementation in Financial Conglomerates;
31. SEOJK No. 32/SEOJK.04/2015 concerning Public Company Governance;
32. Memorandum of Understanding for the Integrated Audit Work Unit on the Development of Audit Quality for the BNI Financial Conglomerate;
33. BNI Financial Conglomerate Corporate Charter;
34. Various guidelines for implementing GCG including the Corporate Governance Principles developed by the Organization for Economic Cooperation and Development (OECD), the ASEAN Corporate Governance Scorecard, and the Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision.

GOOD CORPORATE GOVERNANCE IMPLEMENTATION OBJECTIVES

The Good Corporate Governance (GCG) implementation within the Bank aims to:

1. Increase BNI's corporate value by applying GCG transparency, accountability, responsibility, independence as well as fairness and equality principles when conducting its business so that BNI gains strong national and regional competitiveness;
2. Encourage all BNI organs to always emphasize the GCG culture in every decision made, based on the prevailing values and norms as well as a high level of compliance with the prevailing laws and regulations;
3. Improve BNI's performance through the Company's efficiency programs created from the implementation of a GCG culture in all BNI organs;
4. Increase investor confidence and place BNI as the main choice for investment.

RELATIONSHIP BETWEEN GOOD CORPORATE GOVERNANCE WITH COMPANY PERFORMANCE

The sustainable GCG implementation results has had a positive affect on BNI's performance. This is demonstrated by BNI's achievements throughout 2021, both in terms of financial, operational and awards achieved. Improved GCG implementation is in line with BNI's overall performance improvement. Recognition from external parties achieved by BNI in the form of awards, relate to performance, information disclosure and GCG implementation, and include:

1. Received Award as “Most Trusted Company” from The Indonesia Institute for Corporate Governance on December 8, 2021, with an increase in score of 90.74 in 2020 compared to the 2019 score of 91.60. Currently, there are only 13 companies holding the title “Most Trusted Company”;
2. Predicate as a “very good” company for GCG implementation based on the 2021 ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesia Institute for Corporate Directorship (IICD) on December 14, 2021. BNI's ACGS score was 97.33 (far above the average of 100 issuers with the largest capitalization in Indonesia with an average score of 73.67). BNI's score increased in 2020 from 97.02 to 97.33;
3. Won 2nd place in The Best Indonesia GCG Award VI-2021 in the category of Public Company - Bank Buku IV organized by Economic Review.

In addition to these achievements, BNI also managed to record a good financial performance in 2021 compared to 2020 (2020 financial performance is restate by taking into account the impact of BNI Syariah performance) as follows:

1. Net interest income increased by 12.4% to Rp38.2 trillion;
2. Net profit increased by 232.2% to Rp10.9 trillion;
3. Loans disbursed on a net basis increased by 4.3% to Rp532.1 trillion;
4. Customer deposits increased 15.5% to Rp729.2 trillion;
5. Total Assets increased by 14.9% to Rp964.8 trillion;
6. Total Equity increased by 14.3% to Rp126.5 trillion.

GCG Implementation Development

YEARS	ACTIVITY
2001	BNI is committed to implementing good corporate governance. This commitment was initiated by BNI's Board of Commissioners and Board of Directors with the signing of the Board of Commissioners' and Board of Directors' Collective Decree no. KEP/001/DK and KP/001/DIR dated January 3, 2001 concerning Good Corporate Governance Principles Implementation included in the PT Bank negara Indonesia (Persero) Tbk Corporate Governance Handbook, as the guidelines for the Board of Commissioners and Board of Directors in managing BNI.
2002	As a part of the commitment to continuously improve the Good Corporate Governance Implementation, BNI carried out the following activities: <ol style="list-style-type: none"> 1. Established a Compliance Unit and Anti Money Laundering Unit under the Legal and Compliance Division's responsibility. 2. Established a Remuneration and nomination Committee, with the role and responsibility in preparing work assessment criteria for each member of the Board of Commissioners and Board of Directors and also in assessing the structure, system, and compensation for the Board of Directors and provide recommendations for amendment to the Board of Commissioners if requested. 3. Established an assessment center to improve the process/system for executive officers selection 4. Improved the banking information system. 5. The Board of Commissioner established an Audit Committee Charter as a guideline for Audit Committee members in performing their duties.
2003	BNI continued to improve its Corporate Governance, in terms of commitment or compliance. All employees are obliged to sign a statement of compliance to the Code of Conduct. <p>One such governance improvement in 2003 involved BNI establishing an executive committee tasked to assist the Board of Director in specific areas, including:</p> <ol style="list-style-type: none"> 1. Asset and Liability Committee (ALCO) 2. Risk Management Committee 3. Credit Policy Committee 4. Human Resource Committee 5. Technology Management Committee

YEARS	ACTIVITY
2004	<p>The following were important achievements in the Corporate Governance implementation in 2004:</p> <ol style="list-style-type: none"> 1. BNI management approved the establishment of a Good Corporate Governance Committee tasked with assisting the Board of Directors in evaluating and optimizing corporate governance implementation policy effectiveness in BNI. 2. BNI was recognized as one of the top five public companies with good Corporate Governance practices in a survey conducted by Standard and Poor's Governance Services and 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 supervision of deviating behavior. Through this program, BNI rewards working units that successfully reached zero fraud in their operations, and vice versa, sanctions working units that fail to prevent fraud. 4. BNI established a Work ethics Team under the Human Capital Committee. This team periodically evaluates the working ethics in BNI. <p>BNI increased stakeholder access to all information that has a material impact to BNI, including quarterly financial reports, annual report information on the use of funds from corporate actions, information that could influence investors' investment decisions, General Meeting of Shareholders' resolutions, and other material events relating to BNI, either through BNI website, reports to OJK, stock exchange, mass media, public exposes, or analyst meetings.</p>
2005	<p>BNI's commitment to Corporate Governance improvement was realized by the establishment of a GCG Monitoring implementation unit, based on Board of Director Decree No. KP/174/DIR/R dated April 26, 2005.</p>
2006	<p>Signing of the "Commitment Statement to Implement Good Corporate Governance" by all members of the Board of Director, Board of Commissioners, and Division Heads in the Company Working Meeting, to be followed by all BNI officials at all organization levels and renewed annually.</p>
2007	<p>As follow-up the previous year's "Commitment Statement to Implement Good Corporate Governance", BNI prepared the following GCG programs:</p> <ol style="list-style-type: none"> 1. GCG e-learning 2. Board of Commissioners and Board of Directors Guidelines and Work Procedures 3. Behavioral Guidelines Book for BNI officials consisting of Working Culture Values and Main Behaviors for BNI officials, known as PRINSIP 46. 4. BNI achieved the title of Trusted Company in the Corporate Governance Perception Index ranking organized by The Indonesian Institute for Corporate Governance (IICG) and SWA magazine.
2008	<p>Concerning the implementation of the know Your Customer Principle and the Money Laundering Crime Law (UU TPPU), the Compliance Division, with the Information Technology Division, developed and continued to improve the integrated system with the iCONS system to identify suspicious financial transactions.</p>
2009	<p>BNI successfully improved its performance leading to an increase in profits of 103% compared to the previous year. This was mainly due to the consistent implementation of GCG by all BNI people.</p>
2010	<p>Launch of an integrated Whistleblowing System (WBS), to increase transparency and ensure all BNI employees understand its implementation. Improvement of the BNI employees' code of conduct, to improve BNI employee quality. BNI participated in the GCG implementation ranking conducted by independent ranking institutions, the Center for Good Corporate Governance of Universitas Gadjah Mada (CGCG UGM), and the Indonesian Institute for Corporate Directorship (IICD).</p>
2011	<p>BNI won a number of awards from national and international institutions. Some of the major awards were included:</p> <ol style="list-style-type: none"> 1. Best of The Best Company BUMN 2011 2. Most Admired ASEAN Enterprise Economics Challenges Award 2011 3. Most Trusted Company from The Indonesian Institute for Corporate Governance (IICG) 4. BNI's Corporate information technology Governance was recognized for its reliability with the IT Governance Award given by the Ministry of SOEs
2012	<ol style="list-style-type: none"> 1. Self-assessment results, in accordance with Bank Indonesia provisions, in 2011 and 2012 reflected the stable trend with a composite predicate of Very Good. 2. Establishment of an Anti-Fraud Committee by the Board of Director Decree No. KP/508/DIR/R dated November 9, 2012 concerning the establishment of an Anti-Fraud Committee (KAF). When carrying out its duties and responsibilities, the KAF is assisted by the Ethics Management Unit under the Compliance Division, whose functions include data and reporting liaison with other divisions / units and external parties related to the Anti-Fraud Strategy and database management related to fraud in BNI
2013	<p>BNI won the following awards:</p> <ol style="list-style-type: none"> 1. Most Trusted Company Based on Investors and Analysts' assessment Survey at the 2013 Good Corporate Governance Awards. 2. Most Trusted Company Based on Corporate Governance Index (CGPI) at the 2013 Good Corporate Governance Awards. 3. Award as The Best Bank in Indonesia for Developing Good Corporate Governance (GCG) from the Asiamoney Magazine

YEARS	ACTIVITY
2014	<ol style="list-style-type: none"> 1. BNI continued to improve and update its Corporate Governance. 2. BNI continued to support the economic and environmental growth by organizing programs kampoeng BNI, PKBL, CSR activities organized by BNI Syariah, and its commitment to the one billion Indonesian Trees (OBIT) program, and has planted more than 7 million trees over the last 7 years.
2015	<p>BNI won an 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).</p>
2016	<p>BNI again won awards:</p> <ol style="list-style-type: none"> 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 the Corporate Governance Index (CGPI) at the Good Corporate Governance Award 2016.
2017	<p>BNI again achieved awards:</p> <ol style="list-style-type: none"> 1. 1st Place in the Listed SOE Financial Category at the Annual Report Award 2016 Event. 2. 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). 3. Most Trusted Company Based on Corporate Governance Index (CGPI) at the Good Corporate Governance Award 2017.
2018	<p>BNI again won awards:</p> <ol style="list-style-type: none"> 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 Based on Corporate Governance Index (CGPI) on Good Corporate Governance.
2019	<p>For BNI's hard efforts to maintain its GCG implementation in accordance with best practices, provisions and standards BNI won:</p> <ol style="list-style-type: none"> 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 Based on Corporate Governance Index (CGPI) on Good Corporate Governance. 3. The Best Good Corporate Governance Issuer from the IDX Channel. <p>In addition, BNI also digitized the Board of Directors Meetings and the GCG commitments for all BNI Hi-Movers. In an effort to improve the GCG implementation, the company is also actively cooperating with external institutions IICD to improve the implementation of GCG at BNI.</p>
2020	<p>BNI continued to make improvements and innovations to realize one of BNI's missions "To become a reference for the implementation of compliance and good Corporate Governance for the industry". These efforts received recognition and awards from external and independent parties in the form of:</p> <ol style="list-style-type: none"> 1. Award as "Most Trusted Company" from The Indonesia Institute for Corporate Governance (IICG). 2. Predicate as a "Very Good" company in GCG implementation based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesia 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) and the 2020 Performance Excellence Award event held by Businessweek Indonesia and the CEO Forum. 4. Rank I Award for the Gratification Control Unit (UPG) in the State-Owned Enterprises (BUMN)/Regional Owned Enterprises (BUMD) Category from the Corruption Eradication Commission (KPK).
2021	<p>This year, BNI continued to improve its performance with maintain the GCG implementation and again won awards, as follows:</p> <ol style="list-style-type: none"> 1. Award as "Most Trusted Company" from The Indonesia Institute for Corporate Governance (IICG). 2. Predicate as a "Very Good" company in GCG implementation based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesia Institute for Corporate Directorship (IICD). 3. Won 2nd place in The Best Indonesia GCG Award VI-2021 in the category of Public Company - Bank Buku IV organized by Economic Review. 4. In addition, to strengthen GCG management, BNI changed its GCG management to be under the coordination of two divisions or work units: the Compliance Division and Corporate Secretary. This is instigated so that the individual and integrated GCG management could be more effective. 5. The Cooperation Agreement (PKS) signing between BNI and the Corruption Eradication Commission concerning the Handling of Complaints in Efforts to Eradicating Corruption Crimes based on PKS No. 67 of 2021, and No. DIR/153 dated March 2, 2021 with the aim of building and improving the integrated complaint handling effectiveness and efficiency both internally and externally by prioritizing confidentiality to optimize the eradication of corruption in the work environment. 6. As a form of GCG implementation, management approved the establishment of an Anti-Fraud Unit based on the Board of Directors' Decree No. KP/291/DIR/R dated June 28, 2021 concerning the establishment of an Anti Fraud Unit Organization (SAF) with the aim of improving the implementation of the Anti Fraud Strategy at BNI through prevention, detection, investigation, reporting and sanctions, monitoring and evaluation activities.

During 2021, BNI's GCG implementation activities were as follows:

January

1. Submission of GCG Self Assessment and TKT position as of December 30, 2020 to OJK and Ministry of SOEs;
2. Implementation of Mandatory e-learning through BNI Smarter, with materials including: GCG, Anti Fraud Awareness, Gratification, APU-PPT, Sustainability Finance, Risk Culture and Work Culture;
3. Screening of the AKHLAK video series with the theme "BNI Hi-Movers Reject Gratification and Bribery" for 2 months on the BNI Corpu website in January & February 2021;
4. Issuance of Compliance Reminder (CORE) for the January 2021 period with the theme "Stimulus Scheme for Debtors Affected by Covid-19";
5. Submission of information on changes to the audit committee on January 7, 2021.

February

1. Socialization with the theme "Efforts and Corrective Action as a preventive measure to minimize the imposition of external sanctions by the Regulator" to all Regional/Branch/Central Heads on February 3, 2021;
2. Report on material information or facts in connection with business merger affiliated transactions between PT Bank BNI Syariah, PT Bank Syariah Mandiri, and PT Bank BRI Syariah on February 3, 2021;
3. Announcement of GMS for Fiscal Year 2020 on February 9, 2021;
4. Submission of proof of announcement for the 2020 GMS announcement on February 9, 2021;
5. Appeal for Acceptance/Giving of Gratifications related to the 2021 Lunar New Year to All Divisions/Units uploaded on the BNI Forum;
6. Submission of the 2020 Annual Report on February 24, 2021;
7. Submission of the Fiscal Year 2020 Sustainability Report on February 24, 2021;
8. Issuance of Compliance Reminder (CORE) for the period February 2021 with the theme "Prohibition of Making Certain Transactions Between Banks and Foreign Parties".

March

1. Issuance of a Compliance Reminder (CORE) for the period March 2021 with the theme "Reporting of Commercial Bank Customer-Based Deposit Insurance Data";
2. Invitation to the Annual GMS for the fiscal year 2020 on March 5, 2021;
3. Submission of proof of advertisement for the 2020 Annual GMS on March 5, 2021;
4. Report of material information or facts in connection with the roadshow and pricing plans for the issuance of BNI Tier II Capital Bonds 2021 on March 24, 2021;
5. Implementation of the 2020 Annual GMS on March 29, 2021;

6. Report of material information or facts in connection with the issuance of Tier II Subordinated Notes (BNI Tier II Capital Bonds 2021 on March 31, 2021;
7. Submission of summary of minutes for the Annual GMS for fiscal year 2020 on March 31, 2021;
8. Notification of payment of cash dividends for fiscal year 2020 on March 31, 2021.

April

1. Issuance of a Compliance Reminder with the theme Understand, Prevent and Report Conflicts of Interest;
2. Sharing Session related to Integrity to all BNI GMs (Division Heads) during April-May 2021. GM KPN/ UPG Chair socializes Gratification Control & Anti-Bribery Management System (SMAP);
3. Appeal for Acceptance/Giving of Gratification related to Eid Al-Fitr 2021 to All Divisions /Units and Regional Offices uploaded on the BNI website;
4. Socialization to internal and external parties through digital banners related to Gratification and the SMAP Anti-Bribery Management System on BNI's internal media.
5. Presentation and Discussion of the ASEAN CG ScoreCard Research Report by IICD.

May

1. Issuance of Compliance Reminder (CORE) for the period May 2021 with the theme "Outlet Compliance Review (OCR)";
2. Issuance of a Compliance Reminder (CORE) for the period of May 2021 with the theme "Adjustment of BNI Griya Loan To Value Ratio (LTV) Provisions regarding Bank Indonesia Regulation (PBI) No. 23/2/PBI/2021;
3. Sharing Session related to Integrity to all BNI GMs (Division Heads) during April-May 2021. GM KPN/ UPG Chair socializes Gratification Control & Anti-Bribery Management System (SMAP);
4. Appeal for prevention of gratification related to Eid al-Fitr 1442H 2021 on May 7, 2021;
5. Advertisemens for the prevention of gratification related to Eid al-Fitr 1442H in 2021 on May 7, 2021;
6. Webinar by Dir. HN through BNI Corpu Live Streaming with the material "Enforcement of Integrity in the Credit Process" on May 10, 2021.

June

1. Issuance of Compliance Reminder (CORE) for the period June 2021 with the theme "What is a Village Owned Enterprise Like?;
2. Socialization of Gratification Control and Anti-Bribery to all Denpasar Regional Office employees;

3. Socialization to all Heads of Region (HOR) related to Gratification Control & Anti-Bribery Management System (SMAP) as part of Operational Risk;
4. Mandatory webinar on Good Corporate Governance – Anti-Bribery Management System (SMAP) including Gratification Control material, on June 21;
5. SMAP socialization through webinars to all BNI Hi-Movers on June 21, 2021 attended by 21,975 employees delivered by the Gratification Control Unit (UPG) and Robere Consultants;
6. Socialization on GCG to Officer Development Program.

July

1. Submission of GCG and TKT Self Assessment for the period June 2021 to OJK;
2. Issuance of Compliance Reminder with the theme Giving Preferential Prices for Goods and/or Services Containing a Domestic Component Level (TKDN);
3. Socialization of GCG, Gratification and Anti-Fraud Awareness in the Bandung Region;
4. Information report regarding BNI's share repurchase during significantly fluctuating market conditions on July 21, 2021;
5. Mandatory webinar for all BNI business partners/Partners concerning the Anti-Bribery Management System (SMAP) including Gratification Control material on July 22, 2021, watched by all business partners/Partners and BNI Hi-Movers via Live Youtube BNI Corpu and Applications BNI Smarter.

August

1. Signing of the Integrity Pact by the Board of Directors on August 12, 2021;
2. Signing of the Integrity Pact by the Board of Commissioners on August 13, 2021;
3. Submission of GCG modules/materials as well as Gratification and Anti-Bribery at the Officer Development Program;
4. Issuance of Compliance Reminder (CORE) for the period August 2021 with the theme "Screening KYC On Board";
5. Issuance of Compliance Reminder (CORE) for the period August 2021 with the theme "Bank Secrets".

September

1. Issuance of a Compliance Reminder (CORE) for the period September 2021 with the theme "User-ID and Password is Yours and Yours Only";
2. Issuance of Compliance Reminder (CORE) for the period September 2021 with the theme "BNI & Its Tax Activities";
3. Submission of the annual public expose results on September 9, 2021;
4. Compulsory webinar with the KPK Chairman attended by all Directors and Commissioners as well as Division/Region Heads, with the theme "Corruption Prevention

in the Banking Sector" on September 21, 2021, watched by all BNI Hi-Movers via Live Youtube BNI Corpu and BNI Smarter Application;

5. IT Fraud GCG "Fraud Awareness Series" webinar on September 1, 2021;
6. Reporting the material information or facts concerning the planned issuance of AT-1 Perpetual Non Cumulative Capital Securities on September 17, 2021;
7. Reporting the material information or facts concerning the completion of the issuance of AT-1 Perpetual Non Cumulative Capital Securities on September 27, 2021;
8. Information report with the BNI securities PTE. Ltd. operations on September 10, 2021.

October

1. Issuance of a Compliance Reminder (CORE) for the period October 2021 with the theme "Provision of Funds to Other Than Related Parties (Borrower Groups)";
2. Report on material information or facts in connection with OJK approval regarding the recording of BNI AT-1 Perpetual Non Cumulative Capital Securities on October 1, 2021;
3. GCG Webinar "Fraud Awareness Series" Risk Escort and International Business Development on October 28, 2021.

November

1. Online training for new employees (ODP) related to Good Corporate Governance implementation;
2. Issuance of Compliance Reminder (CORE) for the period November 2021 with the theme "Anti-Bribery Management System";

December

1. Written appeals to all units concerning the prohibition of receiving gratification in the context of Christmas 2021 and New Year 2022;
2. Updated 2021 Integrated Governance Guidelines on December 8, 2021;
3. Award as "Most Trusted Company" Company from The Indonesia Institute for Corporate Governance (IICG);
4. Publication of Anti-Gratification related to Christmas 2021 and New Year 2022 in the Investor Daily on December 14, 2021 and the Company's website;
5. Placing posters prohibiting receiving gratuities on December 14, 2021 in all Divisions/Units;
6. Report on material information or facts related to BNIS affiliated transactions as lead advisor on December 20, 2021;
7. Online training for new employees (ODP) on the implementation of Good Corporate Governance on December 27, 2021;
8. Reflection on SOEs AKHLAK on December 30, 2021;
9. Issuance of Compliance Reminder (CORE) for the period December 2021 with the theme "Transaction Monitoring through Suspect Account to Verify";

10. Issuance of Compliance Reminder (CORE) for the period December 2021 with the theme “Electronic GMS”.

IMPROVING THE QUALITY OF THE BANK'S GOVERNANCE IMPLEMENTATION

BNI's efforts to improve the quality of its GCG implementation and creating, developing and improving itself are in line with the GCG principles. A Roadmap has been prepared as a reference to supporting GCG implementation practices. BNI always evaluates the Corporate Governance implementation on an ongoing basis, so that it can be improved, and BNI continues to improve the quality of GCG implementation in the following ways:

1. Reviewing the Corporate Governance guidelines/policies for BNI and the BNI financial conglomerate to comply with regulatory provisions, guidelines and the latest best practices.
2. Developing new Good Corporate Governance implementation initiatives, including updating new provisions to the Board of Directors and the Board of Commissioners, and the GCG campaign program, etc.
3. Improving the quality of GCG implementation through the Compliance Index including improving the calculation method, strengthening the organization by establishing an Anti Fraud Unit, implementing a Whistle Blowing System (WBS), Gratification Control program and Anti-Bribery Management System (SMAP) as well as implementing a Governance, Risk and Management Forum. Compliance (GRC) in all Units.
4. Preparing Corporate Governance reports, including Governance Reports, Integrated Governance Reports, Corporate Secretary Reports, and other related reports.
5. Facilitating External Complaints regarding GCG to encourage BNI Hi-Movers cultural awareness to always behave in accordance with GCG principles. BNI also involves the community/public as supervisors of BNI's GCG implementation, and provides facilities for the general public to submit grievances and complaints on violations of Corporate Governance committed by BNI employees through the Whistleblowing System (WBS) reporting facility, through the website, telephone, email, letter, SMS/Whatsapp.

People who feel aggrieved by BNI Hi-Movers actions or are aware of BNI employees actions that deviate from the Good Corporate Governance principles can report through the WBS channel.

Grievances or complaints received through BNI's WBS channel are not only seen as helping to resolve problems faced by the reporter, but are used as material for review/ input and evaluation so that BNI can continually improve the quality of its GCG implementation to reduce the number

of irregularities or violations of GCG principles by BNI employees.

AWARENESS

GCG Socialization

During 2021, GCG socialization was carried out at the Head Office and Regional Offices and Subsidiaries. This socialization included explaining the principles of GCG, examples of implementation, up to date provisions related to GCG. By so doing, it is hoped that BNI Hi-Movers will have a shared determination and commitment to realize GCG implementation at BNI.

New Employee Induction Program

New employees are the future BNI employees who will learn, grow and develop at BNI. As newcomers, instilling the corporate values is essential, as the program will instill the expected GCG and the Code of Ethics values to be followed during the course of their career at BNI. This briefing is provided by the GCG Team in collaboration with BNI Corporate University in special briefing hours related to GCG and the Code of Ethics for new employees.

Governance Commitment

As a commitment to upholding GCG implementation, BNI signs a Governance Commitment once a year. All employees, at all position levels must understand and submit a Governance Commitment. This is done through DigiHC, a human capital communication and information platform that can be accessed via mobile/mobile phones, tablets, and other similar gadgets.

This program emphasizes to BNI Hi-Movers the importance of the commitment values. This Governance Commitment states that BNI Hi-Movers are committed to:

1. Carrying out their duties and jobs at all times properly, correctly and with full responsibility, and also follow AKHLAK as the main BUMN value, Prinsip 46, BNI Code of Conduct, and comply with internal company provisions, applicable laws and regulations and the principles of Good Corporate Governance;
2. Acting objectively and upholding ethical and moral values, fairness, transparency, consistency and upholding honesty and commitment and always encouraging all working partners to promote ethical, healthy and transparent business practices;
3. Playing an active role in preventing and eradicating fraud by not committing or tolerating all forms of fraud within BNI, and by being willing to report any fraud within BNI through the reporting media available at BNI;
4. Creating a work environment free from corruption, collusion and nepotism (KKN), by implementing and ensuring the Anti-Bribery Management System (SMAP) and/or Gratification Control, through activities including but not limited to not giving, promising and/or receiving

rewards in any form to or from customers, debtors, vendors, partners, work partners business partners, regulators/supervisors and/or other parties, both external and internal;

5. Avoiding all forms of possible conflicts of interest when carrying out their duties, and not affecting the independence of other BNI personnel;
6. Working prudently (duty of care and loyalty) and professionally in BNI's operational activities including the goods and services procurement, HC management, provision of funds and management of other business activities for the benefit of BNI;
7. Not using personal funds as bailout funds and/or personal accounts for the benefit of company operations;
8. Not using personal funds and/or personal accounts as bailout funds for the benefit of the company's operational activities;
9. Maintaining all data information related to deposit customers and/or borrower customers after the nominal savings and/or nominal loans by not disclosing such data to other parties outside BNI unless otherwise requested based on Law or other regulations ;
10. Not using company information and data for personal or other parties gain where it is prohibited based on internal and external regulations, such as insider trading, misuse of company data, etc;
11. Acting fairly and equally in fulfilling stakeholder rights;
12. Using social media in a professional manner, not in conflict with morality, safeguarding the good name and company secrets subject to the prevailing laws and regulations;
13. Being willing to be subject to sanctions if when carrying out their duties and responsibilities as a BNI Hi-Mover it is proven that they have not carried out the commitments as mentioned above.

Internalization

BNI understands that Corporate Culture contributes to attitude. It shapes the personality of each individual in the company, so this set of attitudes forms an interaction between individuals and integrity, which in turn brings out the existing character of a company. Corporate Culture Internalization, including the application of the Corporate Governance principles at BNI, is carried out through various tools to facilitate the process of adopting values that can later be applied in carrying out daily work. The tools used include:

1. Reading Prinsip 46 and the BNI Code of Ethics on every quality day, held once a month in each unit as well as at morning briefings;
2. Self-education methods through e-learning GCG and DEEP 46 (Daily Exercise Employee Program) through BNI Smarter and DigiHC that provides easy GCG learning for BNI Hi-Movers;

3. Online training and webinars with resource persons involving internal and external professionals, including:
 - a. Operational Risk Training;
 - b. Execution Discipline Cultural Brevet;
 - c. International Banking Literacy Training;
4. Distribution and installation of anti-gratification posters and e-leaflets and GCG enforcement in each unit, BNI Forum, and through the website so that employees are made aware all the time;
5. Easy access to the Code of Ethics and Corporate Culture through the BNI website which can be accessed anytime and anywhere;
6. Competitions related to GCG with the aim of raising awareness in all BNI Hi-Movers to always comply with the Corporate Governance implementation commitments;
7. Anti-Gratification and Anti-Fraud Videos given by the Board of Directors.
8. Learning modules in various formats including e-books, podcasts, bite size video learning, and gamification.
9. Learners' Virtual Assistant (LeVA), an artificial intelligence-based chatbot application that can be accessed with voice and typing commands.
10. BNI Learning Wallet (BLW), the freedom to determine learning through individual learning budgets.

Externalization

GCG externalization is closely related to the transparency and fairness principles. In externalization, the transparency principle means to always observe the Bank secrecy provisions and position secrets and treat stakeholders and the public in a fair and equal manner. BNI delivers GCG externalization to stakeholders and the wider community through the following:

1. GMS

The GMS is a communication media for stakeholders to the Company and is an embodiment of the GCG principles implementation, as in the GMS the Company Management explains their responsibilities in many aspects. A more detailed explanation of the GMS can be found in the GMS Section of the Corporate Governance Chapter in this Annual Report. Shareholders' Rights and Ownership rights are always protected and facilitated, in BNI the rights of Shareholders are implemented through dividend payments, the right to ask questions at the GMS, the right to obtain information, and the right to approve/not approve GMS resolutions through a sound card given at the GMS.

2. Disclosures and Transparency

As a form of the transparency pillar in the GCG principles, BNI continues to provide information disclosure to stakeholders and the wider community through various means including the Annual Report, BNI website, mass media, Electronic Reporting System portal for IDX Issuers, and to regulators through hardcopy or electronic reporting facilities. Given BNI's status as an issuer, this information disclosure is considered very important as a medium of communication as a transparent company. Information disclosure is carried out based on the prevailing capital market regulations.

3. Equal Treatment

All BNI Shareholders including Minority Shareholders and Foreign Shareholders are treated equally. All Shareholders are given the same opportunity to obtain information. This treatment is applied at BNI by providing information on Corporate Actions, and other information disclosure

as stipulated in the capital market regulations. Everyone is given the same opportunity to gain information and submit criticisms/suggestions to the Bank. Information, criticism and/or suggestions can be reported through the BNI website and BNI Call 1500046 service.

4. Building a Positive Image of the Bank

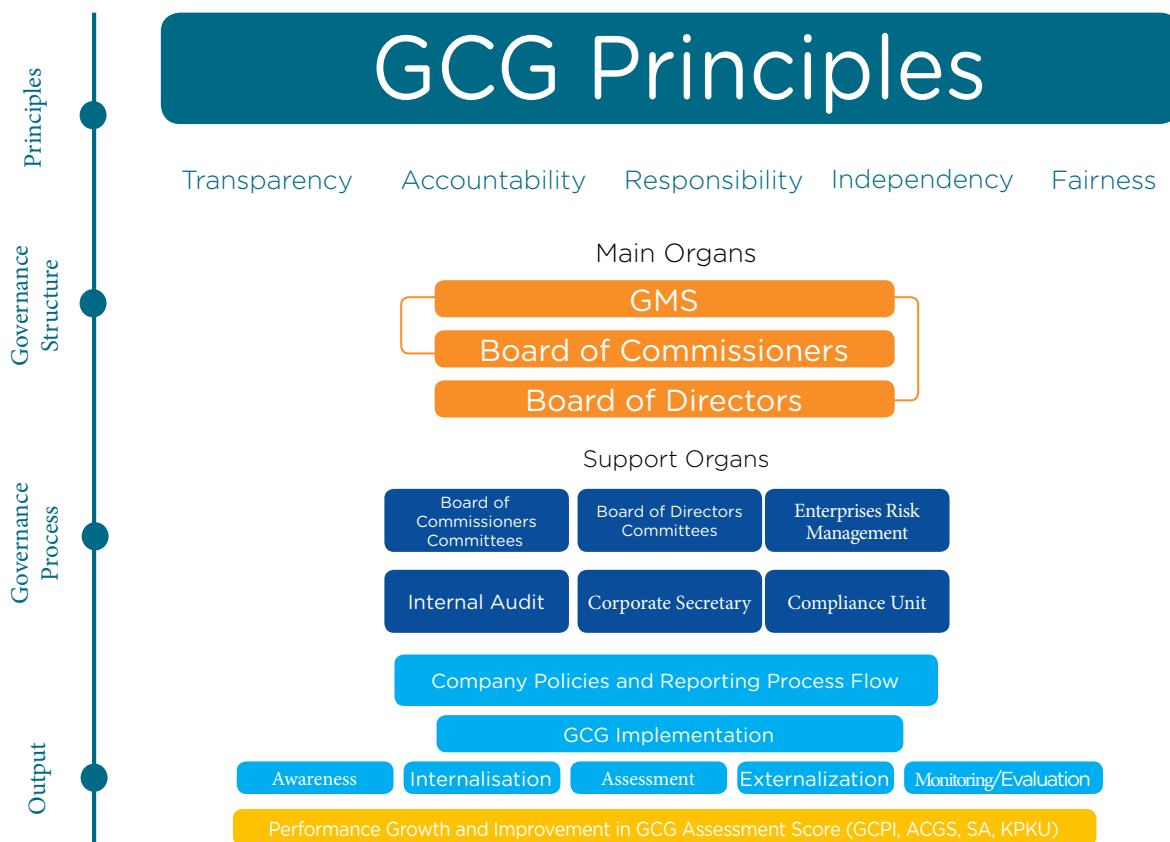
Sound GCG practices by all internal parties and stakeholders improves the Company's image in the wider public over the long term so that trust in the Company can be maintained. In the digital era, BNI looks to use different tools to enhance the Company's positive image through different media including print media (newspapers, tabloids, magazines), electronic media (radio and television) and cyber media (website, twitter, instagram, email, etc. news portals, facebook, blogs and other social media). The use of media to support GCG practices is carried out to disseminate anti-gratification, anti fraud, GCG awareness, WBS, etc.

Monitoring Good Corporate Governance Implementation



GOOD CORPORATE GOVERNANCE STRUCTURE AND MECHANISM

BNI's GCG implementation refers to the roadmap, through 3 (three) main process groups (structure, process and outcome), and is based on GCG principles.

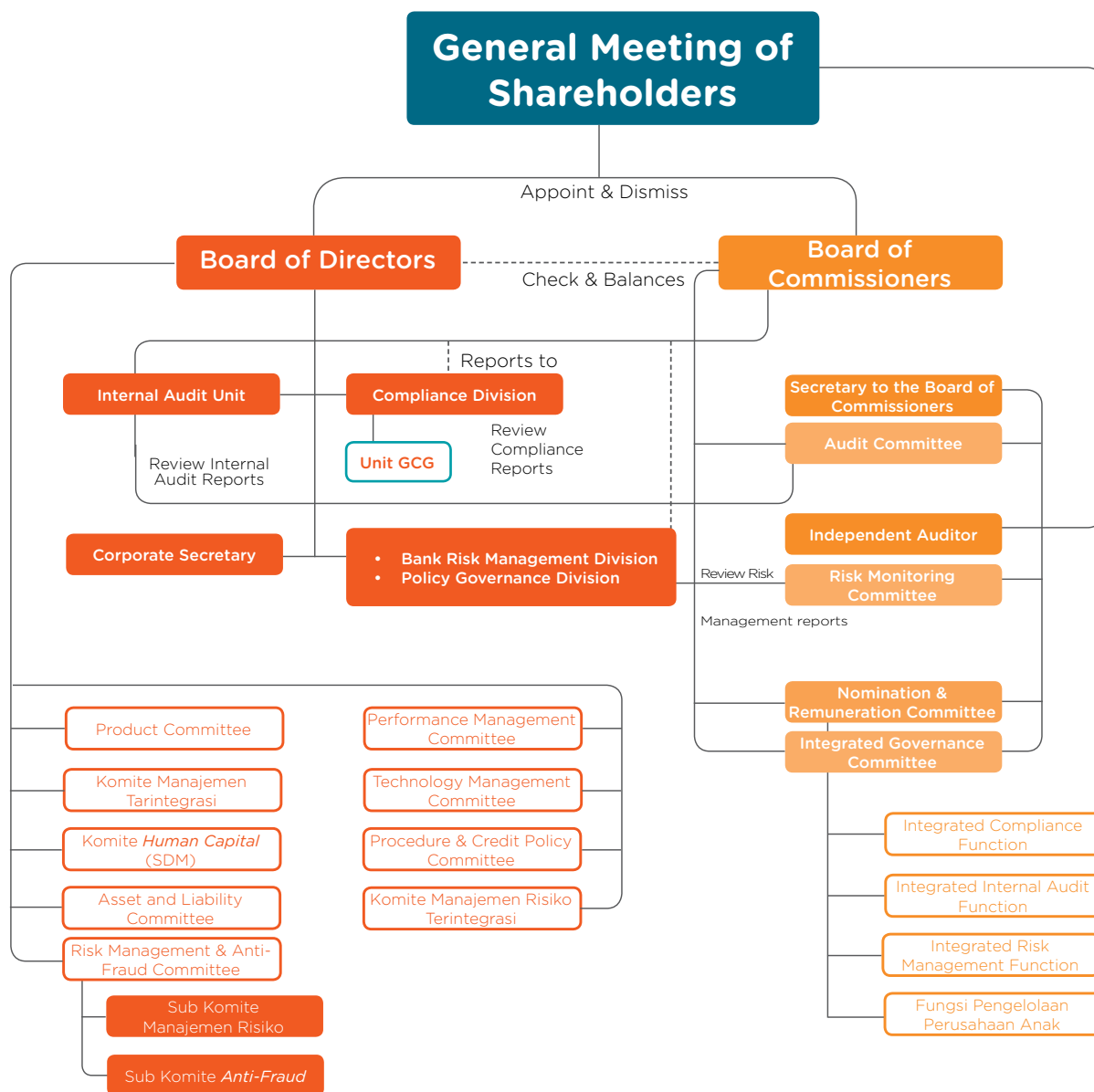


GOVERNANCE STRUCTURE ORGANS

The BNI governance structure consists of main organs and supporting organs, and consists of the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors, supported by their supporting organs, namely the committees below the Board of Commissioners, Committees below the Board of Directors, Risk Management Work Unit, Internal Audit Work Unit, Compliance Unit and Corporate Secretary. Each Bank organ plays an important role in implementing effective GCG with the obligation to carry out their functions in accordance with the provisions in the Bank's Articles of Association, with the aim of improving performance, protecting stakeholder expectations, and increasing compliance with prevailing laws and regulations.

For BNI, the GCG implementation and development for the Bank and its Subsidiaries is important in maintaining the Company's business continuity. By following these principles, BNI believes that it can be strong in facing the increasingly fierce competition.

Governance Organ Structure



GOVERNANCE STRUCTURE

The GCG implementation process by the Company organs when executing their functions and duties is supported by various policies/guidelines referred to as the GCG infrastructure. BNI's GCG infrastructure includes:

1. The Company Articles of Association No. 23 dated April 20, 2021 as received and recorded in the Republic of Indonesia Ministry of Law and Human Rights Legal Entity Administration System through No. AHU-AH.01.03-0264697 Year 2021 dated April 26, 2021. The Articles of Association can be accessed and downloaded on the Company's website: <https://bni.co.id/id-id/perusahaan/tatakelola/anggarandasarbni>;
2. BNI's Code of Ethics as the BNI Hi-Movers Code of Conduct. The code of conduct can be accessed and downloaded on the Company's website through: <https://bni.co.id/id-id/perusahaan/tatakelola/kodeetik>;
3. Board of Commissioners updated Board Manual, as validated by Board of Commissioners' Decision Letter No. KEP/0049/ DK/2017 dated October 26, 2017. These guidelines can be accessed and downloaded on the Company's website through: <https://bni.co.id/Portals/1/BNI/Perusahaan/ Docs/SK%20Pedoman%20dan%20Tata%20Tertib%20Kerja%20Dewan%20Commissioner616.pdf>;

4. Board of Directors updated Board Manual, as validated by Board of Directors' Decisions Letter No. KP/228/DIR/R dated June 29, 2018. These guidelines can be accessed and downloaded on the Company's website through: <https://tinyurl.com/TataTertibKerjaDireksiBNI>;
5. Audit Committee Charter and Audit Committee Code of Ethics, approved by the Board of Commissioners through the Board of Commissioners Decree No. KEP/007/DK/2021 dated April 15, 2021. The charter can be accessed and downloaded on the Company's website through: <https://tinyurl.com/PiagamKomiteAuditBNI>;
6. The Risk Monitoring Committee Charter, approved by the Board of Commissioners through the Board of Commissioners Decree No. KEP/028/DK/2017 dated May 18, 2017. The charter can be accessed and downloaded on the Company's website through: <https://tinyurl.com/PiagamKomitePemantauRisikoBNI>;
7. The Remuneration and Nomination Committee Charter, approved by the Decree of the Board of Commissioners No. KEP 048/DK/20 dated October 22, 2020. The charter can be accessed and downloaded on the Company's website through: <https://tinyurl.com/PiagamKomiteRemunerasiBNI>;
8. The Integrated Governance Guidelines, approved by the Board of Commissioners through the Board of Directors' Decision Letter No. KEP/049/DK/2020 dated October 22, 2020. The charter can be accessed and downloaded on the company's website through: <https://tinyurl.com/PiagamKomiteTKTBNI>;
9. Corporate Governance Handbook (Implementation of the Principles of Good Corporate Governance). The principles can be accessed and downloaded on the Company's website through: <https://tinyurl.com/CorporateGovernanceHandbookBNI>;
10. Updating the Integrated Governance Guidelines for the BNI Financial Conglomerate approval through Board of Commissioners No. DK/22 dated December 8, 2021 and approved by the Board of Directors No. DIR/947 dated December 1, 2021. The guidelines can be accessed and downloaded on the Company's website through: <https://tinyurl.com/TKTKonglomerasiKeuanganBNI>;
11. Integrated Risk Management General Policy as approved by the Board of Commissioners through the Board of Commissioners Letter No. DK/120 dated December 30, 2020 and stated in e-PP No. IN/592/ERM/004 dated 09 August 2021;
12. The updated Internal Audit Charter, through the BNI Board of Directors Decree No. KP/139/DIR/R dated April 14, 2021. The charter can be accessed and downloaded on the company's website through: <https://tinyurl.com/PiagamAuditInternBNI>;
13. Conflict of Interest Guidelines as outlined in the Online Company Guidelines (e-PP) No. IN/695/KMP/001 dated October 29, 2014;
14. Corporate Secretary Guidelines, approved by the Board of Directors Decree No. KP/356/DIR/R dated September 2, 2016;
15. Company Guidelines for Prohibited and Not Prohibited Securities Transactions for Insiders, as outlined in the Online Company Guidelines (e-PP) No. IN/707/KMP/001 dated December 27, 2018;
16. Anti-Money Laundering and Terrorism Funding Prevention (APU-PPT) Company Guidelines, as outlined in the Online Company Guidelines (e-PP) No. IN/10/KPN/002 dated January 5, 2021;
17. Procurement Company Guidelines, as outlined in the Online Company Guidelines (e-PP) No. IN/948/PGV/011 dated December 8, 2021;
18. Corporate Compliance Guidelines, as outlined in the Online Company Guidelines (e-PP) No. IN/963/KPN/002 dated December 14, 2021;
19. Compliance Implementation Guidelines: Whistleblowing System, as outlined in the Online Company Guidelines (e-PP) No. IN/604/KPN/003 dated October 16, 2020;
20. Compliance Implementation Guidelines: Anti-Fraud Strategy, as outlined in the Online Company Guidelines (e-PP) No. IN/283/KPN/003 dated May 18, 2020;
21. Compliance Implementation Guidelines: Anti-Bribery Management System, as outlined in the Online Company Guidelines (e-PP) No. IN/725/KPN/003 dated September 24, 2021;
22. 18. Compliance Implementation Guidelines: Gratuity Control, as outlined in the Online Company Guidelines (e-PP) No. IN/709/KPN/002 dated December 2, 2020;
23. Company Guidelines for Investor Relations Activities, as outlined in the Online Company Guidelines (e-PP) No. IN/41/KMP/001 dated January 26, 2015;
24. Strategic Planning Company Guidelines: Bank Business Plans, as outlined in Online Company Guidelines (e-PP) No. IN/401/REN/002 dated August 30, 2017;
25. Company Guidelines for Quality Management of Published Financial Reports, as outlined in the Online Company Guidelines (e-PP) No. IN/401/REN/002 dated September 28, 2021;
26. GCG Monitoring Activities and Self- Assessment Reports Guidelines contained in e-PP No. IN/462/KMP/001 dated October 22, 2015;
27. The Asset & Liability Committee (ALCO) Work Guidelines, approved by the Board of Directors through the Board of Directors Decree No. KP/437/DIR/DIR/R dated September 22, 2021 concerning Structuring the Asset & Liability Committee (ALCO);

28. Work Guidelines for the Risk Management & Anti-Fraud Capital Committee as approved by the Board of Directors through the Board of Directors' Decree No. KP/484/DIR/DIR/R dated October 26, 2021 concerning the Risk Management and Anti-Fraud Committee Structure ;
29. Working Guidelines for the Credit and Business Policy Committee, including the Credit Policy Sub-Committee (KKP), the Credit Procedures Committee (KPP), and the Business Sub-Committee (KBI). The Credit and Business Policy Committee (KRB) was formed based on the Board of Directors' Decree No. KP/333/DIR/R dated August 21, 2019 with renewed membership via memo REN/2/828 dated July 13, 2020;
30. Performance Management Committee Charter, approved by the Board of Directors through the Board of Directors Decree No. KP/353/DIR/R dated June 21, 2017 concerning the BNI Performance Management Committee (PMC);
31. Product Committee Guidelines, approved by the Board of Directors through the Board of Directors Decree No. KP/448/DIR/R dated September 20, 2012 concerning the BNI Product Committee (PRC);
32. Technology Management Committee Guidelines as approved through the Board of Directors Decree No. KP/364/DIR/R dated August 13, 2021 concerning the Arrangement of the Technology Management Committee.

GOOD CORPORATE GOVERNANCE MECHANISM

The Good Corporate Governance mechanism includes the Governance principles implementation process, supported by the Bank's governance structure and infrastructure adequacy, to produce outcomes in line with stakeholder expectations. For Governance implementation, it is not enough just to rely on the governance structure pillars, it also requires a clear soft structure in the mechanism process. The process of implementing corporate governance is inherent in the corporate governance structure as seen in the Bank's Governance Organizational Structure.

General Meeting of Shareholders

The General Meeting of Shareholders (GMS) is the Company organ with the authorities not given to the Board of Directors or the Board of Commissioners within the limits specified in the Limited Liability Company Law and/or the Company's Articles of Association. The GMS is a forum for Shareholders to exercise their rights by expressing opinions and obtaining Company information so long as it is related to the meeting agenda, and does not conflict with the Company interests, and pays attention to the provisions of the Company's Articles of Association and laws and regulations.

BNI GMS are held with reference to the following provisions:

1. Law No. 40 of 2007 concerning Limited Liability Companies, as amended in part by Law No. 11 of 2020 concerning Job Creation;
2. OJK Regulation No. 15/POJK.04/2020 concerning Planning and Implementing General Meeting of Shareholders in Public Companies;
3. OJK Regulation No. 16/POJK.04/2020 concerning Electronic Implementation of the General Meeting of Shareholders in Public Companies;
4. PT Kustodian Sentral Efek Indonesia Board of Directors Decree No. KEP-0016/DIR/ KSEI/0420/2020 concerning the 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;
5. Company's Articles of Association.

DATE AND VENUE OF THE GMS

The GMS consists of an Annual GMS and Other GMS. The Annual GMS must be held no later than 6 months after the year end, or under certain conditions OJK may set another time limit, while Other GMS may be held at any time as needed. In accordance with the provisions, the GMS must be held in the territory of the Republic of Indonesia. The locations where the GMS is held must be:

1. At the domicile of the Public Company;
2. Where the Public Company conducts its main business activities;
3. In the Provincial Capital where the Public Company is located or where it conducts its main business activities; or
4. The Province where the stock exchange is located and where the shares of the Public Company are listed.

During 2021, BNI has held 1 (one) GMS, namely the Fiscal Year 2020 Annual GMS with details as follows.

NO.	GMS	DATE & VENUE	AGENDA
1	Annual GMS	March 29, 2021, at the BNI Menara Ballroom, 6th Floor, Jl. Pejompongan Raya No. 7, Bendungan Hilir, Jakarta	<ol style="list-style-type: none"> 1. Approval of the Annual Report and Ratification of the Company's Consolidated Financial Statements, Approval of the Board of Commissioners Supervisory Duties Report, and Ratification of the Annual Report on the Implementation of the Partnership & Community Development Program for Fiscal Year 2020, as well as granting full release and discharge of responsibility (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 Fiscal Year 2020. 2. Approval of the use of the Company's Net Profit for the Fiscal Year 2020. 3. Determination of remuneration (salary/honorarium, facilities and allowances) for the Fiscal Year 2021 and the Fiscal Year 2020 Bonus for the Company's Board of Directors and Board of Commissioners. 4. Appointment of a Public Accounting Firm to audit the Company's Consolidated Financial Statements and the Annual Report on the Implementation of the Partnership & Community Development Program for the Fiscal Year 2021. 5. Approval of the Amendment to the Company's Articles of Association. 6. Approval of the Transfer of Shares from the Buyback of Shares held as Treasury Stock. 7. Approval of the Company's Recovery Plan Update. 8. Enforcement Confirmation of the Republic of Indonesia Minister of SOEs Regulation No. PER-11/MBU/11/2020 dated November 12, 2020 concerning Management Contracts and Annual Management Contracts for Directors of State-Owned Enterprises. 9. Changes in the Company's Management composition.

PROCEDURES FOR HOLDING GMS

In accordance with OJK Regulations, when holding a GMS, a Public Company must comply with the following provisions:

1. Notifying the meeting agenda to OJK, no later than 5 (five) working days before the announcement of the GMS, excluding the date of the announcement of the GMS.
2. Announce the GMS to shareholders, no later than 14 (fourteen) days prior to the summons for the GMS, excluding the announcement date and the invitation date; and
3. Deliver the GMS summons to shareholders, no later than 21 (twenty one) days before the date of the GMS, excluding the date of the invitation and the date of the GMS.

With reference to:

1. OJK No. 15/POJK.04/2020 regulation concerning Planning and Implementation of General Meeting of Shareholders in Public Companies;
2. Article 23 paragraph (5) letter d and Article 23 paragraph (7) letter c of the Company's Articles of Association.

Announcements and summons to shareholders shall be made at least through:

1. (one) Indonesian language daily newspaper with national circulation;
2. The Stock Exchange website; and
3. The Public Company website, in Indonesian and foreign languages, provided that the foreign language used is at least English.

At the Company's GMS held in 2021, the Company has complied with the procedures for Notification, Announcement and Summons for GMS, as follows:

GMS	NOTIFICATION TO OJK	ANNOUNCEMENT		SUMMONS	
		DATE	THROUGH	DATE	THROUGH
Annual GMS March 29, 2021	February 1, 2021	February 9, 2021	1. Indonesian Language Daily Newspaper; 2. Stock Exchange website; 3. KSEI website; 4. Company website.	Summons: February 24, 2021; Resummons: March 5, 2021	1. Indonesian Language Daily Newspaper; 2. Stock Exchange website; 3. KSEI website; 4. Company website.

GMS AGENDA MATERIAL

1. GMS Agenda Material documents contain the Meeting Agenda accompanied by the legal basis and explanations related to the GMS Agenda;
2. The Bank shall provide GMS agenda material that can be accessed by Shareholders from the date of the GMS Notification to the GMS implementation. The meeting agenda material for the must be available from the date of the invitation to the GMS until the holding of the GMS;
3. In the event of Changes to the Bank's Management, curriculum vitae for candidates as members of the Board of Commissioners and the Board of Directors of a Public SOE as proposed to be appointed at the GMS, is available and announced at the time of the GMS, before making decisions regarding the appointment of the candidates as members of Board of Commissioners and the Board of Directors. This is stipulated in the Minister of State-Owned Enterprises Regulation No. PER-02/ MBU/02/2015 concerning the Requirements and Procedures for Appointment and Dismissal of Members of Board of Commissioners and Board of Supervisors in SOEs, and Minister of SOEs Regulation No. PER-11/MBU/07/2021 concerning the Requirements, Procedures for Appointment and Dismissal of Members of the Board of Directors of SOEs;
4. At the time of the GMS, shareholders are entitled to receive information on the meeting agenda and material related to the agenda as long as it does not conflict with the interests of the Company.

GMS CONDUCT

1. The GMS Rules are carried out by referring to OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Implementation of General Meeting of Shareholders of Public Companies;
2. GMS Conduct is distributed to shareholders/their proxies at the time of registration;
3. The GMS Conduct regulates meeting participants who have the right to attend the GMS, Meeting Chairperson, Language used in the GMS, meeting quorum and decision making, mechanism for questioning and responding, mechanism for decision making, and voting procedures;
4. The GMS conduct principles are read out prior to the GMS starting;
5. In accordance with the GMS Conduct provisions as stipulated in the Bank's Articles of Association, at the opening of the GMS, the Chairperson of the GMS provides an explanation to the shareholders on:
 - a. The Bank's general conditions in brief;
 - b. GMS agenda;
 - c. Mechanism for decision-making related to GMS agenda; and
 - d. Procedures for using shareholders rights to raise questions and/or share opinions.

SHAREHOLDERS RIGHTS AND ATTENDANCE OF OTHER PARTIES IN THE GMS

Shareholders Rights

Shareholders, either in person or represented based on a power of attorney, are entitled to attend the GMS. Shareholders who are entitled to attend the GMS are shareholders whose names are registered in the list of shareholders of the Public Company 1 (one) working day prior to the invitation to the GMS.

In the Company's GMS in 2021, the Shareholders entitled to attend or be represented in the GMS were shareholders whose names were registered in the Company's Shareholders Register on that date:

GMS

LIST OF SHAREHOLDERS ELIGIBLE TO ATTEND

Annual GMS March 29, 2021

Shareholders entitled to attend the Meeting were Company shareholders whose names were recorded in the Register of Company Shareholders on Thursday, March 4, 2021 at 16.15 WIB.

Power of Authority and Electronic Power of Authority

Based on OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Implementation of the General Meeting of Shareholders of Public Companies, Shareholders either alone or represented based on a power of attorney are entitled to attend the GMS. In voting, the votes cast by shareholders apply to all shares they own and shareholders are not entitled to give power of attorney to more than one proxy for a portion of the total shares they own with different votes.

At the Annual GMS on March 29, 2021, Shareholders unable to attend were given the right to be represented by their proxies by submitting a valid Power of Attorney. In addition, in an effort to prevent and control COVID-19, Shareholders could give their power of attorney to the Proxy through the Electronic General Meeting System (eASY.KSEI) Facility provided by PT Kustodian Sentral Efek Indonesia.

Based on OJK Regulation No. 15/POJK.04/2020 concerning the Planning and Organizing of the General Meeting of Shareholders in Public Companies, it regulates the obligation for a Public Company to provide an alternative electronic power of attorney for shareholders to attend and vote at the GMS.

Shareholders' Rights to Raise Questions and/or Provide Responses:

1. The only shareholders or their proxies who have the right to raise questions and/or provide responses at the GMS are shareholders or their proxies who have been registered at the GMS;
2. Using a questions and/or responses form submitted to shareholders or their proxies during the registration at the GMS;
3. After the GMS Chairperson, or party appointed by the GMS Chairperson, submits a proposal regarding the matters to be decided in the GMS, the GMS Chairperson will provide an opportunity for the Company's shareholders or their proxies to ask questions and/or provide responses before a vote is held on the matter;
4. For Shareholders or their proxies who wish to raise questions and/or responses, the GMS Chairperson will invite the shareholders/their proxies to ask questions and/or responses to the GMS Chairperson in writing by writing their names and the number of shares owned or represented. Questions and/or responses submitted must be directly related to the GMS Agenda being discussed.

In the Annual Fiscal 2020 GMS held on March 29, 2021, eligible Shareholders were granted the opportunity to ask questions and/or responses.

Company's Efforts to Increase Shareholders' Attendance at the GMS

In an effort by the Company to facilitate Shareholders in exercising their rights and authority at the GMS, the Company carried out the following:

1. The Company announced and delivered the summons to the GMS in a timely manner, in Indonesian and English, and published both in 2 (two) national circulation newspapers, the Company website, and the Indonesia Stock Exchange website;
2. For the GMS Announcement and Summons, the Company clearly explained the authorized shareholders who could attend/be represented and vote in the GMS, were the Company's Shareholders whose names were registered in the Bank's Shareholders Register or Shareholders in securities accounts at the Indonesian Central Securities Depository on the date of the Summons;
3. On the website, the Company provided contacts for shareholders to communicate in connection with the holding of the GMS;
4. The Company provided services to shareholders requiring information and/or who would ask questions related to the GMS plan and/or GMS agenda through either direct meetings or correspondence via email.

GMS ATTENDANCE QUORUM AND RESOLUTIONS

Attendance Quorum

In accordance with OJK Regulations, a GMS can be held if at the GMS more than 1/2 (one half) of the total shares with voting rights are present or represented, unless the Articles of Association of the Public Company specify a larger quorum. Based on the Company's Articles of Association, the GMS can make changes to the Board of Directors and the Board of Commissioners, where it is regulated that the GMS must be attended by Series A Dwiwarna shareholders and other shareholders and/or their legal representatives who together represent at least (one half) part of the total number of shares with valid voting rights. This applies also to GMS for amending the Articles of Association, where it is regulated that the GMS must be attended by the Series A Dwiwarna shareholders and other shareholders and/or their legal representatives who together represent at least 2/3 (two thirds) of the total shares with valid voting rights.

GMS Resolutions

GMS resolutions are made based on deliberation to reach consensus. In the event that a resolution based on deliberation to reach a consensus is not reached, the resolution is decided by voting. Resolution by voting must be made with due observance of the GMS attendance quorum and resolution quorum.

The quorum for GMS decisions is regulated so that decisions must be approved by more than (one half) of the total number of shares present. The GMS to approve amendments to the articles of association must be approved by the Series A Dwiwarna shareholders and other shareholders and/or their legal representatives who together represent more than 2/3 (two thirds) of the total shares with valid voting rights present at the GMS, as well as GMS to approve changes to the Board of Directors and the Board of Commissioners composition must be approved by the Series A Dwiwarna shareholders and other shareholders and/or their legal representatives who together represent more than (one half)) part of the total shares with voting rights present at the GMS.

At the Annual GMS for Fiscal Year 2020 held on March 29, 2021, all resolutions on the agenda discussed in the GMS were taken based on voting with due regard to the provisions of the GMS attendance quorum and resolution quorum.

Application of the One Share One Vote Principle

At the Fiscal Year 2020 Annual GMS held on March 29, 2021, the One Share One Vote principle was applied for decision-making and voting procedures. These provisions were contained in the Rules for the Fiscal Year 2020 Annual GMS and among other matters stipulated that each share gave the owner the right to cast 1 (one) vote.

In accordance with OJK Regulation No. 15/POJK.04/2020 concerning the Planning and Organizing of the GMS in a Public Company, in the Fiscal Year 2020 Annual GMS, the GMS Rules were given to shareholders present, and the Principal Rules of the GMS were read out before the GMS started.

Parties Validating Voting Results

During the GMS, the Company engages Independent and professional parties to support the reasonableness and validity of the GMS's conduct and decisions. The Independent Parties are:

1. Notary

A Notary is a public official authorized to prepare an authentic deed with other authorities as referred to in Notarial Law, 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 formalities requirements for the GMS, to ensure they do not conflict with the laws and regulations and articles of association.

2. Share Registrar Bureau

Share Registrar Bureau is a Party contracted with the Bank/Issuer to record the securities ownership and distribution of rights related to securities. The Share Registrar Bureau assists the Bank/Issuer when convening the GMS, by:

- Preparing proxies for minority shareholders;
- Publishing Written Confirmation for Meetings (KTUR);
- Validating shareholders who are entitled to attend the GMS and registering them;
- Calculating shareholders presence in connection with the GMS quorum;
- Providing voting card for shareholders;
- Helping the Notary in calculating votes using a barcode scanner.

Resolutions Report

The resolutions made at the Company's GMS held in 2021 were as follows:

Resolutions of Annual GMS for Fiscal Year 2020 held on March 29, 2021

Agenda I	Approval of the Annual Report and Ratification of the Company's Consolidated Financial Statements, Approval of the Board of Commissioners Supervisory Duties Report and Ratification of the Annual Report on the Implementation of the Partnership & Community Development Program for Fiscal Year 2020, 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 supervision actions carried out during the Fiscal Year 2020		
Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,857,107,687 votes or 99.8776481% of all shares with voting rights present at the Meeting	0 votes or 0% share of all shares with voting rights present at the Meeting	18,200,218 votes or 0.1223519% of all shares with voting rights present at the Meeting
Meeting Resolution	<ol style="list-style-type: none"> 1. Approved the Company's Annual Report including the Board of Commissioners Supervisory Duties Report for the Fiscal Year 2020, and ratified the Company's Consolidated Financial Statements for Fiscal Year 2020, as audited by the Public Accounting Firm of Purwantono, Sungkoro & Surja - member firm of the global network Ernst & Young based on Report No. 00022/2.1032/AU.1/07/0240-1/1/I/2021 dated January 22, 2021 with a fair in all material respects opinion. 2. Approved the Annual Report on the Implementation of the Partnership & Community Development Program for Fiscal Year 2020, as audited by the Public Accounting Firm of Purwantono, Sungkoro & Surja - a member firm of the global network of Ernst & Young based on Report No. 00100/2.1032/AU.2/10/0240-1/1/II/2021 dated February 9, 2021 with a fair in all material respects opinion. 3. Granted 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 carried out during the Fiscal Year 2020, so long as their actions were not a criminal act and their actions are reflected in the Annual Report, the Company's Consolidated Financial Statements, and Annual Report on the Implementation of the Partnership and Community Development Program for Fiscal Year 2020. 		

Agenda II		Approval of the use of the Company's Net Profit for Fiscal Year 2020		
Resolution	VOTING RESULTS			
	AGREE	DISAGREE	ABSTAIN	
	14,855,929,205 votes or 99.8697257% shares of all shares with voting rights present at the Meeting	19,341,400 votes or 0.1300235% of all shares with voting rights present at the Meeting	37,300 votes or 0.0002508% of all shares with voting rights present at the Meeting	
Meeting Resolution	<p>Approved the use of Net Profit for Fiscal Year 2020 as follows:</p> <ol style="list-style-type: none"> Dividends in the amount of 25% or Rp820,100,820,494.00 (eight hundred twenty billion one hundred million eight hundred twenty thousand four hundred ninety four Rupiah) shall be determined as cash dividends to be distributed to shareholders to be paid with the following conditions: <ol style="list-style-type: none"> The Government's share of dividends on ownership of 60% shares in the amount of Rp492,577,663,633.03 (four hundred ninety-two billion five hundred seventy-seven million six hundred sixty-three thousand six hundred thirty-three Rupiahs point zero three cents) will be paid to the State General Treasury account. While the ownership of 40% public shares in the amount of Rp327,523,159,322.46 (three hundred twenty seven billion five hundred twenty three million one hundred fifty nine thousand three hundred twenty two point four six cents Rupiah) will be paid to the shareholders in accordance with their respective ownership. Granting power and authority to the Company's Board of Directors with right of substitution to determine the schedule and procedures for distribution of dividends for the Fiscal Year 2020 in accordance with applicable regulations. 75% or Rp2,460,302,461,482.00 (two trillion four hundred sixty billion three hundred two million four hundred sixty-one thousand four hundred and eighty-two Rupiah) to be used as Retained Earnings 			
Agenda III		Determination of Remuneration (salaries/honorarium, facilities and allowances) for Fiscal Year 2021 and Tantiem for Fiscal Year 2020 for the Company's Board of Directors and Board of Commissioners		
Resolution	VOTING RESULTS			
	AGREE	DISAGREE	ABSTAIN	
	14,373,904,904 votes or 96.6292933% shares of all shares with voting rights present at the Meeting	466,194,901 votes or 3.1340185% of all shares with voting rights present at the Meeting	35,208,100 votes or 0.2366882% of all shares with voting rights present at the Meeting	
Meeting Resolution	<p>Approved:</p> <ol style="list-style-type: none"> Granting power and authority to the Series A Dwiwarna Shareholder to determine the amount of Tantiem for Fiscal Year 2020, as well as to determine the salaries/honorarium, allowances, facilities and other incentives for Fiscal Year 2021, for members of the Board of Commissioners. Granting power and authority to the Board of Commissioners after first obtaining written approval from the Series A Dwiwarna Shareholder to determine the amount of Tantiem for the Fiscal Year 2020, as well as to determine the salaries/honorarium, allowances, facilities and other incentives for the Fiscal Year 2021, for members of the Board of Directors. 			

Agenda IV

Appointment of a Public Accounting Firm to audit the Company's Consolidated Financial Statements and the Annual Report on the Implementation of the Partnership & Community Development Program for Fiscal Year 2021

Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,136,135,759 votes or 95.0308784% of all shares with voting rights present at the Meeting	633,823,146 votes or 4.2609077% of all shares with voting rights present at the Meeting	105,349,000 votes or 0.7082139% of all shares with voting rights present at the Meeting

Meeting Resolution

Approved:

1. Appointing the Public Accounting Firm of Tanudiredja, Wibisana, Rintis & Partners - (firma anggota jaringan global PwC), as the Public Accounting Firm to audit the Company's Consolidated Financial Statements, BNI's Annual Report on the Implementation of the Partnership and Community Development Program, as well as Other Reports for Fiscal Year 2021.
2. Approved the granting of power and authority to the Company's Board of Commissioners to appoint a Public Accountant and/or Public Accounting Firm to audit the Company's Consolidated Financial Statements for other periods in Fiscal Year 2021 for the purposes and interests of the Company.
3. Granted power of attorney to the Company's Board of Commissioners to determine the honorarium and other requirements for the Public Accounting Firm of Tanudiredja, Wibisana, Rintis & Partners (firma anggota jaringan global PwC), and to dismiss and appoint a Substitute Public Accounting Firm in the case the Public Accounting Firm of Tanudiredja, Wibisana, Rintis & Partners (firma anggota jaringan global PwC) for whatever reason is unable to complete the audit of the Company's Consolidated Financial Statements, the Annual Report on the Implementation of the Partnership and Community Development Program and other reports for the Fiscal Year 2021, and to determine the honorarium and other requirements for the Substitute Public Accounting Firm.

Agenda V

Approval of Amendments to the Company's Articles of Association

Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,136,135,759 votes or 95.0308784% of all shares with voting rights present at the Meeting	633,823,146 votes or 4.2609077% of all shares with voting rights present at the Meeting	105,349,000 votes or 0.7082139% of all shares with voting rights present at the Meeting

Meeting Resolution

1. Approved the amendment of the Company's Articles of Association, in the context of adjustment to POJK No. 32/POJK.04/2015 concerning Increase of Public Company Capital by Granting Pre-emptive Rights, as amended by POJK No. 14/POJK.04/2019; POJK No. 15/POJK.04/2020 concerning the Plan and Implementation of the GMS in a Public Company; and POJK No.16/POJK.04/2020 concerning the Electronic Implementation of Public Company GMS.
2. Approved the rearrangement all Company Articles of Association provisions in relation to the changes as referred to in point 1 (one) above.
3. Granting power and authority to the Board of Directors with right of substitution to take all necessary actions related to this Meeting Agenda resolution. The power and authority includes compiling and restating all of the Company's Articles of Association in a Notary Deed and submitting it to the competent authority to obtain a receipt of notification of changes to the Company's Articles of Association, and doing everything deemed necessary and useful for these purposes with nothing being excluded, as well as making additions and/or changes to the amendments in the Company 's Articles of Association if required by the competent authority.

Agenda VI	Approval of the Transfer of Shares from the Buyback of Shares held as Treasury Shares (Treasury Stock)		
Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	12,605,996,460 votes or 84.7444405% of all shares with voting rights present at the Meeting	2,263,697,745 votes or 15.2178211% of all shares with voting rights present at the Meeting	5,613,700 votes or 0.0377384% of all shares with voting rights present at the Meeting
Meeting Resolution	<ol style="list-style-type: none"> 1. Approved the buyback of shares in 2020 currently held as 19,579,700 treasury shares as part of the employee share ownership program and/or the share ownership program by the Board of Directors and the Board of Commissioners. 2. Granted power of attorney to the Company's Board of Directors to determine the share ownership program for employees and/or share ownership program for Board of Directors and Board of Commissioners is in accordance with applicable regulations. 		
Agenda VII	Approval of the Company's Recovery Plan		
Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,875,270,605 votes or 99.9997492% of all shares with voting rights present at the Meeting	0 votes or 0% share of all shares with voting rights present at the Meeting	37,300 votes or 0.0002508% share of all shares with voting rights present at the Meeting
Meeting Resolution	Approved the Company's Recovery Plan Update for 2020 to comply with POJK regulation No. 14/POJK.03/2017 concerning Recovery Plan for Systemic Banks.		
Agenda VIII	Enforcement Confirmation of the Republic of Indonesia Minister of SOEs Regulation No. PER-11/MBU/11/2020 dated November 12, 2020 concerning Management Contracts and Annual Management Contracts for Directors of SOEs		
Resolution	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,875,270,505 votes or 99.9997485% of all shares with voting rights present at the Meeting	100 votes or 0.0000007% share of all shares with voting rights present at the Meeting	37,300 votes or 0.0002508% share of all shares with voting rights present at the Meeting
Meeting Resolution	Approved the implementation of the Minister of SOE Regulation No. PER-11/MBU/11/2020 dated November 12, 2020 concerning Management Contracts and Annual Management Contracts for Directors of SOEs and their amendments for the Company.		

Agenda IX

Changes in the Company's Management Composition

Resolution**VOTING RESULT****AGREE****DISAGREE****ABSTAIN**12,116,088,144 votes or
81.4510074% of all shares with
voting rights present at the
Meeting2,529,940,745 votes or
17.0076530% of all shares with
voting rights present at the
Meeting229,279,016 votes or 1.5413396% of all
shares with voting rights present at the
Meeting**Meeting Resolution**

Approved:

1. To honorably dismiss Joni Swastanto as Commissioner of the Company who was appointed based on the 2015 Annual GMS Decision, effective as of the closing of this GMS, with gratitude for the contribution of energy and thoughts given during his tenure as a Member of the Company's Board of Commissioners.
2. Appointed Erwin Rijanto Slamet as the Company's Independent Commissioner.
3. The Independent Commissioner appointed term of office referred to in number 2, is in accordance with the provisions of the Company's Articles of Association, taking into account the Capital Market sector laws and regulations and without prejudicing the right of the GMS to dismiss at any time.
4. Following the dismissal and appointment of the Board of Commissioners members in number 1 and number 2, the Company's Board of Commissioners membership composition is as follows:
 - a. President Commissioner/Independent Commissioner : Bapak Agus Dermawan Wintarto Martowardojo
 - b. Wakil Vice President Commissioner/Independent Commissioner : Bapak Pradjoto
 - c. Commissioner : Ibu Ratih Nurdianti
 - d. Commissioner : Bapak Askolani
 - e. Commissioner : Bapak Susyanto
 - f. Independent Commissioner : Bapak Erwin Rijanto Slamet
 - g. Independent Commissioner : Bapak Sigit Widyawan
 - h. Independent Commissioner : Bapak Asmawi Syam
 - i. Independent Commissioner : Bapak Septian Hario Seto
 - j. Independent Commissioner : Bapak Iman Sugema
5. Members of the Board of Commissioners appointed as referred to in number 2 can only carry out their duties after obtaining approval from OJK for their the Fit and Proper Test and comply with the applicable laws and regulations. In the event that a member of the Company's Board of Commissioners is later disapproved in the OJK Fit and Proper Test, they shall be honorably dismissed from the date of the OJK Fit and Proper Test results.
6. Members of the Board of Commissioners appointed as referred to in number 2 who are still serving in other positions, and prohibited by laws and regulations from concurrently serving as a member of a State-Owned Enterprise Board of Commissioners, then the person concerned must resign or be dismissed from their other position.
7. Requesting the Board of Directors submit a written application to OJK for the implementation of the Fit and Proper Test of the appointed members of the Board of Commissioners as referred to in number 2.
8. Granting power of attorney with right of substitution to the Company's Board of Directors to declare this GMS resolution in a Notary Deed and to appear before a Notary or authorized official and make necessary adjustments or improvements if required by them for the purpose of implementing the Meeting's resolutions.

MANAGEMENT ATTENDANCE AT THE GMS

Members of the Company's Board of Directors and Board of Commissioners who attended the GMS

Annual GMS for Fiscal Year 2020 (March 29, 2021)

BOARD OF COMMISSIONERS		BOARD OF DIRECTORS	
Vice President Commissioner	Pradjoto	President Director	Royke Tumilaar
Independent Commissioner	Asmawi Syam	Vice President Director	Adi Sulistyowati
Independent Commissioner	Sigit Widyawan	Managing Director - Human Capital and Compliance	Bob Tyasika Ananta
Independent Commissioner	Septian Hario Seto	Managing Director - Risk Management	David Pirzada
Independent Commissioner	Iman Sugema	Managing Director - Finance	Novita Widya Anggraini
Commissioner	Joni Swastanto	Managing Director - Institutional Relations	Sis Apik Wijayanto
Commissioner	Susyanto	Managing Director - Consumer Business	Corina Leyla Karnalies
		Managing Director - IT and Operations	Y.B. Hariantono
		Managing Director - Service and Network	Ronny Venir
		Managing Director - Treasury and International	Henry Panjaitan
		Managing Director	Muhammad Iqbal
		Managing Director - Corporate Banking	Silvano Winston Rumantir

RESOLUTIONS AND FOLLOW-UP FOR THE 2020 GMS

In 2020, BNI held 2 (two) GMS, the Annual GMS on February 20, 2020 and an Extraordinary GMS on September 2, 2020 with the following results and follow-ups:

Resolutions of Annual GMS for Fiscal Year 2019 (held on February 20, 2020)

Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
Agenda I	Approval of the Annual Report and Ratification of the Company's Consolidated Financial Statements, Approval of the Supervisory Report of the Board of Commissioners and Ratification of the Annual Report on the Implementation of the Partnership & Community Development Program for the 2019 Financial Year, as well as granting full payment and release of responsibility (volledig acquit et de charge) to the Board of Directors and the Board of Commissioners of the Company for management and supervision actions that have been carried out during the 2019 Financial Year.		
	15,498,040,727 shares or 99.637% shares of all shares with voting rights present at the Meeting	3,587,070 shares or 0.023% shares of all shares with voting rights present at the Meeting	52,795,139 shares or 0.339% shares of all shares with voting rights present at the Meeting

Meeting Resolutions

1. Approve the Company's Annual Report for the 2019 financial year, Comprise of the Board of Commissioners Supervisory Action Report for the 2019 financial year, and ratify the Financial Statements of the Company for the 2019 financial year which had been audited by the Office of the Registered Public Accountants Purwantono, Sungkoro & Surja - global network of Ernst & Young member firms according to the Office of the Registered Public Accountants Report Number 00014/2.1032/AU.1/07/1008-2/1/2020 dated January 20, 2020, with opinion: The Consolidated Financial Statements have been presented fairly, in all material respects.
2. Approve and ratify the Annual Report of Partnership and Community Development Program including Financial Statements of Partnership and Community Development Program for the 2019 financial year, which has been audited by the Office of the Registered Public Accountants Purwantono, Sungkoro & Surja - global network of Ernst & Young member firms according to the Office of the Registered Public Accountants Report Number 00071/2.1032/AU.2/10/1008-2/1/II/2020 dated February 3, 2020, with opinion: The Financial Statements have been presented fairly, in all material respects.
3. Grant full release and discharge (volledig acquit et de charge) to all members of the Board of Directors and the Board of Commissioners from the management actions and from the supervisory actions they carried out in the 2019 financial year including the management and supervisory actions to the Partnership and Community Development Program, to the extent that such actions do not constitute criminal offenses; and such actions are reflected in the Company's Annual Report and Financial Statements as well as Annual Report of Partnership and Community Development Program for the 2019 financial year.

Follow up on Meeting Decisions

The Financial Statements and Annual Reports have been submitted to OJK and the Indonesia Stock Exchange with the following information:

1. Submission of Financial Reports
Submitted through the OJK Electronic Reporting System and the Indonesia Stock Exchange.
2. Annual Report Submission
Submitted to OJK with a copy to the Indonesia Stock Exchange through Letter No. KMP/7/0763 dated February 24, 2021. Submitted through the OJK Electronic Reporting System and the Indonesia Stock Exchange.

Status

Realized

Agenda II

Approval of the use of the Company's Net Profits for the 2019 Financial Year

Voting Result

	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	15,531,272,500 shares or 99.851% of all shares with voting rights present at the Meeting	23,150,436 shares or 0.148% of all shares with voting rights present at the Meeting	0 shares or 0.000% of all shares with voting rights present at the Meeting

Meeting Resolutions

1. A dividend of 25% or Rp3,846,119,011,149.58 (three trillion eight hundred forty six billion one hundred nineteen million eleven thousand one hundred forty nine Rupiah point fifty eight cents) designated as cash dividend distributed to the shareholders which will be paid with following provisions:
 - a. State dividend regarding 60% shares or amounted Rp2,307,671,406,731 (two trillion three hundred seven billion six hundred seventy-one million four hundred six thousand seven hundred thirty-one Rupiah) will be paid to State General Treasury account.
 - b. While for the ownership of 40% of public shares or a value of Rp1,538,447,604,418.58 (one trillion five hundred thirty eight billion four hundred forty seven million six hundred four thousand four hundred eighteen Rupiah point fifty eight cents) will be given to shareholders in accordance with their respective ownership.
 - c. To grant power and authority to the Company's Board of Directors with the substitution rights to set the schedule and the procedures for distribution for the 2019 Financial Year cash dividends in accordance with prevailing regulations.
2. A sum of 75% or Rp11,538,357,022,201.42 (eleven trillion five hundred thirty eight billion three hundred fifty seven million twenty two thousand two hundred one Rupiah point forty two cents) is determined as the Retained Earnings.

Follow up on Meeting Decisions

On March 24, 2020, the Company paid dividends to all shareholders entitled to dividends, namely shareholders whose names were recorded in the Company's Shareholders Register or recording date and/or owners of company shares in the securities sub-account at PT Kustodian Sentral Efek Indonesia at close of trading on March 3, 2020.

Status

Realized

Agenda III	Determination of remuneration (salary/honorarium, facilities and allowances) for the 2020 financial year and tantien for the 2019 financial year for the Company's Board of Directors and Board of Commissioners.		
Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,865,964,751 shares or 95.573% of all shares with voting rights present at the Meeting	621,638,847 shares or 3.996% of all shares with voting rights present at the Meeting	66,819,338 shares or 0.429% of all shares with voting rights present at the Meeting
Meeting Resolutions	<ol style="list-style-type: none"> To grant power and authority to the Seri A Dwiwarna Shareholders to determine tantien for the 2019 Financial Year, as well as to determine remuneration/honorarium, allowance, benefit, and other incentives for the Company's Board of Commissioners for the 2020. To grant power and authority to the Company's Board of Commissioners with the prior written approval of Seri A Dwiwarna Shareholders to determine tantien for the 2019 Financial Year, and to determine remuneration/honorarium, allowance, benefit, and other incentives for the Company's Board of Directors for the 2020. 		
Follow up on Meeting Decisions	Determination of salaries for members of the Board of Directors and honorarium for members of the Board of Commissioners, and the provision of allowances, facilities, and/or other benefits for Fiscal Year 2020, and the determination of tantien for the performance of members of the Board of Directors and the Board of Commissioners for the Fiscal Year ending December 31, 2019 was carried out by the Board Commissioners after prior approval from the Ministry of SOEs.		
Status	Realized		

Agenda IV	Determination of a Public Accountant Firm to audit the Company's Financial Statements and the Annual Report on the Implementation of the Partnership & Community Development Program for the 2020 Financial Year.		
Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,552,514,187 shares or 93.558% of all shares with voting rights present at the Meeting	942,455,411 shares or 6.059% of all shares with voting rights present at the Meeting	59,453,338 shares or 0.382% of all shares with voting rights present at the Meeting
Meeting Resolutions	<ol style="list-style-type: none"> Approve the appointment of Purwantono, Sungkoro & Surja Public Accountant Office - global network of Ernst & Young member firms, as the Public Accountant Office that will audit the Company's Consolidated Financial Statement and Financial Statement of Partnership and Community Development Program (PKBL) for the 2020 Financial Year. Giving authority and power to the Board of Commissioners of the Company to appoint a Public Accountant Office to conduct an audit of the Company's Consolidated Financial Statements in the other period for Financial Year 2020 for the purposes and interests of the Company. Delegate the authority to the Board of Commissioners of the Company to determine the honorarium and other requirements applied for such Public Accountant Office, and to appoint a substitute Public Accountant Office in the event the Purwantono, Sungkoro & Surja Public - global network of Ernst & Young member firms Accountant Office, due to any reasons whatsoever, is unable to finish the audit for the Consolidated Financial Statement of the Company and the Financial Statement of Partnership and Community Development Program for the 2020 Financial Year, including to determine the honorarium and other requirements applied for such substitute Public Accountant Office. 		
Follow up on Meeting Decisions	The Company appointed the Public Accounting Firm ("KAP") Purwantono, Sungkoro & Surja - a member firm of the global network Ernst & Young as the KAP to audit the Company's Consolidated Financial Statements, the Annual Report on the Implementation of the Partnership and Community Development Program, as well as Other Company Reports for Fiscal Year 2020.		
Status	Realized		

Agenda V	Approval of the Update of the Company's Recovery Plan.		
Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	15,552,285,936 shares or 99.986% of all shares with voting rights present at the Meeting	2,137,000 shares or 0.013% of all shares with voting rights present at the Meeting	0 shares or 0.00% of all shares with voting rights present at the Meeting

Meeting Resolutions	Approve the Updating Company's Recovery Action Plan in compliance with Regulation of Financial Services Authority Number 14/POJK.03/2017.
Follow up on Meeting Decisions	The Company adjusted the Level Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) triggers in the Company's 2019 Recovery Plan.
Status	Realized

Agenda VI Changes in the Composition of the Management of the Company

Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	14,865,874,197 shares or 95.573% of all shares with voting rights present at the Meeting	678,754,346 shares or 4.363% of all shares with voting rights present at the Meeting	9,794,393 shares or 0.062% of all shares with voting rights present at the Meeting

Meeting Resolutions

- Approve:
Confirming the dismissal with respect for the names mentioned below as the Company's Management:

NO.	NAME	POSITION
1	Ari Kuncoro	President Commissioner/Independent Commissioner
2	Hambra	Vice President Commissioner

respectively appointed based on the 2017 EGMS Decree dated November 2, 2017 and 2018 Annual GMS Decree dated May 13, 2019, starting from February 18, 2020 and November 18, 2019, with gratitude for the contribution of energy and thoughts given during his tenure as Management of the Company.

- Dismissal with respect to the names mentioned below as Management of the Company:

NO.	NAME	POSITION
1	Ahmad Fikri Assegaf	Independent Commissioner;
2	Pataniari Siahaan	Independent Commissioner;
3	Revrison Baswir	Independent Commissioner;
4	Achmad Baiquni	President Director;
5	Herry Sidharta	Vice President Director;
6	Adi Sulistyowati	Director of Institutional Relations;
7	Anggoro Eko Cahyo	Director of Consumer Business;
8	Bob Tyasika Ananta	Treasury and International Director;
9	Rico Rizal Budidarmo	Risk Management Director;
10	Ario Bimo	Director of Finance;
11	Dadang Setiabudi	Director of Information Technology and Operations;
12	Endang Hidayatullah	Director of Human Capital and Compliance

which are appointed based on the Annual GMS Decree for the 2016 Financial Year, the Annual GMS Decision for the 2014 Financial Year, the Annual GMS Decision for the 2014 Financial Year, the Annual GMS Decision for the 2014 Financial Year, the Annual GMS Decision for the 2014 Financial Year, the Annual Decision GMS for Fiscal Year 2014, Decision of Annual GMS for Fiscal Year 2014, Decision of Annual GMS for Fiscal Year 2014, Decree of EGMS for 2019, Decree of Annual GMS for Fiscal Year 2017, Decision of Annual GMS for Fiscal Year 2017, starting from the closing of GMS, with thanks for the contribution of labor and thoughts given during his/her tenure as the Company's Management.

- To change the nomenclature of the Company's Board of Directors as follows:

NO.	BEFORE	AFTER
1	Managing Director – Micro, Small, Medium Enterprises & Network	Managing Director – Micro, Small, Medium Enterprises
2	-	Managing Director - Network and Services

- To transfer the following Directors assignment:

NO.	NAME	BEFORE	AFTER
1	Putrama Wahyu Setyawan	Managing Director – Corporate Banking	Managing Director – Treasury & International Banking
2	Tambok P.S. Simanjuntak	Managing Director – Micro, Small, Medium Enterprises & Network	Managing Director – Micro, Small, Medium Enterprises

Which were appointed by AGMS FY 2015 Resolution and AGMS FY 2017 Resolution, with the tenure continuing his/her tenure as Directors based on each GMS resolutions.

5. To appoint the following names as the member of the Board of Commissioners and Directors:

NO.	NAME	POSITION
1	Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner;
2	Pradjoto	Vice President Commissioner/ Independent Commissioner;
3	Susyanto	Commissioner
4	Asmawi Syam	Independent Commissioner;
5	Septian Hario Seto	Independent Commissioner;
6	Iman Sugema	Independent Commissioner;
7	Herry Sidharta	President Director;
8	Anggoro Eko Cahyo	Vice President Director;
9	Benny Yoslim	Managing Director - Corporate Banking;
10	Corina Leyla Karnalies	Managing Director - Consumer Banking;
11	Sigit Prastowo	Managing Director - Finance (CFO);
12	Osbal Saragi Rumahorbo	Managing Director - Risk Management;
13	Y.B. Hariantono	Managing Director - Information Technology and Operation;
14	Bob Tyasika Ananta	Managing Director - Human Capital and Compliance;
15	Sis Apik Wijayanto	Managing Director - Institutional Relation;
16	Adi Sulistyowati	Managing Director - Services and Network.

6. The expiry term of service of appointed member of the Board of Commissioners and the Board of Directors as mentioned on the Point 5, according to the Company Articles of Association, with respect to the prevailing regulations in the field of capital market and without prejudice to the right of the GMS to dismiss at any time.
7. With the confirmation of dismissal, dismissal, change of the nomenclature, transfer of assignment, and the appointment of the member of the Board of Commissioners and the Board of Directors, as mentioned on the Point 1, 2, 3, 4, and 5, the composition of the Board of Commissioners and the Board of Directors of the Company as follows:

- a. The Board of Commissioners

NO.	NAME	POSITION
1	Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner
2	Pradjoto	Vice President Commissioner/ Independent Commissioner
3	Ratih Nurdianti	Commissioner
4	Askolani	Commissioner
5	Joni Swastanto	Commissioner
6	Susyanto	Commissioner
7	Sigit Widyawan	Independent Commissioner
8	Asmawi Syam	Independent Commissioner
9	Septian Hario Seto	Independent Commissioner
10	Iman Sugema	Independent Commissioner

b. The Board of Directors

NO.	NAME	POSITION
1	Herry Sidharta	President Director
2	Anggoro Eko Cahyo	Vice President Director
3	Benny Yoslim	Managing Director - Corporate Banking
4	Corina Leyla Karnalies	Managing Director - Consumer Banking
5	Tambok P.S. Simanjuntak	Managing Director - Micro, Small, Medium Enterprises
6	Putrama Wahyu Setyawan	Managing Director - Treasury and International Banking
7	Sigit Prastowo	Managing Director - Finance (CFO)
8	Osbal Saragi Rumahorbo	Managing Director - Risk Management
9	Y.B. Hariantono	Managing Director - Information Technology and Operation
10	Bob Tyasika Ananta	Managing Director - Human Capital and Compliance
11	Sis Apik Wijayanto	Managing Director - Institutional Relation
12	Adi Sulistyowati	Managing Director - Services and Network

- The members of the Board of Commissioners and the Board of Directors who were appointed as mentioned on the Point 5, can only carry out their duties after obtaining the approval from the OJK.
- The members of the Board of Commissioner and the Board of Directors who were appointed as mentioned on the Point 5 who still hold other position which prohibited by prevailing regulations to served concurrently with the position as the member of the Board of Commissioners and the Board of Directors of SOE, should propose for resignation or dismissed from previous position.
- To request to the Board of Directors to submit written requests to OJK for conducting the Fit and Proper Test on members of the Board of Commissioners and the Board of Directors appointed referred to Point 5.
- To grant power and authority with substitution rights to the Company's Board of Directors to state the Decisions of this Meeting in a deed before a Notary Public or authorized officer and adjusts and/or correct as required by the authorized officers for the purpose of the resolutions.

**Follow up
on Meeting
Decisions**

- Each of the appointed members of the Company's Board of Commissioners and Board of Directors have taken the OJK Fit and Proper Test.
- The appointment of the Company's Board of Commissioners and Board of Directors members together with the of the OJK Fit and Proper Test results has been stated in the Deed of Statement of Meeting Resolution No. 2 dated September 2, 2020, with changes to the Company's data received by the Ministry of Law and Human Rights of the Republic of Indonesia based on Letter No. AHU-AH.01.03-0389501 dated September 22, 2020.

Status Realized

Resolutions of Extraordinary GMS (September 2, 2020)

Agenda	Changes in the Composition of the Management of the Company		
Voting Result	VOTING RESULTS		
	AGREE	DISAGREE	ABSTAIN
	11,409,820,487 votes or 78.52% of the total shares with voting rights present at the Meeting	3,119,735,223 votes or 21.47% share of all shares with voting rights present at the Meeting	137,314,703 votes or 0.94% of the total shares with voting rights present at the Meeting

Meeting Resolutions

- Dismissed with respect Mr. Anggoro Eko Cahyo as Vice President Director of the Company who was appointed based on the Annual GMS Decree for the 2019 Fiscal Year dated February 20, 2020 and observes the Decree of the OJK Board of Commissioners number 30/KDK.03/2020 dated June 2, 2020 as of the closing of this Meeting.

- To honorably dismiss the names as follows:

NO.	NAME	POSITION
1	Herry Sidharta	President Director
2	Sigit Prastowo	Director of Finance
3	Benny Yoslim	Managing Director Corporate Banking
4	Osbal Saragi Rumahorbo	Managing Director Risk Management
5	Tambok P. Setyawati	Managing Director MSME
6	Putrama Wahyu Setyawan	Managing Director Treasury & International

- Change the nomenclature of the positions of the members of the Company's Board of Directors as follows

NO.	PREVIOUS	TO BECOME
1	Director of Corporate Business	Managing Director Corporate Banking

- Transfer the assignments of the names below as members of the Company's Board of Directors:

NO.	NAME	PREVIOUS	TO BECOME
1	Adi Sulistyowati	Managing Director Services & Network	Vice President Director

who are appointed based on the Annual GMS Decree for the 2019 Fiscal Year with the term of office continuing the remaining term of office in accordance with the GMS Decree of the appointment.

- To appoint the names as follows:

NO.	NAME	POSITION
1	Royke Tumilaar	President Director
2	Novita Widya Anggraini	Managing Director Finance
3	Silvano W. Rumantir	Managing Director Corporate Banking
4	David Pirzada	Managing Director Risk Management
5	Muhammad Iqbal	Managing Director MSME
6	Ronny Venir	Managing Director Services and Networks
7	Henry Panjaitan	Managing Director Treasury & International

- The term of office of the appointed members of the Board of Directors as referred to in number 5, is in accordance with the provisions of the Articles of Association of the Company, with due observance of the laws and regulations in the Capital Market sector and without prejudice to the right of the GMS to dismiss at any time.

7. With the dismissal, change in nomenclature of positions, transfer of duties and appointment of members of the Board of Directors as referred to in numbers 1, 2, 3, 4, and 5, the membership composition of the Board of Directors of the Company becomes as follows:

a. Board of Directors

NO.	NAME	POSITION
1	Royke Tumilaar	President Director
2	Adi Sulistyowati	Vice President Director
3	Corina Leyla Karnalies	Managing Director Consumer Banking
4	Novita Widya Anggraini	Managing Director Finance
5	Y.B. Hariantono	Managing Director IT & Operations
6	Bob Tyasika Ananta	Managing Director Human Capital & Compliance
7	Silvano W. Rumantir	Managing Director Corporate Banking
8	David Pirzada	Managing Director Risk Management
9	Sis Apik Wijayanto	Managing Director Institutional Relations
10	Ronny Venir	Managing Director Services & Networks
11	Muhammad Iqbal	Managing Director MSME
12	Henry Panjaitan	Managing Director Treasury & International

8. Members of the Board of Directors who are appointed as referred to in number 5 can only carry out their duties as Members of the Board of Directors after obtaining approval from the Financial Services Authority.
9. Members of the Board of Directors who are appointed as referred to in number 5 who are still holding other positions which are prohibited by statutory regulations from concurrently serving as Members of the Board of Directors of State-Owned Enterprises, must resign or be terminated from their positions.
10. Provide power of attorney with substitution rights to the Board of Directors of the Company to declare that the GMS has decided in the form of a Notary Deed and appear before the Notary or authorized official and make adjustments or corrections required if required by the competent party for the purposes of implementing the contents of the meeting Resolution.

**Follow up on Meeting
Decisions**

1. All appointed members of the Company's Board of Directors have taken the OJK Fit and Proper Test.
2. The appointment of the Company's Board of Directors members and OJK's decision results on the Fit and Proper Test were stated in the Deed of Meeting Resolution No. 7 dated January 11, 2021 and changes to the Company's data were received by the Republic of Indonesia Ministry of Law and Human Rights based on Letter No. AHU-AH.01.03-0024996 dated January 15, 2021.

Status

Realized

SHAREHOLDER RELATIONSHIP POLICY

To implement good governance principles, especially for the transparency aspect, the Company strives to ensure the company's transparency of financial and non-financial information in a fair and timely manner, to all shareholders, including minority shareholders and foreign shareholders.

To realize such information transparency, the Corporate Secretary plays an active role in the implementation of the bank's information disclosure to shareholders as stipulated in Article 5 of OJK Regulation No. 35/POJK.04/2014 concerning Corporate Secretary of Issuers or Public Companies; the Corporate Secretary serves as a liaison between the Bank and shareholders, including OJK and other stakeholders.

As well as complying with the OJK provisions, in order to foster intensive, systematic, and planned Shareholder relationships, the Bank has internal Company policies as stipulated in Company Regulation No. IN/794/KMP/001 dated December 23, 2014.

Board of Commissioners

The Board of Commissioners is a Corporate Governance organ collectively charged with conducting supervision and providing advice to the Board of Directors regarding supervision of management policies, the general course of Bank management and the Bank's business activities carried out by the Board of Directors and provide advice to the Board of Directors for the benefit of BNI and in accordance with the Bank's aims and objectives.

LEGAL BASIS

The legal basis for the establishment and appointment of the Bank's Board of Commissioners refers to several provisions, including the Republic of Indonesia Law No. 40 of 2007 concerning Limited Liability Companies, as amended in part by Law No. 11 of 2020 concerning Job Creation, and the Republic of Indonesia Law No. 19 of 2003 dated June 19, 2003 concerning State-Owned Enterprises and other statutory regulations, specifically OJK No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies and the OJK Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning Implementation of Governance for Commercial Banks.

BOARD OF COMMISSIONERS STRUCTURE AND COMPOSITION

1. The BNI Board of Commissioners structure consists of a President Commissioner, Vice President Commissioner and Commissioners.
2. The BNI Board of Commissioners composition consists of Non-Independent Commissioners and Independent Commissioners.
3. The Board of Commissioners is an assembly and therefore each member of the Board of Commissioners is prohibited from taking any action individually, as they shall be based on the Board of Commissioners resolution.

BOARD OF COMMISSIONERS GUIDELINES AND PROCEDURES

The BNI Board of Commissioners Guidelines and Procedures are stipulated in BNI Board of Commissioners Decree No. KEP/49/DK/2017 dated October 26, 2017, which regulates the following matters:

1. Legal Basis;
2. Structure;
3. Requirement for Members of the Board of Commissioners;
4. Independent Commissioners;
5. Board of Commissioners' Duties, Authorities, Obligations and Responsibilities;
6. Appointment and Dismissal of Members of the Board of Commissioners;
7. Term of Office of the Board of Commissioners and Vacant Position;
8. Board of Commissioners' Meetings and the Board of Commissioners' Meetings with the Board of Directors;
9. Board of Commissioners' division of Work and Working Time;
10. Secretariat of the Board of Commissioners and Secretary to the Board of Commissioners;
11. Corporate Values;
12. Board of Commissioners' Work Ethics and Prohibitions;
13. Transparency.

BOARD OF COMMISSIONERS' DUTIES AND RESPONSIBILITIES

Based on the Republic of Indonesia Law No. 40 of 2007 concerning Limited Liability Companies, as amended in part by Law No. 11 of 2020 concerning Job Creation, and BNI's Articles of Association, the Board of Commissioners is tasked and responsible for supervising management policies, the general course of management both regarding the Company and the Company's business carried out by the Board of Directors as well as providing advice to the Board of Directors, including supervision of the implementation of the Company Long-Term Plan, the Company's Work Plan and Annual Budget as well as the provisions in the Articles of Association, Resolutions in the General Meeting of Shareholders (GMS), as well as the prevailing laws and regulations for the benefit of the Company and in accordance with the purposes and objectives of the Company.

In carrying out their duties, each member of the Board of Commissioners is obliged to:

1. Comply with the Articles of Association and laws and regulations, as well as the principles of professionalism, efficiency, transparency, independence, accountability, responsibility, as well as fairness and equality;
2. Have good faith, prudence and responsibility when carrying out their supervisory duties and providing advice to the Board of Directors for the interests of the Company and in accordance with the purpose and objectives of the Company.

To maintain objectivity and independency in performing the functions and duties of supervision, as stipulated in the POJK that regulates the implementation of governance for Commercial Banks, the Board of Commissioners is prohibited from participating in making decisions in the Bank's operational activities, except for:

1. Provision of funds to related parties as stipulated in the provisions on a legal lending limit for commercial banks; and
2. Other matters set forth in the Bank's Articles of Association or Laws and Regulations.

The decision making of the Bank's operational activities by the Board of Commissioners is part of the Board of Commissioners' supervisory duties, which does not negate the Board of Directors' responsibilities for the Bank's management activities.

BOARD OF COMMISSIONERS' AUTHORITY

In accordance with the Bank's Article of Association, the Board of Commissioners has the following authorities:

1. Examining books, letters, and other documents, examining the cash for verification purposes and other securities, and examining the Bank's assets;
2. Entering the yards, buildings, and offices used by the Bank;
3. Requesting explanations from the Board of Directors and/or other officials on any issues related to the Bank's management;
4. Understanding all policies and actions that have been and will be carried out by the Board of Directors;
5. Requesting the Board of Directors and/or other officials under the Board of Directors, with the consent of the Board of Directors attend the Board of Commissioners' Meeting;
6. Appointing and dismissing a Secretary to the Board of Commissioners;
7. Temporarily dismissing a member of the Board of Directors in accordance with the provisions stipulated in the Articles of Association;

8. Establishing an Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, Integrated Governance Committee, and other committees if deemed necessary with due observance of the Bank's capability;
9. Involving experts on certain matters and for a certain time period at the Bank's expenses, whenever deemed necessary;
10. Performing Bank's management in certain circumstances for a certain time period in accordance with the provisions stipulated in the Articles of Association;
11. Approving the appointment and dismissal of the Corporate Secretary and/or Head of the Internal Audit Unit;
12. Attending Meetings of the Board of Directors and providing insights on matters discussed;
13. Carrying out other supervisory authority as long as it is not in contrary to the laws and regulations, Articles of Association, and/or GMS resolutions.

BOARD OF COMMISSIONERS' OBLIGATIONS

Based on BNI's Articles of Association, the Board of Commissioners is obliged to:

1. Provide advice to the Board of Directors in conducting the management of the Bank;
2. Provide opinions and approval for the Bank's Annual Work Plan and Budget, as well as other work plans prepared by the Board of Directors, in accordance with the provisions of the Articles of Association;
3. Follow the Bank's development, provide opinions and suggestions to the GMS on any matters deemed necessary for the management of the Bank;
4. Report to the Dwiwarna Series A Shareholders in the event of any decline in the Bank's performance;
5. Propose to the GMS the appointment of a Public Accounting Firm to audit the Bank's books;
6. Examine and review the periodic reports and Annual Reports prepared by the Board of Directors, including signing the Annual Report;
7. Provide explanations, opinions, and suggestions to the GMS on the Annual Report, if requested;
8. Prepare Minutes of the Board of Commissioners' Meetings and maintain a copy
9. Report to the Bank on any personal and/or family share ownership in the Bank and any other Companies;
10. Provide a report on the supervisory duties that were performed in the previous fiscal year to the GMS;
11. Provide an explanation on all matters questioned or requested by Dwiwarna Series A Shareholders with due observance of the laws and regulations particularly those applicable in Capital Market sector;

12. Perform other obligations in the framework of supervisory and advisory duties as long as they do not violate the laws and regulations, Articles of Association, and/or GMS resolutions;
13. Grant approval in writing for legal acts performed by the Board of Directors as required in BNI's Articles of Association with regard to the laws and regulations in the Capital Market sector:
 - a. Release/transfer and/or pledge the Bank's assets with criteria and values exceeding certain amounts stipulated by the Board of Commissioners, except assets that are recorded as inventories, with due observance of the provisions in the capital market and banking sector;
 - b. Cooperate with other business entities or parties, in the form of joint operations (KSO), business cooperatives (KSU), license agreements, Build, Operate, and Transfer (BOT), Build, Transfer, and Operate (BTO), Build, Operate, and Own (BOO), and other agreements that have the same nature, same time period, or value exceeding those set by the Board of Commissioners;
 - c. Establish and change the Bank's logo;
 - d. Establish an organizational structure 1 (one) level below the Board of Directors;
 - e. Undertake capital participation with a specified value as stipulated by the Board of Commissioners of other companies, subsidiaries, and joint ventures that is not in the framework of rescuing receivables with due observance of the provisions in the Capital Market sector;
 - f. Establish subsidiaries and/or joint venture companies with a certain value as stipulated by the Board of Commissioners with due observance of the provisions in the Capital Market sector;
 - g. Propose the Bank's representative as a candidate member of the Board of Directors and Board of Commissioners in a subsidiaries that make a significant contribution to the Bank, and/or has strategic value as stipulated by the Board of Commissioners;
 - h. Perform mergers, consolidations, acquisitions, spin-offs, and liquidation of subsidiaries or joint-ventures with a certain value as stipulated by the Board of Commissioners with due observance of the provisions in the Capital Market sector;
 - i. Perform actions included in material transactions as stipulated by the laws and regulations in the capital market sector with certain values as determined by the Board of Commissioners, except if such actions are included in material transactions excluded by the laws and regulations applicable in the Capital Market sector;
 - j. Actions that are not stipulated in the RKAP;
 - k. Actions to transfer including selling, releasing the right to charge and/or not to charge again for:

- i) The principal of non-performing receivables which have been written off in the framework of credit settlement, either partially or entirely;
- ii) The difference between the principal value of non-performing receivables that has been written off with a transfer value including sales or with the value of disposal of right; to be carried out based on the Board of Directors' policies that have been approved by the Board of Commissioners and in the amount of debt-cancelled limit set by the GMS that shall remain in force until any new limit has been determined by the GMS.

The Board of Commissioners' approval regarding letters a, b, e, f, g, and h above, with certain limits and/or criteria, is determined after obtaining the approval from the Dwiwarna Series A Shareholders. The determination of limits and/or criteria by the Board of Commissioners for the matters referred to in letters a, b, e, f, g, and h above is done after obtaining the approval of the Dwiwarna Series A Shareholders.

BOARD OF COMMISSIONERS' DIVISION OF SUPERVISORY ROLES AND RESPONSIBILITIES

PRESIDENT COMMISSIONERS' DUTIES

1. Coordinating the implementation of Board of Commissioners' duties;
2. Chairing the Board of Commissioners' Meetings;
3. Signing written documents including correspondence with other Commissioners;
4. Representing the Board of Commissioners by attending forums, meetings and events organized by the authorities, Dwiwarna Series A Shareholders and other institutions;
5. Representing the Board of Commissioners in chairing the Company's General Meeting of Shareholders.

In addition to the above duties and responsibilities, each member of the Bank's Board of Commissioners has additional roles and responsibilities. The division of work for members of the BNI Board of Commissioners is carried out by determining the distribution of the positions of the Board of Commissioners' members in Committees established by the Board of Commissioners to assist with the smooth running of their duties, namely in the Audit Committee, the Risk Monitoring Committee, the Nomination and Remuneration Committee and the Integrated Governance Committee. The appointment of each Board of Commissioners member as a committee member is regulated through a Board of Commissioners Decree.

In 2021, there was a change in the Board of Commissioners composition so the Board of Commissioners division of duties and responsibilities was adapted to the latest needs and developments. The changes in the Board of Commissioners' membership composition as committee members during 2021 were as follows:

Period January 1, 2021 - March 29, 2021

NAME	POSITION	PERIOD	DIVISION OF DUTIES
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Nomination and Remuneration Committee Chairman of Integrated Governance Committee
Pradjoto	Vice President Commissioner/ Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Risk Monitoring Committee Member of Nomination and Remuneration Committee
Joni Swastanto ¹⁾	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – March 29, 2021 January 1, 2021 – March 29, 2021 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee
Sigit Widyawan	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Audit Committee Member of Audit Committee
Askolani	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Integrated Governance Committee
Ratih Nurdiati	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee
Asmawi Syam	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Audit Committee Member of Nomination and Remuneration Committee
Iman Sugema	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Audit Committee
Susyanto	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Integrated Governance Committee
Septian Hario Seto	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

Period March 29, 2021-December 31, 2021

NAME	POSITION	PERIOD	DIVISION OF DUTIES
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Nomination and Remuneration Committee Chairman of Integrated Governance Committee
Pradjoto	Vice President Commissioner/ Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Risk Monitoring Committee Member of Nomination and Remuneration Committee
Sigit Widyawan	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Audit Committee
Askolani	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Integrated Governance Committee
Ratih Nurdianti	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee
Asmawi Syam	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Chairman of Audit Committee Member of Nomination and Remuneration Committee
Iman Sugema	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Audit Committee
Susyanto	Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Integrated Governance Committee
Septian Hario Seto	Independent Commissioner	<ul style="list-style-type: none"> January 1, 2021 – present January 1, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	<ul style="list-style-type: none"> August 16, 2021 – present August 16, 2021 – present 	<ul style="list-style-type: none"> Member of Nomination and Remuneration Committee Member of Risk Monitoring Committee

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

BOARD OF COMMISSIONERS' CRITERIA

Members of the Board of Commissioners shall be obliged to comply with the Law on Limited Liability Companies, legislation in the Capital Market and other applicable regulations and those related to the Company's business activities.

Based on BNI's Articles of Association, individuals who can be appointed as members of the Board of Commissioners are individuals who meet the requirements upon the appointment date and during their tenure:

1. Having good character, morals, and integrity;
2. Competent in carrying out legal actions;
3. Within 5 (five) years before appointment and during their tenure:
 - a. Has not been declared bankrupt;
 - b. Never a member of Board of Directors and/or Commissioners found guilty in causing a company to become bankrupt;
 - c. Never been convicted of any criminal offense that is detrimental to a country's or financial sector's financial position; and
 - d. Never a member of the Board of Directors and/or Commissioners which during the terms of office:
 - i) Did not hold an AGMS;
 - ii) Their accountability as a member of the Board of Directors and/or Commissioners was not accepted by the GMS or they did not submit their accountability as a member of the Board of Directors and/or Commissioners to the GMS; and

- iii) Caused a company to obtain a license, approval, or registration from the Financial Services Authority when not complying with its obligation to submit the annual report and/or financial report to the Financial Services Authority.
- 4. Has the commitment to comply with laws and regulations;
- 5. Has the knowledge and/or expertise in the fields required by the Company;
- 6. Meets other requirements as regulated in applicable laws and regulations;
- 7. Members of the Board of Commissioners and members of the Board of Directors are prohibited from having blood relations to the third degree, either in a straight line or sideways or a relationship that arises due to marriage ties including in-laws;
- 8. In addition to meeting the above criteria, appointment of the Board of Commissioners members is carried out by taking into account integrity, dedication, understanding of the company's management issues related to the management function, having adequate knowledge in the Company's line of business, and being able to provide sufficient time to carry out their duties and other requirements based on statutory regulations.

BOARD OF COMMISSIONERS' TERM OF OFFICE

The Board of Commissioners' term of office is at most 2 (two) consecutive periods, with the following conditions:

1. Members of the Board of Commissioners are appointed for a term of office from the date of the GMS appointing them until the closing of the 5th (fifth) Annual GMS after the date of their appointment, on condition that they do not exceed 5 (five) years with regards to the laws and regulations in Capital Market, without prejudice to the right of GMS to dismiss them at any time prior to the end of their term of office.
2. After their term of office ends, the members of the Board of Commissioners may be reappointed by the GMS for 1 (one) term of office.

BOARD OF COMMISSIONERS' APPOINTMENT PROCESS

The appointment process of the candidates of BNI's Board of Commissioners is carried out by referring to laws and regulations stipulating the appointment procedures for members of Board of Commissioners for Bank and SOE sectors, particularly:

1. Minister of SOEs Regulation No. Per-02/MBU/02/2015 dated February 17, 2015 concerning Requirements and Procedures for Appointment and Dismissal of Members of the Board of Commissioners and Supervisory Board of State-Owned Enterprises;

2. OJK Regulation No. 27/POJK.03/2016 dated July 22, 2016, concerning Fit and Proper Test for Primary Parties of Financial Services Institutions, and OJK Circular Letter No. 39/SEOJK.03/2016 dated September 13, 2016 on Fit and Proper Test for Prospective Controlling Shareholders, Candidate for Members of the Board of Directors, and Candidates for Members of the Board of Commissioners of the Bank.
3. BNI's Articles of Association that regulates the appointment of members of the Board of Commissioners.

Members of the Board of Commissioners are appointed at the GMS attended and approved by Dwiwarna Series A Shareholders, and the meeting resolutions shall be approved by Dwiwarna Series A Shareholders with due observance to the provisions of the Articles of Association. GMS resolutions on appointment of members of Board of Commissioners also determines the effectiveness of the appointment. In the event that GMS does not adopt a resolution, then the appointment as member of the Board of Commissioners will effectively start from the close of the GMS. Submission of the proposal for candidate members of Board of Commissioners to the GMS through Dwiwarna Series A Shareholders is carried out by observing the recommendations of the Nomination and Remuneration Committee.

OJK Regulation No. 27/POJK.03/2016 dated July 22, 2016, concerning Fit and Proper Test for the Primary Party of Financial Services Institutions, regulates that candidate members of Board of Commissioners, who are included as BNI's Primary Party, which is a Financial Services Institution, must obtain approval from OJK before carrying out actions, duties, and functions as a member of the Board of Commissioners. In order to provide such approval, OJK conducts a fit and proper test of candidate members of the Board of Commissioners.

Members of the Board of Commissioners who have passed the fit and proper test without notes and have obtained approval from OJK indicates that such members of the Board of Commissioners have and fulfill the requirements of integrity, competency, and financial reputation in an adequate manner.

All members of BNI's Board of Commissioners have passed the fit and proper test and received OJK approval to serve as members of BNI's Board of Commissioners as shown in the table below:

Period January 1, 2021 - March 29, 2021

NAME	POSITION	ORGANIZER	EFFECTIVE DATE	RESULT
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Pradjoto	Vice President Commissioner/ Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Joni Swastanto ¹⁾	Commissioner	Financial Services Authority	April 20, 2016	Passed
Sigit Widyawan	Independent Commissioner	Financial Services Authority	September 7, 2018	Passed
Askolani	Commissioner	Financial Services Authority	December 20, 2019	Passed
Ratih Nurdianti	Commissioner	Financial Services Authority	March 16, 2020	Passed
Asmawi Syam	Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Iman Sugema	Independent Commissioner	Financial Services Authority	August 19, 2020	Passed
Susyanto	Commissioner	Financial Services Authority	August 3, 2020	Passed
Septian Hario Seto	Independent Commissioner	Financial Services Authority	August 19, 2020	Passed

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

Period March 29, 2021-December 31, 2021

NAME	POSITION	ORGANIZER	EFFECTIVE DATE	RESULT
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Pradjoto	Vice President Commissioner/ Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Sigit Widyawan	Independent Commissioner	Financial Services Authority	September 7, 2018	Passed
Askolani	Commissioner	Financial Services Authority	December 20, 2019	Passed
Ratih Nurdianti	Commissioner	Financial Services Authority	March 16, 2020	Passed
Asmawi Syam	Independent Commissioner	Financial Services Authority	June 23, 2020	Passed
Iman Sugema	Independent Commissioner	Financial Services Authority	August 19, 2020	Passed
Susyanto	Commissioner	Financial Services Authority	August 3, 2020	Passed
Septian Hario Seto	Independent Commissioner	Financial Services Authority	August 19, 2020	Passed
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	Financial Services Authority	August 6, 2021	Passed

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

All members of the Board of Commissioners are appointed at the GMS as outlined in the Minutes of the GMS. In detail, the basic information for the appointment of each member of the Board of Commissioners is as follows:

Period January 1, 2021 - March 29, 2021

NAME	POSITION	BASIS OF APPOINTMENT
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	AGMS February 20, 2020
Pradjoto	Vice President Commissioner/ Independent Commissioner	AGMS February 20, 2020
Joni Swastanto ¹⁾	Commissioner	AGMS March 10, 2016
Sigit Widyawan	Independent Commissioner	AGMS March 20, 2018
Askolani	Commissioner	EGMS August 30, 2019

NAME	POSITION	BASIS OF APPOINTMENT
Ratih Nurdianti	Commissioner	AGMS May 13, 2019
Asmawi Syam	Independent Commissioner	AGMS February 20, 2020
Iman Sugema	Independent Commissioner	AGMS February 20, 2020
Susyanto	Commissioner	AGMS February 20, 2020
Septian Hario Seto	Independent Commissioner	AGMS February 20, 2020

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

Period March 29, 2021-December 31, 2021

NAME	POSITION	DOMICILE	BASIS OF APPOINTMENT	EFFECTIVE DATE
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	Jakarta	AGMS February 20, 2020	June 17, 2020
Pradjoto	Vice President Commissioner/ Independent Commissioner	Jakarta	AGMS February 20, 2020	June 17, 2020
Sigit Widyawan	Independent Commissioner	Jakarta	AGMS March 20, 2018	September 7, 2018
Askolani	Commissioner	Jakarta	EGMS August 30, 2019	September 7, 2018
Ratih Nurdianti	Commissioner	Jakarta	RUPST 13 Mei 2019	December 20, 2019
Asmawi Syam	Independent Commissioner	Jakarta	AGMS February 20, 2020	March 16, 2020
Iman Sugema	Independent Commissioner	Jakarta	AGMS February 20, 2020	June 17, 2020
Susyanto	Commissioner	Jakarta	AGMS February 20, 2020	August 14, 2020
Septian Hario Seto	Independent Commissioner	Jakarta	AGMS February 20, 2020	July 27, 2020
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	Jakarta	AGMS March 29, 2021	August 14, 2020

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

ORIENTATION AND INDUCTION PROGRAM FOR NEW COMMISSIONERS

The orientation and induction program for new commissioners is carried out through documents, presentations or providing explanations from the Board of Directors, Corporate Secretary, related Divisions or units, which generally include information/matters pertaining to:

1. Vision, mission, the organizational structure of the bank, business activities and operational network;
2. Annual Report, the Bank's Work Plan and Budget (RKAP), and the Bank's Business Plan (RBB), Bank's Code of Ethics, BNI's Corporate Cultures, the Boards of Commissioners Manual, Corporate Governance Handbook, and the Articles of Association;
3. Good Corporate Governance (concurrent positions, share ownership, and independent commissioners);
4. The Board of Commissioners and the Board of Directors' duties, authority, and responsibilities, the Board of Commissioners' delegation of authority and limits of authority in conducting supervisory duties on the bank based on the applicable laws and regulations;
5. Committees under the Board of Commissioners, which are established and directly responsible to the Board of Commissioners, Secretary of the Board of Commissioners, and Secretariat of the Board of Commissioners, which facilitates the duties of the Board of Commissioners;
6. Remuneration and facilities provided to members of the Board of Commissioners.

BOARD OF COMMISSIONERS' NUMBER AND COMPOSITION

In the 2021, the number and composition of the Company's Board of Commissioners underwent 1 (one) change as explained as follows:

Period of January 1 - March 29, 2021

For the period January 1 - March 29, 2021, the Board of Commissioners consists of 10 (ten) members, consisting of 1 (one) President Commissioner who is also an Independent Commissioner, 1 (one) Vice President Commissioner, 4 (four) Independent Commissioners and 4 (four) Commissioners.

NAME	POSITION	DOMICILE	DATE OF APPOINTMENT	EFFECTIVE DATE
Agus Dermawan Wintarto Martowardojo	President Commissioner/Independent Commissioner	Jakarta	AGMS February 20, 2020	June 23, 2020
Pradjoto	Vice President Commissioner/Independent Commissioner	Jakarta	AGMS February 20, 2020	June 23, 2020
Joni Swastanto ¹⁾	Commissioner	Jakarta	AGMS March 10, 2016	April 20, 2016
Sigit Widyawan	Independent Commissioner	Jakarta	AGMS February 20, 2020	September 7, 2018
Askolani	Commissioner	Jakarta	EGMS August 30, 2019	December 20, 2019
Ratih Nurdianti	Commissioner	Jakarta	AGMS May 13, 2019	March 16, 2020
Asmawi Syam	Independent Commissioner	Jakarta	AGMS February 20, 2020	June 23, 2020
Iman Sugema	Independent Commissioner	Jakarta	AGMS February 20, 2020	August 19, 2020
Susyanto	Commissioner	Jakarta	AGMS February 20, 2020	August 3, 2020
Septian Hario Seto	Independent Commissioner	Jakarta	AGMS February 20, 2020	August 19, 2020

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

Period of March 29 - December 31, 2021

For the period March 29 - December 31, 2021, the Board of Commissioners consists of 10 (ten) members, consisting of 1 (one) President Commissioner who is also an Independent Commissioner, 1 (one) Vice President Commissioner, 5 (five) Independent Commissioners and 3 (three) Commissioners.

NAME	POSITION	BASIS OF APPOINTMENT	EFFECTIVE DATE
Agus Dermawan Wintarto Martowardojo	President Commissioner/Independent Commissioner	AGMS February 20, 2020	June 23, 2020
Pradjoto	Vice President Commissioner/Independent Commissioner	AGMS February 20, 2020	June 23, 2020
Sigit Widyawan	Independent Commissioner	AGMS March 20, 2018	September 7, 2018
Askolani	Commissioner	EGMS August 30, 2019	December 20, 2019
Ratih Nurdianti	Commissioner	AGMS May 13, 2019	March 16, 2020
Asmawi Syam	Independent Commissioner	AGMS February 20, 2020	June 23, 2020
Iman Sugema	Independent Commissioner	AGMS February 20, 2020	August 19, 2020
Susyanto	Commissioner	AGMS February 20, 2020	August 3, 2020
Septian Hario Seto	Independent Commissioner	AGMS February 20, 2020	August 19, 2020
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	AGMS March 29, 2021	August 6, 2021

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

BOARD OF COMMISSIONERS' CONCURRENT POSITIONS

The Board of Commissioners does not have concurrent positions that are prohibited based on the applicable laws and regulations. The Board of Commissioners' concurrent positions that are allowed are based on the applicable Laws and Regulations and are executed by the related members of the Board of Commissioners whilst not ignoring the implementation of duties and responsibilities as members of the Bank's Board of Commissioners.

Information on the concurrent positions for each member of the Bank's Board of Commissioners, as of December 31, 2020, are as follows:

NAME	MEMBER OF THE BOARD OF DIRECTORS OF STATE OWNED ENTERPRISES, REGIONAL OWNED ENTERPRISES, PRIVATE OWNED ENTERPRISES	MANAGEMENT BOARD OF POLITICAL PARTIES AND/OR CANDIDATES/ MEMBERS 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
Agus Dermawan Wintarto Martowardojo	No	No	No	No
Pradjoto	No	No	No	No
Sigit Widyawan	No	No	No	No
Askolani	No	No	No	No
Ratih Nurdianti	No	No	No	No
Asmawi Syam	No	No	No	No
Iman Sugema	No	No	No	No
Susyanto	No	No	No	No
Septian Hario Seto ¹⁾	No	No	No	No
Erwin Rijanto Slamet ²⁾	No	No	No	No

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

²⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

BOARD OF COMMISSIONERS' CONFLICT OF INTEREST MANAGEMENT

A Conflict of Interest is a situation where the Bank's economic interests contradict personal economic interests. Regarding such matters, members of the Board of Commissioners are obliged to:

1. Prioritize the Bank's interests and not decrease the Bank's financial in the event of any conflict of interest;
2. Refrain from making decisions in situations and conditions of conflict of interest;
3. Disclose family relationships, financial relationships, management relationships, 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 in the framework of the Bank's business;
4. Disclose decisions that may have been made in a condition of a conflict of interest.

BOARD OF COMMISSIONERS' SHARE OWNERSHIP

For carrying out its duties of authority and responsibility, the Board of Commissioners has prepared a Work Plan and Budget (RKA) which was submitted to the Board of Directors at the beginning of the year. The preparation of the RKA is as required based on:

1. Minister of SOEs Regulation No. PER-01/ MBU/2011 dated August 1, 2011 concerning Good Corporate Governance Implementation in State-Owned Enterprises as amended by Minister of SOEs Regulation Number PER-09/MBU/2012 dated July 6, 2012 Article 12 paragraph (5) which regulates that the Board of Commissioners/Supervisory Board must prepare a work plan and annual budget of the Board of Commissioners/Supervisory Board which is an integral part and RKAP, and
2. Article 17 paragraph (2) of BNI's Articles of Association which regulates that the Board of Commissioners must prepare a work program for the Board of Commissioners as an inseparable part of the Company's Annual Work Plan and Budget prepared by the Board of Directors.

MECHANISM FOR THE BOARD OF COMMISSIONERS' SUPERVISORY DUTIES IMPLEMENTATION

BNI's Board of Commissioners carries out its functions, duties and obligations through the following mechanisms:

1. Through Board of Commissioners' Meetings including internal Board of Commissioners' Meetings, or Meetings by inviting Sectoral Director or Senior Executive Vice Presidents related to the Meeting agenda, as well as the joint meetings between the Board of Commissioners and the Board of Directors that are conducted on a regular basis.
2. The Committees under the Board of Commissioners active roles are to assist and support the duties of the Board of Commissioners, are conducted through the Committee meetings, evaluations, studies or reviews of matters that become the duties of the Board of Commissioners.
3. Providing directives and opinions in writing to the Board of Directors as:
 - a. Follow up on the resolutions of the Board of Commissioners Meeting or the joint meetings of the Board of Commissioners and the Board of Directors;
 - b. Responses to reports on the implementation of the Board of Directors duties or requests for approval, consultations or proposals submitted by the Board of Directors to the Board of Commissioners, as well as information on strategic and significant issues, based on the results of the evaluations and reviews of the Board of Commissioners in written reports on the implementation of the Board of Directors' duties to the Board of Commissioners.
4. Visiting the BNI work units, as well as providing directives and opinions of the Board of Commissioners to the the Board of Directors based on the results of the Work visits.
- b. Supervising efforts to achieve RBB, in particular achieving important aspects in the business plan such as loan distribution, asset quality improvement, third party fund collection, productivity and efficiency;
- c. Reviewing the Revised RBB for 2021-2023;
- d. Evaluating the RBB as reported to the Financial Services Authority every semester and submitting the RBB supervision report to the Financial Services Authority;
- e. Reviewing and giving approval for the 2022-2024 RBB.
2. Evaluating the Consolidated Financial Performance of BNI every month and submitting a Performance Report to the Ministry of SOEs on a quarterly basis;
3. Reviewing the financial information to be issued by the Company;
4. Reviewing the financial statements audit for the fiscal year 2020 conducted by the Public Accounting Firm (KAP) or other external parties;
5. Performing supervisory functions on the implementation of internal controls in BNI, including:
 - a. Ensuring that BNI's internal control system is running well;
 - b. Ensuring the Board of Directors are monitoring the effectiveness of the Internal Audit Unit (SKAI) or the BNI Internal Audit Unit;
 - c. Supervising the BNI Internal Supervision Unit duties including:
 - i) Evaluating internal control or BNI Internal Audit Unit;
 - ii) Reviewing the audit plan and implementation as well as monitoring the follow-up audit results on the implementation of the BNI Internal Audit Unit duties;
 - iii) Ensuring that the Board of Directors has followed up on audit findings and recommendations from the BNI Internal Audit Unit, the supervision results by OJK and/or other supervisory authorities, the Supreme Audit Agency findings, external auditors or public accountants audits results, by ensuring the Board of Directors follow up on audit findings both in writing and orally;
 - iv) Reviewing the main points of audit results from the BNI Internal Audit Unit as reported to the Financial Services Authority every semester.
6. Supervising, monitoring and evaluating the Bank Health Level for Semester II-2019 and Semester I-2020, and supporting the Board of Directors in taking necessary steps to maintain and/or improve the Bank Health Level.
7. Performing supervisory functions on BNI Risk Management and Integrated Risk Management, including:

BOARD OF COMMISSIONERS SUPERVISORY DUTIES REALIZATION

Throughout 2021, the Board of Commissioners carried out their duties, obligations and responsibilities to supervise the management policies and management of the Bank in line with the prevailing laws and regulations, the Bank's Articles of Association and the Work Plan set at the beginning of the year, which included the following:

1. Performing the supervisory function of the Bank's Business Plan (RBB), including:
 - a. Directing, monitoring and evaluating the implementation of the Bank's 2020 strategic policies, including evaluation of the Corporate Plan and RBB as well as financial performance in 2020 every month;



- a. Evaluating the Board of Directors duties on the application of Risk Management policies and providing directives for improvements on the application of Risk Management policies on a regular basis to ensure that the Bank's risk and activity management has been implemented effectively;
- b. Evaluating BNI's Risk Management policies and Risk Management strategies;
- c. Reviewing the Risk Profile on a quarterly basis, as well as evaluating the position and development of BNI's risk on a regular basis;
- d. Ensuring that Risk Management policies and processes are implemented effectively and integrated into the overall Risk Management process;
- e. Evaluating and providing directives for improvement of the Integrated Risk Management Policy on a regular basis;
- f. Approving the Integrated Risk Management Policy/Guidelines;
- g. Ensuring the Integrated Risk Management in accordance with the characteristics and complexity of the Financial Conglomerate business, and ensuring Risk Management in each FSI in the BNI Financial Conglomerate supports the Integrated risk management effectively.
8. Monitoring the implementation of compliance in BNI, including:
 - a. Evaluating the BNI compliance function, and ensuring it has been carried out properly, and providing advice to the Board of Directors to improve the quality of the compliance function;
 - b. Reviewing reports on the compliance function and the implementation of the Director of Compliance duties, submitted by the Board of Directors on a regular basis;
 - c. Monitoring the Anti-Fraud Strategy, the Anti-Money Laundering and Prevention of Terrorism Financing (APU-PPT) Program, as well as Know Your Customer Principles.
9. With regard to the application of Good Corporate Governance (GCG) principles and practices:
 - a. Ensuring the application of the GCG principles and practices at all levels of the BNI organization, as well as at FSI within the BNI Financial Conglomerate;
 - b. Supervising the implementation of GCG in the BNI Financial Conglomerate and evaluating/reviewing the Integrated Governance Guidelines for improvement;
 - c. Encouraging improvement in GCG practices with reference to applicable laws and regulations and international best practices;
 - d. Reviewing the GCG implementation report submitted by the Board of Directors;
 - e. Monitoring the GCG self-assessment results, as well as conducting a self-assessment to assess the effectiveness of the GCG implementation by the Board of Commissioners, including the committees under the Board of Commissioners, every semester as required by the OJK Regulation concerning GCG implementation in Commercial Banks.
10. Monitoring and evaluating the Subsidiaries performance and the Board of Directors policies related to creation of synergies and strengthening the subsidiaries business;
11. Evaluating, directing and monitoring strategic plans, implementation of Information Technology and Bank policies related to BNI Information Technology;
12. Conducting a review of the development of material cases report on a regular basis;
13. Supervising the implementation of the prudential principle in the provision of loan facilities by the Board of Directors, including:
 - a. Supervising the lending and financing plans set out in the RBB;
 - b. Providing advice and opinions on the Board of Directors' decision related to provision of loan facilities above a certain amount that must be consulted with the Board of Commissioners;
 - c. Giving approval for the granting of loan facilities to related parties based on applicable laws and regulations that must obtain the Board of Commissioners' approval;
 - d. Conducting regular and periodic reviews on the development and follow-up of loans in consultation with the Board of Commissioners;
 - e. Evaluating and approving credit policies and strategies in accordance with the obligations regulated by the prevailing laws and regulations;
 - f. Conducting regular reviews on the development and quality of the overall lending or financing portfolio, including Non-Performing Loans (NPLs).
14. Monitoring and evaluating the Human Capital (HC) development and management, especially with regard to the strategic function of HC in supporting the Bank's performance achievements;
15. Evaluating the implementation of the Sector Director duties and responsibilities on a regular basis including the work plan achievement by the Sector Director, particularly related to strategic and significant issues;
16. Reviewing the Financial Institution Pension Fund (DPLK) Performance in 2020 as the Supervisory Board of the DPLK and submitting the Supervisory Report on the BNI Financial Institution Pension Fund (DPLK) Business Plan for Semester II of 2020 and Semester I of 2021 to OJK;

17. Conducting regular monitoring and evaluation of the implementation of BNI remuneration policies and system, including remuneration for the Board of Directors, Board of Commissioners, and employees;
18. Approving matters that must be approved by the Board of Commissioners based on the prevailing laws and regulations and the Company's Articles of Association, including:
 - a. Approval of Loans to Related Parties;
 - b. BNI Organizational Arrangement Approval;
 - c. Approval of the 2020-2023 Bank BNI Business Plan Revision;
 - d. Approval of the 2022-2024 Bank BNI Business Plan;
 - e. Approval of the 2021-2025 BNI Corporate Plan;
 - f. Approval of the Bank Credit Policy;
 - g. Approval of the 2021/2022 BNI Recovery Plan Document;
 - h. Approval of the 2022 BNI Sustainable Finance Action Plan;
 - i. Approval of the Management of the BNI Subsidiary Company;
 - j. Approval of the BNI Shares Buyback;
 - k. Approval of the Updating Policy on Anti-Money Laundering and Prevention of Terrorism Financing (APU & PPT) DPLK BNI;
 - l. Approval of Proposed Changes to BNI Pension Fund Regulations;
 - m. Approval of the 2022 BNI DPLK Business Plan;
 - n. Approval of Company policies or guidelines based on OJK Regulations that must obtain approval from the Board of Commissioners;
 - o. Approval of Changes to the Internal Audit Unit (IAU) Division Head;
 - p. Approval of the Integrated Governance Guidelines for the BNI Financial Conglomerate.
19. Submitting a report to the Ministry of SOEs in the form of responses from the Board of Commissioners on the BNI performance report every quarter as a follow-up to the Minister of SOEs Letter in 2014 to the BNI Board of Commissioners to streamline the supervision and guidance of the SOEs performance, where the Board of Commissioners were requested to provide opinions and responses on BNI performance reports for the quarterly period;
20. 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 regular Board of Commissioners and Board of Directors meetings to discuss aspects related to business, organization, risk management, legal internal control and compliance aspects, human capital, technology and others matters, held regularly through 74 (seventy four) meetings;

21. Conducting online visits to Regional Offices, Branch Offices including Overseas Branch Offices to carry out the supervisory function.

BOARD OF COMMISSIONERS' DECISIONS

During 2021, the Board of Commissioners the decisions to support the implementation of its duties and responsibilities, were as follows:

1. Appointment of Dwita Suherlina as an Risk Monitoring Committee Independent Member;
2. Appointment of Bambang Setyogroho as an Integrated Governance Committee Independent Member;
3. Appointment of Indrayeti as an Integrated Governance Committee Independent Member;
4. Appointment of Human Brillianto as an Audit Committee Independent Member;
5. Confirmation of the Termination of Appointment of Max R Niode as an Integrated Governance Committee Member;
6. Confirmation of the Termination of Appointment of Hasanuddin as an Integrated Governance Committee Member;
7. Audit Committee Charter and Code of Ethics for the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk;
8. Confirmation of the Termination of Appointment of Joni Swastanto as a Nomination and Remuneration Committee Member;
9. Confirmation of the Termination of Appointment of Joni Swastanto as a Risk Monitoring Committee Member;
10. Termination of the Appointment of Pasu Donnaria as an Audit Committee Independent Member;
11. Appointment of Pasu Donnaria as a Board of Commissioners Member;
12. Appointment of Suhendi Muharam as an Audit Committee Independent Member;
13. Appointment of Conscience Raswindriati as a Risk Monitoring Committee Independent Member;
14. Appointment of Erwin Rijanto Slamet as a Nomination and Remuneration Committee Member;
15. Appointment of Erwin Rijanto Slamet as a Risk Monitoring Committee Member;
16. Extension of the Appointment of Pasu Donnaria as a Board of Commissioners Member.

BOARD OF COMMISSIONERS' COMPETENCY DEVELOPMENT

The competency development of the Board of Commissioners can be seen in the discussion section on the Company Profile in this Annual Report.

RISK MANAGEMENT CERTIFICATION

NAME	POSITION	CERTIFICATION
Agus Dermawan Wintarto Martowardojo	President Commissioner/Independent Commissioner	Level 5
Pradjoto	Vice President Commissioner/Independent Commissioner	Level 2
Joni Swastanto	Commissioner	Level 2
Sigit Widyawan	Independent Commissioner	Level 2
Askolani	Commissioner	Level 1
Ratih Nurdianti	Commissioner	Level 1
Asmawi Syam	Independent Commissioner	Level 5
Iman Sugema	Independent Commissioner	Level 2
Susyanto	Commissioner	Level 1
Septian Hario Seto	Independent Commissioner	Level 2
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	Level 2

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

BOARD OF COMMISSIONERS' DISMISSAL AND RESIGNATION MECHANISM

The mechanism for dismissal and resignation of the Board of Commissioners is based on BNI's Articles of Association as follows:

- Members of the Board of Commissioners are appointed and dismissed by the GMS, where the GMS is attended by Dwiwarna Series A shareholders and the Meeting's resolution shall be approved by Dwiwarna Series A shareholders, by observing the provisions in the Articles of Association.
- Members of the Board of Commissioners may at any time be dismissed based on a GMS resolution by stating the reasons. The reason for dismissal of the related member of the Board of Commissioners is carried out in the event that it is based on fact that the member of the Board of Commissioners, among others:
 - Failed to perform the duties properly;
 - Violated the provisions of the Articles of Association and/or laws and regulations;
 - Engaged in actions that harms the Company and/or State;
 - Committed an action that violated the ethics and/or properness that shall be respected as member of the Board of Commissioners;
 - Has been found guilty by a Court decision that has permanent legal force; or
 - Resigns.
- In addition to the aforementioned reasons for the dismissal of member of the Board of Commissioners, members of the Board of Commissioners may be dismissed by the GMS based on other reasons which are deemed appropriate by the GMS for the interests and objectives of the Company.
- The decision to dismiss due to reasons as stated in point 2 letter a, b, c, and d is carried out after the relevant member is given opportunity to defend themselves in the GMS.
- Dismissal as referred to in letter c and e is a dishonorable discharge.
- For members of the Board of Commissioners and among members of the Board of Commissioners and members of the Board of Directors, there must be no blood relationship up to the third degree, either in a straight line or side line, or a marriage relationship/familial relationship arising from marital ties, including son/daughter-in-law or brother/sister-in-law). In the event of such situation, the GMS has the authority to dismiss one of them.

7. A member of the Board of Commissioners has the right to resign from the position before the term of office ends by notifying in writing of the intention to the Company.
8. The Company must convene a GMS to resolve the resignation request of a member of the Board of Commissioners no longer than 90 (sixty) days after receiving the resignation letter.
9. The Company must disclose the information to public and submit to OJK no later than 2 (two) business days after receiving such resignation request from the member of the Board of Commissioners as referred to in point 7 and the results of the GMS convention as referred to in point 8 above.
10. Before the resignation becomes effective, the relevant member of Board of Commissioners will remain obligated to complete the duties and responsibilities in accordance with the Articles of Association and applicable Laws and Regulations.
11. The member of the Board of Commissioners who resigns as mentioned above can still be held accountable as a member of the Board of Commissioners since appointment until the approval date of the resignation at the GMS.
12. The release of the responsibilities of the resigning member of the Board of Commissioners is given after the Annual GMS releases him/her.
13. In the event that a member of Board of Commissioners resigns and this causes the total number of Board of Commissioners to be less than 3 (three) people, then the resignation becomes valid if it has been resolved by GMS and a new member of Board of Commissioners has been appointed, therefore, the minimum requirements of the number of members of Board of Commissioners is satisfied.
14. The position of a member of the Board of Commissioners shall end in the event that:
 - a. The resignation has become effective as referred to in point 8 above.
 - b. They pass away;
 - c. Their term of office ends;
 - d. They are dismissed based on the GMS; or
 - e. They are declared bankrupt by a Commercial Court which has legal binding force; permanent or undergarded based on a court decision;
 - f. They can no longer fulfills the requirements as a member of the Board of Commissioners based on Articles of Association and other laws and regulations.
15. Members of the Board of Commissioners who resign before or after the term of office ends, unless due to death, shall still be responsible for actions whose accountability has not been received by the GMS.

COMPLETENESS OF THE BOARD OF COMMISSIONERS ORGANS

To assist the smooth running of the Board Commissioners its duties and responsibilities, it establishes supporting organs including committees under the Board of Commissioners and the Secretariat of the Board of Commissioners.

The establishment and implementation of the Secretariat of the Board of Commissioners and the Committees under the Board of Commissioners is carried out by taking into account the applicable laws and regulations, including the Financial Services Authority (POJK) Regulations and the Minister of SOEs (BUMN) regulations, in particular:

1. Minister of SOEs' Regulation No. PER-06/MBU/2021 dated April 13, 2021 concerning Supporting Organs of the SOE Board of Commissioners/Supervisory Board, the Board of Commissioners' organs may consist of the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee and Integrated Governance Committee as well as the Secretariat to the Board of Commissioners;
2. POJK No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks, and to support the effectiveness of the implementation of their duties and responsibilities, the Board of Commissioners is required to establish at least an Audit Committee, a Risk Monitoring Committee and a Nomination and Remuneration Committee;
3. POJK No. 18/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates, and to support the effectiveness of carrying out its duties, the Board of Commissioners of the Main Entity is required to establish an Integrated Governance Committee.

COMMITTEES UNDER THE BOARD OF COMMISSIONERS

Committees under the Board of Commissioners consist of the Audit Committee (KA), the Risk Monitoring Committee (KPR), the Nomination and Remuneration Committee (KNR), and the Integrated Governance Committee (TKT).

The Board of Commissioners establishes guidelines that regulates the procedures for appointment, dismissal, arrangement of duties and honorarium for members of the Committees under the Board of Commissioners, which are continuously refined and updated in accordance with developments/amendments in the applicable laws regulations and current conditions. The latest update was made in 2018, which are stipulated in the Board of Commissioners Decision Letter No. KEP/002/DK/2018 dated February 8, 2018, concerning "General Provisions for Appointment, Dismissal, Arrangement of Duties, and Honorarium of Members of Committees Under the Board of Commissioners" which includes the following matters:

1. Procedures for Appointment of Committee Members
2. The principal material that needs to be regulated in the work agreement of the committee members who come from independent parties with BNI
3. Concurrent positions that regulate positions which are permitted and which are prohibited for members of the Committee based on the applicable laws and regulations;
4. The period of appointment/term of office of committee members;
5. Division of duties and scope of duties of the Committee;
6. Committee members' obligation to attend to the Company;
7. Honorarium for Committee members from independent parties;
8. Evaluation/assessment of the performance of Committee members by independent parties;
9. Termination of Appointment of Committee members;
10. Resignation of Committee members.

WORKING MECHANISM FOR COMMITTEES UNDER THE BOARD OF COMMISSIONERS

The Committees under the Board of Commissioners duties are guided by previously prepared Committee Charters in each Committee.

At the beginning of each year, the Committees under the Board of Commissioners prepare a Work Plan Program for each Committee to be used as a reference in carrying out their duties in assisting the implementation of the Board of Commissioners duties, through monitoring, reviewing and providing suggestions or recommendations to the Board of Commissioners on matters related to the functions and duties of the committees concerned through the following mechanisms:

1. The Committees conduct meetings either internally or by inviting related Directors, units and/or divisions and/ or related units
2. The Committees conduct studies/evaluations/reviews as well as discussions/talks outside the meeting forum which if necessary include discussions with the related units or divisions/units.

3. The results of meetings or evaluations/reviews and discussions/talks outside the meeting forum are submitted by the Committee Chairperson to the Board of Commissioners as a report either in writing or in a meeting of the Board of Commissioners that discusses the related agenda.
4. Committees under the Board of Commissioners submit realization reports of work programs/ activities every quarter to the Board of Commissioners.

Information concerning each Committee is presented in a separate sub-chapter.

PERFORMANCE ASSESSMENT FOR COMMITTEES UNDER THE BOARD OF COMMISSIONERS

The Board of Commissioners duties and responsibilities for supervising and managing the Company is supported by the Audit Committee, the Nomination and Remuneration Committee, the Risk Monitoring Committee and the Integrated Governance Committee. In 2021, the Board of Commissioners considered that the committees had carried out their functions, duties and responsibilities as evidenced by:

1. The achievement of all Committees' Work Plans/ Programs set at the beginning of 2021; as well as
2. Implementation of Committee Meetings and level of attendance of Committee members.

The committee programs/work plans are carried out through the committee meetings, including those inviting the relevant Directorates or divisions/work units, and after conducting in-depth reviews/evaluations by each committee outside the meeting forum, the results of which are delivered in writing to the Board of Commissioners.

The Audit Committee has carried out its functions, duties and responsibilities including reviewing the financial information to be released by the Bank to the public and/or the Authorities. The Audit Committee also reviews compliance with laws and regulations related to the Bank's activities, and evaluated the effectiveness of conducting audits/services provided by the Public Accounting Firm (KAP), including examining the independence and objectivity of the KAP.

The Nomination and Remuneration Committee also carried out its functions, duties and oversight responsibilities for the implementation of the nomination and remuneration policy at every level of the organization, starting from the Board of Commissioners, the Board of Directors and employees in accordance with applicable regulations.

The Risk Monitoring Committee supported the Board of Commissioners in carrying out their duties and responsibilities related to the implementation of risk management in the Bank. Meanwhile, the Integrated Corporate Governance Committee oversaw the consistency and sustainability of the integrated corporate governance implementation in all groups of the Bank's financial conglomerates.

Based on the realization of the completion of all programs/work plans, frequency, level of attendance of meetings and reports on the implementation of the activities of the committees under the Board of Commissioners, namely the Audit Committee, the Nomination and Remuneration Committee, the Risk Monitoring Committee and the Integrated Governance Committee, it can be concluded that each of the committees carried out its duties well.

PERFORMANCE ASSESSMENT OR EVALUATION OF INDEPENDENT COMMITTEE MEMBERS

The committee chairperson evaluates the performance of committee members who come from independent parties every 6 (six) months or at any other time. Performance Appraisal Indicators, include but not limited to competence and expertise, output quality, discipline and attendance of the relevant committee members in the company, as well as the implementation of duties and obligations in accordance with the committee's charter and work procedures that apply to independent committee members under the Board of Commissioners.

The results of the evaluation and assessment referred to are submitted as recommendations to the Board of Commissioners to extend or continue or end the appointment of the relevant committee members to the Company.

The evaluation of Committees under the Board of Commissioners members by Independent Parties (not the Board of Commissioners). The assessment factors are:

1. Duties according to Committee Charter (25%);
2. Competence and Skill (30%);
3. Output quality (30%);
4. Attendance rate (15%).

MANDATORY ATTENDANCE OF COMMITTEE MEMBERS WHO ARE INDEPENDENT PARTIES

Committee members coming from outside the company (independent members) have the obligation to regularly attend on working days and office hours based on the days, number of days, and schedules set by the Board of Commissioners and/or the committee chairperson, and include attending Committee Meetings and carrying out other duties, and completing the attendance list at the Company in order to carry out duties other than attending committee meetings. If necessary, at the request of the Board of Commissioners and/or committee chairperson, Committee members from outside the company must also attend at the company or at Board of Commissioners' Meetings or committee meetings, or at activities that must be attended by the Board of Commissioners in accordance with the requirements outside the frequency and routine attendance schedule.

Information on the Committees under the Board of Commissioners and the Secretary to the Board of Commissioners is presented in a separate sub-chapter.

BOARD OF COMMISSIONERS' SECRETARIAT

The Board of Commissioners' Secretariat is led by a Secretary who is from outside the company assisted by the Secretariat staff of the Board of Commissioners. The implementation of the Secretariat of the Board of Commissioners and the Secretary to the Board of Commissioners functions and duties is guided by a Minister of SOEs Regulation that regulates the Supporting Organs of the Board of Commissioners/Supervisory Board of State- Owned Enterprises.

Information on the Board of Commissioners' Secretariat and the Secretary to the Board of Commissioners is presented in a separate sub-chapter.



Independent Commissioners

CRITERIA AND NUMBER OF INDEPENDENT COMMISSIONERS

Independent Commissioners at BNI is in compliance with the provisions of the OJK Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks. This regulation states that Independent Commissioners in commercial banks must be at least 50% (fifty percent) of the total members of the Board of Commissioners. The composition of BNI Commissioners as of December 31, 2021 was 10 (ten) people consisting of 1 (one) President Commissioner concurrently Independent Commissioner, 1 (one) Vice President Commissioner concurrently Independent Commissioner, 5 (five) Independent Commissioners and 3 (three)) Commissioner. Thus, the composition of BNI's Independent Commissioners is more than 50% of the total number of the Board of Commissioners and has complied with the OJK Regulation.

The determination of BNI's Independent Commissioner is carried out by observing and following the provisions governing the requirements and criteria of the Independent Commissioner in the applicable Laws and Regulations particularly:

1. OJK Circular Letter No.13/SEOJK.03/2017 dated March 17, 2017 concerning Governance Implementation for Commercial Banks, which stipulates that Independent Commissioners are members of the Board of Commissioners who do not have financial relationship, management relationship, ownership relationship, and/or familial relationship with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationship with the Bank that can affect their ability to act independently. The definition of having financial relationship, management relationship, ownership relationship, and/or familial relationship with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationship with a bank means the ability to act independently as guided by the applicable Laws and Regulations, particularly the OJK Circular Letter on the Implementation of Governance for Commercial Banks.
2. OJK Regulation (POJK) No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and Board of Commissioners or Independent

Commissioners of Issuers or Public Companies, Article 1 paragraph (4) and Article 21 paragraph 2 which stipulate that:

- a. Independent Commissioners are members of the Board of Commissioners from outside the issuer or public company and fulfill the requirements as an Independent Commissioner as referred to in POJK.
- b. Independent Commissioner must meet the following requirements:
 - i) Not a person who worked or had the authority and responsibility to plan, lead, control, or supervise activities of the Issuer or Public Company within the last 6 (six) months, except for re-appointment as an Independent Commissioner of Issuer or Public Company in the next period;
 - ii) Does not own shares either directly or indirectly with the Issuer or Public Company;
 - iii) Has no Affiliated relationship with the Issuer or Public Company, members of the Board of Commissioners, members of the Board of Directors, or the main shareholders of the Issuer or Public Company; and
 - iv) Does not have a business relationship either directly or indirectly that is related to the business activities of the Issuer or Public Company.
3. Article 120 paragraph (1) and paragraph (2) of the Law on Limited Liability Company states that:
 - a. The Bank Articles of Association can regulate the presence of 1 (one) Independent Commissioner and 1 (one) delegated commissioner.
 - b. Independent Commissioners are appointed based on GMS resolutions for parties not affiliated with the main shareholders, members of the Board of Directors, and/or other members of the Board of Commissioners.

4. Article 8 of Bank Indonesia Regulation No. 11/19/ PBI/2009 dated June 4, 2009, concerning Risk Management Certification for Managers and Commercial Banks as amended by Bank Indonesia Regulation No. 12/7/ PBI/2010 dated April 19, 2010, states that each Independent Commissioner must have Level 2 Risk Management Certificate.

INDEPENDENT COMMISSIONERS' STATEMENT OF INDEPENDENCE

Each of the Bank's Independent Commissioner has prepared an Independent Statement Letter, which has been submitted to the OJK as one of the requirements of the fit and proper test at the OJK. During 2021, the Independent Commissioners were as follows:

Attached are the Statements of Independence by each Independent Commissioner



Board of Directors

The Board of Directors is the Company's organ with collegial duties and responsibilities in managing BNI for the interests and objectives of BNI, as well as represents the Company both inside and outside the court in accordance with the Articles of Association.

In carrying out their duties and obligations, the Board of Directors is obliged to devote their full energy, mind, attention and dedication to the duties, obligations and achievement of BNI's goals. In addition, members of the Board of Directors must comply with the Articles of Association of the Company and laws and regulations and must implement the principles of professionalism, efficiency, transparency, independence, accountability, responsibility and fairness. Each member of the Board of Directors must carry out their duties and responsibilities in good faith, with full responsibility and prudently, with due observance of the prevailing laws and regulations.

LEGAL BASIS

Based on Law No. 40 of 2007 concerning Limited Liability Companies, as partially amended by Law No. 11 of 2020 concerning Job Creation, and OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers of Public Companies, the Board of Directors is authorized and fully responsible for the Company and represents the Company, both inside and outside the court in accordance with the provisions of the Articles of Association.

BOARD OF DIRECTORS' GUIDELINES AND WORK CONDUCT

The BNI Board of Directors' Guidelines and Work Conduct were ratified through the BNI Board of Directors Decree No. KP/228/DIR/R dated June 29, 2018.

The Board of Directors Charter regulates, the Legal Basis, Structure, Requirements, Duties, Authorities and Responsibilities of the Board of Directors, Appointment and Dismissal of Members of the Board of Directors, Term of Office of the Board of Directors, Establishment of Committees under the Board of Directors, Board of Directors Meetings and Joint Meetings with the Board of Commissioners, Working Time of the Board of Directors, Company Values, Work Ethics of the Board of Directors, Transparency, and Reporting and Responsibility.

In addition to issues related to the work rules set out above, several key points of the Board of Directors work guidelines set out in the Board of Directors Work Guidelines and Procedures are described as follows.

BOARD OF DIRECTORS' DUTIES AND RESPONSIBILITIES

The Board of Directors is tasked with carrying out all activities related to the management of and is responsible for the management of BNI for the benefit of the Company in accordance with the aims and objectives of the Company and represents the Company both inside and outside the court on all matters and events with restrictions as stipulated in the laws and regulations, invitation, Articles of Association and/or Resolution of the GMS.

SCOPE OF WORK, RESPONSIBILITIES AND AUTHORITIES FOR EACH BOARD OF DIRECTORS' MEMBER

Throughout 2021, there were no changes in the Board of Directors' Nomenclature from that stipulated in the 2019 Annual General Meeting held on February 20, 2020, the division of duties or sectors of each Director was determined based on the Board of Directors' Decree No. KP/347/DIR/R dated July 30, 2021 concerning BNI Organizational Structure.

In carrying out their duties and responsibilities, each Director has full authority over the SEVP or the work unit they manage and is authorized to act for and on behalf of the Board of Directors, as long as they do not deviate from:

1. General Meeting of Shareholders Resolutions;
2. The Company's Articles of Association;
3. Corporate Plan;
4. The Board of Directors General Policy (KUD); and
5. The Board of Directors specific policies as stipulated in the Board of Directors Meeting or in a Board of Directors Decree or in other written form.

Board of Directors Distribution of Duties and Authorities for the period January 1 – December 31, 2021

NO.	NAME	POSITION	SECTOR
1	Royke Tumilaar	President Director	<ul style="list-style-type: none"> Internal Audit Unit Strategic Planning Division Corporate Communication & Secretarial Division SEVP Corporate Transformation
2	Adi Sulistyowati	Vice President Director	<ul style="list-style-type: none"> Policy Governance Division Anti Fraud Unit SEVP Digital Business Wholesale Solutions Division Retail Solutions Division
3	Corina Leyla Karnalies	Managing Director Consumer Business	<ul style="list-style-type: none"> Consumer Product Management Division Card Business Division Wealth Management Division Marketing Communications Division
4	Novita Widya Anggraini	Managing Director Finance	<ul style="list-style-type: none"> Budgeting & Financial Control Division Asset Management & Procurement Division Data Management & Analytics Division Subsidiary Development Division Investor Relations Division Office of Chief Economist
5	Y.B. Hariantono	Managing Director Information Technology & Operations	<ul style="list-style-type: none"> IT Strategy & Architecture Division IT Development Division Digital Development Division IT Operations Division Information Security Division SEVP Operational Operational Division Digital Operations Division Credit Operations Division
6	Bob Tyasika Ananta	Managing Director Human Capital and Compliance	<ul style="list-style-type: none"> Compliance Division Legal Division Human Capital Strategy Division Human Capital Services Division BNI Corporate University
7	Silvano Winston Rumanir	Managing Director Corporate Banking	<ul style="list-style-type: none"> Corporate Business Division 1 Corporate Business Division 2 Corporate Business Division 3 Syndication & Corporate Solutions Division
8	David Pirzada	Managing Director Risk Management	<ul style="list-style-type: none"> Bank Risk Management Division Corporate Credit Risk Division Commercial & SME Credit Risk Division Consumer Credit Collection & Processing Division SEVP Remedial & Recovery Corporate Remedial & Recovery Division Commercial & SME Remedial & Recovery Division
9	Sis Apik Wijayanto	Managing Director Institutional Relations	<ul style="list-style-type: none"> Institutional Relations Division 1 Institutional Relations Division 2 Small Business & Programs Division
10	Ronny Venir	Managing Director Service and Network	<ul style="list-style-type: none"> Network Management Division Sales Division Service Quality Division Customer Service Center Unit Region 01-17 Business Optimization
11	Muhammad Iqbal	Managing Director MSME	<ul style="list-style-type: none"> Commercial Business Division 1 Commercial Business Division 2 SME Business Division
12	Henry Panjaitan	Managing Director Treasury and International	<ul style="list-style-type: none"> International Division SEVP Treasury Treasury Division Financial Institution Pension Fund Division

BOARD OF DIRECTORS' RIGHTS AND AUTHORITIES

In performing its duties, the Board of Directors has the authority to:

1. Establish policies deemed appropriate in the management of the Company;
2. Arrange the transfer of power of the Board of Directors to represent the Company inside and outside the court to a person or several persons who are specifically designated for such reason including the Company's employee, either individually or jointly, and/or other entity;
3. Manage provisions on the Company's employment affairs including determining salary, retirement, pension plan, and other income for the Company's employees based on the applicable laws and regulations;
4. Appoint, reward or sanction and dismiss the Company's employees based on the Company's employment regulations and applicable laws and regulations;
5. Appoint and dismiss the Corporate Secretary and/or Head of the Internal Audit Unit with the approval of the Board of Commissioners;
6. Write off bad debts based on provisions stipulated in the Articles of Association and subsequently report them to the Board of Commissioners, which shall subsequently be reported and accounted for in the Annual Report;
7. No longer collect interest receivables, fines, fees, and other receivables other than the principal that is carried out in the framework of restructuring and/or settlement of receivables and other actions in order to settle the Company's receivables, with the obligation to report to the Board of Commissioners, in which the provisions and procedures for reporting are determined by the Board of Commissioners.
8. Perform any actions and other activities regarding the management or ownership of the Company's assets, bind the Company to other parties and/or other parties to the Company, as well as represent the Company inside or outside court in all matters and occurrences with limitations as stipulated under the laws and regulations, the Articles of Association, and/or GMS Resolutions.

BOARD OF DIRECTORS' OBLIGATIONS

The Board of Directors' obligations include:

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 in point 4 above 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 Dwiwarna Series A; 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 Dwiwarna Series A, by observing the laws and regulations particularly in Capital Market sector.
 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 RECEIVE WRITTEN APPROVAL FROM THE BOARD OF COMMISSIONERS

1. The following actions by the Board of Directors must obtain prior written approval from the Board of Commissioners:
 - a. Releasing/transferring and/or pledging the Company's assets with criteria and value exceeding a certain amount determined by the Board of Commissioners, except for assets recorded as inventory, with due observance of provisions in the capital market and banking sector;
 - b. Establishing 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 set by the Board of Commissioners;
 - c. Establishing and changing the Company's logo;
 - d. Determining the organizational structure of 1 (one) level below the Board of Directors;
 - e. Making equity participation, releasing equity participation including changes in capital structure of a certain value determined by the Board of Commissioners in other companies, subsidiaries and joint ventures that are not in the context of saving receivables by taking into account the provisions in the Capital Market sector;
 - f. Establishing a subsidiary and/or joint venture of a certain value determined by the Board of Commissioners with due observance of the provisions in the Capital Market sector;
 - g. Proposing representatives of the Company to

become candidates as 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;

- h. Merging, consolidating, taking over, separating, and dissolving subsidiaries and joint ventures of a certain value determined by the Board of Commissioners with due observance of the provisions in the Capital Market sector;
- i. Performing actions included in material transactions as stipulated by legislation in the field of capital markets of a certain value set by the Board of Commissioners, unless such actions are included in material transactions that are exempted by applicable laws in the field of Capital Markets;
- j. Actions not yet specified in the RKAP;
- k. The act of transferring includes selling, forfeiting the right to collect and/or no longer charging for:
 - i) Bad principal receivables that have been written off in order to settle the credit, either in part or in whole;
 - ii) The difference between the value of bad principal receivables that have been written off with the value of the transfer including sales or with the value of the disposal.

Implemented based on a Board of Directors policy as approved by the Board of Commissioners with a ceiling (limit) amount for write-offs as determined by the GMS, which will remain in effect until a new ceiling (limit) is determined by the GMS.

2. The approval of the Board of Commissioners regarding letters a, b, e, f, g, and h for certain limitations and/or criteria, is determined after obtaining approval from the Series A Dwiwarna Shareholder.
3. Determination of limits and/or criteria by the Board of Commissioners for the matters referred to in letters a, b, e, f, g, and h, is carried out after obtaining approval from the Series A Dwiwarna Shareholder.
4. The actions of the Board of Directors as referred to in letter b, as long as they are necessary in the context of carrying out the main business activities that are commonly carried out in the relevant business field with due observance of the provisions of laws and regulations, do not require the approval of the Board of Commissioners and/or GMS.
5. Within a maximum period of 30 (thirty) days from the receipt of the application or explanation and complete documents from the Board of Directors, the Board of Commissioners must provide the decision as referred to in number 1.

BOARD OF DIRECTORS' ACTIONS THAT MUST RECEIVE GMS APPROVAL

1. The Board of Directors is required to seek GMS approval for:
 - a. Transferring the Company's assets; or
 - b. Collateral for the Company's assets debt. that constitutes more than 50% (fifty percent) of the total Company net assets in 1 (one) or more transactions, whether related to each other or not, except as 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 party in the legal act has good intentions.
3. The GMS may reduce restrictions on the Board of Directors actions as regulated in the Articles of Association or determine other restrictions on the Board of Directors other than those stipulated in the Articles of Association.

BOARD OF DIRECTORS' ACTIONS THAT MUST RECEIVE A WRITTEN RESPONSE FROM THE BOARD OF COMMISSIONERS AND APPROVAL AT THE GMS

1. The actions below can only be carried out by the Board of Directors after obtaining a written response from the Board of Commissioners and obtaining approval from the GMS for:
 - a. Performing actions that are included as material transactions as stipulated by legislation in the field of capital markets with a value above 50% (fifty percent) of the Company's equity, unless such actions are included in material transactions that are exempted by applicable Laws in the field of Capital Markets;

- b. Conducting transactions that contain a conflict of interest as specified in the Legislation in force in the capital market;
 - c. Performing other transactions in order to comply with the Laws and Regulations in force in the capital market.
2. If within 30 (thirty) days from the receipt of the application or explanation and complete documents from the Board of Directors, the Board of Commissioners does not provide a written response, the GMS may issue a decision without a written response from the Board of Commissioners.
3. Actions carried out without the approval of the GMS remain binding on the Company as long as the other party in the legal act has good intentions.

DIRECTOR IN CHARGE OF COMPLIANCE FUNCTION

As the complexity of the Bank's business activities as a bank and a public company increases, mitigation of risks faced by the Bank is needed. To mitigate the risk of such business activities, preventive (ex-ante) and curative (expost) efforts become necessary. As part of preventive efforts, the Bank always adheres to applicable banking rules to reduce or minimize the risk of the bank's business activities.

In this regard, the Board of Directors has an obligation to develop and realize a Compliance Culture at all organizational levels and the Bank's business activities.

To enforce the Bank's compliance function, the Bank has a Director in charge of compliance, whose function is guided by OJK Regulation No. 46/POJK.03/2017 concerning Implementation of Compliance Function of Commercial Bank and Board of Directors Work Conduct.

DIRECTOR IN CHARGE OF COMPLIANCE FUNCTION REQUIREMENTS

In relation to its function, the candidate for Director in charge of compliance function shall fulfill the following requirements:

1. Candidate for Director in charge of compliance function must have sufficient integrity and knowledge on the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations.
2. The Director in charge of Compliance Function must fulfill the independence requirement. The “independence requirement” means not having financial, management, share ownership, and/or familial relationships up to second degree with members of Board of Commissioners, Board of Directors, and/or Controlling Shareholders or relationships with the Bank, which may affect their ability to act independently as stipulated in the provisions of Good Corporate Governance Implementation for Commercial banks.

STRUCTURE

1. The President Director and/or Vice President Director are not permitted to hold a concurrent position as Director in charge of Compliance Function.
2. The Director in charge of Compliance Function is prohibited from being in charge of the following functions:
 - a. Business and operations;
 - b. Risk management related to decision-making for the Bank’s business activities;
 - c. Treasury;
 - d. Finance and accounting;
 - e. Logistics and goods/services procurement;
 - f. Information Technology; and
 - g. Internal audit.
3. Replacement of Director in charge of compliance function:
 - a. In the event that the Director in charge of the Compliance function is unable to carry out their duties for more than 7 (seven) consecutive working days, the relevant duties must be temporarily replaced by another Director until the Director in charge of the Compliance function is able to carry out their duties again;
 - b. In the event that the Director in charge of the Compliance function is permanently unable to, resigns, or their term of office has expired, the Bank must immediately appoint a replacement 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 their term of office ends;

- c. During the process of replacing the Director in charge of the Compliance function, the Bank is required to appoint or assign another Director to temporarily carry out the duties of the Director in charge of the Compliance function;
- d. The Director who performs the temporary duties as the Director in charge of the Compliance function, must meet the above requirements, except when there is no Director who meets the requirements in the Company;
- e. The temporary replacement of the Director’s position in charge of the Compliance function must be reported to the Financial Services Authority.

DIRECTOR IN CHARGE OF COMPLIANCE FUNCTION DUTIES AND RESPONSIBILITIES

The Director in charge of Compliance function duties and responsibilities, shall at least include:

1. Formulating strategies to encourage the creation of the Bank’s Compliance Culture.
2. Proposing compliance policies or compliance principles to be stipulated by the Board of Directors.
3. Establishing compliance systems and procedures to be used to develop the Bank’s internal rules and guidelines.
4. Ensuring all policies, regulations, systems, and procedures, as well as business activities conducted by the Bank are in accordance with provisions of the Financial Services Authority, Bank Indonesia, and the prevailing laws and regulations.
5. Minimizing the Bank’s Compliance Risk.
6. Taking precautionary measures so that the Bank’s Board of Directors policies and/or decisions do not deviate from the provisions of the Financial Services Authority, Bank Indonesia, and the applicable laws and regulations.
7. In the context of implementing the Anti Money Laundering (APU) and Prevention of Terrorism Funding (PPT) Program, the Compliance Director has at least the duties and responsibilities to:
 - a. Proposing strategic written policies and procedures concerning the APU and PPT programs implementation to the Board of Commissioners;
 - b. Ensuring there are discussions related to money laundering and/or terrorism financing in the Board of Directors and Board of Commissioners meetings;
 - c. Determining the necessary steps to ensure the Bank has complied with the provisions of the Financial Services Authority concerning APU and PPT and other relevant laws and regulations;
 - d. Ensuring the scope of active supervision of the Board of Directors has been adequately met;

- e. Monitoring and maintaining the Bank's compliance with all commitments made by the Bank to the Financial Services Authority, including commitments in the Action Plan, the Data Update Activity Plan Report, and the results of Bank Indonesia supervision related to the implementation of the APU and PPT Programs;
 - f. Monitoring the implementation of the Special Work Unit and/or Bank officials duties responsible for the implementation of APU and PPT;
 - g. Providing recommendations to the President Director concerning the official to lead the Special Work Unit or the official responsible for the implementation of the APU and PPT Programs;
 - h. Approving the Suspicious Financial Transaction Report (LTKM);
 - i. Proposing Action Plan Reports and Data Update Plan Reports prior to submission to the Financial Services Authority.
8. The Director in charge of Compliance Function must submit reports to Financial Services Authority on their duties implementation covering:
 - a. Compliance Work Plan contained in the Bank's Business Plan;
 - b. Compliance Report; and
 - c. Special Report on Board of Director policies and/or decisions for the Director in charge of Compliance Function that deviate from Financial Services Authority regulations and/or the prevailing laws and regulations, as part of the Director in charge of Compliance Function duties.
 9. Reporting the implementation of the President Director duties and responsibilities with copies to the Board of Commissioners at least in a quarterly manner.
 10. Performing other duties related to Compliance Function.
1. Integrity, at least including:
 - a. Proficient in performing legal actions in the 5 (five) years before appointment and during their term of office:
 - i) Has never been declared bankrupt; or
 - ii) 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;
 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).

BOARD OF DIRECTORS' CRITERIA

Those eligible to be appointed as members of the Board of Directors are individuals who satisfy the following requirements upon appointment and during their term of office:

BOARD OF DIRECTORS TERM OF OFFICE

The Board of Directors term of office is at most 2 (two) consecutive periods, with the following conditions:

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.
2. Dismissal is effective from the closing of the GMS, unless otherwise determined by the GMS.
3. After the term of office ends, the members of the Board of Directors may be reappointed by the GMS for 1 (one) term of office.

BOARD OF DIRECTORS' NUMBER AND COMPOSITION

In 2021, there were no changes in the Board of Directors composition, and BNI's Board of Directors composition as of December 31, 2021 was as follows:

NAME	POSITION	DOMICILE	DATE OF APPOINTMENT	EFFECTIVE DATE
Royke Tumilaar	President Director	Jakarta	September 2, 2020	November 19, 2020
Adi Sulistyowati	Vice President Director	Jakarta	<ul style="list-style-type: none"> March 17, 2015 (appointed as Director of Institutional Relations) September 2, 2020 (reassigned to Deputy President Director) 	<ul style="list-style-type: none"> May 22, 2015 November 6, 2020
Corina Leyla Karnalies	Managing Director Consumer Business	Jakarta	February 20, 2020	June 26, 2020
Novita Widya Anggraini	Managing Director Finance	Jakarta	September 2, 2020	November 19, 2020
Y.B. Hariantono	Managing Director Information Technology & Operations	Jakarta	February 20, 2020	August 12, 2020
Bob Tyasika Ananta	Managing Director Human Capital and Compliance	Jakarta	<ul style="list-style-type: none"> March 17, 2015 (appointed as Director of Risk Management) February 20, 2020 (reassigned to Human Capital and Compliance Director) 	May 22, 2020
Silvano Winston Rumanthir	Managing Director Corporate Banking	Jakarta	September 2, 2020	December 1, 2020
David Pirzada	Managing Director Risk Management	Jakarta	September 2, 2020	December 1, 2020
Sis Apik Wijayanto	Managing Director Institutional Relations	Jakarta	February 20, 2020	June 26, 2020

NAME	POSITION	DOMICILE	DATE OF APPOINTMENT	EFFECTIVE DATE
Ronny Venir	Managing Director Service and Network	Jakarta	September 2, 2020	November 6, 2020
Muhammad Iqbal	Managing Director MSME	Jakarta	September 2, 2020	November 19, 2020
Henry Panjaitan	Managing Director Treasury and International	Jakarta	September 2, 2020	November 12, 2020

BASIS FOR APPOINTMENT OF MEMBERS OF THE BOARD OF DIRECTORS

In accordance with Article 11 paragraph (10) of the Company's Articles of Association, members of the Board of Directors are appointed and dismissed by the GMS. The appointment of each member of the Board of Directors was as follows:

NO.	NAME	POSITION	DATE OF APPOINTMENT
1	Royke Tumilaar	President Director	EGMS September 2, 2020
2	Adi Sulistyowati	Vice President Director	Annual GMS dated March 17, 2015 was dismissed and reappointed as Managing Director Services and Network at the Annual GMS dated February 20, 2020, with his assignment transferred to Vice President Director at the EGMS dated September 2, 2020
3	Corina Leyla Karnalies	Managing Director Consumer Business	Annual GMS February 20, 2020
4	Novita Widya Anggraini	Managing Director Finance	EGMS September 2, 2020
5	Y.B. Hariantono	Managing Director Information Technology & Operations	AGMS February 20, 2020
6	Bob Tyasika Ananta	Managing Director Human Capital and Compliance	AGMS February 20, 2020
7	Silvano Winston Rumantir	Managing Director Corporate Banking	EGMS September 2, 2020
8	David Pirzada	Managing Director Risk Management	EGMS September 2, 2020
9	Sis Apik Wijayanto	Managing Director Institutional Relations	AGMS September 2, 2020
10	Ronny Venir	Managing Director Service and Network	EGMS September 2, 2020
11	Muhammad Iqbal	Managing Director MSME	EGMS September 2, 2020
12	Henry Panjaitan	Managing Director Treasury and International	EGMS September 2, 2020

FIT AND PROPER TEST

The appointment of members of the Board of Directors is effective after obtaining approval from the Financial Services Authority on the Fit and Proper Test in accordance with Financial Services Authority Regulation Number 27/POJK.03/2016 concerning the Fit and Proper Test for Primary Parties of Financial Services Institutions, and compliance with prevailing laws and regulations. In order to participate in the Fit and Proper Test process, the Company submits an application for approval of its Board of Directors candidate to the Financial Services Authority.

Fit and Proper Test

NO.	NAME	POSITION	ORGANIZER	EFFECTIVE DATE BASED ON OJK LETTER
1	Royke Tumilaar	President Director	Financial Services Authority	November 19, 2020
2	Adi Sulistyowati	Vice President Director	Financial Services Authority	November 6, 2020

NO.	NAME	POSITION	ORGANIZER	EFFECTIVE DATE BASED ON OJK LETTER
3	Corina Leyla Karnalies	Managing Director Consumer Business	Financial Services Authority	June 30, 2020
4	Novita Widya Anggraini	Managing Director Finance	Financial Services Authority	November 19, 2020
5	Y.B. Hariantono	Managing Director Information Technology & Operations	Financial Services Authority	August 14, 2020
6	Bob Tyasika Ananta	Managing Director Human Capital and Compliance	Financial Services Authority	May 22, 2020
7	Silvano Winston Rumanthir	Managing Director Corporate Banking	Financial Services Authority	December 1, 2020
8	David Pirzada	Managing Director Risk Management	Financial Services Authority	December 1, 2020
9	Sis Apik Wijayanto	Managing Director Institutional Relations	Financial Services Authority	June 30, 2020
10	Ronny Venir	Managing Director Service and Network	Financial Services Authority	November 6, 2020
11	Muhammad Iqbal	Managing Director MSME	Financial Services Authority	November 19, 2020
12	Henry Panjaitan	Managing Director Treasury and International	Financial Services Authority	November 13, 2020

NEW DIRECTORS' ORIENTATION AND INDUCTION PROGRAM

The orientation and induction program for new members of the Board of Directors, includes:

1. Discussions on the Annual Report, the Company's Work Plan and Budget (RKAP), and the Company's Long-term Plan (RJPP), Code of Ethics, Board of Directors' Guidelines for Work Conduct, Corporate Governance Handbook, and the Articles of Association.
2. Explanations relating to delegated authority, internal and external audits, internal control systems and policies, as well as duties and roles of the Audit Committee and other committees under the Board of Directors and the Board of Commissioners.
3. Description on duties, authority, and responsibilities of the Board of Commissioners and the Board of Directors.

These explanations are given by way of a presentation by the related Units to the members of the Board of Directors as well as by conducting visits to BNI Regional/Branch Offices.

The Orientation and Introduction Program for New Directors was not carried out in 2021 as there were no appointments of new members to the Board of Directors in 2021.

BOARD OF DIRECTORS CONCURRENT POSITIONS

Members of the BNI Board of Directors do not hold concurrent positions that are prohibited under the prevailing laws and regulations. The concurrent positions of members of the Board of Directors that are allowed under the prevailing laws and regulations are carried out by the members of the Board of Commissioners concerned without neglecting the implementation of their duties and responsibilities as a member of the Board of Commissioners of the Bank.

The provisions on concurrent position for the Board of Directors are stipulated in the following regulations:

1. Minister of SOEs Regulation No. PER-11/MBU/07/2021 concerning Requirements, Procedures for Appointment and Dismissal of Members of the Board of Directors of SOEs, members of the Board of Directors are prohibited from holding concurrent positions as:

- a. Directors in SOEs, regionally-owned enterprises, private-owned enterprises;
- b. Board of Commissioners/Supervisory Board of SOEs and other companies;
- c. Other structural and functional positions in central and/or regional government agencies/institutions;
- d. Other positions in accordance with the provisions of the legislation;
- e. Political party administrators, members of the legislature and/or regional heads/deputy regional heads;
- f. Other positions that may cause a conflict of interest; and/or
- g. Standing as a legislative candidate or a candidate for regional head/deputy regional head.

In addition to these concurrent positions, members of the Board of Directors are prohibited from holding concurrent positions as members of the Board of Commissioners in other companies, except:

- a. The Board of Commissioners in a subsidiary of the BUMN/SOE affiliated company concerned, provided that they are only entitled to the highest income from the positions they hold, unless stipulated otherwise by the Minister;
- b. Board of Commissioners in other companies who represent/fight for the interests of SOEs as long as they obtain permission from the Minister of SOEs.

2. Based on OJK Regulation No. 55/POJK.03/2016, members of the Board of Directors are prohibited to holding concurrent position as members of Board of Directors, members of the Board of Commissioners, or Executive Officers at other banks, companies, and/or institutions. Nonetheless, it does not include concurrent positions in the event that the Board of Directors is in charge of monitoring a Bank's subsidiary, running functional duties as members of the Board of Commissioners at a non-bank subsidiary controlled by the Bank, as long as it does not cause the related Director to ignore the implementation of their duties and responsibilities as members of the Bank's Board of Directors.

NAME	MEMBER OF THE BOARD OF DIRECTORS OF STATE-OWNED COMPANIES, REGIONAL- OWNED ENTERPRISES, PRIVATE- OWNED ENTERPRISES	MANAGEMENT BOARD OF POLITICAL PARTIES AND/OR CANDIDATES/ MEMBERS 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.
Royke Tumilaar	No	No	No	No
Adi Sulistyowati	No	No	No	No
Corina Leyla Karnalies	No	No	No	No
Novita Widya Anggraini	No	No	No	No
Y.B. Hariantono	No	No	No	No
Bob Tyasika Ananta	No	No	No	No
Silvano Winston Rumantir	No	No	No	No
David Pirzada	No	No	No	No
Sis Apik Wijayanto	No	No	No	No
Ronny Venir	No	No	No	No
Muhammad Iqbal	No	No	No	No
Henry Panjaitan	No	No	No	No



MANAGEMENT OF BOARD OF DIRECTORS' CONFLICTS OF INTEREST

Management of the Board of Directors' conflict of interest is stipulated in the Guidelines for Handling Conflict of Interest No. IN/695/KMP/001 dated October 29, 2014. A Conflict of Interest is a condition whereby the Company's economic interests contradict with personal economic interests. Regarding the above matter, members of the Board of Directors:

1. Must prioritize the Company's economic interest over personal economic interest or family or other parties;
2. Must never use their position for personal interest or for other person's or party's interest that is contrary to the Company's interest.
3. Must complete a Special Register containing their and/or their family's share ownership that reaches 5% (five percent) or more in the Bank or other companies located inside and outside the country.
4. Must disclose financial relationships and familial relationships with other members of the Board of Commissioners, members of the Board of Directors, and/or the Company's controlling shareholders.
5. Are prohibited from taking actions that may harm the Company or reduce the Company's profit and must disclose conflicts of interest in any decision in the event that a conflict of interest occurs.
6. Shall not participate in any discussion and decision-making that contains a potential conflict of interest.

BOARD OF DIRECTORS' INDEPENDENCY

Each member of the Board of Directors prepares a statement of independence in the form of a Statement of Acting Independently in the Implementation of the Company's Operational Management at the beginning of each year to state their independence status, and at the end of each year to state whether during the last year there has been a conflict of interest situation by the Board of Directors, and the actions taken.

Members of the Board of Directors are obliged to report if there is a change in status that affects their independence, including if there is a change in share ownership, both personal and familial, in BNI and or in other banks, non-bank financial institutions, and other companies.

Statement of Independent Commissioners

NO	STATEMENT	ROYKE TUMILAAAR	ADI SULISTYOWATI	CORINA LEYLA KARNALIES	NOVITA WIDYA ANGGRAINI	Y.B. HARIANTONO	
1	Is an party independent to the owner of the bank or PSP	√	√	√	√	√	
2	Does not have financial, management, share ownership and/or familial relationships with other members of the Board of Commissioners, members of the Board of Directors and/or controlling shareholders or other relationships that may affect their ability to act independently	√	√	√	√	√	



	BOB TYASIKA ANANTA	SILVANO WINSTON RUMANTIR	DAVID PIRZADA	SIS APIK WIJAYANTO	RONNY VENIR	MUHAMMAD IQBAL	HENRY PANJAITAN
	√	√	√	√	√	√	√
	√	√	√	√	√	√	√

IMPLEMENTATION OF BOARD OF DIRECTORS' DUTIES AND RESPONSIBILITIES IN 2021

During 2021, the Board of Directors carried out management duties in accordance with applicable laws and regulations as well as the Company's Articles of Association, including:

1. Compiling the Company's plans, including the Corporate Plan revision, RBB, and RBB revision;
2. Fulfilling the Company's performance targets;
3. Managing the assets and finance;
4. Organizing the Board of Directors Meeting;
5. Attending the Board of Commissioners Meetings;
6. Organizing the General Meeting of Shareholders;
7. Supervising and improving the internal business processes;
8. Other assignments are related to the Company's management.

BOARD OF DIRECTORS' DECISIONS IN 2021

During 2021, members of the Board of Directors issued 94 Decrees, including:

NO	REGARDING
1	Judiciary Decision of Employee 2020 Performance Assessment and Talent Classification 2021 for C-1 employees
2	Individual authority for temporary loan approval
3	Authority on loan approvals
4	Retirement preparation period (MPP)
5	Rotations/position changes
6	BNI 75th anniversary Committee
7	Revaluation of BNI Fixed Assets (Land and Building) Committee
8	Establishment of Digital Development Organization Division
9	Establishment of Commercial Business Organization Division 1
10	Establishment of Institutional Relations Organization Division 2
11	Establishment of Institutional Relations Organization Division 2
12	Establishment of Human Capital Organization Division
13	Establishment of Human Capital Services Organization Division
14	Establishment of Human Capital Strategy Organization Division
15	Establishment of Investor Relations Organization Division
16	Establishment of IT Development Organization Division
17	Establishment of Chief Economist Organization Office
18	Establishment of Organization Anti Fraud Unit
19	Establishment of BNI Fiscal Year 2021 Annual Report Team
20	Establishment of Organization Regional Office Implementation Team
21	Establishment of BNI 2021 Sustainability Report team
22	Establishment of TASK Force Team for Acceleration of Corporate Customer Cross Selling
23	Establishment of Task Force Team for BNI (Green Bond) in 2022
24	Establishment of Task Force Team for BNI Tier 2 Capital Bond 2021 Issuance
25	Enactment of the Republic of Indonesia Minister of SOEs' No. PER-05/MBU/04/2021 concerning Social and Environmental Responsibility Programs in State-Owned Enterprises (BUMN SER Program)
26	Positioning the Risk Management & Anti Fraud Committee (KRA)
27	Positioning the Technology Management Committee
28	Positioning the BNI Board of Directors
29	Organizational Structure for the Corporate Business Division 1
30	Organizational Structure for the Corporate Business Division 2

NO	REGARDING
31	Organizational Structure for the Corporate Business Division 3
32	Organizational Structure for the SME Business Division
33	Organizational Structure for the Financial Institution Pension Fund Division
34	Organizational Structure for the Legal Division Organization
35	Organizational Structure for the International Division Organization
36	Organizational Structure for the Compliance Division
37	Organizational Structure for the Credit Operational Division
38	Organizational Structure for the IT Operational Division
39	Organizational Structure for the Consumer Credit Processing & Billing Division
40	Organizational Structure for the Budgeting & Financial Control Division
41	Organizational Structure for the Subsidiary Development Division
42	Organizational Structure for the Sales Division
43	Organizational Structure for the Corporate Credit Risk Division
44	Organizational Structure for the Syndications & Corporate Solutions Division
45	Organizational Structure for the Retail Solutions Division
46	Organizational Structure for the Wholesale Solutions Division
47	Organizational Structure for the IT Strategy & Architecture Division
48	Organizational Structure for the Treasury Division
49	Organizational Structure for the Singapore Overseas Branch Office
50	Organizational Structure for the Regional Offices
51	Organizational Structure for the Internal Audit Unit
52	Organizational Structure for the Financial Institutions Pension Unit
53	Position Grades Determination
54	Mutation/Change of Position
55	End of Work Relationships
56	Extension of Assignment as Bank Negara Indonesia Pension Fund Manager
57	SK Temporary Replacement
58	Appointment/Consolidation of Officers
59	Re-Appointment as Bank Negara Bank Indonesia Pension Fund Head of Supervisory Board
60	Temporary substitute for the DGL Division Head
61	Temporary substitute for the HCE Division Head
62	Temporary substitute for the KMP Division Head
63	Temporary substitute for the MTI Division Head
64	Temporary substitute for the OPK Division Head
65	Temporary substitute for the OTI Division Head
66	Temporary substitute for the REN Division Head
67	Temporary substitute for the STI Division Head
68	Temporary substitute for the SAF
69	Masa Bhakti Employee Awards
70	Appointment/Consolidation Changes in connection with organization change
71	Appointment of Employees
72	Pension
73	Organizational Structure for the Strategic Planning Division
74	Assignment as Administrator of the Bank Negara Indonesia Pension Fund
75	Appointment/Assignment of the BNI Corporate Transformation Program Implementation Team

NO	REGARDING
76	Appointment and Assignment of Employees as PIC Contributors for Ministry of BUMN Public Portal Content
77	Appointment of APU & PPT DPLK BNI Responsibility
78	Appointment and Duties Assignment for the Financial Institution Pension Unit Management
79	Appointment/Assignment of the BNI Corporate Transformation Program Implementation Team
80	Position Grades Adjustment
81	Positions and Position Grades Adjustment
82	Second Change to the SK Project and Crash Cleansing Data Program 2021 Ad-hoc Team
83	Changes to the SK Project and Crash Cleansing Data Program 2021 Ad-hoc Team
84	Internal Audit Charter for PT Bank Negara Indonesia (Persero) Tbk
85	Optimization Project for Business Banking BNI Loans at Risk
86	SK Program for BNI Corporate Actions
87	SK Implementation Team for Strengthening BNI Capital Management
88	SK Implementation Team for BNI Corporate Transformation
89	SK for MSME Business Digitization Project Team
90	Crash Cleansing Data Program 2021 Ad-hoc Team
91	Project Teamfor Implementation of Middle Credit Consolidation (SKM)
92	Establishment of Transition team for the UKM1 Business Division
93	Appointment of APU & PPT DPLK BNI Responsibility
94	Revocation of APU & PPT DPLK BNI Responsibility

BOARD OF DIRECTORS' COMPETENCY DEVELOPMENT

Board of Directors competency development can be seen in the Company Profile section of this Annual Report.

RISK MANAGEMENT CERTIFICATION

All of BNI's Board of Directors have passed Level 5 Risk Management Certification as one of the requirements for the fit and proper test, as administered by the Financial Services Authority.

BOARD OF DIRECTORS' DISMISSAL AND RESIGNATION MECHANISM

The mechanism for the Board of Directors dismissal and resignation is stipulated in the Company's Articles of Association, which refers to OJK Regulation No. 33/POJK.04/2014 and OJK Regulation No. 15/POJK.04/2014, stating that:

1. The GMS may dismiss members of the Board of Directors at any time by stating the reasons.
2. The reasons for dismissing member of the Board of Directors are made, in the event that based on fact, the related 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 the 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 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 themselves, 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 expires, unless due to death, 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:
 - i) There is a GMS decision confirming or revoking the temporary dismissal in item 8 letter d; or
 - ii) The time period in item 8 letter d has passed.
 - g. In the GMS as referred to in item 8 letter d, the related member of the Board of Directors is given an opportunity to defend themselves.
 - h. Such temporary dismissals cannot be extended or re-established for the same reasons, in the event that such temporary dismissal is declared void as referred to in item 8 letter e.
 - i. 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.
 - j. 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.
 - k. 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 themselves in the GMS and has accepted the GMS resolution.

PERFORMANCE ASSESSMENT FOR COMMITTEES UNDER THE BOARD OF DIRECTORS

In carrying out its management duties, the Board of Directors has established committees at Board of Directors' level based on BNI's business needs and regulatory requirements, who are expected to create operational effectiveness and efficiency, including:

1. Credit Committee;
2. Credit and Business Policy Committee;
3. Product Committee;
4. Asset & Liability (ALCO) Committee;
5. Human Capital Committee (HC);
6. Performance Management Committee;
7. Risk Management and Anti Fraud Committee;
8. Technology Management Committee;
9. Integrated Risk Management Committee;

During 2021, the Board of Directors assessed that the performance of the Committees under the Board of Directors, and they carried out their respective functions well, according to the purpose of their formation. This is based on the fulfillment of each committee duties in accordance with the Committee Charter, Competence and Skills as well as Meeting Attendance Level of the Committee members.

Board of Directors

Performance Assessment

The performance appraisal of the Board of Directors in 2021 refers to the Minister of SOE Regulation No. PER-11/MBU/11/2020 dated November 12, 2020 regarding Management Contracts and Annual Management Contracts for SOE Directors and KBUMN Letter No. S-63 /MBU/01/2021: January 29, 2021.

The 2021 Key Performance Index (KPI) for the Board of Directors consists of collegial KPIs and Individual KPIs. Collegial KPI is translated into 5 (five) priority programs, namely Social Economic Value, Business Model Innovation, Technology Leadership, Investment Increase, and Talent Development. Each priority program consists of several KPIs that reflect financial and non-financial performance targets that are in line with the strategic initiatives that have been set.

The following are the Board of Directors Collegial KPIs for 2021:

KPI Table of Board of Directors Collegial 2021

PERSPECTIVE		WEIGHT	NO	BOARD OF DIRECTORS KPI 2021		UNIT
Economic & Social Value For Indonesia	Financial	17%	6%	1	Net Profit After Tax (NPAT)	Rp T
			7%	2	PPOP (Pre Provision Operating Profit) Margin	%
			4%	3	ROIC (Return on Invested Capital) ≥ WACC	%
	Operational	29%	6%	4	Fee-Based Income Ratio	%
			7%	5	CKPN to NPL	%
			7%	6	CKPN to LaR	%
			5%	7	Cost of Credit	%
			4%	8	Cost of Fund	%
	Social	4%	4%	9	KUR distribution	%
Business Model Innovation	18%	5%	10	Growth of customers using M-Banking/Internet Banking/fintech facilities	%	
		5%	11	Wholesale banking financing leader through a value chain approach	%	
		3%	12	International Banking Business Leader	%	
		5%	13	SME customer growth	Total	
Technology Leadership	11%	3%	14	Sharpening blockchain initiative business strategy to support Wholesale business	%	
		4%	15	IT Maturity Level	Score	
		4%	16	Added API Partner	Total	
Investment Increase	9%	5%	17	Implementation of the merger of BSM, BRIS, and BNIS	%	
		4%	18	Enviroment Social Governance (ESG) Assessment	Rating	
Talent Development	12%	3%	19	% Female nominated talent at levels C-1 and C-2	%	
		3%	20	% Millennials (<40 years) at levels C-1 and C-2	%	
		3%	21	Number of Disabled Employees	Total	
		3%	22	Development index	%	

The individual KPI of the Board of Directors is the KPI in accordance with the main duties, functions and responsibilities of each Board of Directors.

Members of the Board of Commissioners and Board of Directors Composition Diversity Policy



BOARD OF COMMISSIONERS COMPOSITION DIVERSITY POLICY



In accordance with OJK Circular Letter No. 32/SEOJK.04/2015 dated November 27, 2015 concerning Guidelines for the Governance of Public Companies, it states that the Board of Commissioners composition must be a combination of individual characteristics of members of the Board of Commissioners and Board of Commissioners, in accordance with the needs of the Public Company. These characteristics are reflected in the expertise, knowledge, and experience needed in carrying out supervisory duties and providing advice by the Board of Commissioners of the Public Company. The composition that takes into account the needs of the public company is a positive thing, especially related to decision making in the context of implementing the supervisory function carried out by considering a broader range of aspects. Thus, the current composition of the Board of Commissioners has fulfilled the elements of diversity as reflected in their education, work experience, age and gender, as presented in the following table:

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	65 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics 	<ul style="list-style-type: none"> International Loan Officer, Bank of America NT & SA Assistance Vice President Business & Risk Management Division Head, Corporate Banking Group at Bank Niaga Area II East Java-Bali Vice President, Corporate Banking Head Surabaya at Bank Niaga Area II East Java-Bali Vice President, Regional Commercial Banking Head Area II Surabaya at Bank Niaga Vice President Corporate Banking Group Head at Bank Niaga Deputy CEO at Maharani Holding President Director at PT Bank Bumiputera President Director at PT Bank Export Import Indonesia (Persero) Managing Director Risk Management and Credit Restructuring at PT Bank Mandiri (Persero) Managing Director Retail Banking and Operation Coordinator at PT Bank Mandiri (Persero) Managing Director of Human Resources and Support Services at PT Bank Mandiri (Persero) Advisor to Chairman of IBRA President Director at PT Bank Permata Tbk President Director at PT Bank Mandiri (Persero) Tbk Minister of Finance Ministry of Finance RI Governor of Bank Indonesia Commissioner at PT AKR Corprindo Tbk President Commissioner at PT Tokopedia President Commissioner at PT Sarana Multi Infrastruktur (Persero) President Commissioner/ Independent Commissioner at PT Bank Negara Indonesia (Persero) Tbk. 	Economy

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Pradjoto	Vice President Commissioner/ Independent Commissioner	68 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's Degree in Law Master's Degree in Economics 	<ul style="list-style-type: none"> Professional Staff at PT Bank Pembangunan Indonesia (Bapindo) Research Associate Institute of Economic Research Kyoto University Founder/Head of Pradjoto & Associates – Advocates and Legal Consultant Lecturer of Management Post Graduate Program in Management, Universitas Atmajaya Yogyakarta Member of Sub-Commission E at the National Law Commission of the Republic of Indonesia Member of the National Ombudsman Commission Member of the Association of Capital Market Legal Consultants (HKHPM) Member of the Joint Corruption Crime Team (TGTPK) Chief Ombudsman at IBRA Independent Commissioner at Bank Internasional Indonesia Member of the Indonesian Advocates Association (Peradi) Board of Ethics at Risk Management Certification Body (BSMR) Independent Commissioner at PT Bank Mandiri (Persero) Tbk Advisory Board at the Indonesian Bankers Association (IBI) Senior Advisor at Bank Internasional Indonesia Chairman of the Banking Business Ethics Supervisory Board at the National Banks Association (Perbanas) Member of the Supervisory Board at the Indonesian Bankers Association (IBI) Deputy President Commissioner/Independent Commissioner at PT Bank Negara Indonesia 	<ul style="list-style-type: none"> Law Economy

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Joni Swastanto ¹⁾	Commissioner	65 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics Master 's degree in Economics PhD in Economics 	<ul style="list-style-type: none"> Head of Section at Bank Indonesia Bandung Deputy Head of Non-Foreign Exchange Bank Supervision 2 at Bank Indonesia Senior Bank Supervisor for Bank Supervision 3 at Bank Indonesia Executive Bank Supervisor for Bank Supervision Affairs 3 at Bank Indonesia Head of Foreign Exchange Management Analysis Division at Bank Indonesia Head of the Monetary Division at Bank Indonesia Head of Bank Indonesia Surabaya Bank Supervisor Senior Executive at Bank Indonesia Surabaya Deputy Director of Department of Banking Supervision 3 at Bank Indonesia Director of Banking Supervision Department 3 at Bank Indonesia Director of Licensing and Banking Information Department at Bank Indonesia Head of Semarang Representative Office at Bank Indonesia. Head of the Department of Banking Research and Development at the Financial Services Authority Head of the Department of Banking Licensing and Information at the Financial Services Authority Advisor to the Financial Services Authority Panelist Group Deputy Commissioner for Strategic Management 1B at Financial Services Authority Deputy Commissioner for Strategic Management 2B at Financial Services Authority Commissioner at PT Bank Negara Indonesia (Persero) Tbk 	Economy
Sigit Widyawan	Independent Commissioner	56 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's Degree in Economics Master's Degree in Accounting 	<ul style="list-style-type: none"> Head of Taxation Division at PT Wijaya Karya (Persero) Concrete Products Division Head of Finance at PT Wijaya Karya Beton Finance Director of Roda Jati Group Director of PT Roda Pembangunan Jaya Independent Commissioner of PT Jasamarga (Persero) Tbk Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk 	<ul style="list-style-type: none"> Economic accounting Finance

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Askolani	Commissioner	55 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics & Development Studies • Master's degree in Economics 	<ul style="list-style-type: none"> Head of Routine Expenditure Analysis Division of State Expenditure Analyst Center, Fiscal Analysis Agency, Ministry of Finance Lecturer of the Master's Program and Public Policy Planning, Post Graduate, at Fakultas Ekonomi Universitas Indonesia. Head of Sub-directorate of Central Government Expenditure Budgeting, Directorate of State Budget Preparation, Directorate General of Budget and Fiscal Balance, Ministry of Finance. Head of the Division of Formulation of State Expenditure Policy Recommendations, Center for State Expenditure Policy, Fiscal Policy Agency, Ministry of Finance. Head of PNB Policy Division, Central Budget Policy, Fiscal Policy Agency, Ministry of Finance. Head of State Budget Policy Center Central Budget Policy Center, Fiscal Policy Agency, Ministry of Finance Director of PNPB, Directorate of PNPB, Directorate General of Budget, Ministry of Finance Alternate Governor of the OPEC Fund for Indonesia OPEC Fund for International Development (OFID), Austria. Governor of the OPEC Fund for Indonesia OPEC Fund for International Development (OFID), Austria Commissioner at PT Pertamina Gas Commissioner at PT Angkasa Pura I (Persero) Commissioner at PT Bank Mandiri (Persero) Tbk Director General of Budget Directorate General of Budget at Ministry of Finance Director General of Customs and Excise Directorate, General Customs and Excise, Ministry of Finance Independent Commissioner at PT Bank Negara Indonesia (Persero) Tbk 	Economy

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Ratih Nurdianti	Commissioner	60 years as of December 31, 2021	Female	<ul style="list-style-type: none"> Bachelor's degree in Constitutional Law Master's degree in Commercial Law 	<ul style="list-style-type: none"> Head of the Bureau of Economy and Industry, Deputy Secretary of the Cabinet for Legal Affairs, Cabinet Secretariat of the Republic of Indonesia Assistant Deputy for Industry, Small and Medium Enterprises, Trade and Employment, Cabinet Secretariat of the Republic of Indonesia Deputy for Economic Affairs, Cabinet Secretariat, RI Deputy for Maritime Affairs, Cabinet Secretariat, RI Deputy Cabinet Secretary at RI Cabinet Secretariat Commissioner at PT Bank Negara Indonesia (Persero) Tbk. 	Law
Asmawi Syam	Independent Commissioner	66 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics Master's degree in Economics 	<ul style="list-style-type: none"> Head of the Corporate Division of PT Bank Rakyat Indonesia (Persero) Tbk Regional Head of BRI Denpasar PT Bank Rakyat Indonesia (Persero) Tbk Regional Head of BRI Bandung PT Bank Rakyat Indonesia (Persero) Tbk Head of the Consumer Banking Division of PT Bank Rakyat Indonesia (Persero) Tbk Head of General Business Division of PT Bank Rakyat Indonesia (Persero) Tbk Director of Institutional and BUMN Business PT Bank Rakyat Indonesia (Persero) Tbk President Director of PT Bank Rakyat Indonesia (Persero) Tbk President Director of PT Askrindo (Persero) President Director of PT Asuransi Jiwasraya (Persero) Special Staff to the Minister of SOEs, Ministry of SOEs Non-Independent President Commissioner of PT Bank Tabungan Negara (Persero) Tbk Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk 	Economy
Iman Sugema	Independent Commissioner	57 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Agribusiness Master's degree in Economics PhD in Economics 	<ul style="list-style-type: none"> Senior Lecturer at Institut Pertanian Bogor President Commissioner/ Independent Commissioner of PT Perusahaan Gas Negara (Persero) Tbk Commissioner of PT Bank Tabungan Negara (Persero) Tbk Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk 	<ul style="list-style-type: none"> Agribusiness Economics



NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Susyanto	Commissioner	59 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Civil Law Bachelor's degree in Law 	<ul style="list-style-type: none"> Head of Legal Documentation Sub Division at the Directorate General of Oil and Gas Head of Sub-Section for Formulation of Draft Legislation at the Directorate General of Oil and Gas Head of Sub-division for Considerations at the Directorate General of Oil and Gas Head of Legal and Legislation Division at the Directorate General of Oil and Gas Head of the Center for State Property Management, Secretariat General at the Ministry of Energy and Mineral Resources Head of Legal and Public Relations Bureau at the Ministry of Energy and Mineral Resources Head of the Legal Bureau at the Secretariat General of the Ministry of Energy and Mineral Resources Secretary of the Directorate General of Oil and Gas Directorate General of Oil and Gas Head of the Center for State Property Management, Secretariat General at the Ministry of Energy and Mineral Resources Secretary of the Ministry of State-Owned Enterprises Commissioner at PT Bank Negara Indonesia (Persero) Tbk. 	Law

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Septian Hario Seto	Independent Commissioner	37 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Civil Law Accounting Master's degree in International Finance 	<ul style="list-style-type: none"> Lecturer and Researcher at the Department of Accounting, Faculty of Economics and Business, University of Indonesia Investment Analyst Ciptadana Asset Management PricewaterhouseCoopers (PwC) Indonesia Junior Auditor Principia Management Group Analyst Finance Manager of PT Toba Bara Sejahtera Tbk Director/Echelon II Staff Office of the President of the Republic of Indonesia Expert Staff of the Coordinating Minister for Political, Legal and Security Affairs at the Coordinating Ministry for Political, Legal and Security Affairs Expert Staff of the Coordinating Minister for Maritime Affairs, Coordinating Ministry for Maritime Affairs Special Staff to the Coordinating Minister for Maritime Affairs and Investment of the Coordinating Ministry for Maritime Affairs and Investment Deputy for Investment and Mining Coordination of the Coordinating Ministry for Maritime Affairs and Investment Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk 	<ul style="list-style-type: none"> Accounting Finance

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Erwin Rijanto Slamet ²⁾	Independent Commissioner	63 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics Master's degree in Economics 	<ul style="list-style-type: none"> Head of Section for Supervision of Non-Foreign Exchange Banks at Bank Indonesia Deputy Head of Department of Foreign Affairs/INDRA Bank Indonesia Head of Bank Indonesia 1 Bank Audit Division Executive Analyst, Department of Bank Research and Regulation, Bank Indonesia Head of Public Relations Bureau of the Governor of Bank Indonesia Deputy Head of the Governor's Bureau of Bank Indonesia Principal Researcher of the Department of Bank Research and Regulation, Bank Indonesia Deputy Director of Bank Supervision Department 3, Bank Indonesia Director of Bank Supervision Department 3, Bank Indonesia Director of the Singapore Representative Office of Bank Indonesia Executive Director of the Bank Indonesia Financial System Surveillance Department Executive Director of Bank Indonesia's Macroprudential Policy Department Member of the Board of Commissioners of the Deposit Insurance Corporation Ex Officio Bank Indonesia Deposit Insurance Corporation Deputy Governor of Bank Indonesia Lintasarta's President Commissioner Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk 	Economy

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

²⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

BOARD OF DIRECTORS' COMPOSITION DIVERSITY POLICY

The recommendation of the Financial Services Authority as outlined in the Attachment to the OJK Circular Letter No. 32/SEOJK.04/2015 concerning Guidelines for the Governance of Public Companies states that the composition of the members of the Board of Directors takes into account the composition diversity of the members of the Board of Directors. The composition diversity of the members of the Board of Directors is a combination of desirable characteristics, both in terms of the Board of Directors and individual members of the Board of Directors, in accordance with the needs of a Public Company. The combination is determined by taking into account the appropriate expertise, knowledge and experience in the division of the Board of Directors duties and functions to achieve the objectives of the Public Company. Considering this combination of characteristics will have an impact on the accuracy of the nomination process and the appointment of individual members of the Board of Directors or the Board of Directors collegially.

In accordance with Article 5 paragraph (4) letter c.2 of the Company's Articles of Association, Series A Dwiwarna Shareholders have the privilege to nominate candidates as members of the Company's Board of Directors. Based on Article 11 paragraph (10) of the Articles of Association, members of the Board of Directors are appointed and dismissed by the GMS, where the GMS is attended by the Series A Dwiwarna Shareholder and the meeting resolution must be approved by the Series A Dwiwarna Shareholder with due observance of the provisions in the Articles of Association.

Based on the Articles of Association provisions, the determination of the Board of Directors membership composition takes into account the diversity of expertise, knowledge and experience required as referred to in the Recommendation of the Financial Services Authority in the OJK Circular Letter Attachment No. 32/SEOJK.04/2015 concerning Guidelines for the Governance of a Public Company, which has been fulfilled by Series A Dwiwarna Shareholders as Shareholders with are entitled to nominate candidates for members of the Board of Directors. Thus, the current the Board of Directors diversity composition reflecting the education, work experience, age and gender, as presented in the following table:

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Royke Tumilaar	President Director	57 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics Master of Business degree in Finance 	<ul style="list-style-type: none"> Director of Treasury, FI & Special Asset Management PT Bank Mandiri (Persero) Tbk Director of Wholesale Banking PT Bank Mandiri (Persero) Tbk Director of Corporate Banking PT Bank Mandiri (Persero) Tbk. President Director of PT Bank Mandiri (Persero) Tbk President Director of PT Bank Negara Indonesia (Persero) Tbk 	Management, credit, risk, marketing, treasury, international, procurement, special assets, finance, strategic planning

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Adi Sulistiyowati	Vice President Director	54 years as of December 31, 2021	Female	Bachelor's degree in Economics	<ul style="list-style-type: none"> VP Marketing and Sales BNI Financial Services Division and Institutional Funds PT Bank Negara Indonesia (Persero) Tbk Jakarta Senayan Regional Head at PT Bank Negara Indonesia (Persero) Tbk Head of Network Management Division of PT Bank Negara Indonesia (Persero) Tbk Director of Network and Services at PT Bank Negara Indonesia (Persero) Tbk Director of Banking Institutional and Transactional Relations at PT Bank Negara Indonesia (Persero) Tbk Director of Institutional Relations at PT Bank Negara Indonesia (Persero) Tbk Director of Services and Networks at PT Bank Negara Indonesia (Persero) Tbk Vice President Director PT Bank Negara Indonesia (Persero) Tbk 	Marketing & Networking; Transactional Banking, Credit; Operational Network
Corina Leyla Karnalies	Managing Director Consumer Business	53 years as of December 31, 2021	Female	Bachelor's degree in Physics	<ul style="list-style-type: none"> VP Deputy Division Head Operations Credit Card & Business Acquiring PT Bank Negara Indonesia (Persero) Tbk VP Deputy Division Head Collection Management PT Bank Negara Indonesia (Persero) Tbk SVP - Head of Card Business Division of PT Bank Negara Indonesia (Persero) Tbk SVP - Head of Product Development Management Division of PT Bank Negara Indonesia (Persero) Tbk SVP - Head of Data Management and Analytic Division of PT Bank Negara Indonesia (Persero) Tbk Managing Director Consumer Business PT Bank Negara Indonesia (Persero) Tbk 	Consumer Banking; Product Management; Collections; Portfolio Management

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Novita Widya Anggraini	Managing Director Finance	45 years as of December 31, 2021	Female	Bachelor's degree in Economics	<ul style="list-style-type: none"> Group Head Accounting PT Bank Mandiri (Persero) Tbk Group Head Strategy & Performance Management PT Bank Mandiri (Persero) Tbk Managing Director Finance PT Bank Negara Indonesia (Persero) Tbk 	Strategic and Corporate Plans; Performance Management (planning & budgeting); Finance & Accounting; Risk Management
Y.B. Hariantono	Managing Director IT & Operations	55 years as of December 31, 2021	Male	Bachelor's degree in Electrical Engineering	<ul style="list-style-type: none"> EVP, Head of Special Project at Bank Permata EVP, Network Head of Bank Permata EVP, IT Head BII - Maybank Director of Information Technology of Bank Mega Head of Information Technology Bank BTPN Managing Director IT & Operations PT Bank Negara Indonesia (Persero) Tbk 	Information Technology and Operations
Bob Tyasika Ananta	Managing Director Human Capital and Compliance	58 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Accounting Master's degree in Finance 	<ul style="list-style-type: none"> Strategic Planning Division Leader Director of Operations and Information Technology PT Bank Negara Indonesia (Persero) Tbk Director of Planning and Operations of PT Bank Negara Indonesia (Persero) Tbk Risk Management Director of PT Bank Negara Indonesia (Persero) Tbk Treasury and International Director of PT Bank Negara Indonesia (Persero) Tbk 	Human Capital, International Banking, Treasury, Corporate Finance and Strategic Management
Silvano Winston Rumantir	Managing Director Corporate Banking	43 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree Master's degree in Finance 	<ul style="list-style-type: none"> President Director of PT Mandiri Sekuritas Advisor at PT Mandiri Sekuritas Senior Executive Vice President Corporate Banking PT Bank Mandiri (Persero) Tbk Director of Finance and Strategy of PT Bank Mandiri (Persero) Tbk Managing Director Corporate Banking PT Bank Negara Indonesia (Persero) Tbk 	Finance, Capital Market, Corporate Banking

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
David Pirzada	Managing Director Risk Management	53 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor of Science degree in Electrical Engineering Master's degree in Business Management 	<ul style="list-style-type: none"> Head of Commercial Portfolio Administration The Bank of Tokyo Head of Credit and Market Middle Department The Bank of Tokyo Head of Risk Administration Department The Bank of Tokyo Country Chief Risk Officer The Bank of Tokyo SEVP Wholesale Risk PT Bank Mandiri (Persero) Tbk Managing Director Risk Management PT Bank Negara Indonesia (Persero) Tbk 	Risk, Credit
Sis Apik Wijayanto	Managing Director Institutional Relations	60 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Business Administration Master's degree in Management Doctor in Administrative Sciences 	<ul style="list-style-type: none"> Banjarmasin Regional Head at PT Bank Rakyat Indonesia (Persero) Tbk Jakarta Region 2 Head at PT Bank Rakyat Indonesia (Persero) Tbk Funding & Distribution Director at PT Bank Tabungan Negara (Persero) Tbk Consumer Director at PT Bank Rakyat Indonesia (Persero) Tbk Institutional & BUMN Relations Director at PT Bank Rakyat Indonesia (Persero) Tbk Managing Director Institutional Relations PT Bank Negara Indonesia (Persero) Tbk 	Strategic Management; Institutional Relations; Operational
Ronny Venir	Managing Director Service and Network	54 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Animal Husbandry Master's degree in Agribusiness 	<ul style="list-style-type: none"> Padang Regional Office Head at PT Bank Negara Indonesia (Persero) Tbk Jakarta City Regional Office Head at PT Bank Negara Indonesia (Persero) Tbk Small Business Division Head at PT Bank Negara Indonesia (Persero) Tbk SEVP Medium Business at PT Bank Negara Indonesia (Persero) Tbk SEVP Network at PT Bank Negara Indonesia (Persero) Tbk Managing Director Service and Network PT Bank Negara Indonesia (Persero) Tbk 	Management, Credit and Risk

NAME	POSITION	AGE (YEARS)	GENDER	EDUCATION	WORKING EXPERIENCE	EXPERTISE
Muhammad Iqbal	Managing Director MSME	48 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Engineering Master's degree in General Management Master of Business 	<ul style="list-style-type: none"> Head of the Consumer & Retail Business Risk Division of PT Bank Negara Indonesia (Persero) Tbk Head of the Consumer Product Management Division of PT Bank Negara Indonesia (Persero) Tbk Head of Consumer Banking Business PT Bank Muamalat (Persero) Tbk Senior Vice President Group Head Retail Product & Transaction Risk PT Bank Mandiri (Persero) Tbk Senior Vice President Group Head Small Medium Enterprise & Micro Risk PT Bank Mandiri (Persero) Tbk SVP Group Head Small Medium Enterprise Banking PT Bank Mandiri (Persero) Tbk Managing Director MSME PT Bank Negara Indonesia (Persero) Tbk 	Strategic Management, Risk Management, Credit Underwriting, Customer Relationship Management, Marketing Management, Management Consulting, Product Management, Business Banking, Consumer/Retail Banking
Henry Panjaitan	Managing Director Treasury and International	52 years as of December 31, 2021	Male	<ul style="list-style-type: none"> Bachelor's degree in Economics Master's degree in Commerce Master Management 	<ul style="list-style-type: none"> General Manager of the Hongkong Branch of PT Bank Negara Indonesia (Persero) Tbk Head of Business & Banking Jakarta Senayan Regional Office PT Bank Negara Indonesia (Persero) Tbk Head of the Business & Institutions Division of PT Bank Negara Indonesia (Persero) Tbk Head of the International Division of PT Bank Negara Indonesia (Persero) Tbk Jakarta BSD Regional Leader PT Bank Negara Indonesia (Persero) Tbk Jakarta Senayan Regional Leader PT Bank Negara Indonesia (Persero) Tbk 	Management, Risk, Kredit, Marketing

Good Corporate Governance Assessment

Each year, BNI carries out assessments with the aim of measuring or mapping the condition of the Bank implementation of GCG principles. This is carried out to ensure the level of GCG implementation within the Bank and to identify appropriate steps to prepare the Bank's infrastructure and structure that is conducive to an effective GCG implementation. Therefore, a GCG assessment is required to identify aspects that need attention first, and steps that can be taken to make them happen. To determine the level of GCG implementation adequacy, BNI carries out GCG Assessments periodically and consistently every year, and consist of Self Assessments in accordance with BI/OJK regulations and Third Party Assessments, as follows:

SELF ASSESSMENT

This GCG assessment in BNI is carried out with reference to SEOJK No. 13/ SEOJK.03/2017 concerning the Good Corporate Governance for Commercial Banks, POJK No. 55/ POJK.03/2016 concerning Good Corporate Governance for Commercial Banks, POJK No.21/ POJK.04/2015 concerning Corporate Governance Guidelines, OJK Circular Letter No. 32/SEOJK.04/2015 concerning Corporate Governance Guidelines, and OJK Circular Letter No. 4/POJK.03/2016 concerning Bank Rating on GCG Implementation for Commercial Banks, and the Bank Indonesia Regulation concerning Bank Rating, where one of the Bank Rating points refers to a self assessment on the implementation of Good Corporate Governance (GCG) principles in the Bank. The Self-Assessment is conducted periodically each semester in June and December in the current year.

GCG assessments are also intended to produce a Governance Rating, a factor in determining the Bank's Health Level. The assessment is carried out on 3 (three) aspects of the Governance system, namely the Governance structure, process and results of the of 11 (eleven) Governance Implementation Assessment Factors. The three aspects are as follows:

1. Governance Structure

The Governance structure assessment is aimed at assessing the adequacy of Bank's GCG governance structures and infrastructures so that the implementation process produces outcomes that match the expectations of the Bank's stakeholders. Included in the Bank's governance structure is the GMS, the Board of Commissioners, the Board of Directors, and Committees and work units at the Bank. The Bank's governance infrastructure, includes the organizational structure of Bank policies and

procedures, management information systems and the main duties and functions of each organizational structure. The Governance Structure is an assessment aspect on the fulfillment of the corporate structure and infrastructure in applying GCG as measured through the governance structures which includes:

- a. Composition of Shareholders and Company Organs; the structure and function of the person in charge for the GCG implementation; the structure of the person in charge of ethics enforcement; structures responsible for information disclosure; structures in charge of supervision and audit; structures in charge of HC management; the structure of the person in charge of operations/production; the structure of the person in charge of marketing; the structure of the person in charge of finance; the risk management structure, structure in charge of information technology management; structure responsible for stakeholder relations; the structure of the person in charge of the procurement of goods and services; and the structure of the person in charge of change management;
- b. Fulfillment of Company policies, especially related to enforcing the GCG function in carrying out the Company's operations, includes the guidelines and policies related to GCG, ethics enforcement, information disclosure, supervision and audit as well as compliance, HC management, operations/production, marketing, finance and accounting, risk management, information technology governance, relations with stakeholders.

2. Governance Process

The governance process assessment aims to assess the effectiveness of the process of implementing GCG principles supported by the adequacy of the Bank's governance structure and infrastructure so as to produce outcomes that are in line with the expectations of the Bank's stakeholders. The Governance Process is an assessment aspect on the implementation of company systems and mechanisms in applying GCG as measured by:

- a. The process of implementing GCG implementation, ethics enforcement, information disclosure, supervision and audit as well as compliance, HC management, operations/production, marketing, finance and accounting, risk management, information technology governance, relations with stakeholders etc;
- b. Corporate governance mechanism including the GCG implementation mechanism and process, ethics enforcement, information disclosure, supervision and audit as well as compliance, HC management, operations/production, marketing, finance and accounting, risk management, information technology management, stakeholder relations etc.

3. Governance Outcome

Governance Outcome is an assessment aspect on the results of the implementation of the company's system and mechanisms in applying GCG as measured through GCG Implementation Results, including outputs and outcomes of the processes of GCG, ethics, information disclosure, supervision and audit as well as compliance, HC management, operations/marketing, finance and accounting, risk management, information technology governance, relationships with stakeholders etc.

For the GCG implementation evaluation, BNI has evaluated and measured the BNI GCG. Implementation through a self assessment based on the OJK Regulation No. 55/POJK.03/2016 concerning the implementation of Governance for Commercial Banks which measures the implementation of GCG from 11 aspects comprising:

- a. The Board of Commissioners' duties and responsibilities implementation;
- b. The Board of Directors' duties and responsibilities implementation;
- c. Committee's duties completion and implementation;
- d. Conflicts of interest handling;
- e. Compliance function Implementation;
- f. Internal audit function application;
- g. External audit function implementation;
- h. Risk management implementation, including the internal control system;
- i. Provision of funds to related parties and large exposures;
- j. Banks' financial and non financial condition transparency, reports on the implementation of good corporate governance and internal reporting;
- k. Strategic Plan.

The Bank is obliged to conduct a Self Assessment for the GCG implementation. The GCG Self Assessment results for the last 3 (three) years can be seen in the table below:

DESCRIPTION	2021	2020	2019
Composite Score	2	2	2

Assessment Result

In the first semester of 2021, BNI conducted a GCG self-assessment and submitted it to OJK, with the assessment results as follows:

GCG Implementation Self-Assessment Results for Semester I/June 2021

RATING	RATING DEFINITION	TREND
2	"This shows that the Bank's Management has implemented a Governance that is generally fairly good as reflected in adequate compliance with the principles of Governance. In the event that there are weaknesses in the application of Governance principles, in general these weaknesses are insignificant and can be resolved by normal actions by the Bank's Management. Currently the Bank is continuing to make corrective actions to follow up on Regulators' findings."	Stable

In semester II 2021, BNI conducted a GCG self-assessment and submitted it to the OJK, with the assessment results as follows:

GCG Implementation Self-Assessment Results for Semester II/December 2021

RATING	RATING DEFINITION	TREND
2	"This shows that the Bank's Management has implemented a Governance that is generally fairly good as reflected in adequate compliance with the principles of Governance. In the event that there are weaknesses in the application of Governance principles, in general these weaknesses are insignificant and can be resolved by normal actions by the Bank's Management. Currently the Bank is continuing to make corrective actions to follow up on Regulators' findings."	Stable

These rankings are based on the following strengths and weaknesses of BNI's GCG implementation in 2021:

1. Strengths of the Corporate Governance implementation

a. Governance structure

- i) The completeness of the BNI Governance structure having met the established requirements so as to support the implementation of Governance in every unit in BNI;
- ii) The implementation of Good Governance at BNI is also supported by the structure of the Internal Audit Unit, the Bank's Risk Management Division, and the professional and independent Compliance Division;
- iii) All BNI Personnel are committed to implementing good governance in BNI, which is manifested in the establishment of BNI's sixth mission, "to become a reference in implementing compliance and good corporate governance for the industry";
- iv) The Governance Structure aspect adequacy for the internal audit function implementation is adequate and the Bank has adequate and up to date policies, procedures and organizational structures.

b. Governance process

- i) In general, the GCG implementation process has been implemented well as reflected in the fulfillment of BNI's obligations as a Bank and Issuer to all BNI stakeholders;
- ii) The decision-making process for both business and non-business has been carried out based on the Governance principles so as to increase efficiency and achieve the company's targets;
- iii) Governance in general has been implemented properly and effectively, as reflected in the Internal Audit Work Unit carrying out its duties and obligations properly in accordance with applicable regulations.
- iv) For implementing gratification control, BNI has a Gratification Control Unit (UPG), Gratification Control Policy and Program and an Anti-Bribery Management System (SMAP), which have been certified to ISO 37001, and is under the supervision and management of the Compliance

Division.

c. Governance outcome

- i) Improved implementation of Good Governance has delivered a positive impact on BNI's performance, in the midst of the global uncertainty due to the Covid-19 Pandemic, BNI was still able to maintain its performance and ensure that banking operations were carried out properly and prudently.
- ii) BNI's CGPI score increased from 90.74 in 2020 to 91.60 in 2021 with the predicate "Most Trusted Company", and BNI's ACGS score increased from 97.03 in 2020 to 97.33 in 2021 with the predicate "Very Good" ;
- iii) The internal audit function is adequate and has met the stakeholders' expectations (Board of Commissioner), and this is reflected in the IAU reports submitted to the Board of Commissioners through the Audit Committee on a regular basis (every quarter), including the realization of the Annual Audit Plan (RAT), audit findings and recommendations, completion of audit results follow-up, and dispositions from the Board of Directors;
- iv) The quality of the audit results and management letter comprehensively explains the Bank's condition, including the Bank's significant problems contained in the Public Accountant/ KAP audit results in accordance with the audit scope as stipulated by the prevailing regulations, and as stated in the work agreement between the Bank and the KAP.

2. Weaknesses in the Corporate Governance implementation

a. Governance structure

The structure and infrastructure of BNI's Governance is fully in accordance with applicable regulations, however, BNI continues to improve its structure and infrastructure by always adjusting to business developments/conditions and applicable regulations.

b. Governance process

Overall, the governance process has been implemented well in every activity/business and Bank Operations, however, there are still matters that need improvement, including:

- i) The Internal Control System is still not running optimally, and there has been a rise in fraud cases, negligence cases, repeated audit findings and fines from regulators;
- ii) In Risk Management, particularly for Credit Risk and Operational Risk, there are weaknesses in the credit risk management, which can be seen in the lack of improvements in loan quality as a result of the Covid-19 pandemic, as well as weaknesses in the operational risk management, which can be seen in the high cost of operational risk due to fraud (both internal and external).

Improvement efforts included:

- i) Credit Risk, through End-to-end Credit Process improvements (pipeline management, sharpening loan documents verification, development of tools for loan analysis references, improving quality of monitoring based on Debtor Risk profiles), as well as a more structured LaR management (Account Prioritization & Hand Over, Account Tracking & Dashboard mechanisms, and Non-Conventional LaR management).
- ii) Operational Risk, by implementing a single sanction as a deterrent and as awareness for all employees, with process/system improvements to mitigate internal fraud as well as accelerate the migration to chip debit cards, and upgrades to the EMV/NSICCS capabilities with Ready ATMs to mitigate external fraud (Card Skimming).
- iii) Internal Control System, by improving the control/waskat system especially in Regional Offices and Branches, by working with Internal Control (KI) under regional supervision, improving the IT Security/System, and creating a compliance and risk culture, and awareness to all employees and third parties.

c. Governance Outcome

During 2021, sanctions were still being imposed in the form of warnings or fines by the regulator, showing the need for increased risk awareness and increased implementation of an effective internal control system in all lines of business and operations.

Based on the Risk Profile position Self Assessment results on December 31, 2021, Credit Risk and Operational Risk were still ranked 3 (three) or Fair. This shows that the Bank must continue to pay attention to the implementation of risk management for these two risks as they still need improving

CORPORATE GOVERNANCE PERCEPTION INDEX (CGPI)

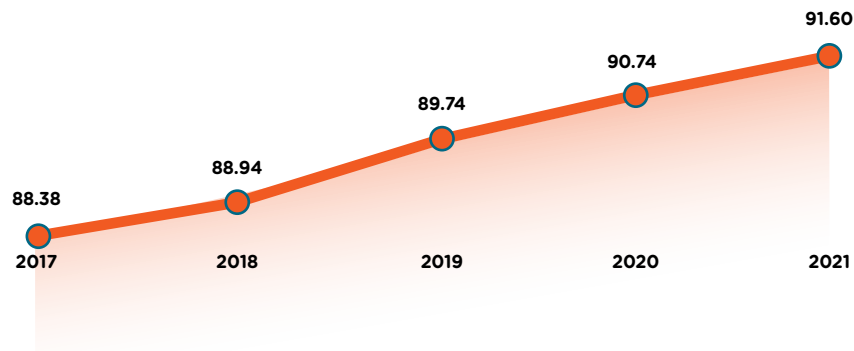
In assessing the quality of governance implementation, BNI follows the Corporate Governance Perception Index (CGPI) organized by The Indonesian Institute for Corporate Governance (IICG) with the aim of evaluating the GCG implementation at BNI. The evaluation results become a reference for BNI to improve GCG implementation in the future.

The 2020 CGPI carried out in 2021 covered assessment aspects including governance structure, governance process, and governance outcome.

The CGPI assessment uses the mandatory GCG implementation as a reference and generally accepted best practices as well as an approach with a stakeholder perspective where relationships with all stakeholders are increasingly important in maintaining the Company's business continuity over the long term.

Thus, BNI has completed all the requirements and stages of the CGPI assessment for the 2020 Fiscal Year with the results showing very good results and receiving the title of "Most Trusted Company". The CGPI assessment results starting for the 2017-2021 fiscal years are as follows:

CGPI Score



CGPI Assessment Results for Fiscal Year 2017-2021

INDICATOR	2021	2020	2019	2018	2017
Governance Structure	32.48	24.59	31.39	23.03	29.06
Governance Process	33.20	33.01	28.84	38.14	29.73
Governance Outcome	25.92	33.14	29.51	27.77	29.59
CGPI Score	91.60	90.74	89.74	88.94	88.38

Over the last 5 (five) years, the IICG assessment with regard to BNI's participation in CGPI has always increased, showing that BNI's GCG implementation is getting better year on year.

The recommendations received by BNI from CGPI for fiscal year 2020 carried out in 2021 and followed up were as follows:

CGPI Recommendations and Follow-Up

NO	RECOMMENDATIONS	FOLLOW-UP
1	Governance Structure Aspect	
	1. BNI needs to consider the organization structure design is in accordance with the Company's business plan where the functional structure formation is starting to be filled by young talent, which is also a shareholder program (Ministry of SOEs).	1. BNI's organization structure development is continuously evaluated and aligned with the Company's business strategy to compete and beat the competition. In line with Ministry of SOEs program which has set a target for Young Talent representation to occupy strategic positions, BNI supports this through a career acceleration program for employees who have superior competencies and performance. Currently, the Young Talent in BNI leadership positions (C-1 & C-2) composition is 7.6%.
	2. BNI needs to develop a special structure and/or function that is responsible for handling crises and building Company resilience to optimize the integrated and sustainable corporate resilience building programs' development.	2. BNI has implemented Business Continuity Management (BCM) and established a Crisis Management Team (CMT) and/or Emergency Tasks Force (ETF) in all domestic and overseas units to minimize operational risk in the event of an emergency or disaster.

NO	RECOMMENDATIONS	FOLLOW-UP
2	Governance Process Aspect	
1.	BNI needs to optimize all Company resources to build Company resilience through crisis management, business continuity management, and strengthen the resilience foundation, as well as develop an integrated resilience program.	1. BNI is making improvements and innovations in business processes to address some of the challenges faced in the banking industry through the BNI Corporate Transformation Program. The BNI Corporate Transformation program strategic initiatives developed include improving loan quality, SME Exporter Hub (BNI XPORA), and developing digital capabilities to meet customer needs through digital-based innovations and solutions supported by increased data capabilities and partnerships.
2.	BNI needs to develop and update Disclosure of Company Information policies and guidelines, especially in the use of electronic social media with reference to the applicable regulations and guidelines development.	2. BNI continues to improve its Company Information Disclosure policies, especially in the use of BNI media channels. BNI has also provided several facilities that function as information disclosure channels, through the BNI media channels.
3.	BNI needs to optimize the Company's business sustainability mechanism is in accordance with SNI ISO 22301:2014 standards regarding the Business Continuity Management System.	3. To anticipate disaster events, BNI has implemented Business Continuity Management (BCM) in all domestic and overseas units. This development is in line with the Regulatory regulations requiring Banks to carry out a risk control process to manage risks that can endanger the Bank's business continuity, as well as in line with the Basel II document requirements that requires Banks to have business continuity management and contingency plans to assure the Bank's ability to continue operating and minimize losses in the event of disruptions to its business activities
4.	BNI needs to optimize its compliance management systems and mechanisms by implementing and certify according to the ISO 37301 standards on Compliance Management Systems	4. BNI already has a management system that ensures that the Company operates in accordance with prevailing laws, regulations and codes of ethics, and is always improving the Compliance Management System, through compliance reviews (Credit Compliance Review, Procurement Compliance Review, internal audit policy, compliance certification) and Compliance Index (CIX) measurement. Based on this, BNI has targeted one of the Company's targets in its six missions, namely to become a reference for the implementation of compliance and good corporate governance for the industry.
5.	BNI needs to develop guidelines for managing innovation activities in the Company, and improve the Company's business innovation achievements to be one of the best in products, processes, support functions, organizational performance or strategies so as to become a benchmark for other companies.	5. BNI has a strategic plan as outlined in the BNI Corporate Plan as a guide for innovation activities in the Company containing 7 (seven) strategic policies, namely: <ol style="list-style-type: none"> Improving loan quality through improved risk management; Improving digital capability in meeting customer needs by developing digital-based innovations and solutions supported by increased data capabilities, partnerships through the use of API Management, blockchain platforms, and business process re-engineering; Increasing sustainable business expansion; Increasing FBI and CASA transactions by offering total solutions and optimizing accounts as well as increasing business transactions through business ecosystem development, cross selling, and optimizing other channels; Optimizing network and international business by strengthening partnership cooperation; Optimizing Subsidiary Contributions; Optimizing Human Capital to support the Bank's business.

NO	RECOMMENDATIONS	FOLLOW-UP
6.	BNI needs to develop the Company's internal control system and mechanism, as well as carry out follow-up actions on the Internal Audit Unit findings.	<p>6. BNI has implemented an Internal Control System and continues to strengthen it through:</p> <ul style="list-style-type: none"> a. Conducting reviews of the Internal Control System Policy; b. Reviewing and assessing the Internal Control System; c. Improving the Internal Control System at Branches/Centers/Regional Offices/Divisions, through: <ul style="list-style-type: none"> i) Re-organizing with Dedicated Auditors as the Internal Control under the supervision of Business/Operational units at the Regional Office level to strengthen the internal control function at a higher ownership of risk level, as well as higher responsiveness and flexibility in decision making and problem solving; ii) Improving the IT Security System and Risk Management Information System; iii) Reviewing of risk management by ERM and an independent unit (IAU); iv) Creating a compliance and risk culture, as well as awareness by all employees and third parties. d. Improving and developing audit tools, including continuous development of the Audit Management System (FAST) application to support audit activities, IAU transformation program, updated audit tools, and strengthening integrated audit implementation; e. IAU playing a role for perfecting the Internal Control function and role by developing the Internal Control Methodology; f. Improving the monitoring of the Internal Audit findings completion, by establishing KPIs for the completion of internal audit findings follow-up in all Branches/Centers/Regional Offices/Divisions.
7.	BNI needs to optimize the communication system and mechanism as well as intensive and clear coordination between members of the Audit Committee and Internal Audit/IAU and the External Auditor/KAP who have been selected by the GMS in the implementation of the supervisory function, so that the audit results can be used to optimize the monitoring program by the organs. Company and used by all stakeholders.	<p>7. Intensifying communication and coordination between members of the Audit Committee and Internal Audit with the External Auditor/KAP has been carried out to support the implementation of supervision, through of:</p> <ul style="list-style-type: none"> a. Periodic communication with the Audit Committee. The IAU acts as a counterparty with external auditors (BPK, OJK, BI) and monitors the completion of follow-up inspections and reporting; b. Communicating with KAP to support the audit process, including the fulfillment of the IAU Audit Report Results as requested by KAP in carrying out the audit; c. The audit results help the KAP in conducting an assessment of the risk management and internal control adequacy at BNI.
3 Governance Outcome Aspect		
1.	From BNI's financial performance, it was found that the Bank had been constrained by the Covid-19 pandemic that affected all economic and social sectors, so BNI needs to maintain the principle of prudence in building financial and non-financial resilience to continue to grow and be sustainable.	<p>1. For 2022, BNI is optimistic it will grow positively in line with the controlled management of the COVID-19 pandemic. For business development, analysis of the Bank's position in facing business competition, risk management policies and compliance policies has been carried out. Based on this analysis, BNI has established a business development strategy to improve financial performance, business growth and customer satisfaction through business synergies, digital banking improvements, strengthening integrated business solutions while still applying prudential banking principles aimed at boosting performance, providing guarantees for the fulfillment of the stakeholders rights, as well as improving compliance with generally accepted banking industry and capital market laws and regulations.</p>

NO	RECOMMENDATIONS	FOLLOW-UP
2.	BNI needs to increase the amount of dividends proportionally and consistently for all shareholders.	2. BNI has a progressive dividend policy, meaning the Company will pay higher dividends if there is a strong and sustainable trend in profitability recovery, and the Company has achieved a good level of capital adequacy to anticipate future economic volatility. With the current stronger level of capital adequacy as a result of the recovery in performance and issuance of securities in 2021, and supported by more prospective economic conditions, we hope to realize a better dividend payout ratio.
3.	BNI needs to develop follow-up actions for handling and resolving all customer complaints.	<p>Customer complaints are recorded in the Online Request Management application and is integrated across all BNI branch offices and the value chain to facilitate monitoring of Service Level Agreement (SLA) complaint resolution. In addition, customers can find out the status of complaints through all BNI touch points and receive the same experience regarding the information submitted to complaints. Following up on customer complaints is through the voice of customer, and BNI Contact Center plays an active role in carrying out program improvements, including:</p> <ul style="list-style-type: none">a. Providing insights and lessons learned to business units on improving superior products, features and services to customers as well as improving internal processes;b. Collaborating with related units through Focus Group Discussions to identify any root causes of complaints and correcting them to minimize recurring complaints. With the lessons learned, the acceleration and improvement of business processes will be carried out so that the customer experience improves;c. Educating customers on the features, risks, and benefits of banking products and services through all service channels.
4.	BNI needs to cultivate a culture of resilience with the ability to adapt and respond to and manage any changes and crises that occur.	4. In carrying out all Company activities, BNI carries out its duties and work properly, correctly and responsibly. Currently, BNI's values to guide employees in carrying out their work and daily activities include the AKHLAK Core Value (Amanah, Kompeten, Harmonis, Loyal, Adaptif, dan Kolaboratif), which have become BNI's core work culture values, and the PRINSIP46 Corporate Values (Professionalism, Integrity, Customer Orientation, and Continuous Improvement), which are the Company values to continuously guide, and the Transformation RACE Value (Risk Culture, Agile, Collaboration, and Execution Oriented), which are the main business transformation values. These three values are designed and fully implemented so that BNI can adapt, continue to innovate, and respond to any business changes and crises that occur in the global market.

ASEAN CORPORATE GOVERNANCE SCORECARD (ACGS)

Another form of GCG implementation assessment carried out by BNI uses the ASEAN Corporate Governance Scorecard, one of the initiatives of the ASEAN Capital Market Forum (ASEAN Capital Market Forum), to improve the corporate governance standards and practices in public companies in ASEAN, to enhance the global viability of ASEAN public companies with good corporate governance, and to demonstrate to the global community that ACGS participating companies are good places to invest.

The ASEAN CG Scorecard uses parameters based on the corporate governance principles issued by The Organization for Economic Cooperation and Development (OECD) are as follows:

1. Shareholders Rights;
2. Equal Treatment of Shareholders;
3. The Role of Stakeholders;
4. Disclosure and Transparency;
5. Responsibilities of the Board of Commissioners.

The assessment results show that the overall weighted score for the Company was 97.33 points with a predicate of "Very Good" or Level 4 (90-100.00), with the definition that the GCG practices conducted by BNI have fully adopted international standards.

NO.	ASSESSMENT COMPONENT	FISCAL YEAR 2021	FISCAL YEAR 2020
1	Shareholders Rights	9.52	9.52
2	Equal Treatment of Shareholders	6.67	6
3	The Role of Stakeholders	13.85	15
4	Disclosure and Transparency	22.66	21.88
5	Responsibilities of the Board of Commissioners	35.63	35.63
6	Bonus	11	11
7	Penalty	(2)	(2)
Total Score		97.33 (Very Good)	97.03 (Very Good)

For the BNI 2021 ASEAN CG Scorecard assessment, there were several recommendations for future improvements in. These recommendations included:

NO.	RECOMMENDATION	FOLLOW UP
1	BNI is expected to be able to announce the results of the AGMS to the public as soon as possible within 1 working day. In order for the announcement of the AGMS results to be carried out immediately, the Bank can use the website (by still informing the date or time of uploading the information).	The process of announcing the summary of the GMS minutes is currently in accordance with applicable regulations in Indonesia, however BNI always strives to be able to accelerate the delivery of information on the Annual/ Extraordinary General Meeting of Shareholders so that it can meet these criteria.
2	The bundling agenda can be resolved by the company if the voting process for the agenda related to changes in the membership composition of the Bank's Commissioners/Directors (election or re-election of new members of the Board of Commissioners and/or Directors) is carried out individually per each candidate, so not through voting on the candidate pack that has been going on so far.	The voting process for the agenda for changes to the composition of the management is in accordance with the applicable regulations in Indonesia, however BNI always strives to be able to expedite the submission of information on the Annual/Extraordinary General Meeting of Shareholders so that it can meet these criteria.
3	In the invitation or summons for the AGM, it is recommended that an explicit explanation be disclosed of the profile (candidates) of the new commissioners or directors who will be appointed at the AGMS. At a minimum, the disclosure includes age, qualifications, date of joining the company, experience, and concurrent positions in other public companies. An explanation of the profile can be presented explicitly in several alternative sources of information, including in the document or explanation of the AGMS invitation (AGMS invitation), supporting materials or attachments to the AGMS, company website, and Annual Report.	The publication of the profile of the candidate Management who will be appointed at the GMS at the time of submission of the invitation to the GMS, will be our material for revision in the future GMS, with due observance of the prevailing regulations in Bank SOE.

NO.	RECOMMENDATION	FOLLOW UP
4	Identify and disclose the identity or names of the external auditors who will be appointed to audit the financial statements for the current period. For the identity or name of the external auditor, what is meant here is the name of a person, not the name of the KAP.	The Company will pay attention to it in the next GMS
5	Make rules or policies regarding the reporting period (maximum 3 days) for trading transactions of company shares carried out by the Board of Directors/ Commissioners and put it in the Corporate Governance Guidelines or Board Charter. So any change in the ownership of the Bank's shares by members of the Board of Commissioners and the Board of Directors as far as possible is submitted to the Corporate Secretary no later than 3 (three) working days from the date of the transaction. Furthermore, the Corporate Secretary will process	The mechanism for reporting transactions for a maximum of 3 (three) working days by the Board of Directors and the Board of Commissioners has been implemented with reference to applicable regulations and has been regulated in the Board Manual for the Board of Directors and the Board of Commissioners.
6	The policy on Related Party Transaction should be reviewed and include provisions governing the prohibition of loans or ensure that the permitted loans for members of the company's commissioners and directors are carried out in a fair transaction and at a fair interest rate/market interest rate.	To facilitate this, BNI has prepared provisions for providing loan facilities for the Board of Directors and the Board of Commissioners.
7	The Company need to reconsider implementing compensation or reward programs/policies for employees (not only the Board of Commissioners and Board of Directors), for example ESOP/MSOP or stock options, and must also be accompanied by further information or explanation on the lock out period of the long-term compensation programs.	The Company's AGMS held on March 29, 2021 approved the transfer of shares from the 2020 buy back to be used for the management and employee share ownership program, the program implementation report has been submitted in this year's report.
8	Explicitly disclose information in the annual report regarding the dividend payment policy (c/o: target dividend payout ratio or dividend per share) for the assessed fiscal year (not the dividend policy for the previous fiscal year). This policy applies both to companies that decide to distribute dividends or not to their shareholders on the company's operating performance for the fiscal year being assessed.	The dividend payment policy has been disclosed in the Company's Annual Report. A more complete disclosure will be the next refinement.
9	Disclosure in the Annual Report on the total remuneration received by each member of the company's commissioners. The disclosure must include the name of the commissioner concerned and the amount of remuneration they receive. It is not enough just to be identified based on the position name in the Board of Commissioners position structure or the delivery of an aggregated amount of remuneration.	Total remuneration has been disclosed in the AR
10	The company is required to disclose information on the company's share transaction activities owned and carried out by insiders or members of the company's Commissioners/Directors for 1 fiscal year. Information regarding the existence or absence of transactions that only show insiders' share ownership at the beginning and at the end of the reporting period is still considered insufficient to meet the transparency aspect requested in this assessment item.	Already disclosed in the AR
11	Regarding the audit committee, it is recommended to add a role or function, which is not only recommending the appointment of an external auditor, but also providing recommendations for the dismissal of the company's external auditor. The roles or functions should be clearly stated or defined in the audit committee charter.	It has become part of the duties and responsibilities of the Audit Committee as stated in the Audit Committee document.
12	The Company needs to encourage members of the board of commissioners to attend at least 75% of the total meetings held during the year or needs to consider developing a policy that sets a minimum level of attendance for members of the board of commissioners in meetings (at least 75% of the total board of commissioners meetings held in a year).	All Members of the Board of Commissioners attended more than 75% of the meetings held throughout the year
13	It is necessary to propose changes the provisions of the quorum requirements in the decision-making board of commissioners meetings, from the previous requirement of more than 1/2 of the board of commissioners members attending the meeting to a minimum of 2/3.	The Company's will pay attention to reviewing changes in the Articles of Association and the Rules for the Board of Commissioners' Meeting.
14	The circulation of meeting materials should be accepted by each member of the board of commissioners no later than five (5) (working) days prior to the meeting of the board of commissioners. Therefore, companies are advised to change the provisions contained in the BOC Charter regarding the circulation period of meeting materials, from a minimum or no later than 3 (three) working days to a minimum or no later than five 5 (five) working days prior to the scheduled meeting of the board of commissioners. .	The Bank has determined the rules and working procedures of the Board of Directors and the Board of Commissioners and has determined the delivery of meeting materials is in accordance with applicable regulations.



NO.	RECOMMENDATION	FOLLOW UP
15	Encouraging the company's corporate secretary to obtain certification or basic titles required by a corporate secretary and actively participate in training relevant to their work as a corporate secretary. This is due to the company's corporate secretary for the 2020 fiscal year not having a background in accounting or law.	During 2021 competency development was carried out including in the fields of law and accounting
16	Formulate a remuneration policy by setting measurable standards that link the board of directors performance with the long-term interests of the company, such as claw back provision, rewards or deferred bonuses using measures, such as ROE, Cumulative Free Cash Flow, Operating Profit or others. In Indonesia, banking is regulated in POJK No. 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks.	The Bank has disclosed its remuneration policy related to guaranteed income as well as short-term incentives and long-term incentives by always aligning it with the company's performance.
17	The company is advised to conduct an annual performance assessment of each or every member of the board of commissioners (or disclose if this practice already exists) and it is also recommended to disclose the process of evaluating the performance of members of the board of commissioners as well as the criteria used in evaluating the performance of members of the board of commissioners. The disclosure can be through the Board Manual or the company's Annual Report.	The Board of Commissioners' performance appraisal is carried out by the Shareholders through the Board of Commissioners Supervisory Report submitted at the Annual GMS

Board of Commissioners' and Board of Directors' Remuneration

BOARD OF COMMISSIONERS REMUNERATION POLICY

REMUNERATION GOVERNANCE

For the Board of Commissioners remuneration, BNI is guided by OJK Regulation No. 45/POJK.03/2015 dated December 23, 2015 concerning Remuneration Governance for Commercial Banks, as well as the Minister for SOEs Regulation that regulates Guidelines for Determination of Income for Board of Directors, Board of Commissioners and Supervisory Board for State-Owned Enterprises

Based on BNI's Articles of Association, members of the Board of Commissioners receive an honorarium and benefits/facilities including bonuses and retirement benefits, the types and amounts of which are determined by the GMS with due observance of the prevailing laws and regulations.

The Board of Commissioners supervises the implementation of the Remuneration Policy and conducts periodic evaluations through the Nomination and Remuneration Committee. The evaluation of the Nomination and Remuneration Committee is based on performance, risk, fairness with peer groups, long-term goals and strategies of the Bank, fulfillment of reserves as stipulated in laws and regulations and the Bank's potential future earnings.

Based on BNI's Fiscal Year 2020 AGMS decision, held on March 29, 2021, the GMS decided:

1. Granted authority and power to the Dwiwarna Series A Shareholder to determine the amount of tantiem for Fiscal Year 2020, as well as to determine the salary/honorarium, allowances, facilities and other incentives for members of the Board of Commissioners for Fiscal Year 2021;

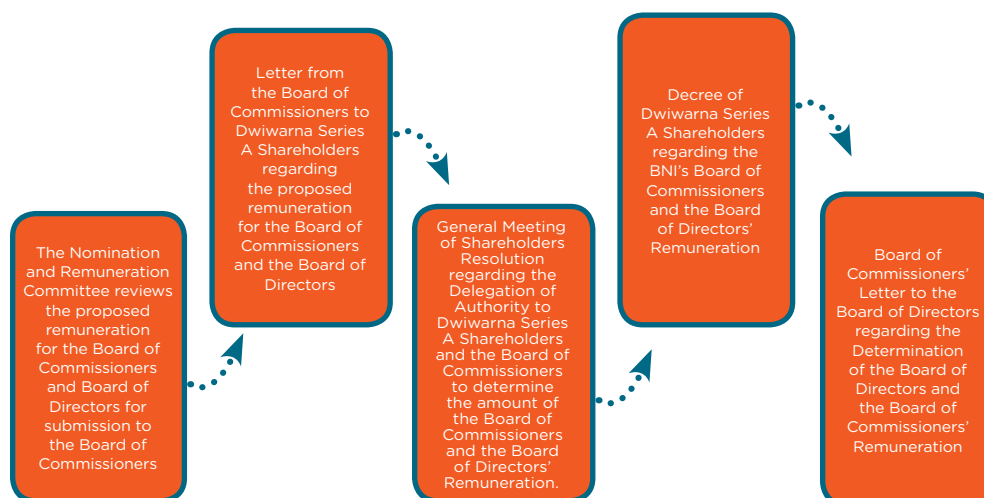
2. Granted authority and power to the Board of Commissioners by first obtaining written approval from the Dwiwarna Series A Shareholder to determine the amount of tantiem for the Fiscal Year 2020 and to determine the salaries/honorarium, allowances, facilities and other incentives for members of the Board of Directors for Fiscal Year 2021.

PROCEDURE FOR REMUNERATION DETERMINATION

In general, the procedure for determining the remuneration of the Board of Commissioners is carried out in the following stages:

1. The Nomination and Remuneration Committee evaluates the remuneration policies applicable to the Board of Commissioners;
2. Then the Nomination and Remuneration Committee provides recommendations to the Board of Commissioners regarding the remuneration policy for the Board of Commissioners
3. The Board of Commissioners submits the remuneration recommendations for salaries/honorarium and tantiem to the Dwiwarna Series A Shareholder for approval from the GMS.

Process of Determining the Board of Commissioners Remuneration



MEMBERS OF THE BOARD OF COMMISSIONERS REMUNERATION STRUCTURE

The remuneration structure for members of the Board of Commissioners is based on Minister of SOEs Regulation No. PER-04/MBU/2014 dated March 10, 2014 concerning Guidelines for Determining the Remuneration for Board of Directors, Board of Commissioners and Supervisory Board of State-Owned Enterprises as amended several times, most recently by the Minister of SOEs Regulation No. PER-13/MBU/09/2021 dated September 24, 2021, and the Minister of SOEs Letter No. SR-33/Wk2.MBU.A/10/2021 dated October 1, 2021 concerning Determining the Remuneration the Board of Directors and Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk. in 2021, as follows:

Members of the Board of Commissioners Remuneration Structure

TYPE OF REMUNERATION/ FACILITY	DESCRIPTION
Honorarium	<ol style="list-style-type: none"> 1. President Commissioner is 45% of the salary of the President Director. 2. Vice President Commissioner is 42.5% of the salary of the President Director. 3. Commissioner is 90% of the honorarium of the President Commissioner.
Allowances	
Religious Holiday	Board of Commissioners is given allowances for Religious Holiday for 1 (one) time honorarium
Transportation	Board of Commissioners is given transportation for 20 (twenty) percent of the honorarium.
Post- Employment Insurance	<ol style="list-style-type: none"> 1. During the term of office (effective from appointment until it ceases) 2. Premium borne by the Company is 25% (twenty-five percent) of the honorarium in one year. 3. Selecting the program for post-employment insurance is determined by the Board of Directors and the Board of Commissioners, coordinated by the unit managing the facilities and allowances for members of the Board of Directors and the Board of Commissioners. 4. Provision of premium, fee, or other terms relevant to post-employment insurance already includes premium for accident and death insurance.
Facilities	
Health	<ol style="list-style-type: none"> 1. Health facilities are given to members of the Board of Commissioners in the forms of health insurance or reimbursement of medical expenses. 2. Health facilities are given to members of the Board of Commissioners, the wife/husband, and maximum 3 (three) children who have not reached the age of 25 (twenty five) provided that in the event that the child is not yet 25 years but had been married or had previously worked, the said child is not entitled to receive health facilities. Health facilities are provided in the forms of: <ol style="list-style-type: none"> a. Outpatient and medicines; b. Inpatient and medicines; c. Medical check up subject to 1 (one) time every year and done inside the country. 3. In the event that the treating doctor provides referrals for treatment overseas, the health facility is provided in full.

TYPE OF REMUNERATION/ FACILITY	DESCRIPTION
Legal Aid	<ol style="list-style-type: none"> 1. Legal Aid facility to members of the Board of Commissioners is given in the event of any action/activity for and on behalf of a position of members of the Board of Commissioners that is related to the purpose and objective as well as the company's business activities. 2. Legal aid facility is at cost. 3. Legal aid facility is budgeted at the Bank's expense as stated in the Bank's Work Plan and Budget (RKAP). 4. Legal aid facility can only be used during the term of office or no longer in office on the policies taken during the term of office and cannot be given directly to the person concerned. 5. In the event that members of the Board of Commissioners use lawyers/legal consultants of their own choice, either at level of preliminary investigation/investigation, first-level court, appeal, cassation, and judicial review, then, the lawyer/legal consultant fee is not borne/compensated by the Bank. 6. Procedures for the Board of Commissioners' legal aid facility are carried out by referring to the applicable Laws and Regulations, specifically the Minister of State-Owned Enterprises Regulation which regulates the Guidelines for Determining the Income of the Board of the Directors, the Board of Commissioners, and Supervisory Board of State-Owned Enterprises.

INDICATORS FOR DETERMINING THE BOARD OF COMMISSIONERS REMUNERATION

The indicators for determining the Board of Commissioners and Board of Directors, the Company refers to Minister of SOEs Regulation No. PER-04/MBU/2014 concerning Guidelines for Determination of Income of Board of Directors, the Board of Commissioners, and Supervisory Board of SOE, as amended several times, lastly by Minister of SOEs Regulation No. PER-01/MBU/05/2019, and includes:

1. Business scale factor;
2. Business complexity factor;
3. Inflation Rate;
4. Company's condition and financial capability;
5. Other relevant factors, so long as not in violation of the laws and regulations.

TOTAL NOMINAL/COMPONENT OF REMUNERATION FOR THE BOARD OF COMMISSIONERS

The disclosure of the Board of Commissioners remuneration components refers to OJKCircular Letter No. 40/SEOJK.03/2016 concerning Governance Implementation in Providing Remuneration for Commercial Banks.

The following shows the total remuneration nominal/component for the Board of Commissioners in 2021:

TOTAL REMUNERATION AND OTHER FACILITIES	AMOUNT RECEIVED IN 1 (ONE) YEAR	
	PERSONS	RP MILLION
Remuneration		
Honorarium	10	18,468
Housing Allowance	-	-
Transportation Allowance	10	3,694
Religious Holiday Allowance	10	1,539
Tantiem	10	52,233
Other Natura Facilities		
Housing (cannot be owned)	-	-
Transportation (cannot be owned)	-	-
Post-Employment Insurance (can be owned)	10	3,432
Health (cannot be owned)	10	1,897

The honorarium composition for members of the Board of Commissioners is determined as follows:

1. President Commissioner, 45% of the salary of the President Director.
2. Vice President Commissioner, 42.5% of the salary of the President Director.
3. Commissioner, 90% of the President Commissioner.

The annual remuneration grouped by range of income levels is as follows:

Board of Commissioner Remuneration Group

TOTAL REMUNERATION	NUMBER OF COMMISSIONERS	RP MILLION
Above Rp2 billion	10	81,263
Above Rp1 billion - Rp2 billion	-	-
Above Rp500 million - Rp1 billion	-	-
Bellow Rp500 million	-	-

TANTIEM

The Tantiem paid in 2021 equated to 7.18% of the Company's net profit for the period January 1, 2020-December 31, 2020, and was given to members of the Board of Commissioners proportionately to the President Director, with the the President Commissioner receiving 45%, the Vice President receiving received 42.5%, and other members of the Board of Commissioners receiving 90% of the President Commissioner's tantiem.

To comply with Article 23 of OJK Regulation No. 45/POJK.03/2015 concerning Remuneration Governance for Commercial Banks, for the 2020 performance paid in 2021, 20% (twenty percent) of the total Tantiem was paid as a Long Term Incentive (LTI).

The LTI for Non-Independent Members of the Board of Commissioners is given in the form of BNI shares, while for Independent Members of the Board of Commissioners, it is given in the form of Cash, kept in the form of Time Deposits. Any suspension of LTI payments uses the Malus system, a policy that delays payment of part of the Tantiem for a certain period and is paid if the recipient meets certain criteria.

Regarding the determination of Fixed Remuneration, it observes the difference (gap) of remuneration between position levels, to prevent potential internal conflicts and operational risks such as fraud or other operational risks. For the determination of variable remuneration, the Bank uses the basis of prudent risk taking that refers to the provisions of the Financial Services Authority regulating Risk Management Implementation for Commercial Banks.

Based on BNI's Articles of Association, members of the Board of Directors are given salaries and allowances/facilities including tantiem and post-retirement benefits, the types and the amounts of which are determined by the GMS with due observance to the prevailing laws and regulations.

The Board of Commissioners supervises the remuneration policies implementation and conducts regular evaluations through the Nomination and Remuneration Committee. The Nomination and Remuneration Committee conducts evaluations on the Remuneration Policy based on performance, risk, fairness with peer group, targets, and the Bank's long term strategy, as well as fulfilment of reserves as regulated in laws and regulations, and the Bank's potential future revenue.

BOARD OF COMMISSIONERS' REMUNERATION POLICY

REMUNERATION GOVERNANCE

The Board of Commissioners' Remuneration Governance Policy refers to OJK Circular No. 40/SEOJK.03/2016 concerning Implementation of Governance in Providing Remuneration for Commercial Banks. The policy states that the remuneration is of Fixed and Variable nature, and is given based on the business scale, business complexity, peer group, inflation rate, financial condition and capability of the Bank, as well as not contrary to the applicable laws and regulations.

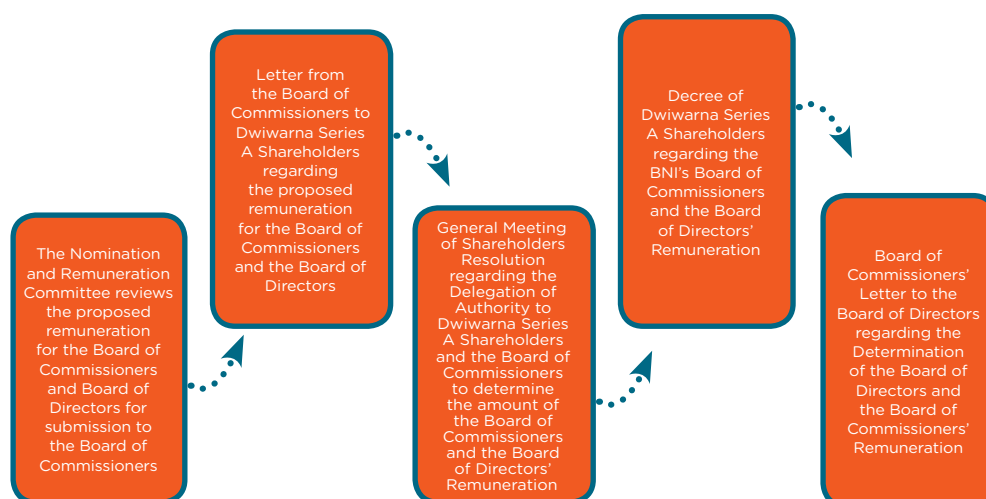
REMUNERATION DETERMINATION PROCEDURE

In general, the procedure for determining the Board of Directors' remuneration is carried out through the following stages:

1. The Nomination and Remuneration Committee evaluates the remuneration policy applicable to the Board of Directors;

2. Then, the Nomination and Remuneration Committee provides recommendations to the Board of Commissioners on the remuneration policy for the Board of Directors;
3. The Board of Commissioners submits proposals on the remuneration recommendation in the form of salaries/honorarium and tantiem to be approved by the GMS.

Process for Determining the Board of Commissioners and Board of Directors Remuneration



REMUNERATION STRUCTURE FOR MEMBERS OF THE BOARD OF DIRECTORS

The remuneration structure for members of the Board of Directors refers to the Minister of SOEs Regulation No. PER-04/MBU/2014 dated March 10, 2014 concerning Guidelines for Determination of Remuneration for the Board of Directors, Board of Commissioners and Supervisory Boards of State-Owned Enterprises, as amended several times, most recently by Minister of SOEs Regulation No. PER-13/MBU/09/2021 dated September 24, 2021, and Minister of SOEs Letter SR-33/WK2.MBU.A/10/2021 dated October 1, 2021 concerning Determination of Remuneration for the Board of Directors and Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk. in 2021, as follows:

Remuneration Structure for Members of Board of Directors

TYPE OF REMUNERATION/ FACILITY	DESCRIPTION
Salary	<ol style="list-style-type: none"> 1. President Director is 100%. 2. Vice President Director is 95% of the Salary of President Director. 3. Other directors is 85% of the salary of the President Director
Allowance	
Religious Holidays	Members of the Board of Directors are given allowance for Religious Holiday for 1 (one) time salary each year.
Housing	Members of the Board of Directors are given housing allowances of Rp27,500,000.
Post-Employment Insurance	<ol style="list-style-type: none"> 1. Given during term of office 2. The premium borne by the company is maximum 25% of the annual salary 3. Selecting the post-employment insurance program is determined by each member of the Board of Directors that is coordinated by the unit managing the facilities and allowances for members of the Board of Directors and members of the Board of Commissioners. 4. Provision of premiums, fees, or other terms relevant to post-employment insurance already includes premiums for accident and life insurance.

**TYPE OF REMUNERATION/
FACILITY****DESCRIPTION****Facilities**

Vehicles	<ol style="list-style-type: none"> Members of the Board of Directors are provided with 1 (one) unit of official vehicle and 1 (one) driver who can be used full time by members of the Board of Directors with overtime paid by the Company. The brand and type of vehicle are determined by the Company. Maintenance costs and vehicle operating costs as well as other costs incurred in connection with official vehicle facilities shall be borne by the Company at cost. Members of the Board of Directors who are no longer in office shall return the official vehicle to the Company no later than 30 (thirty) days.
Health	<ol style="list-style-type: none"> Health facilities are given in the forms of health insurance or reimbursement of medical expenses. Health facilities are given to members of the Board of Directors and a wife/husband as well as maximum 3 (three) children who have not reached the age of 25 (twenty-five) provided in the event that the child is not yet 25 (twenty-five) years but had been married or had previously worked, the said child is not entitled to receive health facilities. Health facilities are provided in the forms of: <ol style="list-style-type: none"> Outpatient and medicine; Inpatient and medicine, Medical check-up, 1 (one) time every year and taken domestically. In the event that the doctor recommends overseas treatment, the health facility may be covered fully.
Legal Aid	<ol style="list-style-type: none"> Legal Aid facility to members of the Board of Directors is given in the event of any action/deeds for and on behalf of a position of members of the Board of Directors with the intention and objective as well as the company's business activities. Legal aid facility is at cost. Legal aid facility to members of the Board of Directors is budgeted at the Bank's expense as stated in the Bank's Work Plan and Budget (RKAP). Legal aid facility can only be used in the event of a claim from third party, either during term of office or no longer in office on the policies taken during the term of office and cannot be given directly to the person concerned. In the event that members of the Board of Directors use lawyers/legal consultants of their own choice, either at level of preliminary investigation/investigation, first-level court, appeal, cassation, and judicial review, then the attorney/legal consultant fee is not borne/compensated by the Bank. Procedures for the Board of Directors' legal aid facility are carried out by referring to the applicable laws and regulations, specifically the Minister of State-Owned Enterprises Regulation which regulates the Guidelines for Determining the Remuneration of the Board of Directors, the Board of Commissioners, and Supervisory Board of State-Owned Enterprises.
Housing Facilities	<ol style="list-style-type: none"> In the event that the Bank provides office-house for the Board of Directors, the Director must use the house as a housing facility and is not provided with housing allowance. In the event that the Bank does not provide office-house, then the Director will receive housing allowance. The housing facility received by the Board of Directors include utilities and maintenance of the house of residence. Details of utility amount (electricity, water, telephone, etc.) as mentioned above refer to the policies stipulated in the Bank.

INDICATORS FOR DETERMINING THE BOARD OF DIRECTORS' REMUNERATION

For determining the Board of Directors' indicators, BNI refers to the Minister of SOEs Regulation No. PER-04/MBU/2014 concerning Guidelines for Determining the Board of Directors, Board of Commissioners, and Supervisory Boards of SOEs Remuneration, as amended several times, most recently by Minister of SOEs Regulation No. PER-13/MBU/09/2021, and are as follows:

1. Business scale factor;
2. Business complexity factor;
3. Inflation Rate;
4. Company's condition and financial capability;
5. Other relevant factors, so long as it is not in contradiction to the laws and regulations.

TOTAL NOMINAL/COMPONENT OF REMUNERATION FOR THE BOARD OF DIRECTORS

The disclosure of the Board of Directors remuneration components refers to OJK Circular Letter No. 40/SEOJK.03/2016 concerning Implementation of Governance in Providing Remuneration for Commercial Banks.

TYPE OF REMUNERATION AND OTHER FACILITIES	AMOUNT RECEIVED IN 1 YEAR	
	PERSONS	RP MILLION
Remuneration		
Salary	12	46,900
Housing Allowances	12	2,640
Transportation Allowances	-	-
Religious Allowances	12	3,908
Tantiem	12	145,515
Other Natura Facilities		
Housing (cannot be owned)	-	-
Transportation (cannot be owned)	12	9,515
Post-Employment Insurance (can be owned)	12	8,760
Health (cannot be owned)	12	3,209

The annual remuneration grouped by income level range is as follows:

Board of Directors Remuneration by Group

TOTAL REMUNERATION	NUMBER OF DIRECTORS	RP MILLION
Above Rp2 billion	12	220,447
Above Rp1 billion - Rp2 billion	-	-
Above Rp500 million - Rp1 billion	-	-
Below Rp500 million	-	-

TANTIEM

The Tantiem paid in 2021 equated to 7.18% of the Company's net profit for the period January 1, 2020-December 31, 2020, and was given to members of the Board of Directors proportionately to the President Director, with the President Director receiving 100%, the Vice President Director receiving 90%, and other members of the Board of Directors receiving 85%.

To comply with Article 23 of OJK Regulation No. 45/POJK.03/2015 concerning Remuneration Governance for Commercial Banks, for the 2020 performance paid in 2021, 20% (twenty percent) of the total Tantiem was paid as a Long Term Incentive (LTI).

The LTI for Members of the Board of Directors is given in the form of BNI shares. Any suspension of LTI payments uses the Malus system, a policy that delays payment of part of the Tantiem for a certain period and is paid if the recipient meets certain criteria.

EMPLOYEE REMUNERATION

The employee remuneration strategy is determined based on the principles of supply and demand, BNI's remuneration position compared to the market, and by considering employee talent classification. The component of employee remuneration consists of permanent remuneration differentiated based on position weight and person value. While variable remuneration is given based on performance associated with the achievement of bank performance, unit performance, and the employee concerned. The unit performance is reflected in the classification of business units, regions, subsidiaries, and branch offices located abroad.

A remuneration policy consultant, PT Tower Watson Indonesia, is assigned to conduct a salary survey every year. The survey results are used as a reference for employee remuneration.

HIGHEST AND LOWEST EMPLOYEE SALARY RATIO

A salary is employee's right, a compensation in the form of money, given by the Company or employer for the services rendered by the employee, which is determined and pay upon according to a work agreement, arrangement, or laws and regulations.

1. Ratio of highest and lowest employee's salary is 42.38:1;
2. Ratio of highest and lowest Director's salary ratio is 1.18:1;
3. Ratio of highest and lowest Commissioners' salary ratio is 1.11:1;
4. Ratio of Director's highest salary and employee's highest salary is 2.24:1.

EMPLOYEES AND/OR COMPANY MANAGEMENT STOCK ALLOCATION PROGRAM (MSOP/ESOP)

The Fiscal Year 2020 Annual GMS held on March 29, 2021 agreed to transfer the entire 2020 buyback shares, which were held as 19,579,700 treasury shares for the Employee, Board of Directors and Board of Commissioners share ownership program.

On January 3, 2022, the Company submitted a Report of Material Information or Facts through Letter No. KMP/7/0002 dated January 3, 2022 that stated that on December 30, 2021, the Company had distributed the shares from the 2020 buyback, held as 19,579,700 treasury shares for the Employees, Non-Independent Directors and Commissioners share ownership program in the form of Long Term Incentives.

Following the Annual GMS resolution, 5,724,673 shares were distributed to members of the Board of Directors and Non-Independent members of the Board of Commissioners currently serving in 2020 as part of the variable remuneration that is deferred to non-Independent members of the Board of Directors and the Board of Commissioners. The remainder was used for the Employee Stock Option Plan (ESOP).

COMPANY SHARE OWNERSHIP BY MEMBERS OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS

In accordance with OJK Regulation No. 11/POJK.04/2017 concerning Ownership Report or Any Change in Share Ownership of a Public Company, a member of the Board of Directors or a member of the Board of Commissioners is required to report to the Financial Services Authority their ownership and any change in ownership of shares of a Public Company, either directly or indirectly. The said report must be submitted no later than 10 (ten) days after the ownership or change occurs.

In addition to the provisions for reporting to the Financial Services Authority, members of the Board of Directors and members of the Board of Commissioners are also required to submit information to the Public Company regarding ownership and any changes in ownership of shares in the Public Company. The information to be submitted no later than 3 (three) working days after any ownership change in ownership of a Public Company shares. In practice in the Company, members of the Board of Directors and members of the Board of Commissioners submit the information to the Corporate Secretary or Head of the Corporate Communications & Secretariat Division no later than 3 (three) working days after the ownership change occurs.

The policy covering the obligations of members of the Board of Directors and members of the Board of Commissioners to submit information regarding ownership and any changes in share ownership of the Company's shares is regulated in the Board of Commissioners Decree No. KEP/049/DK/2017 dated October 26, 2017 concerning Guidelines and Work Rules for the PT Bank Negara Indonesia (Persero) Tbk. Board of Commissioners, and Board of Directors Decree No. KP/228/DIR/R dated June 29, 2018 concerning Improving the Guidelines and Work Procedures of the Board of Directors.

During 2021, there was a change in the ownership of the Company's shares owned by members of the Board of Directors and non-Independent members of the Board of Commissioners which was submitted to the OJK in accordance with the provisions of OJK Regulation No. 11/POJK.04/2017 concerning Ownership Report or Any Change in Share Ownership of a Public Company.

The share ownership reports of members of the Board of Directors and members of the Board of Commissioners throughout 2021 were as follows:

NAME	POSITION	SHARE OWNERSHIP DECEMBER 31, 2020	SHARE OWNERSHIP DECEMBER 31, 2021
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	0	0
Pradjoto	Vice President Commissioner/ Independent Commissioner	0	0
Sigit Widyawan	Independent Commissioner	0	0
Septian Hario Seto	Independent Commissioner	0	0
Asmawi Syam	Independent Commissioner	0	0
Erwin Rijanto Slamet ¹⁾	Independent Commissioner	0	0
Iman Sugema	Independent Commissioner	0	0
Askolani	Commissioner	61,833 shares/0.0003316%	244,205 shares/0.0013095%
Joni Swastanto ²⁾	Commissioner	235.120	-
Ratih Nurdianti	Commissioner	116,628 shares/0.0006254%	299,000 shares/0.0016033%
Susyanto	Commissioner	0	156,959 shares/0.0008417%
Royke Tumilaar	Direktur Utama	0	163,584 shares/0.0008772%

	CHANGE OF SHARE OWNERSHIP							
	TRANSACTION DESCRIPTION	NUMBER OF SHARES	TRANSACTION PURPOSE	PRICE	TRANSACTION DATE	DATE OF REPORTING TO THE COMPANY	DATE OF REPORTING TO OJK	SHARE OWNERSHIP STATUS
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	Transfer	182,372 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	-	-	-	-	-	-	-	-
	Transfer	182,372 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	156,959 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	163,584 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct

NAME	POSITION	SHARE OWNERSHIP DECEMBER 31, 2020	SHARE OWNERSHIP DECEMBER 31, 2021	
Adi Sulistyowati	Vice President Director	575,102 shares/0.0030839%	1,007,373 shares/0.0054019%	
Novita Widya Anggraini	Managing Director Finance	0	139,046 shares/0.0007456%	
David Pirzada	Managing Director Risk Management	0	139,046 shares/0.0007456%	
Henry Panjaitan	Managing Director Treasury and International	10,844 shares/0.0000581%	149,890 shares/0.0008038%	
Corina Leyla Karnalies	Managing Director Consumer Business	44 shares/0.0000002%	365,041 shares/0.0019575%	

	CHANGE OF SHARE OWNERSHIP							
	TRANSACTION DESCRIPTION	NUMBER OF SHARES	TRANSACTION PURPOSE	PRICE	TRANSACTION DATE	DATE OF REPORTING TO THE COMPANY	DATE OF REPORTING TO OJK	SHARE OWNERSHIP STATUS
	Transfer	432,271 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	364 997 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct

NAME	POSITION	SHARE OWNERSHIP DECEMBER 31, 2020	SHARE OWNERSHIP DECEMBER 31, 2021	
Muhammad Iqbal	Managing Director MSME Business	0	139,046 shares/0.0007456%	
Y.B. Hariantono	Managing Director Information Technology & Operations	0	364,997 shares/0.0019572%	
Bob Tyasika Ananta	Managing Director Human Capital & Compliance	657,669 shares/0.0035266%	1,088,761 shares/0.0058383%	
Sis Apik Wijayanto	Managing Director Institutional Relations	90,000 shares/0.0004826%	454,997 shares/0.0024398%	
Silvano Winston Rumanthir	Managing Director Corporate Banking	0	139,046 shares/0.0007456%	

	CHANGE OF SHARE OWNERSHIP							
	TRANSACTION DESCRIPTION	NUMBER OF SHARES	TRANSACTION PURPOSE	PRICE	TRANSACTION DATE	DATE OF REPORTING TO THE COMPANY	DATE OF REPORTING TO OJK	SHARE OWNERSHIP STATUS
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	364,997 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	431,092 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	364,997 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/ POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp 4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct

NAME	POSITION	SHARE OWNERSHIP DECEMBER 31, 2020	SHARE OWNERSHIP DECEMBER 31, 2021	
Ronny Venir	Managing Director Service and Network	26,700 shares/0.0001432%	172,746 shares/0.0009263%	

Note:

¹⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

²⁾ Ceased serving as Commissioner on March 29, 2021

BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS SHARE OWNERSHIP IN BANKS OR OTHER COMPANIES

To maintain each member of the Board of Commissioners and the Board of Directors independence, information on members of the Board of Commissioners and the Board of Directors share ownership in other banks, non-bank financial institutions and other companies domiciled at home or overseas is also disclosed. As of December 31, 2021, no members of the Board of Commissioners and Board of Directors owned shares in other banks, non-bank financial institutions and other companies domiciled at home or overseas.

	CHANGE OF SHARE OWNERSHIP							
	TRANSACTION DESCRIPTION	NUMBER OF SHARES	TRANSACTION PURPOSE	PRICE	TRANSACTION DATE	DATE OF REPORTING TO THE COMPANY	DATE OF REPORTING TO OJK	SHARE OWNERSHIP STATUS
	Transfer	139,046 shares	In the context of implementing the OJK Regulation No.45/POJK.03/2015 concerning the Implementation of Good Corporate Governance in Giving Remuneration for Commercial Banks.	Rp4,057.7	December 30, 2021	December 30, 2021	January 3, 2021	Direct



Board of Commissioners and Board of Directors Meetings

BOARD OF COMMISSIONERS MEETINGS

MECHANISM FOR THE BOARD OF COMMISSIONERS MEETINGS AND THE BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS

Based on OJK Regulation and the Company's Articles of Association No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies and the Company's Articles of Association. The regulation states that the Board of Commissioners must hold a Meeting at least 1 (one) time in 2 (two) months and hold a meeting with the Board of Directors periodically at least 1 (one) time in 4 (four) months. In addition, the Board of Commissioners can hold a meeting at any time at the request of 1 (one) or several members of the Board of Commissioners or Board of Directors, stating the matters to be discussed.

The Board of Commissioners may also make valid decisions without holding a Board of Commissioners Meeting provided 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 agreement.

As the guideline for the implementation of the Board of Commissioners Meetings and the Joint Meetings with the Board of Directors, the Board of Commissioners has established procedures and mechanisms for the implementation of the Board of Commissioners Meetings and Board of Commissioners Meetings with the Board of Directors in the Board of Commissioners Decree No. Kep/049/ DK/2017 dated October 26, 2017 concerning the Board of Commissioners' Guidelines and Work Rules, which were further elaborated in the Board of

Commissioners Decree No. KEP/010/DK/2018 dated July 12, 2018 concerning Rules of Procedure for the Board of Commissioners Meetings and the Joint Meetings with the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk, which in principle contains the following provisions:

1. Meeting Schedule;
2. Meeting agenda;
3. Meeting Venues;
4. Meeting Participants;
5. Power and Representation;
6. Meeting Summons;
7. Meeting Attendance and Decision Making;
8. Documentation of the implementation of the Meeting and administration of Minutes of Meeting;
9. Decisions of the Board of Commissioners outside the meeting;
10. Meeting of the Board of Commissioners through Teleconference Media;
11. Format and materials for Meeting Presentations.

The Board of Commissioners' meetings consist of:

1. Internal Meetings of the Board of Commissioners (Rakom);
2. Board of Commissioners meetings by inviting the Field/Sectoral Director or Senior Executive Vice President (SEVP);
3. Joint Meetings of the Board of Directors and the Board of Commissioners (Radikom), Board of Commissioners Meeting with the Board of Directors, attended by the Corporate Secretary and the Secretary to the Board of Commissioners.

AGENDA, DATE AND PARTICIPANTS OF THE BOARD OF COMMISSIONERS MEETINGS IN 2021

During 2021, the agenda, date and participants of the Board of Commissioners' Meetings were as follows:

Board of Commissioners Meetings

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
1.	January 7, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Proposed Change to the Head of the Internal Audit Unit Discussion on the Ministry of SOEs Letter for Submission of Proposals for Revision of BNI Key Performance Indicators (KPI) for 2020 Discussion on Appointment of Independent Executive Remuneration Consultant 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Not present Present Present 	Video Conference
2.	January 14, 2021	Board of Commissioners meeting inviting the relevant Directors Self-Determined Cost (HPS) for Procuring General Audit Services of the PT Bank BNI (Persero) Tbk Consolidated Financial Statements and Other Reports for the Fiscal Year Ending December 31, 2021 Board of Commissioners Internal Meetings Determination of Candidates from outside the Company as Board of Commissioners Committee Members.	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Not present Present Present Present Present Present Present Present Not present Present 	Video Conference
3.	January 19, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Applications as the Public Accounting Firm for the closing audit with the Board of Commissioners Discussion on issues at BNI Overseas Branch Offices 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Not present Present Present Not present Present Present Present Present Present Not present 	Video Conference
4.	January 21, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Discussion on credit consultation with the Board of Commissioners Board of Commissioners' support for the Plan to Establish a BNI Sekuritas Subsidiary in Singapore (Subsidiary of BNI Subsidiary) Closing meeting with Public Accounting Firm Closing meeting with Public Accounting Firm and all Directors 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Not present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
5.	January 28, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Risk Profile and Bank Health Level Report December 2020 2. Risk Appetite and Risk Tolerance Review 2021 3. BNI Performance for Fiscal Year 2020, Position As of December 31, 2020 Board of Commissioners Internal Meeting <ol style="list-style-type: none"> 1. OJK Letter concerning the Implementation of Pension Fund Governance 2. Plan to Establish BNI Sekuritas Subsidiary in Singapore 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Not present • Present • Present • Present • Not present • Present • Not present • Present • Present 	Video Conference
6.	February 2, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 3. Discussion on OJK's letter on the Pension Fund Implementation 4. Governance Realization Report on BNI DPLK Business Plan 2020 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Not present • Present • Present • Present • Present • Present 	Video Conference
7.	February 4, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Follow-up Discussion on the Head of Internal Audit Unit Change 2. Integrated Governance Committee Meeting result report 3. Application for Approval to the Board of Commissioners on the Mechanism for Providing Consumer Loan Facilities to Related Parties 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Not present • Not present • Present • Present • Present • Present 	Video Conference
8.	February 11, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Presentation of the 2020-2021 Board of Directors and Commissioners Remuneration Independent Consultant study 2. Presentation of the Nomination and Remuneration Committee on the proposed BNI Multifinance Commissioner position 3. Presentation by the President Director and Vice President Director regarding the 2020 Key Performance Indicators (KPI) achievement by the Board of Directors both Collegially and Individually 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
9.	February 18, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Proposal to Replace the President Director of PT BNI Sekuritas Credit Consultation with the Board of Commissioners Self-Assessment Results for the Integrated Risk Profile and Quality of Integrated Minimum Capital Adequacy for December 2020 Internal Audit Unit (IAU) Work Plan and IAU Charter BNI DPLK Health Level in 2020 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not Present 	Video Conference
10.	February 25, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Proposed Winner of the General Audit Services for BNI Consolidated Financial Statements for Fiscal Year 2021 Consolidated Financial Performance January 2021 Minimum Capital Adequacy Requirement based on Risk Profile 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Not Present Present Present Present Present Not Present Present Present Present Present 	Video Conference
11.	March 4, 2021	Board of Commissioners meeting inviting the relevant Directors One On One Meeting with the Board of Directors on Key Performance Indicators	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	Video Conference
12.	March 8, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Appointment of the of the BNI Annual GMS Chairman and their replacements BNI Annual GMS Preparation Update Determination of Key Performance Indicators for the Board of Commissioners Credit Consultation to the Board of Commissioners Board of Commissioners Internal Meeting BNI Officer Talent 1 (one) level below the Board of Directors (BOD-1)	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
13.	March 10, 2021	Board of Commissioners Internal Meeting BNI Officer Talent 1 (one) level below the Board of Directors (BOD-1)	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Not Present 	
14	March 18, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Discussion on the BNI Annual GMS for Fiscal Year 2020 Organization Arrangement of BNI's Board of Directors (Directors' Field) Follow-up report on the Board of Commissioners' decision for the nominated candidate as the President Director of BNI Sekuritas Credit Consultation to the Board of Commissioners 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Present 	Video Conference
15.	March 23, 2021	Board of Commissioners meeting inviting the relevant Directors Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Not Present Present Present Present Not Present Present Present Present Present Not Present 	Video Conference
16.	March 25, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Consolidated Financial Performance for February 2021 Request for Approval of Updated Anti-Money Laundering and Prevention of Terrorism Financing (APU and PPT) DPLK BNI Policy to the Board of Commissioners Board of Commissioners Internal Meeting Dismissal of Integrated Governance Committee Members	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Not Present Not Present Present Present Present Not Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
17.	April 1, 2021	Board of Commissioners meeting inviting the relevant Directors Board of Commissioners Internal Consolidation - Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Not Present Present Present Present 	Video Conference
18.	April 8, 2021	Board of Commissioners meeting inviting the relevant Directors 1. BNI Consumer Business and Digital Business Development Report and Future Development Strategy 2. MSME Loan Performance and Future Development Efforts	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Not Present Present Present Present 	Video Conference
19.	April 15, 2021	Board of Commissioners meeting inviting the relevant Directors 1. Request for approval from the Board of Commissioners on the Bank's Credit Policy 2. Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Not Present Present Present Present Present 	Video Conference
20.	April 22, 2021	Board of Commissioners meeting inviting the relevant Directors 1. Consolidated BNI Financial Performance for March 2021 and Discussion on Network and Service Developments and Plans 2. BNI Risk Profile Position March 31, 2021	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Present Not Present 	Video Conference
21.	April 29, 2021	Board of Commissioners meeting inviting the relevant Directors Credit Consultation to the Board of Commissioners Board of Commissioners Internal Meeting	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Not Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
22.	May 6, 2021	Board of Commissioners meeting inviting the relevant Directors Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
23.	May 7, 2021	Board of Commissioners Internal Meeting BNI Bank Credit Policy Review (continued)	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
24.	May 11, 2021	Board of Commissioners meeting inviting the relevant Directors 1. BNI Bank Credit Policy Review (continued) 2. Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
25.	May 20, 2021	Board of Commissioners meeting inviting the relevant Directors 1. Submission of the Board of Commissioners' Response to the Credit Policy Review Proposal from the Board of Directors 2. Discussion of Unaudited BNI DPLK Financial Statements for the Year Ended 31 December 2020 3. Discussion on the Approval for the Appointment of the 2021 Internal Audit Function Review Service	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
26	May 27, 2021	Board of Commissioners meeting inviting the relevant Directors 1. Consolidated Financial Performance for April 2021 2. Network and Service Developments and Plans	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Not Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
27.	June 3, 2021	Board of Commissioners Internal Meeting <ol style="list-style-type: none"> Approval of the 2021 BNI Tier 1 Capital Strengthening Study Selection of Candidates for Independent Non-Dekom Committee Members 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Not Present Present Present Present 	Video Conference
28.	June 10, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Approval of the 2021 BNI Tier 1 Capital Strengthening Study Credit Consultation to the Board of Commissioners 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Present 	Video Conference
29.	June 17, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Independent consultant discussion on the Benefit Analysis Discussion for members of the Board of Commissioners and Board of Directors Board of Directors' proposal on the Application for Approval of the Nominated Directors and Commissioners for the Subsidiary Companies Credit Consultation to the Board of Commissioners 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Present 	Video Conference
30.	June 24, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Consolidated Financial Performance for May 2021 and Discussion on Revision of BNI 2021-2023 Bank Business Plan Kick Off Meeting for BNI's annual financial statements audit for fiscal year 2021 by KAP Revision of BNI 2021-2023 Bank Business Plan (RBB) 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Present 	Video Conference
31.	June 30, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Revision of BNI 2021-2023 Bank Business Plan (RBB) (continued) Discussion on the Application for Proposals for Changes to BNI Pension Fund Regulations 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Not Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
32.	July 1, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. BNI Shares Buyback 2. Credit Consultation to the Board of Commissioners 3. Risk Monitoring Committee and Audit Committee Presentation regarding the Development of BNI's Loan at Risk (LaR) Handling 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Not Present 	Video Conference
33.	July 8, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Board of Directors' recommendations on the Human Capital Management Division Organization 2. Further discussion on the Application for Approval of the Proposed Changes to BNI Pension Fund Regulations 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Not Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
34.	July 15, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Evaluation of BNI's Internal Control including the Effectiveness of the BNI Internal Audit Unit 2. Evaluation of Compliance Function, and Evaluation and Handling of Anti-Fraud and Anti-Money Laundering and Prevention of Terrorism Financing (APU PPT) Program strategies at BNI 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Not Present • Present • Present • Present • Present • Present • Not Present • Present • Present • Present 	Video Conference
35.	July 22, 2021	Board of Commissioners meeting inviting the relevant Directors <p>Self Assessment Result for the Bank Health Level and BNI Individual Risk Profile as of June 31, 2021</p>	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Not Present • Not Present • Present 	Video Conference
36.	July 29, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Credit Consultation to the Board of Commissioners 2. Discussion of the BNI DPLK Supervision Semester Report 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Not Present • Present • Present • Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
37.	August 3, 2021	Board of Commissioners meeting inviting the relevant Directors Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	Video Conference
38.	August 5, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Consolidated Financial Performance Position for June 2021, Update and Follow-up on BNI Tier 1 Capital Strengthening Plans, particularly related to PMN Request for Support and Approval for Establishment and Participation of BNI Venture Capital to the Board of Commissioners Credit Consultation to the Board of Commissioners Board of Commissioners Internal Meeting <ol style="list-style-type: none"> Approval of applications for leave from the Board of Directors Discussion of the BNI PMN Proposal 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Present 	Video Conference
39.	August 12, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Evaluation of Integrated Risk Profile and Quality of Integrated Risk Management Implementation (KPMR) Semester I 2021 Public Accounting Firm Clearance Meeting on BNI Audit Position as of June 30, 2021 Board of Commissioners Internal Meeting	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	Video Conference
40.	August 19, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> Credit Consultation to the Board of Commissioners Discussion on Targets and Achievement of Board of Directors Collegial and Individual Key Performance Indicators for the First Semester 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
41.	August 26, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. BNI Financial Performance for July 2021 and Economic and Industrial Development 2. Updates on Material Cases Board of Commissioners Internal Meeting	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyanawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
42.	September 2, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Discussion on BNI's Consumer & Digital Banking Segments Developments and Plans 2. Discussion on the Managing Director Institutional Relations Business Plan and Performance 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyanawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Not Present 	Video Conference
43.	September 9, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Presentation on the results of the Internal Audit Unit function review at BNI by RSM 2. Credit Consultation to the Board of Commissioners 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyanawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
44.	September 16, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Discussion on Board of Directors' collegial and individual Key Performance Indicators targets and achievements for semester I and semester II 2021 2. BNI Employee Remuneration Policy in the context of compliance with applicable regulations and its implementation in the field 3. Audit Committee Update on the Disbursement of KUR at the Mataram Branch Office, and Presentation by the Internal Audit Unit (IAU) to the Board of Commissioners on the progress of completing the follow-up to the IAU Audit results and Audit Results Report (LHA) recommendations. 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto • Martowardojo • Pradjoto • Sigit Widyanawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Not Present • Present • Not Present • Present • Present • Present • Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
45.	September 23, 2021	Board of Commissioners meeting inviting the relevant Directors Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Present 	Video Conference
46.	September 30, 2021	Board of Commissioners meeting inviting the relevant Directors 1. BNI Consolidated Financial Performance Position for August 2021 2. Foreclosed Assets Report (AYDA)	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not Present 	Video Conference
47.	October 7, 2021	Board of Commissioners meeting inviting the relevant Directors 1. Procurement and Management of Assets Development and Policy 2. Small Business Credit Development and Performance	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Not Present 	Video Conference
48.	October 14, 2021	Board of Commissioners Internal Meeting Reports by the Committees Under the Board of Commissioners for 2021, and Approval by the Board of Commissioners on Report Documents that Need to be Prepared Periodically by the Board of Directors for Review by the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Not Present Not Present Not Present Not Present Present Present Present Present 	Video Conference
49.	October 21, 2021	Board of Commissioners meeting inviting the relevant Directors 1. BNI Consolidated Financial Performance Position for September 2021 2. Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjot Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
50.	October 28, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. BNI Corporate Action Update 2. Individual BNI Risk Profile Self Assessment Results as at September 30, 2021 3. Credit Consultation to the Board of Commissioners 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present 	Video Conference
51.	November 4, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Special audit results from the Internal Audit Unit on Foreclosed Assets (AYDA), Bank Temporary Participation (PSB) and Debt to Asset Swaps (DAS) 2. Update on BNI's role in the National Economic Recovery Program 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present 	Video Conference
52.	November 11, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. International Development and Performance including BNI Overseas Branch Offices 2. BNI Treasury Development and Performance 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
53	November 18, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Appointment of a Public Accounting Firm (KAP) for BNI and Overseas Branch Offices (KCLN) Consolidated Financial Statements for 2022 2. Consultation with the Board of Commissioners 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
54.	November 25, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. Discussion on the BNI Long Term Plan (RJPP)/Corporate Plan for 2021-2025, BNI 2022-2024 Bank Business Plan (RBB), and the Sustainable Finance Action Plan (RAKB) for 2022 2. Discussion on the 2021 BNI DPLK RBB and Draft Changes to the 2021 BNI DPLK DPLK 3. Discussion on the BNI 2021/2022 Recovery Plan 4. Discussion on the Follow-up Plan for the Establishment of BNI Venture Capital 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Joni Swastanto¹⁾ • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
55.	December 2, 2021	Board of Commissioners meeting inviting the relevant Directors <ol style="list-style-type: none"> 1. BNI Consolidated Financial Performance for October 2021, and the Board of Directors Report on the provision of funds to related parties 2. Credit Consultation to the Board of Commissioners 3. Discussion on the proposed appointment of PT BNI Multifinance and BNI Sekuritas management 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
56.	December 7, 2021	Board of Commissioners meeting inviting the relevant Directors Credit consultation to the Board of Commissioners	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present 	Video Conference
57.	December 9, 2021	Board of Commissioners meeting inviting the relevant Directors Credit consultation to the Board of Commissioners Board of Commissioners Internal Meeting	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	NOTE
58.	December 16, 2021	Board of Commissioners meeting inviting the relevant Directors Credit consultation to the Board of Commissioners	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Present • Present • Present • Present 	Video Conference
59.	December 20, 2021	Board of Commissioners Internal Meeting Presentation of the Committees under the Board of Commissioners Work Plans Board of Commissioners meeting inviting the relevant Directors Year-End Meeting of the Board of Commissioners and the Board of Directors - Delivering feedback on the Board of Directors performance	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
60.	December 22, 2021	Board of Commissioners meeting inviting the relevant Directors Preparation for OJK Examination Exit Meeting	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Not Present • Present • Not Present • Present • Present • Not Present 	Video Conference
61.	December 23, 2021	Board of Commissioners Internal Meeting Evaluation of Experts and Independent Committee Members	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present 	Video Conference
62.	December 24, 2021	Board of Commissioners meeting inviting the relevant Directors Submission of the Board of Commissioners' view on the 2021 Financial Services Authority Examination Results	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Erwin Rijanto Slamet²⁾ • Septian Hario Seto 	<ul style="list-style-type: none"> • Present • Present • Present • Not Present • Present • Present • Not Present • Present • Present • Not Present 	Video Conference

Note:¹⁾ Ceased serving as Commissioner effective March 29, 2021²⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

JOINT BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS

AGENDA, DATE AND PARTICIPANTS OF THE JOINT BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS

During 2021, the Board of Commissioners held joint meetings with the Board of Directors with the following agenda, dates and participation:

Joint Board of Commissioners Meetings with the Board of Directors

NO.	DATE	MEETING AGENDA	BOARD OF COMMISSIONERS PARTICIPANTS	ATTENDANCE	NOTE	BOARD OF DIRECTORS PARTICIPANTS	ATTENDANCE
1.	January 28, 2021	Board of Commissioners meeting with the Board of Directors 1. Risk Profile and Bank Health Level Report for December 2020 2. Review of Risk Appetite and Risk Tolerance 2021 3. BNI Performance for Fiscal Year 2020 as of December 31, 2020	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto⁹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Not Present Present Not Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggraini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Not Present Not Present Present Present Present Present Present Present Present Present Present 	Video Conference
2.	February 25, 2021	Board of Commissioners meeting with the Board of Directors 1. Proposed Winner of General Audit Services Procurement for BNI Consolidated Financial Statements for Fiscal Year 2021 2. Consolidated Financial Performance for January 2021 3. Minimum Capital Adequacy Requirement based on Risk Profile	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto⁹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Not Present Present Present Present Present Not Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Not Present Present Present Not Present 	Video Conference

NO.	DATE	MEETING AGENDA	BOARD OF COMMISSIONERS PARTICIPANTS	ATTENDANCE	NOTE	BOARD OF DIRECTORS PARTICIPANTS	ATTENDANCE
3.	March 25, 2021	Board of Commissioners meeting with the Board of Directors 1. Consolidated Financial Performance for February 2021 2. Application for Approval of Updated Anti-Money Laundering and Prevention of Terrorism Financing (APU and PPT) DPLK BNI Policy to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Joni Swastanto¹⁾ Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Not Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Present Present Not present Not present Present Present Not present Present Present Not present Present 	Video Conference
4.	April 22, 2021	Board of Commissioners meeting with the Board of Directors 1. Consolidated BNI Financial Performance for March 2021 and Discussion on Network and Service Developments and Plans 2. BNI Risk Profile Position March 31, 2021	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Not Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Present Present Not present Not present Present Present Present Not present Present Present Not present 	Video Conference
5.	May 27, 2021	Board of Commissioners meeting with the Board of Directors 1. Consolidated Financial Performance for April 2021 2. Network and Service Developments and Plans	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Present Not present Present Present Present Present Present Present Present Present Not present 	Video Conference

NO.	DATE	MEETING AGENDA	BOARD OF COMMISSIONERS PARTICIPANTS	ATTENDANCE	NOTE	BOARD OF DIRECTORS PARTICIPANTS	ATTENDANCE
6.	June 24, 2021	Board of Commissioners meeting with the Board of Directors 1. Consolidated Financial Performance for May 2021, and Discussion on Revision of BNI 2021-2023 Bank Business Plan 2. Kick Off Meeting for audit of BNI's annual financial statements for fiscal year 2021 by the KAP. 3. Revision of BNI 2021-2023 Bank Business Plan (RBB)	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not Present Present Present 	Video Conference
7.	August 5, 2021	Board of Commissioners meeting with the Board of Directors 1. Consolidated Financial Performance Position for June 2021, and Update and Follow-up on BNI Tier 1 Capital Strengthening Plans, particularly related to PMN 2. Request for Support and Approval of Establishment and Participation of BNI Venture Capital to the Board of Commissioners 3. Credit Consultation to the Board of Commissioners Board of Commissioners Internal Meeting 1. Approval of the application for leave of the Board of Directors 2. Discussion of the BNI PMN Proposal	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	BOARD OF COMMISSIONERS PARTICIPANTS	ATTENDANCE	NOTE	BOARD OF DIRECTORS PARTICIPANTS	ATTENDANCE
8.	August 26, 2021	Board of Commissioners meeting with the Board of Directors 1. BNI Financial Performance for July 2021 and Economic and Industrial Development 2. Updates regarding Material Cases Board of Commissioners Internal Meeting	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Present Not present Present Present Present Present Present Not present Not present 	Video Conference
9.	September 30, 2021	Board of Commissioners meeting with the Board of Directors 1. BNI Consolidated Financial Performance for August 2021 2. Foreclosed Assets Implementation Report (AYDA)	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Present Present Not present Present Present Present Present Present Present Present Not present 	Video Conference
10.	October 21, 2021	Board of Commissioners meeting with the Board of Directors 1. BNI Consolidated Financial Performance for September 2021 2. Credit Consultation to the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Not present Not present Present Present Present Present Present Present Present Not present Not present Present 	Video Conference

NO.	DATE	MEETING AGENDA	BOARD OF COMMISSIONERS PARTICIPANTS	ATTENDANCE	NOTE	BOARD OF DIRECTORS PARTICIPANTS	ATTENDANCE
11.	December 2, 2021	Board of Commissioners meeting with the Board of Directors 1. BNI Consolidated Financial Performance for October 2021, and Board of Directors Report on the provision of funds to related parties 2. Credit Consultation to the Board of Commissioners 3. Discussion on the proposed appointment of the management of PT BNI Multifinance and BNI Sekuritas	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Not Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
12.	December 20, 2021	Board of Commissioners meeting with the Board of Directors 1. Board of Commissioners and the Board of Directors Year-End Meeting 2. Submission of Appreciation and Advice by the Board of Commissioners to the Board of Directors	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Erwin Rijanto Slamet²⁾ Septian Hario Seto 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present 	<ul style="list-style-type: none"> Royke Tumilar Adi Sulistyowati Bob Tyasika Ananta Sis Apik Wijayanto Corina Leyla Karnalies Y.B. Hariantono Novita Widya Anggarini Ronny Venir David Pirzada Henry Panjaitan Muhammad Iqbal Silvano Winston Rumantir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

Note:¹⁾ Ceased serving as Commissioner effective March 29, 2021²⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

FREQUENCY OF THE BOARD OF COMMISSIONERS MEETINGS AND JOINT BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS

During 2021, the Board of Commissioners held 62 (sixty two) Board of Commissioners Meetings, and 12 (twelve) Joint Board of Commissioners Meetings with the Board of Directors. Following is the frequency and attendance of meetings of each member of the Board of Commissioners.

NAME	POSITION	BOARD OF COMMISSIONERS MEETINGS			JOINT BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS		
		NUMBER AND (%) ATTENDED			NUMBER AND (%) ATTENDED		
		NUMBER OF MEETINGS	NUMBER ATTENDED	%	NUMBER OF MEETINGS	NUMBER ATTENDED	%
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	62	58	93.54	12	11	91.66
Pradjoto	Vice President Commissioner/ Independent Commissioner	62	55	88.70	12	9	75.00
Joni Swastanto ¹⁾	Commissioner	16	16	100.00	3	3	100.00
Sigit Widyawan	Independent Commissioner	62	61	98.38	12	12	100.00
Askolani	Commissioner	62	40	64.51	12	9	75.00
Ratih Nurdianti	Commissioner	62	50	80.64	12	9	75.00
Asmawi Syam	Independent Commissioner	62	61	98.38	12	12	100.00
Susyanto	Commissioner	62	51	82.25	12	11	91.66
Iman Sugema	Independent Commissioner	62	60	96.77	12	12	100.00
Erwin Rijanto Slamet ²⁾	Independent Commissioner	25	25	100.00	5	5	100.00
Septian Hario Seto	Independent Commissioner	62	49	79.03	12	8	66.66

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

²⁾ Served as Independent Commissioner since March 29, 2021 and effective based on OJK approval since August 6, 2021

THE BOARD OF COMMISSIONERS MEETING PLAN FOR 2022

The planned agenda for the Board of Commissioners Meetings and Joint Board of Commissioners Meetings with the Board of Directors in 2022 is prepared based on the Board of Commissioners Work Plan established in early 2022 with due observance to the prevailing laws and regulations specifically regulating the duties, obligations and responsibilities of the Board of Commissioners:

1. Joint Board of Commissioners Meetings with the Board of Directors:
 - a. Consolidated BNI Financial Performance for each month;
 - b. Reports on credit decisions that need to be consulted to the Board of Commissioners;
 - c. Issues of a strategic nature.

2. Internal Meetings of the Board of Commissioners consisting of Meetings of the Board of Commissioners, Meetings of the Board of Commissioners by inviting the Directors of the Sector/Fields, in general include:
 - a. Approval of the Bank's Business Plan and monitoring the implementation of the BNI Bank Business Plan;
 - b. Bank BNI Health Level for Semester II-2021 and Semester I-2022 and BNI Risk Profile per quarter;
 - c. Implementation of BNI Risk Management and Integrated Risk Management in the BNI Financial Conglomeration;
 - d. The effectiveness of the implementation of the BNI Internal Control Unit;
 - e. Findings and recommendations submitted by the Financial Services Authority, internal auditors, and external auditors;
 - f. Implementation of BNI's Compliance Function at least 2 (two) times in one year;

- g. Implementation of the Anti Money Laundering (APU) and Prevention of Terrorism Funding (PPT) Programs in the Financial Services Sector, Implementation of Anti-Fraud Strategies and the Principles of Knowing BNI Customers;
- h. BNI's Human Capital strategic issues;
- i. Implementation of Good Corporate Governance at BNI;
- j. Implementation of Integrated Governance for the BNI Financial Conglomeration;
- k. The quality of the BNI credit or financing portfolio;
- l. Governance and strategic issues of BNI Information Technology;
- m. Sector Directors' performance related to BNI's strategic issues;
- n. BNI material case reports;
- o. Approval of matters that are based on the Legislation and the Articles of Association of BNI must obtain approval from the Board of Commissioners, including:
 - i) Approval of lending to related parties;
 - ii) Approval of Company Policies/Guidelines

BOARD OF DIRECTORS' MEETINGS

MECHANISM FOR THE BOARD OF DIRECTORS MEETINGS

The Board of Directors Meetings are held with reference to the provisions of OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies and Article 13 of the Company's Articles of Association.

Board of Directors Meeting are held with the following provisions:

Organizing Meetings

1. The Board of Directors must hold a Board of Directors' meeting at least 1 (one) time every month.
2. The Board of Directors must hold a joint meeting of the Board of Directors with the Board of Commissioners periodically at least 1 (one) time in 4 (four) months.
3. The Board of Directors' Meetings may be held at any time in the event that:
 - a. It is deemed necessary by one or more members of the Board of Directors
 - b. Upon a written request from one or more members of the Board of Commissioners

Meeting Summons

1. Meetings can be held at the Bank's domicile or elsewhere in the territory of the Republic of Indonesia or at the place of business of the Bank.
2. The summons of Board of Directors' Meeting shall be made by the member of Board of Directors who is entitled to represent the Board of Directors.
3. The summons of the Board of Directors' Meeting shall be made in writing and submitted or delivered directly to each member of the Board of Directors with an adequate receipt or by registered mail or by courier or telex, facsimile, or e-mail no later than 5 (five) days before the meeting is held by not including the Calling Date and the meeting date or in a shorter time if in an urgent situation.
4. The summons of meeting shall state the agenda, date, time, and place of the meeting.
5. Such calling is not required for meetings that have been scheduled based on the decisions of the Board of Directors' Meeting held previously or if all members of the Board of Directors are present at the meeting.

Chair of the Board of Directors' Meeting

1. All Board of Directors' Meetings are chaired by the President Director. In the event that the President Director is absent or unavailable, the Vice President Director will chair the Board of Directors' meeting or a Director who is appointed in writing by the President Director will chair the Board of Directors' Meeting in the event that at the same time the Vice President Director is also absent or unavailable or the Director appointed by the Vice President Director who will chair the Board of Directors' Meeting in the event that at the same time the President Director is absent or unavailable and does not appoint anyone.
2. If the GMS does not appoint a Vice President Director, then in the event that the President Director is absent or unavailable, one of the Directors who is appointed in writing by the President Director will chair the Board of Directors' Meeting.
3. In the event that the President Director does not appoint anyone, one of the Directors with the longest term of office as member of Board of Directors will chair the Board of Directors' Meeting.
4. In the event that there are more than 1 (one) members of the Board of Directors who have the longest term of office as a member of the Bank's Board of Directors, then the Director as stated in point 3 above who is the oldest in age will act as the chair of the Board of Directors' Meeting.

Attendance

1. Members of the Board of Directors may be represented at the 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 may only represent one other 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 opinions in writing and sign, then submit it to the President Director or Vice President Director or to other members of the Board of Directors who will chair the Board of Directors' Meeting, whether or not they support the matters will be discussed and this opinion will be deemed as a vote legally issued at the Board of Directors' Meeting.
3. In the event that a member of the Board of Directors is unable to attend a meeting physically, then such member of the Board of Directors may attend the meeting through teleconferencing, video conferencing, or other electronic media facilities, in accordance with the applicable regulations.
4. Each member of the Board of Directors who personally in any way, directly or indirectly, has an interest in a transaction, contract, or proposed contract, in which the Bank is one of the parties shall state the nature of interest in a Board of Directors' Meeting, and therefore, has no right to take part in voting on matters related to such transaction or contract.

Decision Making

1. The Board of Directors' Meeting is valid and entitled to make binding decisions if attended and/or represented by more than 1/2 (one half) from the total members of the Board of Directors.
2. In the event that there is more than one proposal, a re-election is conducted so that one of the proposals gets votes more than 1/2 (one half) part of the total votes cast.
3. The Board of Directors' Meeting Decisions shall be made based on deliberation to reach a consensus. In the event that decision based on deliberation to reach a consensus is not reached, then the decision shall be taken by voting based on the agreed votes that are more than 1/2 (one half) part of the total valid votes cast at the related meeting.
4. In Board of Directors' Meetings, each member of the Board of Directors is entitled to cast 1 (one) vote and 1 (one) additional vote for each other member of the Board of Directors represented.
5. Blank votes (abstention) are considered as approving the proposal submitted at the meeting. Void votes are considered non-existent and not counted in determining the number of votes cast at the meeting.
6. Voting concerning an individual shall be in folded ballots without signature, while voting concerning other matters shall be conducted orally, unless otherwise determined by the Chair of the Meeting, without any objection being raised by those present.

Minutes of Meeting

1. The results of the Board of Directors' Meeting must be stated in Minutes of Meeting. Minutes of Meeting shall be made by a person present at the meeting who is appointed by the Chair of the Meeting, and then signed by all members of the Board of Directors present and delivered to all members of the Board of Directors.
2. Results of Board of Directors' Meetings with the Board of Commissioners must be stated in Minutes of Meeting. Minutes of Meeting shall be made by a person present at the meeting who is appointed by the Chair of the Meeting, and then signed by all members of the Board of Directors and members of the Board of Commissioners present and delivered 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 meeting results as referred to in number 1 and 2 above, such member must state the reason in writing in a separate letter attached to the minutes of meeting.
4. Minutes of Meeting as referred to in number 1 and number 2 above must be documented by the Bank.
5. Minutes of the Board of Directors' Meeting are legitimate evidence for members of Board of Directors and third parties regarding the decisions taken in the related Meeting.

Decisions Outside the Board of Directors Meeting

1. The Board of Directors may also make valid decision without holding the Board of Director's Meeting, provided that all members of Board of Directors have been notified in writing and all members of Board of Directors have approved the related proposal submitted in writing and have signed such approvals.
 2. Decisions made by such way have the same binding power as that of made validly in the Board of Director's Meeting.
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AGENDA, DATE AND PARTICIPANTS IN BOARD OF DIRECTORS' MEETINGS IN 2021

During 2020, the agenda, date and participants of the Board of Directors' Meetings were as follow:

Board of Directors' Meetings

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
1	January 6, 2021	<ol style="list-style-type: none"> General Procurement Level of Board of Directors Meeting Update Performance and Capital 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Not present Present 	Video Conference
2	January 12, 2021	<ol style="list-style-type: none"> General Approval of KCLN Hongkong and London Update on Business Meeting Preparation Organizational Arrangement of Directors and Regions 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
3	January 13, 2021	<ol style="list-style-type: none"> General Organizational Arrangement of Directors and Regions 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
4	January 19, 2021	<ol style="list-style-type: none"> General Discussion: <ol style="list-style-type: none"> Report on the Result of the Bank's Health Level Assessment and the Risk Profile of BNI only as of December 31, 2020; Risk Management Review. Discussion on the 2020 Audited Financial Report BOD KPI <ol style="list-style-type: none"> Executive Talent Development; Individual Performance Management. 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Not Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
5	January 21, 2021	<ol style="list-style-type: none"> General Discussion on RBB BNI 2021-2023 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Present Present Present Present Not Present Present Present Present 	Video Conference
6	January 24, 2021	Discussion on RBB BNI 2021-2023	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
7	January 25, 2021	<ol style="list-style-type: none"> General Update on Business Meeting Preparation Updates regarding Company Assets 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
8	January 26, 2021	<ol style="list-style-type: none"> Review of Proposed Authority Arrangements for the Procurement of Goods and/or Services AYDA Management Strategy Analyst Meeting Preparation Finalization of PMS Unit Q4 2020 Score and Individual Performance Management 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
9	February 2, 2021	<ol style="list-style-type: none"> General Executive Talent Development IT Infrastructure Update IT Strategy for Distribution of KUR 2021 Approval of the Corporate Action Plan 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
10	February 2, 2021	General	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
11	February 16, 2021	<ol style="list-style-type: none"> General Executive Talent Committee (ETC) Operational Conditions during the Covid Pandemic 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
12	February 23, 2021	<ol style="list-style-type: none"> General Anti Fraud Strategy Update Credit Policy 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Not Present Present 	Video Conference
13	February 26, 2021	<ol style="list-style-type: none"> General Executive Talent Committee (ETC) 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
14	March 2, 2021	<ol style="list-style-type: none"> General Update Program BNI Go Global AYDA Update Executive Talent Committee (ETC) Follow up 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
15	March 3, 2021	Remuneration Study	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
16	March 9, 2021	<ol style="list-style-type: none"> General Update on GMS Preparation Discussion regarding ATM Update KCLN Seoul 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
17	March 16, 2021	<ol style="list-style-type: none"> General Use of Tools (IT) for Credit BNI Digital Products Umbrella Campaign Update KCLN Seoul 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
18	March 30, 2021	<ol style="list-style-type: none"> HCT General Procurement of Radiation Level Transformation Journey of BNI Contact Center Credit Policy Review 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Present Present Not Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
19	April 6, 2021	1. General 2. Branchless Banking Agen46	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Not Present Present Present Present Present Present Present Present Present Present 	Video Conference
20	April 13, 2021	1. General 2. SMEs Export and Diaspora 3. Proposals regarding KCLN Tokyo 4. Follow-up Updates for Regional Visits	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
21	April 15, 2021	Board of Directors Meeting Level Procurement	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
22	April 20, 2021	1. General 2. Update Analyst Meeting, Public Expose 3. Update on the AGMS of Subsidiary Companies for Fiscal Year 2020 4. Procurement of Board of Directors Meeting Level 5. Report on the Results of BNI only Risk Assessment Position March 31, 2021	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Not Present Present Present Not Present Present Present Present Present Present Present Present 	Video Conference
23	April 27, 2021	1. General 2. Request for Board of Directors KPI Approval 2021 3. Update Progress Loan at Risk (LaR) 4. SMExporter HUB Branding Proposal	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
24	May 4, 2021	<ol style="list-style-type: none"> General Discussion on Corporate Action Update OPR Division Activities and Transactions Presentation of Blueprint for Saving Performance Improvement Projects Update on Operational Preparation Ahead of Eid Al-Fitr 1442H Update CMT <ol style="list-style-type: none"> Human Capital Management Proposed retirement benefits for 2021 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
25	May 5, 2021	Preparation of Radikom related to Human Capital Management	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Not Present Present Present 	Video Conference
26	May 11, 2021	<ol style="list-style-type: none"> General Update on Financial Performance for April 2021 Update on CMT Update on Operational Preparation Ahead of Eid Al-Fitr 1442 H Update on Xpora Progress 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
27	May 25, 2021	<ol style="list-style-type: none"> General Radisi for Small Business Credit Management & Programs 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
28	May 31, 2021	<ol style="list-style-type: none"> Discussion on Corporate Action Plan Executive Talent Committee (ETC) 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
29	June 8, 2021	<ol style="list-style-type: none"> General Revised RBB 2021 Additional Tier 1 Publishing Plan Update Marketing Communication and Social Media 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
30	June 15, 2021	<ol style="list-style-type: none"> General Update on Corporate Action Preparation Bank Guarantee Business Improvement Strategy Update Branchless Banking – Branding Agen46 Update Xpora 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
31	June 22, 2021	<ol style="list-style-type: none"> General Procurement of Board of Directors Meeting Level Results of the Identification of the Covid-19 Impact Survey for the Q2 2021 Period Proposed Corporate Action 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Present Present Present Present 	Video Conference
32	June 29, 2021	<ol style="list-style-type: none"> General Discussion on Project Cost Management (Corporate Transformation) Update on the Distribution of Social Assistance and Government Programs through BNI 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
33	July 6, 2021	<ol style="list-style-type: none"> General Complaint Handling 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Not Present Present Present Present Not Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
34	July 13, 2021	General	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Not Present Present Present Present Present Present 	Video Conference
35	July 21, 2021	<ol style="list-style-type: none"> General Discussion on TKB and Risk Profile as of June 2021 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
36	July 27, 2021	<ol style="list-style-type: none"> General Executive Talent Committee (ETC) 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
37	August 2, 2021	Update on Financial Report Audit Progress dated 30 June 2021	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
38	August 3, 2021	<ol style="list-style-type: none"> Executive Talent Committee (ETC) General Update ESG BNI International Division Event Update 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
39	August 10, 2021	<ol style="list-style-type: none"> General Closing Audit LK 30 June 2021 Financial Performance July 2021 Executive Talent Committee (ETC) 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Not Present Present 	Video Conference
40	August 16, 2021	<ol style="list-style-type: none"> General Kick Off Annual Strategy and Business Plan Technology Management Committee (KMT) Health Sharing Session 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Not Present Present 	Video Conference
41	August 24, 2021	General	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Present Present Present Present Present Present Not Present Not Present 	Video Conference
42	August 30, 2021	General (DigiCS Machine Update (Sonic))	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Not Present Present Present Present Present Present 	Video Conference
43	September 6, 2021	<ol style="list-style-type: none"> General (including ATM and EDC Management) Classification of Regions, SBK, SBE, Branches, and KCP/KK Procurement of Board of Directors Meeting Level 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Not Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
44	September 13, 2021	1. General 2. Top Complaints for Digital 3. Business August Performance and September Prognosis	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
45	September 22, 2021	1. Executive Talent Committee (ETC) 2. Additional Tier 1 (AT-1) Project	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Present Present Not Present Present Present Present Present Present 	Video Conference
46	September 27, 2021	1. General 2. Update RM capacity increase to Support Digital Business 3. Corporate Action Update	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Not Present Present Present Present Present Not Present Present Present 	Video Conference
47	October 5, 2021	Procurement of Board of Directors Meeting Level	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Not Present Present Present Present Present Present Not Present Present Not Present 	Video Conference
48	October 11, 2021	1. a. General b. i) DMA Division's business processes to support digital business; ii) 38 group value chain dashboard. 2. Update on Corporate Action 3. Financial Performance September 2021	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
49	November 2, 2021	<ol style="list-style-type: none"> General Surveillance Data 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Not Present Present Present Present Not Present Present Present Present Present Present Not Present Present 	Video Conference
50	November 8, 2021	General	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
51	November 15, 2021	<ol style="list-style-type: none"> General Procurement of Board of Directors Meeting Level Evaluation of BNI Corporate Transformation Wave 1 and Launch Wave 2 Financial Performance October 2021 + Profitability Segment Updating BNI Recovery Plan Documents for 2021/2022 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
52	November 16, 2021	<ol style="list-style-type: none"> Evaluation of BNI Corporate Transformation Wave 1 and Wave 2 Launch Approval of BNI 2021-2025 Corporate Plan 2022-2024 Non-Financial Bank Business Plan (RBB) 2022 Subsidiary RBB 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
53	November 23, 2021	<ol style="list-style-type: none"> General Approval of 2022 Subsidiary Business Plan Presentation of Customer Satisfaction Survey 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Not Present Present Present Present Present Present Not Present 	Video Conference

NO.	DATE	MEETING AGENDA	MEETING PARTICIPANTS	ATTENDANCE	DESCRIPTION
54	November 29, 2021	<ol style="list-style-type: none"> General Presentation of Customer Satisfaction Survey 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
55	December 6, 2021	<ol style="list-style-type: none"> General IT Update: International Division Event Update 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
56	December 13, 2021	<ol style="list-style-type: none"> General Technology Management Committee Management of ATMs Savings and Consumer Credit Updates 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	Video Conference
57	December 21, 2021	<ol style="list-style-type: none"> General Preparation for Exit Meeting Corporate Action Approval Financial Performance November 2021 & Financial Prognosis December 2021 Directors KPI 2022 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	
58	December 28, 2021	<ol style="list-style-type: none"> General ESG Implementation at BNI Report on the BNI Asset Revaluation Result in 2021 Procurement of Board of Directors Meeting Level 	<ul style="list-style-type: none"> Royke Tumilaar Adi Sulistyowati Novita Widya Anggraini David Pirzada Henry Panjaitan Corina Leyla Karnalies Muhammad Iqbal Y.B. Hariantono Bob Tyasika Ananta Sis Apik Wijayanto Silvano W. Rumantir Ronny Venir 	<ul style="list-style-type: none"> Present Present Present Present Present Present Present Present Present Present Present Present 	

Frequency and Attendance of the Board of Directors Meetings

During 2021, the Board of Directors held 58 (fifty eight) Board of Directors' Meetings and 12 (twelve) Board of Directors' Joint meetings with the Board of Commissioners. The frequency and attendance of meetings for each Board of Directors' member was as follows:

NAME	POSITION	BOARD OF DIRECTORS MEETINGS			JOINT BOARD OF COMMISSIONERS MEETINGS WITH THE BOARD OF DIRECTORS		
		NUMBER AND (%) ATTENDED			NUMBER AND (%) ATTENDED		
		NUMBER OF MEETINGS	NUMBER ATTENDED	%	NUMBER OF MEETINGS	NUMBER ATTENDED	%
Royke Tumilaar	President Director	58	51	88	12	6	50
Adi Sulistyowati	Vice President Director	58	57	98	12	9	75
Corina Leyla Karnalies	Managing Director Consumer Business	58	58	100	12	10	83
Novita Widya Anggraini	Managing Director Finance	58	57	98	12	12	100
Y.B. Hariantono	Managing Director Information Technology & Operations	58	58	100	12	12	100
Bob Tyasika Ananta	Managing Director Human Capital & Compliance	58	55	95	12	9	75
Silvano Winston Rumanir	Managing Director Corporate Banking	58	51	88	12	7	58
David Pirzada	Managing Director Risk Management	58	56	97	12	10	83
Sis Apik Wijayanto	Managing Director Institutional Relations	58	55	95	12	9	75
Ronny Venir	Managing Director Service and Network	58	55	95	12	11	92
Muhammad Iqbal	Managing Director MSME	58	53	91	12	10	83
Henry Panjaitan	Managing Director Treasury and International	58	52	90	12	10	83

MEETINGS SCHEDULED FOR 2022

Based on Article 13 of the Bank's Articles of Association, the Board of Directors is required to convene Board of Directors Meeting periodically at least 1 (one) time every 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.

In 2022, Board of Directors Meetings has scheduled 12 (twelve) meetings. The Board of Directors Meeting Schedule for 2022 will be as follows:

NO.	MONTH	AGENDA
1	January 2022	<ol style="list-style-type: none"> 1. Discussion on the 2022 Business Meeting 2. Financial statements 3. Performance and Financial evaluation 4. Covid-19 Business and Operational Impact Management evaluation 5. Transformation 6. ESG implementation evaluation
2	February 2022	<ol style="list-style-type: none"> 1. Corporate Plan and RBB 2. Business Continuity Management 3. Investor Relations & BNI Shares 4. MSME Business Review & Strategy

NO.	MONTH	AGENDA
3	March 2022	<ol style="list-style-type: none"> 1. IT Architecture and Digitization 2. Banking Operations 3. Human Capital Evaluation & Strategy 4. Corporate Banking Business Review & Strategy
4	April 2022	<ol style="list-style-type: none"> 1. Risk management 2. Internal Control 3. Consumer Business Review & Strategy 4. Credit, Funding & Services Policy evaluation 5. ESG implementation evaluation
5	May 2022	<ol style="list-style-type: none"> 1. Equity Participation 2. Subsidiary Performance evaluation 3. Integrated Risk Management & Governance 4. Remedial Recovery Evaluation & Strategy
6	June 2022	<ol style="list-style-type: none"> 1. Government, Risk & Compliance 2. Review of Anti-Gratification & Anti-Bribery Policy 3. Office Network & Service Digitization evaluation 4. Covid-19 Impact Recovery Strategy 5. Banking Ratios 6. RBB Realization Review
7	July 2022	<ol style="list-style-type: none"> 1. Performance and Financial evaluation 2. International Business and Performance Review 3. Treasury Business Review 4. Transformation 5. Big Data Evaluation and Strategy 6. ESG implementation evaluation
8	August 2022	<ol style="list-style-type: none"> 1. Bank Capital 2. Assets & Liabilities 3. Company Organizational Effectiveness Review 4. Institutional & Transactional Relations Business Review & Strategy
9	September 2022	<ol style="list-style-type: none"> 1. Bank Income Evaluation and Strategy 2. Performance and Financial Evaluation 3. Digitalization Strategy and Anti Cyber Crime
10	October 2022	<ol style="list-style-type: none"> 4. Human Capital Management Strategy 5. Banking Ratios 6. ESG implementation evaluation
11	November 2022	<ol style="list-style-type: none"> 1. Bank Assets Management 2. Business Innovations 3. Bank Products & Services evaluation
12	December 2022	<ol style="list-style-type: none"> 1. Performance & Financial evaluation 2. Target Achievement evaluation 3. Strategy & Transformation evaluation 4. BNI Shares Performance evaluation 5. ESG implementation evaluation

Affiliated Relationships

BOARD OF COMMISSIONERS AFFILIATED RELATIONSHIPS

All members of the Board of Commissioners and between members of the Board of Commissioners and members of the Board of Directors are prohibited from having familial relationships up to the third degree, either vertically or horizontally, including relationships arising from marriage. The entire Board of Commissioners does not have financial, family and management relationships with fellow members of the Board of Commissioners or with the Board of Directors.

The independence and affiliation of members of the Board of Commissioners can be seen in the table below:

NAME	POSITION	FINANCIAL, FAMILIAL AND MANAGEMENT RELATIONSHIP OF THE COMMISSIONERS													
		FINANCIAL RELATIONSHIP WITH						FAMILIAL RELATIONSHIP WITH						MANAGEMENT RELATIONSHIP WITH OTHER COMPANY	
		BOARD OF COMMISSIONERS		BOARD OF DIRECTORS		CONTROLLING SHAREHOLDER		BOARD OF COMMISSIONERS		BOARD OF DIRECTORS		CONTROLLING SHAREHOLDER			
		YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Agus Dermawan Wintarto Martowardojo	President Commissioner/ Independent Commissioner	√		√		√		√		√		√		√	
Pradjoto	Vice President Commissioner/ Independent Commissioner	√		√		√		√		√		√		√	
Joni Swastanto ⁹	Commissioner	√		√		√		√		√		√		√	
Sigit Widyawan	Independent Commissioner	√		√		√		√		√		√		√	
Askolani	Commissioner	√		√		√		√		√		√		√	
Ratih Nurdianti	Commissioner	√		√		√		√		√		√		√	
Asmawi Syam	Independent Commissioner	√		√		√		√		√		√		√	
Iman Sugema	Independent Commissioner	√		√		√		√		√		√		√	
Susyanto	Commissioner	√		√		√		√		√		√		√	
Septian Hario Seto	Independent Commissioner	√		√		√		√		√		√		√	
Erwin Rijanto Slamet	Independent Commissioner	√		√		√		√		√		√		√	

Note:

¹⁾ Ceased serving as Commissioner on March 29, 2021

BOARD OF DIRECTORS' AFFILIATED RELATIONSHIPS

The Board of Directors always acts independently, in the sense that there is no conflict of interest that may interfere with their ability to perform their duties independently and critically, either in regard of relationship to one another or in regard of relationship to the Board of Commissioners.

The Board of Directors has no financial relationship, management relationship, share ownership, and/or familial relationship with other members of the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders or relationship with the Bank, therefore, the Board can perform the duties and responsibilities independently.

Affiliated relationships between members of the Board of Directors, Board of Commissioners, and Majority and/or Controlling Shareholders includes:

1. Affiliated relationship between member of the Board of Directors and other member of Board of Directors.
2. Affiliated relationship between members of the Board of Directors and members of Board of Commissioners.
3. Affiliated relationship between members of the Board of Directors and Majority and/or Controlling Shareholders.

The Board of Directors Independence and affiliated relationships can be seen in the table below:

NAME	POSITION	FINANCIAL, FAMILIAL AND MANAGEMENT RELATIONSHIP OF THE COMMISSIONERS													
		FINANCIAL RELATIONSHIP WITH						FAMILIAL RELATIONSHIP WITH						MANAGEMENT RELATIONSHIP WITH OTHER COMPANY	
		BOARD OF COMMISSIONERS		BOARD OF DIRECTORS		CONTROLLING SHAREHOLDER		BOARD OF COMMISSIONERS		BOARD OF DIRECTORS		CONTROLLING SHAREHOLDER			
		YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Royke Tumilaar	President Director		√		√		√		√		√		√		√
Adi Sulistyowati	Vice President Director		√		√		√		√		√		√		√
Corina Leyla Karnalies	Managing Director Consumer Business		√		√		√		√		√		√		√
Novita Widya Anggraini	Managing Director Finance		√		√		√		√		√		√		√
Y.B. Hariantono	Managing Director Information Technology & Operations		√		√		√		√		√		√		√
Bob Tyasika Ananta	Managing Director Human Capital & Compliance		√		√		√		√		√		√		√
Silvano Winston Rumantir	Managing Director Corporate Banking		√		√		√		√		√		√		√
David Pirzada	Managing Director Risk Management		√		√		√		√		√		√		√
Sis Apik Wijayanto	Managing Director Institutional Relations		√		√		√		√		√		√		√
Ronny Venir	Managing Director Service and Network		√		√		√		√		√		√		√
Muhammad Iqbal	Managing Director MSME		√		√		√		√		√		√		√
Henry Panjaitan	Managing Director Treasury and International		√		√		√		√		√		√		√

Information on Majority and Controlling Shareholders

BNi is a State-Owned Enterprise in which the largest share ownership is owned by the Republic of Indonesia. The Republic of Indonesia has one Dwiwarna Series A Share with 60% share ownership. So there are no majority Shareholders and Individual Controllers.



LARGEST SHAREHOLDER SCHEME

Dwiwarna A Series Shares grant the shareholders privileges that are not owned by other shareholders, which are:

1. The right to approve in GMS on the following matters:
 - a. Approval for amendments to the Articles of Association;
 - b. Approval for changes to Capital;
 - c. Approval for the appointment and dismissal of members of the Board of Directors and the Board of Commissioners;
 - d. Approval for mergers, consolidations, acquisitions, splits and dissolution;
 - e. Approval for remuneration of members of the Board of Directors and Board of Commissioners;
 - f. Approval for 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 long-term investments and financing based on the Articles of Association, requiring the approval of the GMS;
2. The right to propose candidate members of the Board of Directors and candidate 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 Articles of Association and laws and regulations. Detailed information on Majority and Controlling Shareholders can be seen in the Shareholders Composition section in this Annual Report.

EQUAL TREATMENT POLICY FOR ALL SHAREHOLDERS

All Shareholders including Minority Shareholders and Foreign Shareholders are given equal treatment and opportunities to obtain information about the Bank. BNI actively makes timely or accurate disclosures on all material aspects of the Company, including the financial situation, performance, ownership and governance of the Company (The 2021 Information Disclosure List has been disclosed in the discussion of the Corporate Secretary).

BNI protects the rights of the 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, work and sustainability of the Bank.



Organs and Committees Under the Board of Commissioners

To support their supervisory function, the Board of Commissioners is supported by the Secretary to the Board of Commissioners, and has Supporting Committees including Secretary to the Board of Commissioners, the Audit Committee, Remuneration and Nomination Committee, Risk Monitoring Committee, and Integrated Governance Committee.

SECRETARY TO THE BOARD OF COMMISSIONERS

The Secretary to the Board of Commissioners in the good corporate governance structure is a supporting organ to the Board of Commissioners. Based on BNI's Articles of Association, the Secretary to the Board of Commissioners is appointed and reports directly to the Board of Commissioners. The Secretary to the Board of Commissioners of BNI comes from outside the Company, and is appointed and dismissed by the Board of Commissioners based on a Board of Commissioners Decree and reports directly to the Board of Commissioners.

The Secretary to BNI's Board of Commissioners oversees the Board of Commissioners' Secretariat, which is formed and tasked with assisting and supporting the smooth activities and duties of the Board of Commissioners. In carrying out its duties, the Secretary to the Board of Commissioners, who is from outside the Company, is assisted by the Board of Commissioners Secretarial Staff, and Staff who are internal staff of the Bank.

LEGAL BASIS FOR FORMATION

The Secretary to the Board of Commissioners and the Secretariat to the Board of Commissioners duties is guided by the Minister of SOEs Regulation No. PER-12/MBU/2012 dated August 24, 2012 concerning Supporting Organs for the Board of Commissioners/Supervisory Board of State-Owned Enterprises, as amended by the Minister of SOEs Regulation No. PER-06/MBU/04/2021 dated April 13, 2021, which includes regulations relating to the Secretariat to the Board of Commissioners and the Secretary to the Board of Commissioners.

GUIDELINES AND WORK RULES

The Board of Commissioners issued a Decision Letter No. KEP/041/DK/2017 dated September 28, 2017, concerning Guidelines and Work Conduct of the Board of Commissioners Secretariat that 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.

Secretary to the Board of Commissioners

Profile Period January 1, 2021-December 31, 2021



ANAS PUJI ISTANTO

Secretary to the Board of Commissioners
(November 1, 2019 - present)

Anas Puji Istanto, appointed as Secretary to the Board of Commissioners of BNI since November 1, 2019 was appointed based on the Board of Commissioners Decree No. KEP/015/DK/2019 dated October 24, 2019.

Born in 1986, graduated with a Bachelor's Degree from Universitas Gadjah Mada in 2008. Currently also Serves as the Head of Sub Division of SOE Legal Services at the Ministry of SOEs (2019), previously served as the Head of of Legislation I Sub Division (2014-2017).

REQUIREMENTS FOR THE SECRETARY TO THE BOARD OF COMMISSIONERS

The Secretary of the Board of Commissioners shall fulfil the following requirements:

1. Understand SOE management, monitoring, and development systems;
2. Has good integrity;
3. Understand the secretariat function;
4. Has the ability to communicate and coordinate properly;
5. Has sufficient time to perform the duties at the Bank.

SECRETARY TO THE BOARD OF COMMISSIONERS DUTIES AND RESPONSIBILITIES

The Secretary to the Board of Commissioners duties and responsibilities include facilitating the Board of Commissioners duties implementation. 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 Board of Commissioners Decrees;
 - 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;
 - 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 TO 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.

IMPLEMENTATION OF THE SECRETARY TO THE BOARD OF COMMISSIONERS DUTIES IN 2021

The Secretary to the Board of Commissioners carried out the functions and duties in supporting the Board of Commissioners duties by providing information, studies, and reports needed by the Board of Commissioners. Throughout 2021, the Secretary to the Board of Commissioners carried out general duties including the following:

1. Assisting in preparing the Board of Commissioners 2022 Work Plan and 2021 Work Plan Realization Report
2. Assisting in preparing the Board of Commissioners draft report, which is a mandatory obligation for the Board of Commissioners in accordance with the prevailing regulatory provisions, including:
 - a. Quarterly reports to the Republic of Indonesia Ministry of SOEs
 - b. Financial Services Authority reports
 - c. Board of Commissioners working visit reports
3. Monitoring, reviewing and reporting the latest laws and regulations development to be submitted to the Board of Commissioners, including preparing, updating/adjusting the Board of Commissioners Decrees based on the prevailing laws and regulations.

4. Coordinating and organizing Board of Commissioners Meetings and Board of Commissioners Meetings with the Board of Directors, including preparing meeting schedules, meeting materials, compiling and administering the Board of Commissioners meeting minutes, submitting Board of Commissioners suggestions and opinions based on the Board of Commissioners meeting results to the Board of Directors and monitoring the Board of Commissioners suggestions and opinions follow-up.

5. Assisting and supporting the Committees under the Board of Commissioners duties that support the Board of Commissioners duties based on prevailing regulations, including:

- a. Coordinating the division of duties for the committees under the Board of Commissioners
- b. Coordinating and preparing for committees under the Board of Commissioners meetings, including preparing meeting materials, compiling and administering minutes of meetings, as well as submitting suggestions and opinions on the results of evaluations and committee meetings to the Board of Commissioners as input.
- c. Memantau pelaksanaan Rencana Kerja komite-komite di bawah Dewan Komisaris
- d. Ensuring the completion of the committees under the Board of Commissioners reports.

6. Carrying out administrative duties to assist the smooth running of the Board of Commissioners duties, including the management, storage and administration of Minutes for Board of Commissioners Meetings, Board of Commissioners with the Board of Directors Meetings, and for Committees under the Board of Commissioners Meetings, and documents/letters from the Board of Commissioners to the Board of Directors and other parties, including preparing draft approval letters as well as strategic input/suggestions from the Board of Commissioners to be submitted to the Board of Directors.

7. Accompanying the Board of Commissioners on work visits/office trips (online) to Company work units, and at meetings with regulators or bank supervisors related to the Board of Commissioners duties and obligations.

AUDIT COMMITTEE

The Audit Committee was formed by and is responsible to the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk, with the aim of helping the Board of Commissioners carry out their duties and supervisory functions, including reviewing the Company's internal control system, the quality of the Company's Financial Statements, the effectiveness of the Internal Audit function, as well as all Board of Directors functions in accordance with Good Corporate Governance ("GCG")

BASIS FOR THE ESTABLISHMENT OF THE AUDIT COMMITTEE

BNI'S Audit Committee was established in 2000 based on the Board of Commissioners' Decree No. Kep/05/DK/2000 dated July 28, 2000 concerning the Establishment of the Audit Committee. The BNI Audit Committee Charter is continuously refined and updated in accordance with the applicable rules and regulations' developments/ amendments and current conditions. The latest amendments to BNI Audit Committee Charter were made in 2019 stipulated by the Board of Commissioners Decree No. KEP/003/DK/2019 dated June 20, 2019 concerning the Audit Committee Charter and Code of Conduct of PT Bank Negara Indonesia (Persero) Tbk, with the following rules:

1. Peraturan Menteri Negara Badan Usaha Milik Negara No. PER-12/MBU/2012 tanggal 24 Agustus 2012 tentang Organ Pendukung Dewan Komisaris/Dewan Pengawas Badan Usaha Milik Negara sebagaimana telah diubah dengan Peraturan Menteri Negara Badan Usaha Milik Negara No. PER-06/MBU/04/2021 tanggal 13 April 2021;
2. PT Bursa Efek Indonesia Board of Directors Decree No. Kep-00001/BEI/01-2014 dated January 20, 2014, Amendment to Regulation Number I-A concerning Stock Listing and Equity-Type Securities Issued by the Listed Company.
3. Financial Services Authority (OJK) Regulation No. 55/POJK.04/2015 dated December 23, 2015 concerning the Establishment and Work Guide-lines of the Audit Committee.
4. Financial Services Authority Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning Implementation of Governance for Commercial Banks.
5. Financial Services Authority Regulation No. 13/POJK.03/2017 dated March 27, 2017 concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Service activities.
6. Financial Services Authority Regulation No. 1/POJK.03/2019 dated January 28, 2019 concerning Internal Audit Function for Commercial Banks.

AUDIT COMMITTEE CHARTER

The Audit Committee Charter stipulates the structure and requirements for members' term of office, duties and responsibilities, authorities, Audit Committee meetings, and reporting obligations on the implementation of the Audit Committee's duties or activities. The Audit Committee's Code of Ethics includes integrity, objectivity and independence, competency and confidentiality.

AUDIT COMMITTEE DUTIES AND RESPONSIBILITIES

In carrying out its function, the Audit Committee duties and responsibilities include:

1. Reviewing the financial information to be published by the Company to the public and/or authorities, such as financial statements, projections, and other statements relating to the Company's financial information;
2. Reviewing the adherence to laws and regulations relating to the Company's activities;
3. Providing independent opinions in the case of:
 - a. Disagreements between management and the Accountant for services rendered; and/or
 - b. Non-compliance of the public accounting firm's audit with applicable auditing standards.
4. Providing recommendations to the Board of Commissioners on the appointment of Public Accountants and Public Accounting Firms to be submitted to the General Meeting of Shareholders as regulated by the regulator.

The Audit Committee must ensure that a report on the appointment of a Public Accountant and/or Public Accounting Firm for auditing the annual historical financial information is reported by the Company to OJK no later than 10 working days after the appointments, and must be accompanied by the Audit Committee's recommendations and considerations used in providing their recommendations;

5. Evaluating the audit services for annual historical financial information by Public Accountant and/or Public Accounting Firm, at least through:

- a. The suitability of the audit performed by the Public Accountant and/or Public Accounting Firm with the applicable audit standards;
- b. Adequacy of fieldwork time;
- c. Assessment of the scope of services provided and the adequacy of the quotation test; and
- d. Recommendations for improvements provided by the Public Accountant and/or Public Accounting Firm.
- e. The Audit Committee must ensure that the Audit Committee's evaluation report on the conduct of providing audit services on annual historical financial information by the Public Accountant and/or Public Accounting Firm, the Company reports to the Financial Services Authority periodically every year no later than 6 (six) months after the fiscal year ends;
6. Reviewing the execution of audits by internal auditors and external auditors, and oversee the implementation of follow-up actions by the Board of Directors on the auditor findings, in order to provide recommendations to the Board of Commissioners;
7. Reviewing complaints relating to the Company's accounting and reporting process;
8. Examining allegations of errors in decisions at the Board of Directors Meetings, or irregularities in the execution of the Board of Directors' decisions. Such inspections may be conducted by the Audit Committee, or an independent party proposed by the Audit Committee and approved by the Board of Commissioners at the expense of Bank;
9. Reviewing and advising the Board of Commissioners regarding potential conflict of interest;
10. The Audit Committee provides recommendations to the Board of Commissioners concerning the appointment and dismissal of the Head of the Internal Audit Unit (IAU), and must ensure that the Head of IAU appointment or dismissal report is signed by the President Director and the Chief Commissioner to the Financial Services Authority no later than 10 (ten) working days after the date of appointment or dismissal of the Head of IAU;
11. Providing recommendations to the Board of Commissioners regarding the stipulation of Internal Audit Charter. The Audit Committee must ensure that the Internal Audit Charter is re-viewed at least once in 3 (three) years;
12. In carrying out the internal audit function, the Audit Committee is responsible for:
 - a. Monitoring and reviewing the Bank's internal audit implementation effectiveness;
 - b. Evaluating IAU Performance;
 - c. Ensuring IAU communicates with the Board of Directors, the Board of Commissioners, external auditors, and the Financial Services Authority;
 - d. Ensuring IAU works independently;
 - e. Providing recommendations to the Board of Commissioners regarding the preparation and determination of the audit plan, the scope and budget of the IAU;
 - f. Reviewing audit reports and ensuring the Board of Directors take corrective actions needed quickly to anticipate control weaknesses, fraud, problems with compliance with policies, laws and regulations, or other problems identified and reported by the IAU;
 - g. Providing recommendations to the Board of Commissioners regarding the overall IAU annual remuneration and performance awards; and
 - h. Ensuring the IAU upholds integrity in carrying out its duties.
13. Providing recommendations to the Board of Commissioners regarding the appointment of an independent quality controller from an external party to conduct a review of the IAU's performance. The Audit Committee must ensure that the report on the results of an independent external review party signed by the President Director and the President Commissioner is submitted to the Financial Services Authority no later than 2 (two) months after the review period ends.
14. The Audit Committee must ensure that special reports regarding any internal audit findings that are expected to endanger the business continuity of the Bank, signed by the President Director and the Head of Audit Committee, are submitted to the Financial Services Authority no later than 3 (three) working days after they are discovered;
15. The Audit Committee is obliged to ensure that the report on the implementation of the main results of the internal audit, which is signed by the President Director and the Chair of the Audit Committee, is submitted to the Financial Services Authority semi-annually at the latest:
 - a. July 31 of the current year for the first semester;
 - b. January 31 of the following year for the second semester; and
16. Maintaining the confidentiality of Company documents, data and information.
In carrying out its duties and responsibilities, the Audit Committee takes into account the Audit Committee Code of Conduct as follows:
 - a. **Integrity**
Audit Committee Members are committed to always being consistent in thoughts, sayings and actions based on conscience and belief in essential truth principles. In performing their duties Audit Committee Members:

- i) Shall carry out their duties honestly, diligently and responsibly;
- ii) Shall be subject to the law and make disclosures in accordance with the rules of law and profession;
- iii) Shall practice and encourage others to act in a professional manner;
- iv) Shall respect and support the established Vision and Mission of BNI;
- v) Shall be prohibited from intentionally becoming part of illegal activities, or engaging in acts that undermine the credibility of the Audit Committee;
- vi) Shall be prohibited from deliberate misrepresentation or manipulation in carrying out the duties, responsibilities and authorities given.

b. Objective and Independent

The Audit Committee members provide fair and balanced assessments of all relevant conditions and are not affected by the personal or other interests of the party in expressing their opinions. In performing their duties, Audit Committee Members:

- i) Shall pay attention to balance, and place the interests of stakeholders above other interests;
- ii) Shall disclose all material facts which, if not disclosed, may obscure the result reporting;
- iii) Shall disclose if there is a relationship that has the potential to affect explicit judgment and cause a conflict of interest;
- iv) Shall be prohibited from accepting anything that may, or may potentially, affect professional judgment.

c. Competence

Audit Committee Members use their knowledge, expertise, and experience necessary to perform the tasks, responsibilities, and authorities provided. In performing their duties, Audit Committee Member:

- i) Shall perform the duties, responsibilities, and authorities given in accordance with their competence;
- ii) Shall maintain and improve their knowledge and expertise sustainably.

d. Confidentiality

Audit Committee Members shall always keep the confidentiality of information that is secret and confidential to the Bank in accordance with the Bank's policies and prevailing regulations. In performing their duties, Audit Committee Members:

- i) Shall be prudent in the use and safeguard of information obtained;
- ii) Shall be prohibited from using information for personal or other purposes unless there is a legal obligation or professional obligation.

AUDIT COMMITTEE AUTHORITIES

For carrying out its duties, the Audit Committee has the following authorities:

1. Access to Company documents, data, and information regarding employees, funds, assets, and necessary Company resources, including access to information regarding all of the Company's activities;
2. Communicating directly with employees, including the Board of Directors and those carrying out the functions of internal audit, risk management, and accountants related to the Audit Committee duties and responsibilities;
3. Involve independent parties other than members of the Audit Committee as needed to assist in carrying out their duties (if needed); and
4. Carry out other authorities assigned by the Board of Commissioners.

AUDIT COMMITTEE MEMBERS TERM OF OFFICE

1. Audit Committee members' term of office who are members of the Board of Commissioners may not be longer than the Board of Commissioners term of office as stipulated in the Articles of Association and can be re-elected only for the next 1 (one) period;
2. If the Commissioner who is the Audit Committee stops chairman ceases their term of office before their term of office as a Commissioner of the Company is over, another Independent Commissioner replaces the Audit Committee chairman;
3. The term of office of Audit Committee members who come from independent parties is a maximum of 3 (three) years and can be extended once for 2 (two) years of service so that the Audit Committee members' tenure from independent parties is a maximum of 5 (five) years, with does not reduce the right of the Board of Commissioners to terminate the members of the committee at any time before the term of its appointment ends.

AUDIT COMMITTEE STRUCTURE, MEMBERSHIP, AND EXPERTISE

The Audit Committee structure is set forth in the Audit Committee Charter set by the Board of Commissioners, as follows:

1. The Audit Committee is established by and responsible to the Board of Commissioners;
2. The Audit Committee members are appointed and dismissed by the Board of Commissioners;
3. The Audit Committee members shall consist of at least:
 - a. An independent commissioner;
 - b. One independent party with expertise in finance or accounting; and
 - c. One independent party with expertise in law or banking.

4. Independent Commissioners and independent parties who are members of the Audit Committee make up at least 51% (fifty one percent) of the total members of the Audit Committee;
5. The Audit Committee Chairman may only hold the position of Committee Chairman in no more than 1 (one) other committee;
6. Audit Committee memberships comprise an Independent Commissioner as Audit Committee Chairman. In the case of more than one Independent Commissioner being members of the Audit Committee, then one of them will act as the Audit Committee Chairman;

In the 2021 period, the Audit Committee structure and membership underwent several changes as explained in the table below:

Period January 1 - May 31, 2021

NAME	POSITION	DESCRIPTION	EXPERTISE
Asmawi Syam	Chairman	Independent Commissioner	Banking and Finance
Sigit Widyawan	Member	Independent Commissioner	Accounting and Finance
Iman Sugema	Member	Independent Commissioner	Economics and Finance
Donnaria Silalahi ¹⁾	Member	Independent Party	Banking and Technology
Human Brilianto ²⁾	Member	Independent Party	Banking and Finance

Note:

¹⁾Cases serving as an independent member of the Audit Committee on May 31, 2021

²⁾Served as an independent member of the Audit Committee on January 25, 2021

Period June 1 - December 31, 2021

NAME	POSITION	DESCRIPTION	EXPERTISE
Asmawi Syam	Chairman	Independent Commissioner	Banking and Finance
Sigit Widyawan	Member	Independent Commissioner	Accounting and Finance
Iman Sugema	Member	Independent Commissioner	Economics and Finance
Human Brilianto ¹⁾	Member	Independent Party	Banking and Finance
Suhendi Muharam ²⁾	Member	Independent Party	Banking and Technology

Note:

¹⁾Served as an independent member of the Audit Committee on January 25, 2021

²⁾Served as an independent member of the Audit Committee on July 5, 2021

To comply with the OJK Regulation Number 55/POJK.04/2015 dated December 23, 2015 concerning the Establishment and Guidelines for the Implementation of the Audit Committee, information concerning the appointment and dismissal of the Audit Committee has been submitted to the Financial Services Authority within a maximum period of 2 (two) working days after appointment or dismissal, and has been published on the Stock Exchange Website and/or the Company's Website.

AUDIT COMMITTEE PROFILES

Asmawi Syam Audit Committee Chairman

Audit Committee Chairman, Asmawi Syam, profile can be found in the of the Board of Commissioners Profiles.

Sigit Widyawan Audit Committee Member

Audit Committee Member, Sigit Widyawan, profile can be found in the of the Board of Commissioners Profiles.

Iman Sugema Audit Committee Member

Audit Committee Member, Iman Sugema, profile can be found in the of the Board of Commissioners Profiles.

Donnaria Silalahi¹⁾ Audit Committee Independent Member

Indonesian citizens. He previously had a career at PT Bank Tabungan Pensiun Nasional Tbk & PT Bank BTPN Syariah with the positions of QA & HC Operation Division Head (EVP) and Operational Division Head (EVP), Operational Risk Division Head (EVP) at PT Bank OCBC NISP Tbk, Various positions position with the last position as Operation Risk Management Head (EVP) at PT Bank Danamon Indonesia Tbk and various positions with the last position as System and Operation Policy Group Head (VP) at PT Bank Niaga Tbk.

Human Brillianto Audit Committee Independent Member

Indonesian citizen, domiciled in Jakarta. Born in 1963, currently 58 years old. Appointed as a member of the BNI Audit Committee since January 2021 based on Board of Commissioners Decree No. KEP/004/DK/2021/ dated January 25, 2021.

Previously served at PT Bank Rakyat Indonesia (BRI) as Branch Manager in several regions (1993-2000), Middle Staff of Retail Business Division (2000-2002), Group Head of General Business Division (2002-2005), Senior Internal Audit Auditor (2005-2009), Group Head of Internal Audit (2009-2018), and finally as Deputy Inspector of BRI Makassar (2018-2019).

Suhendi Muharam Audit Committee Independent Member

Indonesian citizen, domiciled in Jakarta. Born in 1962, currently 59 years old. Obtained a Bachelor's degree (S1) in Industrial Engineering from Institut Teknologi Bandung, and a Master's degree (S2) Master of Management from Universitas Gadjah Mada. Appointed as a member of the BNI Audit Committee in July 2021 based on the Board of Commissioners Decree No. KEP/012/DK/2021/ dated July 5, 2021.

Previously served at Bank Niaga (Bank CIMB Niaga) for more than 27 years, with 14 years in the field of Internal Audit. Positions held included 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.

Note:

¹⁾Ceased serving as an independent member of the Audit Committee on May 31, 2021

AUDIT COMMITTEE QUALIFICATIONS, EDUCATION AND WORK EXPERIENCE

In general, the requirements for membership of the Company's Audit Committee are as follows:

1. Must have high integrity, good character and morals, ability, knowledge, experience in accordance with the field of work, and be able to communicate well;
2. Not a person who worked or had the authority and responsibility to plan, lead, control, or supervise the Company's activities within the last 6 (six) months, except for an Independent Commissioner;
3. Not a internal person of a Public Accounting Firm, Legal Consulting 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 last 6 (six) months;
4. Must understand financial reports, the company's business, especially those related to the services or business activities of the Company, the audit process, risk management, and laws and regulations in the Capital Market sector as well as other related laws and regulations;
5. Must comply with the Audit Committee code of conduct established by the Company;
6. Willing to continuously improve competencies through education and training;
7. Does not have direct or indirect shares in the Company;
8. In the event that a member of the Audit Committee acquires shares of the Company either directly or indirectly as a result of a legal event, the shares must be transferred to another party within a maximum period of 6 (six) months after the shares were acquired;
9. Has no affiliation with members of the Board of Commissioners, members of the Board of Directors, or the Company's Major Shareholders; and
10. Has no business relationship, either directly or indirectly, relating to the Company's business activities.

As of December 31, 2021, the educational qualifications and work experience of the Chairman and Members of the Audit Committee were as follows:

Educational Qualifications and Work Experience of the Audit Committee

NAME	POSITION	EDUCATION	WORK EXPERIENCE
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
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
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
Donnaria Silalahi ¹⁾	Independent Member	-	QA & HC Operation Division Head (EVP) and Operational Division Head (EVP) at PT Bank Tabungan Pensiun Nasional Tbk & PT Bank BTPN Syariah, Operational Risk Division Head (EVP) at PT Bank OCBC NISP Tbk, Various positions with last position as Operation Risk Management Head (EVP) at PT Bank Danamon Indonesia Tbk, Various positions with the last position as System and Operation Policy Group Head (VP) at PT Bank Niaga Tbk
Human Brillianto	Independent Member	Master's degree in 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)
Suhendi Muharam	Independent Member	Master's degree in 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)

Note:

¹⁾Ceased serving as an independent member of the Audit Committee on May 31, 2021

AUDIT COMMITTEE INDEPENDENCY

The Audit Committee members' independency is regulated in the BNI Code of Ethics. Audit Committee members provide a fair and balanced assessment of all relevant conditions without being influenced by personal interests or other parties in expressing their opinions.

All Audit Committee members coming from independent parties have no relationship in terms of finance, management, share ownership and/or family relationships with all members of the Board of Commissioners, the Board of Directors and/or Controlling Shareholders or relationship with the Bank, which may affect their ability to act independently. There is no member of the Audit Committee who has concurrent positions as other Committee members.

Audit Committee Independence

INDEPENDENCE ASPECT	ASMAWI SYAM	SIGIT WIDYAWAN	IMAN SUGEMA	DONNARIA SILALAH ¹⁾	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 family 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	√	√	√	√	√	√

Note:

¹⁾Ceased serving as an independent member of the Audit Committee on May 31, 2021

AUDIT COMMITTEE MEETINGS

1. The Audit Committee must hold a meeting at least once in 1 (one) month;
2. The Audit Committee Meeting may make decisions if attended by at least 51% (fifty one percent) of the total members, including Independent Commissioner and Independent Party;
3. Decisions made in the committee meetings are based on deliberation to reach consensus. In the event that consensus agreement does not occur, decision making shall be carried out by majority votes;
4. The meeting is chaired by the Audit Committee Chairman or a member of the Audit Committee from an Independent Commissioner if the Audit Committee Chairman is unable to attend;
5. Each Audit Committee meeting must be stated in the minutes of the meeting and signed by all Audit Committee members present. Dissenting opinions that occur in committee meetings must be clearly stated in the minutes of the meeting along with the reasons for such differences.
6. Meetings can be held physically or via video conference or other media facilities that allow all Audit Committee Meeting participants to see and hear each other directly and participate in the meeting.

In 2021, the Audit Committee held 29 (twenty-nine) meetings, both internal Committee meetings, joint meetings with related Sector and Divisional Directors, as well as through Board of Commissioners Meetings attended by members of the Audit Committee with the aim that substantive matters be immediately reported to the Board of Commissioners.

The following shows the Audit Committee Meetings frequency and attendance rate:

Attendance at Audit Committee Meetings

NAME	POSITION	NUMBER OF MEETINGS	ATTENDANCE	PERCENTAGE
Asmawi Syam	Chairman	29	29	100%
Sigit Widyawan	Member	29	29	100%
Iman Sugema	Member	29	29	100%

NAME	POSITION	NUMBER OF MEETINGS	ATTENDANCE	PERCENTAGE
Donnaria Silalahi ¹⁾	Independent Member	8	8	100%
Human Brillianto ²⁾	Independent Member	27	27	100%
Suhendi Muharam ³⁾	Independent Member	17	17	100%

Note:¹⁾ Ceased serving as a member of the Audit Committee since May, 31 2021²⁾ Served as a member of the Audit Committee since January 25, 2021³⁾ Served as a member of the Audit Committee since July 5, 2021**AUDIT COMMITTEE MEETING AGENDA**

During 2021, the Audit Committee Meetings dates, agenda and participants were as follows:

Audit Committee Meetings Agenda

NO.	DATE OF MEETING	MEETING AGENDA	MEETING PARTICIPANTS
1	January 8, 2021	Progress of Auditing BNI Consolidated Financial Statements for fiscal year 2020	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi
2	January 12, 2021	Evaluation of RKAT IAU Semester II 2020, Evaluation of the main points of the audit results, follow up on the internal and external inspections results	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi
3	January 28, 2021	Discussion on the OJK warning letter concerning BNI DPLK	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
4	February 9, 2021	Discussion on follow-up disposition of incoming letters to the Board of Commissioners.	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
5	March 3, 2021	<ol style="list-style-type: none"> Realization of Compliance Division QVI 2020 Review, Follow-up on the KPN, SAF, WBS Division review results, Employee Cases Discussion on OJK letter No. S-32/PB.31/2021 concerning the Anti-Fraud Strategy Report 	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
6	March 23, 2021	Discussion on the non-Dekom KA members review results related to credit	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
7	March 30, 2021	Explanation on credit consultations	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
8	April 20, 2021	Discussion on Financial Performance and Publication of BNI Financial Statements for the March 2021 Period	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Donnaria Silalahi Human Brillianto
9	June 8, 2021	<ol style="list-style-type: none"> Realization of the Compliance Division QIV 2020 Review, Follow-up on the KPN, SAF, WBS Division review results Discussion on OJK letter No. S-32/PB.31/2021 concerning the Anti-Fraud Strategy Report 	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brillianto

NO.	DATE OF MEETING	MEETING AGENDA	MEETING PARTICIPANTS
10	June 16, 2021	Discussion on preparation for auditing the consolidated BNI financial statements for fiscal year 2021	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto
11	June 22, 2021	Realization of the QI 2021 Compliance Division Review, Follow-up on the KPN, SAF, WBS Division review results	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto
12	June 28, 2021	Follow up on application for BNI 2021 RBB revision approval by the Board of Commissioners	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto
13	July 6, 2021	Discussion on Write-Off Reports for the Period to June 2021, Recovery Reports on Write-offs, and Recovery Plan for BNI Write-offs	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
14	July 28, 2021	Discussion and updating of cases	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
15	August 10, 2021	<ol style="list-style-type: none"> 1. Discussion on the Audit Committee's review work program and results 2. Discussion of the IAU audit report to OJK for Semester I 2021 	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
16	August 10, 2021	Discussion on the PWC KAP Report regarding the BNI financial performance audit results for the June 2021 period	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
17	August 24, 2021	Realization of Board of Commissioners & Board of Directors Facilities Review in 2020	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
18	August 27, 2021	Presentation and discussion on the IAU review results by RSM Consultants	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
19	September 3, 2021	Report on IAU Audit QII 2021 Main Results, Evaluation of Main Audit Results, Follow-up on IAU and External Auditors Audits	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
20	September 7, 2021	Compliance Division QII 2021 review realization; Div. KPN review follow up; Anti Fraud Strategy Program; WBS program	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam
21	September 15, 2021	Discussion and updating of cases	<ul style="list-style-type: none"> • Asmawi Syam • Sigit Widyawan • Iman Sugema • Human Brilianto • Suhendi Muharam

NO.	DATE OF MEETING	MEETING AGENDA	MEETING PARTICIPANTS
22	September 29, 2021	Discussion on the BNI's financial performance review results for August 2021 by the Audit Committee	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
23	October 19, 2021	Discussion on the special IAU audit of AYDA, PSB and DAS results	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
24	November 16, 2021	Discussion on the disposition of Board of Commissioners' incoming letters reviewed by the Audit Committee	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
25	November 23, 2021	Discussion of the FAST application and IAU supporting applications	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
26	December 7, 2021	Realization of the 2021 QIII Compliance Division review; Div. KPN review follow up; Anti Fraud Strategy Program; WBS program	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
27	December 14, 2021	Discussion on the 2022 KA work plan	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
28	December 21, 2021	Report on QIII Main Audit Results, Evaluation of Main Audit Results, Follow-up on IAU and External Auditor Audits	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam
29	December 22, 2021	Report on the 2021 BNI annual financial report audit progress by KAP PWC	<ul style="list-style-type: none"> Asmawi Syam Sigit Widyawan Iman Sugema Human Brilianto Suhendi Muharam

In addition to the above meetings, the Audit Committee also attended and provided input in Board of Commissioners Committee meetings that invited the Audit Committee. During 2021, the Audit Committee attended 9 (nine) other committee meetings.

BRIEF REPORT ON THE AUDIT COMMITTEE'S ACTIVITIES IN 2021

To implement good corporate governance, the Board of Commissioners has already established an Audit Committee based on the prevailing regulations. The Audit Committee duties and responsibilities, as well as the Audit Committee's Code of Ethics are regulated in the Audit Committee's Charter and the Audit Committee's Code of Ethics established by the Board of Commissioners.

To comply with OJK Regulation Number 55/POJK.04/2015 dated December 23, 2015, BNI published the Audit Committee Charter and other information required by the OJK Regulation on the Company's Website.

During 2021 the Audit Committee's duties and responsibilities in accordance with the following provisions included:

1. Reviewing the financial information to be issued by the Company to the public and/or the authorities.
2. Reviewing compliance with laws and regulations related to the Company's activities.
3. Evaluating the effectiveness of the audit/services provided by the Public Accounting Firm (KAP), including reviewing its independence and objectivity.

4. Providing recommendations to the Board of Commissioners on the appointment of Public Accountants and Public Accounting Firm for the fiscal year 2021 audit.
5. Preparing a report on the KA evaluation results on the provision of KAP audit services for fiscal year 2020.
6. Reviewing the audit by the internal and external auditors, and supervising the follow-up actions by the Board of Directors on the auditors' findings.
 - a. Reviewing the planning and implementation of the IAU audit and consultation, as well as supervising the follow-up to the IAU audit results.
 - b. Reviewing the planning and implementation of the Compliance Division (KPN) review, as well as supervising the follow-up to the KPN Division review results.
 - c. Reviewing the implementation of the OJK Examination, as well as supervising the follow-up to the OJK examination results.
 - d. Reviewing the implementation of the BPK Audit, as well as supervising the follow-up to the BPK audit results.
 - e. Reviewing the implementation of the KAP Audit, as well as supervising the follow-up to the of the KAP audit results (Management Letter).
 - f. Monitoring the preparation of reports from the Board of Directors and Board of Commissioners on the main points of the audit results.
 - g. Monitoring the progress of the settlement of employee cases, and follow up on cases related to fraud.
7. Conducting an assessment of the BNI Internal Control System.
 - a. Evaluating the implementation of the Whistle Blowing System (WBS).
 - b. Evaluating the implementation of the Anti Fraud Strategy Program.
8. Reviewing the Company's monthly performance reports.
9. Reviewing the Company's Good Corporate Governance (GCG) implementation.
10. Reviewing the Financial Institution Pension Fund Investment Performance (DPLK)
11. Reviewing the Management's proposals requiring Board of Commissioners' approval.
12. Preparing reports related to the the Audit Committee duties.
 - a. Audit Committee Report for the Annual Report.
 - b. Report on the realization of the Audit Committee work program
13. Remedial & Recovery progress review
14. Coordination between Committees.
15. Carry out dispositions from the Board of Commissioners

In the 2021 fiscal year, through Committee meetings, the Audit Committee conducted discussions with related parties regarding the following matters:

1. Management

The Audit Committee reviews the audited and unaudited financial statements to be published in 2021, to ensure the information content and disclosure is in accordance with accounting standards and prevailing regulations. Evaluations of the audit effectiveness, independence, objectivity, and adequacy of the audit scope by external auditors is also carried out by the Audit Committee through discussions with Management. The Audit Committee also discusses and monitors the follow-up completion of the internal and external audit findings, monitors the follow-up to the settlement of cases that occur in order to encourage the acceleration of settlement as well as the necessary administrative sanction steps.

With regard to efforts to further improve the quality of the Bank's lending, the Audit Committee through the Board of Commissioners has recommended that Management conducts a thorough review of the BNI loan process.

2. External Auditor

Regarding the audit process of the company's financial statements as of December 31, 2021 carried out by the Public Accounting Firm (KAP), the Audit Committee discussed the audit plan, monitored the audit progress including findings that required adjustments, evaluated internal control including internal control over the Company's financial reporting, as well as the quality of the Company's overall financial reporting.

In the monitoring function of the audit results conducted by external auditors, namely Bank Indonesia (BI), the Financial Services Authority (OJK), the Supreme Audit Agency (BPK), the Financial Transaction Reports and Analysis Center (PPATK), and KAP, the Audit Committee evaluated the follow-up actions taken by the Management on the audit results of the said external auditor. The review and evaluation of the results of external audits conducted by the Audit Committee until the end of 2021 were as follows:

- a. The progress of completing the BI audit results was 100%, or all recommendations have been followed up.
- b. The progress of completing the OJK audit results was 98.29%, with a total of 23 (twenty three) recommendations outstanding.

- c. The progress of completing the BPK audit results was 83.43%, with a total of 57 (fifty seventy) recommendations outstanding.
- d. The progress of completing the Management Letter from KAP Purwanto, Sungkoro & Surja (member of Ernst & Young) was 92.86%, with 1 (one) recommendation outstanding.

The Audit Committee prepared a Report on the Audit Services Evaluation Results for Annual Historical Financial Information for Fiscal Year 2021 by KAP Purwanto, Sungkoro & Surja (member of Ernst & Young) to comply with OJK Regulation Number 13/POJK.03/2017 dated March 27, 2017 concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities, the Company reported the Audit Committee Evaluation Results Report to OJK in June 2021.

3. Internal Audit Unit

The Audit Committee reviews the annual internal audit plan, monitors the inspection results, as well as the follow-up on its completion by the Company's Management. The Audit Committee also held discussions with the Internal Audit Unit (IAU), in an effort to encourage the effectiveness and strengthening of the functions of the IAU.

Based on the IAU's 2021 Annual Work Plan and Budget (RKAT), the realization of the planned activities carried out by IAU were as follows:

NO.	TYPE OF ACTIVITY	PLAN	REALIZATION
1	Delivery Channel Audit	130	130
2	KCLN Audit	4	5
3	Divisions Audit	5	5
4	Subsidiaries Audit	3	3
5	Mandatory Audit	14	12
6	IT Thematics/Activities including IT and Non-IT Applications Audit	67	70
7	Independent Review	5	5
Total		228	230

For the IAU audit results review and evaluation of follow-up until the end of 2021, the IAU audit follow-up completion results progress was 99.67%, and showed that 99 (ninety nine) follow-ups were still in the completion process, consisting of 13 (thirteen) follow-ups to the 2020 IAU audit, and 86 (eighty six) follow-ups to the 2021 IAU audit.

Based on the results of the review and evaluation of the employee case resolution process, in 2021 there were 119 (one hundred and nineteen) cases. A total of 107 (one hundred seven) cases had been processed, while 12 (twelve) cases were still in the process of being resolved. Employees proven to have committed violations and/or fraud sanctioned by dismissal (Termination of Employment Relations) amounted to 64 (sixty four) employees, Demotions amounted to 23 (twenty three) employees, STK (Final Warning Letter) amounted to 26 (twenty six) employees, STE (Reprimand Letter) amounted to 61 (sixty one) employees, and SP (Warning Letter) amounted to 71 (seventy one) employees.

To further optimize the functions of IAU, the Audit Committee has recommended implementing Risk Based Audits as the audit method and approach used by IAU in conducting audits.

4. Compliance Director

The results of the Audit Committee's review of the Compliance Report on Banking regulations and other related laws are submitted in the form of a Compliance Director's Duties Implementation Report. During 2021, the Company routinely submitted these reports to OJK in accordance with OJK Regulation No. 46/POJK.03/2017 concerning Implementation of Compliance Function for Commercial Banks. In addition to this, the Audit Committee also conducted reviews and discussions on the Compliance Division work plan, employee case processes, implementation of the Whistle Blowing System (WBS), and the implementation of the Anti- Fraud Strategy Program.

The Compliance Division work plan discussion is carried out to encourage effective synergy between the Compliance Division and the IAU in carrying out its supervisory functions, especially the Company's compliance with applicable regulations.

Based on the WBS report review and evaluation results, during 2020 there were 100 (one hundred) reports submitted through the WBS, consisting of 46 (fourty six) reports outside the scope of the WBS, 17 (seventeen) reports with insufficient evidence/not proven, 2 (two) proven reports related to unethical behavior, 3 (three) proven reports related to fraud, 7 (seven) proven reports related to violations of regulations/laws, 3 (three) proven report related to gratification, 2 (two) proven report related to conflicts of interest, and 20 (twenty) follow-up reports are still in the process of being completed.

The Anti-Fraud Strategy for semester II of 2020 was reported to OJK in January, 2021, and the Anti-Fraud Strategy for semester I 2021 was reported to OJK in July 2021. In 2021, there were 6 (six) cases of fraud reported as incidental reports to OJK. Based on the results of the review and evaluation of the implementation of the Anti-Fraud Strategy, in 2021 there were 63 (sixty three) internal fraud incidents and 14 (fourteen) external outlet frauds.

5. The Board of Commissioners

The Audit Committee Duties and responsibilities, as well as recommendations, have been periodically reported to the Board of Commissioners, as follows:

- Review of the proposed KAP appointment and the Audit Committee recommendations to the Board of Commissioners to appoint KAP Tanudiredja, Wibisana, Rintis & Rekan (member of PwC global network) to audit the BNI Consolidated Financial Statements ending December 31, 2021, and review of the effectiveness of the Public Accounting Firm Audit Services including aspects of independence and objectivity.
- Review of the Bank's Published Financial Statements;
- Review of the effectiveness of the Internal Audit function related to the RKAT, audit findings and recommendations including compliance with Internal Control, risk management processes and implementation of corporate governance (GCG);
- Review of the follow-up effectiveness on the completion of the findings of the Internal Auditors and External Auditors (OJK, BPK, PPAK);
- Review of the monthly performance report of the Company, the proposed revision of the RBB for the Year 2021-2023, and the proposed RBB for the year 2022-2024 submitted by the Management;
- Review of the Management's proposals requiring the approval of the Board of Commissioners;
- Prepared the main points of the Audit Committee advice and opinions based on the Audit Committee Meeting results, and recommended to the Board of Commissioners to submit the main points of Audit Committee advice and opinions to the Management for follow-up;

AUDIT COMMITTEE COMPETENCY DEVELOPMENT

In 2021, members the Company's Audit Committee participated in competency improvement programs in the form of training, workshops, conferences, seminars, as shown in the following table:

Audit Committee Competency Development

NAME	POSITION	COMPETENCY DEVELOPMENT/TRAINING MATERIALS	TYPE OF TRAINING AND ORGANIZER	IMPLEMENTATION TIME AND PLACE
Asmawi Syam	Chairman	The Audit Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Sigit Widyawan	Member	The Audit Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Iman Sugema	Member	The Audit Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Donnaria Silalahi ¹⁾	Independent Member	-	-	-
Human Brillianto ²⁾	Independent Member	-	-	-
Suhendi Muharam ³⁾	Independent Member	-	-	-

Note:

¹⁾Ceased serving as a Independent Member of the Audit Committee since May, 31 2021

²⁾Served as a Independent Member of the Audite Committee since January 25, 2021

³⁾Served as a Independent Member of the Audite Committee since July 5, 2021

NOMINATION AND REMUNERATION COMMITTEE

BNI has a Nomination and Remuneration Committee with functions and duties to assist the Board of Commissioners with regard to the nomination and remuneration policy at the Board of Commissioners, Board of Directors, Board of Commissioners Committee members' levels, and all Bank employees based on applicable regulations.

BASIS FOR THE ESTABLISHMENT OF NOMINATION AND REMUNERATION COMMITTEE

The Nomination and Remuneration Committee was established in 2002 through the Board of Commissioners Decree No. Kep/01/DK/2002 dated December 2, 2002 concerning the Establishment of the Nomination and Remuneration Committee. The Nomination and Remuneration Committee is established by the Board of Commissioners and carries out their duties according to regulations, as follows:

1. Minister of SOEs Regulation No. PER-12/MBU/2012 dated August 24, 2012 concerning the Supporting Organs of the Board of Commissioners/Supervisory Board of SOEs;
2. OJK Regulation No. 34/POJK.04/2014 dated December 8, 2014 concerning the Nomination and Remuneration Committee of Issuers or Public Companies;
3. OJK Regulation No. 45/POJK.03/2015 dated December 23, 2015 concerning the Implementation of Remuneration Corporate Governance in Commercial Banks;
4. Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 dated September 26, 2016 concerning the Implementation of Remuneration Corporate Governance in Commercial Banks;
5. OJK Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Corporate Governance in Commercial Banks;
6. OJK Circular Letter No. 13/SEOJK.03/2017 dated March 17, 2017 concerning the Implementation of Corporate Governance in Commercial Banks.

NOMINATION AND REMUNERATION COMMITTEE CHARTER

The Nomination and Remuneration Committee has a Committee Charter that is continuously refined and updated in accordance with the development of prevailing laws and regulations and current conditions. The latest update/improvement of the Nomination and Remuneration Committee Charter was carried out in 2020 as stipulated in the PT Bank Negara Indonesia (Persero) Tbk Board of Commissioners Decree No. KEP/048/DK/2020 dated October 22, 2020 concerning the Nomination and Remuneration Committee Charter.

The Nomination and Remuneration Committee Charter contains:

1. Legal Basis;
2. Organizational structure and Nomination and Remuneration Committee membership;
3. Remuneration and Nomination Committee Membership requirements;
4. Remuneration and Nomination Committee responsibilities;
5. Remuneration and Nomination Committee duties;
6. Remuneration and Nomination Committee Rights and obligations;
7. Remuneration and Nomination Committee Meetings;
8. Remuneration and Nomination Committee members Term of Office.

NOMINATION AND REMUNERATION COMMITTEE STRUCTURE, MEMBERSHIP AND EXPERTISE

The Nomination and Remuneration Committee structure and membership is set forth in the Nomination and Remuneration Committee Charter as follows:

1. The Nomination and Remuneration Committee is established by the Board of Commissioners. The Board of Commissioners may establish a separate Nomination and Remuneration Committee;
2. The Nomination and Remuneration Committee shall act in an independent and responsible manner reporting directly to the Board of Commissioners;
3. Appointment of Nomination and Remuneration Committee members for the Board of Directors is based on a Board of Commissioners' Meeting Decision;
4. The Nomination and Remuneration Committee consists of at least three (3) members, namely 1 (one) Independent Commissioner serving as Chairman, 1 (one) Commissioner and 1 (one) company executive officer in charge of human resources, or those who occupy managerial positions below the Board of Directors in charge of human resources at BNI.
5. Nomination and Remuneration Committee Members, other than those mentioned in point d above may come from other Board of Commissioners members and those from outside BNI.
6. In the event that the membership of the Nomination and Remuneration Committee is more than 3 (three) persons, committee members who are Independent Commissioners shall be at least 2 (two) persons.

7. Other Nomination Committee members as referred to in point e cannot come from managerial parties under the Board of Directors in charge of human resources.
8. The Nomination and Remuneration Committee Chairman will be an Independent Commissioner at BNI.
9. The Nomination and Remuneration Committee Chairman shall not concurrently serve as chairman in more than 1 (one) other committee, and may only concurrently serve as Committee Chairman in at most 1 (one) other committee in BNI.
10. Nomination and Remuneration Committee Members shall not be allowed from the Board of Directors, either in BNI or other Banks.
11. If deemed necessary, the Committee may appoint a Secretary to the Committee with the assignment, rights, powers and responsibilities established by the Chairman of the Committee.

In the 2021 period, the structure and membership of the Nomination and Remuneration Committee has undergone several changes as explained in the table below:

Period January 1 - March 29, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Agus Dermawan Wintarto Martowardojo	Chairman	President Commissioner/Independent Commissioner	Economics
2	Pradjoto	Member	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
3	Sigit Widyawan	Member	Independent Commissioner	<ul style="list-style-type: none"> • Economic accounting • Finance
4	Joni Swastanto ¹⁾	Member	Commissioner	Economics
5	Askolani	Member	Commissioner	Economics
6	Ratih Nurdianti	Member	Commissioner	Law
7	Asmawi Syam	Member	Independent Commissioner	Economics
8	Susyanto	Member	Commissioner	Law
9	Iman Sugema	Member	Independent Commissioner	<ul style="list-style-type: none"> • Agribusiness • Economics
10	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance
11	Efita Praharani	Member	SVP Business Partner	<ul style="list-style-type: none"> • Psychology • Administrative Science
12	Danni Tri Suryani	Member	Independent Party	<ul style="list-style-type: none"> • Economics • HR Management

Note:

¹⁾Ceased serving as a member of KNR on March 29, 2021

Period March 29 - December 31, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1.	Agus Dermawan Wintarto Martowardojo	Chairman	President Commissioner / Independent Commissioner	Economics
2.	Pradjoto	Member	Vice President Commissioner / Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
3.	Sigit Widyawan	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance
4.	Askolani	Member	Commissioner	Economics
5.	Ratih Nurdianti	Member	Commissioner	Law
6.	Asmawi Syam	Member	Independent Commissioner	Economics
7.	Susyanto	Member	Commissioner	Law

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
8.	Iman Sugema	Member	Independent Commissioner	<ul style="list-style-type: none"> Agribusiness Economics
9.	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> Accounting Finance
10	Erwin Rijanto Slamet ¹⁾	Member	Independent Commissioner	Economics
11.	Efita Praharani	Member	SVP Business Partner	<ul style="list-style-type: none"> Psychology Administrative Sciences
12.	Danni Tri Suryani	Member	Independent Party	<ul style="list-style-type: none"> Economics HR Management

Note:¹⁾Ceasing serving as a member of KNR on August 16, 2021**Period August 16, 2021 - December 31, 2021**

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Agus Dermawan Wintarto Martowardojo	Chairman	President Commissioner/Independent Commissioner	Economics
2	Pradjoto	Member	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> Law Economics
3	Sigit Widyawan	Member	Independent Commissioner	<ul style="list-style-type: none"> Economic accounting Finance
4	Askolani	Member	Commissioner	Economics
5	Ratih Nurdianti	Member	Commissioner	Law
6	Asmawi Syam	Member	Independent Commissioner	Economics
7	Susyanto	Member	Commissioner	Law
8	Iman Sugema	Member	Independent Commissioner	<ul style="list-style-type: none"> Agribusiness Economics
9	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> Accounting Finance
10	Erwin Rijanto Slamet ¹⁾	Member	Independent Commissioner	Economics
11	Efita Praharani	Member	SVP Business Partner	<ul style="list-style-type: none"> Psychology Administrative Science
12	Danni Tri Suryani	Member	Independent Party	<ul style="list-style-type: none"> Economics HR Management

Note:¹⁾Ceasing serving as a member of KNR on August 16, 2021**NOMINATION AND REMUNERATION COMMITTEE PROFILES**

Profiles for the Chairman and Members of the BNI Nomination and Remuneration Committee as follows:

Nomination and Remuneration Committee Chairman

Agus Dermawan Wintarto Martowardojo
Nomination and Remuneration Committee Chairman

Profile can be found in the Board of Commissioners Profiles

Nomination and Remuneration Committee Member

Pradjoto
Nomination and Remuneration Committee Member

Profile can be found in the Board of Commissioners Profiles

Joni Swastanto¹⁾**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Sigit Widyawan**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Askolani**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Ratih Nurdianti**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Asmawi Syam**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Susyanto**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Iman Sugema**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Septian Hario Seto**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Erwin Rijanto Slamet²⁾**Nomination and Remuneration Committee Member**

Profile can be found in the Board of Commissioners Profiles

Efita Praharani**Nomination and Remuneration Committee Member**

Indonesian citizen, domiciled in Bekasi, West Java. Currently 54 years old. Appointed as Member of the Company's Nomination and Remuneration Committee since September 2018 based on the Board of Commissioners Resolution No. KEP/018/ DK/2018 December dated 17, 2018.

Obtained a Bachelor's degree in Psychology from Universitas Gadjah Mada in 1992 and a Master of Science degree in Administrative Sciences from the Universitas Indonesia in 2005.

Served as Regional Consumer Banking Leader - Jakarta Kemayoran Regional Office PT Bank Negara Indonesia (Persero) Tbk (2016-2018), and Deputy Head of the Consumer Product Management Division of PT Bank Negara Indonesia (Persero) Tbk (May-September 2018), and Head of Human Capital Management Division (September 2018-September 2021) of PT Bank Negara Indonesia (Persero) Tbk, Currently Serving as SVP Business Partner (September 2021-present) PT Bank Negara Indonesia (Persero) Tbk.

Danni Tri Suryani**Independent Member**

Indonesian citizen, domiciled in Bekasi, West Java. Currently 55 years old. Appointed as Member of the Company's Nomination and Remuneration Committee since September 2018 based on the Board of Commissioners Resolution No. KEP/018/ DK/2018 December dated 17, 2018.

Holds a Bachelor's Degree in Economics Management from Universitas Indonesia, and a Master of Science in the Human Resources Development from the University of Stirling, Scotland, UK.

Served as Learning and Knowledge Management Group Head at PT Bank Niaga (Persero) Tbk (2006-2009), Executive Vice President of Human Capital at Bank Mutiara/J Trust (2014-2015), Human Capital Director at Sucorinvest Securities company (2015 -2016), Head of Human Capital and Corporate Secretary of Mandiri Manajemen Investasi (2017-2020) and Human Capital Advisor in several financial companies, both banking and non-banking.

Note:

¹⁾Ceasing serving as a member of KNR on March 29, 2021

²⁾Ceasing serving as a member of KNR on August 16, 2021

NOMINATION AND REMUNERATION COMMITTEE QUALIFICATIONS, EDUCATION AND WORK EXPERIENCE COMMITTEE

Requirements for members of the Nomination and Remuneration Committee, include:

1. Members of the Nomination and Remuneration Committee must have the following requirements:
 - a. High integrity, ability, knowledge and adequate work experience in the Nomination and Remuneration Committee's duties, as well as have an understanding of banking;
 - b. Has no personal interests/relationships that may have a negative impact and conflict of interest on the Company;
 - c. Can provide sufficient time to complete the duties;
 - d. Is able to work with others and communicate well and effectively.
2. In addition to the requirements as stated in point 1 above, members of the Nomination and Remuneration Committee from an Independent Party must meet the following requirements:
 - a. Has no affiliation or financial relationship, management relationship, ownership relationship and/or familial relationship with members of the Board of Commissioners, members of the Board of Directors and/or Series A Dwiwarna Shareholders or any relationship with BNI that may affect their ability to act independently. The meaning of Independent Party in this charter is guided by the provisions governing the Independent Parties of committees under the Board of Commissioners in the prevailing laws and regulations, in particular the OJK Circular that regulates the Implementation of Governance for Commercial Banks and the OJK Regulations governing the Nomination and Remuneration Committee of Issuers or Public Companies;
 - b. Has experience related to nominations and/or remuneration;
 - c. Is not an employee of BNI;
 - d. Does not have any concurrent position as:
 - i) Member a the Board of Commissioners/Supervisory Board in State-Owned Enterprises (BUMN)/other companies;
 - ii) Secretary/staff Secretary to the Board of Commissioners/Supervisory Board in BUMN/other companies;
 - iii) Other committee member in the Company.
 - e. The executive officer in charge of human resources must have knowledge of the remuneration and/or nomination system as well as the Bank's succession plan;
 - f. BNI must examine the correctness of all documents or data supporting the fulfillment of Independent Party requirements, including a personal statement regarding the integrity of the Independent Party.

As of December 31, 2021, the educational qualifications and work experience of the Nomination and Remuneration Committee Chairman and Members were as follows:

NAME	POSITION	EDUCATION	WORK EXPERIENCE
Agus Dermawan Wintarto Martowardojo	Committee Chairman/ President Commissioner/ Independent Commissioner	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
Pradjoto	Committee Member/Vice President Commissioner/ Independent Commissioner	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
Joni Swastanto ¹⁾	Committee Member/ Commissioner	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
Sigit Widyawan	Committee Member/ Independent Commissioner	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
Askolani	Committee Member/ Commissioner	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
Ratih Nudiati	Committee Member/ Commissioner	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
Asmawi Syam	Committee Member / Independent Commissioner	Educational history can be seen in the Board of Commissioners composition diversity.	Work experience can be seen in the Board of Commissioners composition diversity

NAME	POSITION	EDUCATION	WORK EXPERIENCE
Susyanto	Committee Member/ Commissioner	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
Iman Sugema	Committee Member/ Independent Commissioner	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
Septian Hario Seto	Committee Member/ Independent Commissioner	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
Erwin Rijanto Slamet ²⁾	Committee Member/ Independent Commissioner	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
Efita Praharani	Member/SVP Business Partner	<ul style="list-style-type: none"> Bachelor's degree in Psychology Master's degree in Administration Science 	<ul style="list-style-type: none"> Regional Consumer Banking Head - BNI Jakarta Kemayoran Regional Office Consumer Product Management Division Deputy Head - BNI BNI Human Capital Management Division Head - BNI
Danni Tri Suryani	Independent Member	<ul style="list-style-type: none"> Bachelor's degree in Economics Management Master of Science degree in Human Resources 	<ul style="list-style-type: none"> Learning and Knowledge Management Group Head - PT Bank Niaga (Persero) Tbk. Executive Vice President of Human Capital - Bank Mutiara/J Trust. Human Capital Director - Sucorinvest Securities company. Head of Human Capital and Corporate Secretary Mandiri Investment Management. Human Capital Advisor to several financial companies, both banking and non-banking.

Note:

¹⁾ Ceased serving as a member of KNR on March 29, 2021

²⁾ Served as a Member of KNR since August 16, 2021

NOMINATION AND REMUNERATION COMMITTEE MEMBERS TERM OF OFFICE

1. The term of office for Nomination and Remuneration Committee members who are Board of Commissioners members is equal to the period of their appointment as a Commissioner as determined by the General Meeting of Shareholders;
2. Nomination and Remuneration Committee Members who are Board of Commissioners member shall cease if the term of office as a member of the Board of Commissioners ends;
3. If a Board of Commissioners member appointed as a member of the Nomination and Remuneration Committee resigns from their position as a Board of Commissioners member before their term of office is completed, then they said Committee member may be replaced by another member of the Board of Commissioners;
4. If a member of the Board of Commissioners serving as the Nomination and Remuneration Committee Chairman resigns from their position as a member of the Board of Commissioners, the Nomination and Remuneration Committee Chairman shall be replaced by another member from the Independent Board of Commissioners within 30 (thirty) days at the latest;
5. A replacement of Nomination and Remuneration Committee member who is not from the Board of Commissioners shall take place no later than 60 (sixty) days after the Nomination and Remuneration Committee member ceases performing their functions;
6. The term of office for Nomination and Remuneration Committee independent party members is 3 (three) years and this can be extended once for 2 (two) years, so the accumulation tenure in the company is for a maximum of 5 (five) years, but not prejudicing the rights of the Board of Commissioners to discharge any member of the Committee at any time.

NOMINATION AND REMUNERATION COMMITTEE INDEPENDENCE

Nomination and Remuneration Committee members shall provide fair and balanced assessments on all relevant conditions and shall not be influenced by personal or any other parties interests when conveying their opinions

Nomination and Remuneration Committee Independence

NAME	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 FAMILY RELATIONSHIP WITH THE BOARD OF COMMISSIONERS, THE BOARD OF DIRECTORS AND/ OR FELLOW MEMBERS OF NOMINATION AND REMUNERATION COMMITTEE	NOT SERVING ON BOARDS OF POLITICAL PARTIES, GOVERNMENT OFFICIALS
Agus Dermawan Wintarto Martowardojo	√	√	√	√	√
Pradjoto	√	√	√	√	√
Joni Swastanto ¹⁾	√	√	√	√	√
Asmawi Syam	√	√	√	√	√
Sigit Widyawan	√	√	√	√	√
Askolani	√	√	√	√	√
Ratih Nudiati	√	√	√	√	√
Susyanto	√	√	√	√	√
Iman Sugema	√	√	√	√	√
Septian Hario Seto	√	√	√	√	√
Erwin Rijanto Slamet ²⁾	√	√	√	√	√
Efita Praharani	√	√	√	√	√
Danni Tri Suryani	√	√	√	√	√

Note:

¹⁾ Ceased serving as a member of KNR on March 29, 2021

²⁾ Ceased serving as a member of KNR on August 16, 2021

NOMINATION AND REMUNERATION COMMITTEE DUTIES AND RESPONSIBILITIES

The Nomination and Remuneration Committee evaluates, prepares and provides recommendations to the Board of Commissioners regarding the nomination and remuneration system/policy for Commissioners, Directors, executive officers and overall for employees.

1. Related to nomination:

- a. Provides recommendations to the Board of Commissioners on:
 - i) Membership Composition for the Board of Directors and/or members of the Board of Commissioners;
 - ii) Policies and criteria required in the Nomination process; and
 - iii) Performance evaluation policies for members of the Board of Directors and/or members of the Board of Commissioners.
- b. Assists the Board of Commissioners to assess the Board of Directors and/or Board of Commissioners members performance based on benchmarks that had been developed as an evaluation;

- c. Provides recommendations to the Board of Commissioners regarding the capacity building program for Board of Directors and/or Board of Commissioners members;
- d. Provides proposals/recommendations for candidates who qualify as Board of Directors and/or Board of Commissioners members to the Board of Commissioners to be submitted to the General Meeting of Shareholders;
- e. Develops and provides recommendations to the Board of Commissioners regarding the systems and procedures for replacement of Board of Commissioners and/or Board of Directors members to the Board of Commissioners to be submitted to the General Meeting of Shareholders;
- f. Prepares and provides recommendations to the Board of Commissioners regarding the process of managing and implementing talent development for the executives of State Owned Enterprises (Directors and one level below the Board of Directors).

- g. Provides recommendations to the Board of Commissioners on Independent parties who will become members of the Audit Committee and the Risk Monitoring Committee.
2. Related to remuneration:
 - a. Evaluates remuneration system/policy based on performance, risk, fairness against peer groups, target, and long term Bank strategy, fulfillment of reserves as regulated in rules and regulations and future potential of Bank earnings.
 - b. Develops and provides recommendations to the Board of Commissioners regarding:
 - i) Remuneration structure
 - ii) Remuneration policy; and
 - iii) Amount of remuneration;
 - iv) Structure, policy and amount of remuneration for the Board of Commissioners and the Board of Directors mentioned above to be evaluated by the Nomination and Remuneration Committee at least once a year.
 - c. Deliver evaluation results and provide recommendations to the Board of Commissioners on:
 - i) Remuneration policy for the Board of Directors and the Board of Commissioners to be submitted to the General Meeting of Shareholders;
 - ii) Remuneration policy for executive officers and employees overall to be submitted to the Board of Directors.
 - d. Ensure the remuneration policy is in accordance with prevailing regulations.
 - e. Conduct regular evaluations of the implementation of remuneration policies.
 - f. Assist the Board of Commissioners in conducting performance appraisals in accordance with the remuneration received by each of the Board of Directors and/or the Board of Commissioners members.
3. Carry out other duties assigned by the Board of Commissioners related to the nomination and remuneration functions.
4. The procedure for carrying out the Nomination and Remuneration Committee duties and functions is carried out in accordance with the OJK Regulations that regulates the Nomination and Remuneration Committee for Commercial Banks, the OJK Regulations that regulates the Nomination and Remuneration Committee of Issuers or Public Companies and the OJK Regulations that regulates the implementation of corporate governance. management in the provision of remuneration for commercial banks.

NOMINATION AND REMUNERATION COMMITTEE RIGHTS AND OBLIGATIONS

1. Based on a written assignment from the Board of Commissioners, Nomination and Remuneration Committee may access the records or information about employees, funds, assets, and other resources owned by the company relating to the performance of its duties. The Committee shall report in writing the results of the assignment to the Board of Commissioners;
2. To carry out its duties, Nomination and Remuneration Committee shall cooperate with the Human Capital Division and other relevant Divisions;
3. Nomination and Remuneration Committee, with the approval of the Board of Commissioners, reserves the right to appoint a third party (person or entity) to assist their duties;
4. The Nomination and Remuneration Committee Members shall perform their duties properly and maintain the confidentiality of all documents, data and company information from both internal and external parties and use them only for the benefit of the Committee's duties;
5. The Nomination and Remuneration Committee, related to the remuneration policy, shall take into account at least:
 - a. Financial performance and fulfillment of reserves as regulated in applicable legislation;
 - b. Individual work performance;
 - c. Appropriateness with peer groups; and
 - d. Consideration of the Bank's long -term targets and strategies.
6. Before the end of the current fiscal year, the Nomination and Remuneration Committee shall prepare and submit work plan and annual budget to the Board of Commissioners to be set, with a copy delivered by the Board of Commissioners to the Board of Directors. The implementation of Nomination and Remuneration Committee work plan and annual budget will be reported to the Board of Commissioners.
7. The Nomination and Remuneration Committee shall prepare and submit reports on their tasks, responsibilities and procedures to the Board of Commissioners.

NOMINATION AND REMUNERATION COMMITTEE MEETINGS

1. Nomination and Remuneration Committee meetings shall be held in accordance with the needs of the Company, at least four (4) times a year.

2. Nomination and Remuneration Committee meetings may only be held if attended by a majority of members, with the majority there being the Chairman and 1 (one) Executive Officer in charge of Human Resources, or the party occupying a managerial position under the Board of Directors in charge of Human Capital.
3. The meetings shall be chaired by the Chairman, and if they are unable to attend the meeting, it shall be chaired by a senior committee member appointed/ agreed upon in the meeting.
4. Decision making in the meetings shall be conducted based on consensus agreement. In the absence of consensus, decisions shall be made on the basis of a majority vote with the principle of 1 (one) person 1 (one) vote.
5. If the result of voting is a tie, then the decision shall be made on the basis of a majority vote with the principle of 1 (one) person 1 (one) vote, excluding the votes from the Executive Officer of Human Capital, or the party occupying a managerial position under the Board of Directors in charge of Human Capital.
6. The results of meetings will be recorded in the meeting minutes and signed by all members of the Committee and properly documented.
7. Any dissenting opinions that occurred in the meeting shall be clearly detailed in the meeting minutes.
8. The meeting minutes, as referred to in item 6 above, shall be submitted in writing by the Nomination and Remuneration Committee to the Board of Commissioners.
9. Members attendance at meetings will be reported in a quarterly report and the annual report of the Nomination and Remuneration Committee.

NOMINATION AND REMUNERATION COMMITTEE MEETINGS AGENDA

During 2021 the KNR conducted 19 (nineteen) meetings as follows:

Nomination and Remuneration Committee Meetings Agenda

NO.	MEETING DATE	MEETING AGENDA	MEETING PARTICIPANTS
1	January 14, 2021	Interviews with Candidates as Committee members under the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Danni Tri Suryani
2	February 11, 2021	<ol style="list-style-type: none"> 1. Study of Directors and Commissioners 2020-2021 Remuneration 2. Charging the position of the Company Subsidiary Commissioners 3. Board of Directors Collegial and Individual key Performance Indicator (KPI) achievement 2020 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Efita Praharani • Danni Tri Suryani
3	February 18, 2021	Replacement of Subsidiary President Director	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Efita Praharani • Danni Tri Suryani

NO.	MEETING DATE	MEETING AGENDA	MEETING PARTICIPANTS
4	March 4, 2021	Board of Directors Performance Evaluation and Competency in 2020	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Danni Tri Suryani
5	March 8, 2021	<ol style="list-style-type: none"> 1. Appointment of BNI's AGMS Chairman and successor 2. Board of Commissioners Key Performance Indicator (KPI) Approval in 2021 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Danni Tri Suryani
6	March 10, 2021	Validation of 2021 Selected Talent Interview in PT Bank Negara Indonesia (Persero) Tbk	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Danni Tri Suryani
7	March 18, 2021	<ol style="list-style-type: none"> 1. Study of the BNI Board of Directors and Board of Commissioners Remuneration 2. Organization arrangement (Director Division) 3. Replacement of the BNI Subsidiary President Director Report 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Joni Swastanto¹⁾ • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Danni Tri Suryani
8	March 29, 2021	Changing the Company's Board of Commissioners in the context of the PT BNI (Persero) Tbk AGMS	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Efita Praharani • Danni Tri Suryani

NO.	MEETING DATE	MEETING AGENDA	MEETING PARTICIPANTS
9	May 6, 2021	<ol style="list-style-type: none"> Presentation of Willis Towers Watson (WTW) (1) Related to Directors and Commissioners Benefit Analysis Presentation by the Managing Director HC and Compliance: <ol style="list-style-type: none"> Evaluation of the application of employee remuneration policies, the nomination system and overall management of human capital Managing and implementing talent development for SOE executive needs (Board of Directors and BOD-1), as well as the Company's internal talents 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Efita Praharani Danni Tri Suryani
10	June 3, 2021	Interview with Candidates as Independent Committee members under the Board of Commissioners	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanan Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Danni Tri Suryani
11	June 17, 2021	<ol style="list-style-type: none"> Presentation of Benefit Analysis for Members of the Board of Directors and Board of Commissioners by WILLIS Tower Watson Consultants Changes to the BNI Subsidiary Management 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanan Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Efita Praharani Danni Tri Suryani
12	June 17, 2021	KNR Self-Assessment for Erwin Rijanto Slamet as Independent Commissioner of PT Bank Negara Indonesia (Persero) Tbk	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanan Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Efita Praharani Danni Tri Suryani
13	June 30, 2021	Discussion on Proposed Changes to the BNI Pension Fund Regulations	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyanan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Efita Praharani Danni Tri Suryani

NO.	MEETING DATE	MEETING AGENDA	MEETING PARTICIPANTS
14	July 8, 2021	<ol style="list-style-type: none"> 1. Discussion on proposals for solving the human capital management division organization 2. Discussion (continued) on the Application for Approval of Proposals for Changes to BNI Pension Fund Regulations 	<ul style="list-style-type: none"> • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Efita Praharani • Danni Tri Suryani
15	August 19, 2021	2021 KPI Target and achievement in semester 1/2021 KPI - collegial and individual Directors	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Erwin Rijanto Slamet ²⁾ • Danni Tri Suryani
16	September 16, 2021	<ol style="list-style-type: none"> 1. Discussion (continued) on the 2021 target and semester 1 Directors collegial and individual Directors achievement of KPI 2. BNI Employee remuneration policy related to fulfillment of applicable provisions / regulations and implementation in the field 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Iman Sugema • Septian Hario Seto • Erwin Rijanto Slamet ²⁾ • Efita Praharani • Danni Tri Suryani
17	October 4, 2021	<ol style="list-style-type: none"> 1. Discussion on the Ministry of SOEs letter concerning the 2021 remuneration and 2020 Tantiem 2. Other matters 	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Erwin Rijanto Slamet ²⁾ • Efita Praharani • Danni Tri Suryani
18	November 25, 2021	Further decision related to 2021 remuneration and 2020 Tantiem	<ul style="list-style-type: none"> • Agus Dermawan Wintarto Martowardojo • Pradjoto • Sigit Widyawan • Askolani • Ratih Nurdianti • Asmawi Syam • Susyanto • Iman Sugema • Septian Hario Seto • Erwin Rijanto Slamet ²⁾ • Danni Tri Suryani

NO.	MEETING DATE	MEETING AGENDA	MEETING PARTICIPANTS
19	December 2, 2021	Discussion on Proposal Determination for BNI Subsidiary Management	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Pradjoto Sigit Widyawan Askolani Ratih Nurdianti Asmawi Syam Susyanto Iman Sugema Septian Hario Seto Erwin Rijanto Slamet ²⁾ Danni Tri Suryani

Note:¹⁾Ceased serving as a member of KNR on March 29, 2021²⁾Served as member of KNR since August 16, 2021

NOMINATION AND REMUNERATION COMMITTEE MEETINGS FREQUENCY AND ATTENDANCE LEVEL

The Nomination and Remuneration Committee meetings frequency and attendance level can be seen in the table below:

Attendance at Nomination and Remuneration Committee Meetings

NAME	POSITION	NUMBER OF MEETINGS	ATTENDANCE	PERCENTAGE
Agus Dermawan Wintarto Martowardojo	Committee Chairman/ President Commissioner/ Independent Commissioner	19	18	94.74%
Pradjoto	Committee Member/Vice President Commissioner/Independent Commissioner	19	18	94.74%
Joni Swastanto ¹⁾	Committee Member/Commissioner	8	7	87.50%
Sigit Widyawan	Committee Member/Independent Commissioner	19	19	100%
Askolani	Committee Member/Commissioner	19	14	73.68%
Ratih Nudiati	Committee Member/Commissioner	19	18	94.74%
Asmawi Syam	Committee Member/Independent Commissioner	19	19	100%
Susyanto	Committee Member/Commissioner	19	18	94.74%
Iman Sugema	Committee Member/Independent Commissioner	19	19	100%
Septian Hario Seto	Committee Member/Independent Commissioner	19	17	89.47%
Erwin Rijanto Slamet ²⁾	Committee Member/Independent Commissioner	5	5	100%
Efita Praharani	Member/SVP Business Partner	19	10	52.63%
Danni Tri Suryani	Independent Member	19	19	100%

Note:¹⁾Ceased serving as a member of KNR on March 29, 2021²⁾Served as a member of KNR on August 16, 2021

BRIEF REPORT ON THE NOMINATION AND REMUNERATION COMMITTEE ACTIVITIES IN 2021

During 2021, the Nomination and Remuneration Committee (KNR) Committee carried out all programs/ Work Plans set at the beginning of 2021 in order to assist the implementation of the duties of the Board of Commissioners. The mechanism of implementing KNR activities/tasks is carried out through:

1. Implementation of the KNR Meeting;
2. Studies/evaluations/reviews outside the meeting forum.

The results of the KNR Meeting and monitoring, reviews / evaluations of the KNR were submitted to the Board of Commissioners as reports and recommendations both in writing and in the Board of Commissioners' Meeting forum.

The implementation of KNR activities in general covered the following matters:

1. Implementation of nomination tasks
 - a. Conducting a review of prospective BNI management from internal BNI parties as well as providing suggestions/recommendations regarding prospective BNI administrators who meet the requirements to be proposed at the BNI GMS through Series A Dwiwarna Shareholders;
 - b. Reviewing the completeness of requirements for prospective BNI management for the purpose of submitting a fit and proper test to OJK as candidates for BNI management;
 - c. Conducting a review of the candidates for the management of BNI's subsidiary companies who must obtain approval from the Board of Commissioners and who will be proposed to the Series A Dwi Warna Shareholders (Ministry of SOEs);
 - d. Making recommendations regarding the Capability Development Program for members of the Board of Directors and the Board of Commissioners;
 - e. Preparing recommendations on the Nomination System for Members of the Board of Directors and Board of Commissioners;
 - f. Evaluating and providing recommendations on the proposed candidates as members of the Audit Committee, Risk Monitoring Committee and Integrated Governance Committee from independent parties to the Board of Commissioners;
 - g. Conducting performance appraisals of members of the Board of Directors and Board of Commissioners;
 - h. Reviewing the HC management nomination system as a whole;
 - i. Evaluating the HC development in accordance with the Corporate Plan;

- j. Evaluating the transfer, promotion and employee sanctions system;
 - k. Evaluating the Talent Management System.
 - l. Evaluating the Board of Directors' recommendation regarding the Company's organization structure.
2. Implementation of remuneration duties
 - a. Evaluating the remuneration system/policy for members of the Board of Directors and Board of Commissioners, executive officers and employees as a whole;
 - b. Reviewing the Board of Directors and Board of Commissioners remuneration for 2021 and tantiem for 2020;
 - c. Evaluating and making recommendations regarding the remuneration structure, remuneration policy and amount of remuneration for members of the Board of Directors and Board of Commissioners to be submitted to the GMS through the Series A Dwiwarna Shareholders, including a review of the proposed remuneration for the Board of Directors related to the allocation of Long Term Incentives.

Ensuring the employee remuneration policy is in accordance with applicable regulations by conducting periodic evaluations of the implementation of the employee remuneration policy.

NOMINATION AND REMUNERATION COMMITTEE OBLIGATIONS RELATED TO THE BOARD OF DIRECTORS SUCCESSION POLICY

To prepare for future leadership regeneration, the Company's internal programs have been harmonized with Minister of SOEs Regulation No. PER-11/MBU/07/2021 dated August 24, 2021 concerning Requirements, Procedure for Appointment and Termination of Directors of SOEs. In this program potential employees who enter the Talent Pool will have the opportunity to attend a training or activities related to the field of management, business strategy, strategic planning, risk analysis and business potential, analysis of operational and financial performance as well as in a variety of other similar programs.

With this program, if the Company requires leadership replacements, the Company will apply for internal candidates from the program participants, facilitated by the Board of Commissioners, after considering the Nomination and Remuneration Committee recommendations. Furthermore, the results of the internal candidate selection will be submitted to the Minister of SOEs to conduct a fit and proper test.

NOMINATION AND REMUNERATION COMMITTEE MEMBERS COMPETENCY DEVELOPMENT

Throughout 2021, the Company's Nomination and Remuneration Committee members participated in competency improvement programs in the form of training, workshops, conferences, seminars, as follows:

Nomination and Remuneration Committee Competency Development

NAME	POSITION	COMPETENCY DEVELOPMENT/TRAINING MATERIALS	TYPE OF TRAINING AND ORGANIZER	TIME AND PLACE
Agus Dermawan Wintarto Martowardojo	Committee Chairman/ President Commissioner/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Pradjoto	Committee Member/Vice President Commissioner/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Sigit Widyawan	Committee Member/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Askolani	Committee Member/ Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Ratih Nudiati	Committee Member/ Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Susyanto	Committee Member/ Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Asmawi Syam	Committee Member/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Iman Sugema	Committee Member/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Septian Hario Seto	Committee Member/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Erwin Rijanto Slamet ¹⁾	Committee Member/ Independent Commissioner	The Nomination and Remuneration Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Joni Swastanto ²⁾	Committee Member/ Commissioner	-	-	-
Efita Praharani	Member/SVP Business Partner	Instructional System Design (ISD) & Module Developer Digital Learning	BNI	January 12, 2021
		Internalization of AKHLAK for C-1 Senior Leaders	BNI	March 5, 2021
		How Does The Year 2021 Look For The Wealth Management Industry	BNI	April 16, 2021
Danni Tri Suryani	Independent Member	-	-	-

¹⁾ Served as a member of KNR on August 16, 2021

²⁾ Ceased serving as a member of KNR on March 29, 2021

RISK MONITORING COMMITTEE

The Risk Monitoring Committee is a committee established by and responsible to the Board of Commissioners in order to support the implementation of the Board of Commissioners duties and responsibilities related to Risk Management in the Bank and the application of the principles of Good Corporate Governance.

BASIS FOR THE ESTABLISHMENT OF THE RISK MONITORING COMMITTEE

Risk Monitoring Committee was formed in 2004 based on Board of Commissioners Decree No. Kep/002/DK/2004 dated March 1, 2004 concerning the Establishment of Risk Monitoring and Compliance Committee. BNI established the Risk Monitoring Committee and they carry out their duties according to the following regulations:

1. Ministry of SOEs Regulation PER-12/MBU/2012 dated August 24, 2012 concerning Board of Commissioners/ Supervisory Board Supporting Organs in SOEs, as amended by the Minister of SOEs Regulation No. PER-06/MBU/04/2021 dated April 13, 2021;
2. OJK Regulation No. 33/POJK.04/2014 dated December 8, 2014 concerning Board of Directors and Board of Commissioners of Issuers or Public Companies;
3. OJK Regulation No. 55/POJK.03/2016 dated December 7, 2016 concerning Implementation of Good Corporate Governance for Commercial Banks;
4. OJK Circular Letter No. 13/SEOJK.03/2017 dated March 17, 2017 concerning Implementation of Good Corporate Governance for Commercial Banks.

RISK MONITORING COMMITTEE CHARTER

The Risk Monitoring Committee has a Committee Charter which is continuously refined and updated in accordance with developments/changes in the prevailing laws and regulations as well as current conditions. The latest update/revision of the BNI Risk Monitoring Committee Charter was carried out in 2017, and stipulated in the Board of Commissioners Decree No. KEP/028/DK/2017 dated 18 May 2017 concerning the "Risk Monitoring Committee Charter".

The Risk Monitoring Committee Charter includes:

1. Basis of formation and implementation of Risk Monitoring Committee duties;
2. Risk Monitoring Committee Goals and objectives;
3. Risk Monitoring Committee Structure and membership;

4. Risk Monitoring Committee membership requirements;
5. Risk Monitoring Committee duties;
6. Risk Monitoring Committee authorities;
7. Risk Monitoring Committee rights and obligations;
8. Risk Monitoring Committee meetings;
9. Risk Monitoring Committee term of office.

RISK MONITORING COMMITTEE STRUCTURE, AND MEMBERSHIP

1. Risk Monitoring Committee is established by decision at Board of Commissioners' meeting and in a Board of Commissioners' Decree;
2. Risk Monitoring Committee is under the coordination of the Board of Commissioners and is directly responsible to the Board of Commissioners;
3. Appointment of Risk Monitoring Committee Members shall be conducted by Board of Directors based on a Board of Commissioners' Meeting decision;
4. Risk Monitoring Committee shall at least consist of:
 - a. 1 (one) Independent Commissioner as concurrent as chairman;
 - b. (one) person from an independent party with expertise in risk management;
 - c. (one) person from an independent party with expertise in finance;
5. Independent Commissioners and independent parties who are members of Risk Monitoring Committee shall at least make up 51% (fifty one percent) of the total members of Risk Monitoring Committee;
6. Risk Monitoring Committee Chairman is an Independent Commissioner concurrent as member as stipulated in the decision of Board of Commissioners' meeting and in a Board of Commissioners Decree;
7. Risk Monitoring Committee Chairman may only concurrently hold 1 (one) other Committee Chairman position at BNI;
8. Former members of BNI Board of Directors and former executive officers or parties with links to BNI that may influence their ability to act independently, who may become an independent member of Risk Monitoring Committee, shall be subject to a 6 (six) month long cooling off period. The cooling off provision shall not apply to former members of the Board of Directors and former BNI executive officer whose duties are only to perform supervisory function for at least 6 (six) months. The term "cooling off" refers to the cooling off period as stipulated in OJK Regulations and Circular on the Implementation of Governance for Commercial Banks;

9. Member of Risk Monitoring Committee from independent party may not concurrently hold positions as:
 - a. Member of the Board of Commissioners/ Supervisory Board of SOE/other companies;
 - b. Secretary/Sekretariat staff to the Board of Commissioners/Supervisory Board of SOEs/other companies.
10. The Board of Directors shall appoint and dismiss of of Risk Monitoring Committee independent party members based on a Board of Commissioners decision and Board of Commissioners' Decree;
11. Risk Monitoring Committee Chairman shall have the right to propose the replacement of Risk Monitoring Committee member to Board of Commissioners if one of the members of the Risk Monitoring Committee ends their term, resigns or is dismissed;
12. Risk Monitoring Committee members are prohibited from being members of BNI's or other banks Board of Directors;
13. Risk Monitoring Committee shall work collectively in performing its duties to assist te Board of Commissioners;
14. Risk Monitoring Committee shall be independent both in the execution of its duties and reporting, and directly responsible to the Board of Commissioners;
15. In performing daily tasks, the Committee shall be assisted by external staff or secretary to the Committee. The staff or secretary shall be appointed on the basis of a Board of Commissioners Meeting decision and a Board of Commissioners' Decree.

In 2021, the Risk Monitoring Committee structure and membership was amended several times as shown in the tables below:

Period January 1 – March 29, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Pradjoto	Chairman	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
2	Joni Swastanto ¹⁾	Member	Commissioner	Economics
3	Ratih Nurdianti	Member	Commissioner	Law
4	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance
5	Dwita Suherlina	Member	Independent Party	<ul style="list-style-type: none"> • Agriculture • Finance

Note:

¹⁾Ceased serving as a member of KNR on March 29, 2021

Period March 29-July 15, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Pradjoto	Ketua	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
2	Ratih Nurdianti	Member	Commissioner	Law
3	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance
4	Dwita Suherlina	Member	Independent Party	<ul style="list-style-type: none"> • Agriculture • Finance

Period July 15 – August 16, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Pradjoto	Chairman	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
2	Ratih Nurdianti	Member	Commissioner	Law
3	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
4	Dwita Suherlina	Member	Independent Party	<ul style="list-style-type: none"> • Agriculture • Finance
5	Nurani Raswindriati ¹⁾	Member	Independent Party	<ul style="list-style-type: none"> • Accounting • Finance

Note:

¹⁾Ceased serving as a member of KPR on July 15, 2021

Period August 16 - December 31, 2021

NO.	NAME	POSITION	DESCRIPTION	EXPERTISE
1	Pradjoto	Chairman	Vice President Commissioner/Independent Commissioner	<ul style="list-style-type: none"> • Law • Economics
2	Ratih Nurdianti	Member	Commissioner	Law
3	Septian Hario Seto	Member	Independent Commissioner	<ul style="list-style-type: none"> • Accounting • Finance
4	Erwin Rijanto Slamet ¹⁾	Member	Independent Commissioner	Economics
5	Dwita Suherlina	Member	Independent Party	<ul style="list-style-type: none"> • Agriculture • Finance
6	Nurani Raswindriati	Member	Independent Party	<ul style="list-style-type: none"> • Accounting • Finance

Note:

¹⁾Ceased serving as a member of KPR on August 16, 2021

Risk Monitoring Committee Profiles

Brief profiles for the Risk Monitoring Committee Chairman and Members are as follows:

Risk Monitoring Committee Chairman**Pradjoto****Risk Monitoring Committee Chairman**

Profile can be found in the Board of Commissioners Profiles

Risk Monitoring Committee Member**Ratih Nurdianti****Risk Monitoring Committee Member**

Profile can be found in the Board of Commissioners Profiles

Joni Swastanto¹⁾**Risk Monitoring Committee Member**

Profile can be found in the Board of Commissioners Profiles

Erwin Rijanto Slamet²⁾**Risk Monitoring Committee Member**

Profile can be found in the Board of Commissioners Profiles

Septian Hario Seto**Risk Monitoring Committee Member**

Profile can be found in the Board of Commissioners Profiles

Dwita Suherlina**Risk Monitoring Committee Independent Member**

Indonesian citizen, domiciled in Jakarta. Currently 57 years old. Appointed as a member of the Company's Risk Monitoring Committee in January 2021 based on the Board of Commissioners Decree No. KEP/001/DK/202021 dated January 18, 2021.

Holds a Bachelor's degree in Agriculture Agronomy from Institut Pertanian Bogor in 1986, and a Master's degree in Financial Management from Universitas Padjajaran in 2003. Has served as Assistant Vice President of Regional Risk Management Bandung at PT Bank Mandiri (Persero) Tbk (2006-2012), Vice President Regional Risk Management Bandung at PT Bank Mandiri (Persero) Tbk (2012), Vice President Regional Risk Management Jakarta Kelapa Gading at PT Bank Mandiri (Persero) Tbk (2012-2016), Vice President Department IV Corporate Risk Group at PT Bank Mandiri (Persero) Tbk (2016-2020).

Nurani Raswindriati⁽³⁾ **Risk Monitoring Committee Member**

Indonesian citizen, domiciled in Jakarta. Currently 59 years old. Appointed as a Member of the Company's Risk Monitoring Committee in July 2021 based on the Board of Commissioners Decree No. KEP/013/DK/2021 dated July 15, 2021. Born in 1962. Obtained a Bachelor's degree in Accounting from Universitas Padjajaran, and Masters in Management from Finance Department in Universitas Gadjah Mada.

Previously served as Director of Finance and Operations at PT Niaga International Factors (2002-2005), Head of Credit Risk Control, Risk Management Group at PT Bank Permata Tbk (2007-2012), Deposit Insurance Agency (LPS) (2012-2015), Risk Monitoring Committee Member at Bank Resonia Perdania (2015-2016), Risk Monitoring Committee Member at PT Bank Tabungan Negara, Director of Compliance and Risk Management at PT Bank Victoria Syariah (2016-2021), Senior Vice President at Indonesia Eximbank 2021.

Note:

¹⁾Ceased serving as a member of KPR on March 29, 2021

²⁾Ceased serving as a member of KPR on January 18, 2021

³⁾Ceased serving as a member of KPR on July 15, 2021



RISK MONITORING COMMITTEE MEMBERSHIP REQUIREMENTS

1. General Requirements
 - a. Have good integrity, character and morals as well as sufficient work experience related to duties in other committees;
 - b. Has no personal interest/relationship that could have a negative impact and conflict of interest on BNI.
2. Competency Requirements
 - a. Has sufficient expertise, ability, knowledge and experience in the fields of economics, finance and banking or risk management in accordance with the requirements stipulated by the OJK Regulation that regulates the requirements for members of the Risk Monitoring Committee;
 - b. Able to work together and has the ability to communicate well and effectively and provide sufficient time to carry out their duties;
 - c. Has sufficient knowledge and understanding of banking, capital market, BUMN and other laws and regulations, particularly those related to BNI operational activities, implementation of Good Corporate Governance and risk management.
3. Independence Requirements Independent members of the Risk Oversight Committee:
 - a. Are parties from outside BNI who have no financial, management, share ownership and/or familial relationship with the Board of Commissioners, the Board of Directors and/or Dwiwarna Series A shareholder, or relationships with a bank that may affect their ability to act independently, based on prevailing laws and regulations;
 - b. Has no direct or indirect business relationship with BNI's business activities;
 - c. In the last 1 (one) year before being appointed as a member of the Risk Monitoring Committee, he was not a person in the Public Accounting Firm or a consultant providing audit services, risk management services and/or non-audit consulting services to BNI;
 - d. Not a party from the Company employees.

RISK MONITORING COMMITTEE QUALIFICATIONS, EDUCATION AND WORK EXPERIENCE

The Risk Monitoring Committee chairman and members educational qualifications and work experience as at the end of December 31, 2021, were as follows:

NAME	POSITION	EDUCATION	WORK EXPERIENCE
Pradjoto	Committee Chairman/Vice President Commissioner/Independent Commissioner	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
Joni Swastanto ¹⁾	Member/Commissioner	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
Ratih Nurdianti	Member/Commissioner	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
Erwin Rijanto Slamet ²⁾	Member/Independent Commissioner	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
Septian Hario Seto	Member/Independent Commissioner	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

NAME	POSITION	EDUCATION	WORK EXPERIENCE
Dwita Suherlina	Independent Member	<ul style="list-style-type: none"> Bachelor's degree in Agriculture Master's degree in Management 	<ul style="list-style-type: none"> Assistant Vice President Regional Risk Management-Bank Mandiri (Persero) Tbk Vice President-Bank Mandiri (Persero) Tbk
Nurani Raswindriati ⁴⁾	Independent Member	<ul style="list-style-type: none"> Bachelor's degree in Accounting Master's degree in Finance 	<ul style="list-style-type: none"> Director of Finance and Operations-Bank Niaga International Factors Head of Credit Risk Control, Risk Management Group-PT Bank Permata Tbk Senior Vice President-Lembaga Penjamin Simpanan/LPS Risk Monitoring Committee Member-Bank Resonia Perdania Risk Monitoring Committee Member-PT Bank Tabungan Negara Director of Compliance and Risk Management-PT Bank Victoria Syariah Senior Vice President-Indonesia Eximbank

Note:¹⁾ Ceased serving as a member of KPR on March 29, 2021²⁾ Ceased serving as a member of KPR on August 16, 2021³⁾ Ceased serving as a independent member of KPR on July 15, 2021**RISK MONITORING COMMITTEE TERM OF OFFICE**

1. Risk Monitoring Committee Members who are member of the Board of Commissioners, their term of office as a member of the committee is the same as his term of office as a member of the Board of Commissioners determined by the GMS;
2. Risk Monitoring Committee Members who are members of the Board of Commissioners automatically cease being members of the committee when their term of office as a member of the Board of Commissioners ends;
3. If a Board of Commissioners member becomes the Risk Monitoring Committee Chairman ceases before their term of office as a member of the Board of Commissioners, the Risk Monitoring Committee Chairman will be replaced by another Independent Commissioner;
4. The term of office for Risk Monitoring Committee members from independent parties is a maximum of 3 (three) years and can be extended once for 2 (two) years so the total term of office for members of the Risk Monitoring Committee in the company is a maximum of 5 (five) years without prejudice to the right of the Board of Commissioners to dismiss the members of the Committee concerned at any time;
5. The Board of Commissioners, by taking into account the proposal from the Risk Monitoring Committee Chairman, may dismiss at any time a Risk Monitoring Committee independent party member if they are deemed not to have carried out their duties and obligations as a member of the committee as stipulated in the appointment/appointment Decree for the committee member concerned and/or Work Agreement between the relevant committee member and BNI, as well as based on prevailing regulations;
6. In the event that a member of the Board of Commissioners serving as Chairman of the Risk Monitoring Committee ceases to be a member of the Board of Commissioners, the Chairman of the Committee concerned must be replaced by another member of the Board of Commissioners within 30 (thirty) days at the latest.

RISK MONITORING COMMITTEE INDEPENDENCE

All members of Risk Monitoring Committee shall be independent from financial, management, share ownership and/or familial relationships with the Board of Commissioners, the Board of Directors and/or controlling shareholder or any relationships with the Bank, which may affect their ability to act independently.

NAME	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
Pradjoto	✓	✓	✓	✓	✓
Joni Swastanto ¹⁾	✓	✓	✓	✓	✓
Ratih Nurdianti	✓	✓	✓	✓	✓
Erwin Rijanto Slamet ²⁾	✓	✓	✓	✓	✓
Septian Hario Seto	✓	✓	✓	✓	✓
Dwita Suherlina	✓	✓	✓	✓	✓
Nurani Raswindriati ³⁾	✓	✓	✓	✓	✓

Note:

¹⁾ Ceased serving as a member of KPR on March 29, 2021

²⁾ Ceased serving as a member of KPR on August 16, 2021

³⁾ Ceased serving as a member of KPR on July 15, 2021

RISK MONITORING COMMITTEE DUTIES

The Risk Monitoring Committee duties cover:

- Evaluating the suitability of risk management policies and the implementation of Bank policies, which include:
 - Evaluating the conformity between the Bank's risk management policy with the implementation of other policies, including credit risk, market risk, liquidity risk, operational risk, strategic risk, legal risk, compliance risk, and reputation risk;
 - Evaluating the conformity between the integrated risk management policy with the implementation of other policies, consisting of the 8 (eight) in point 1.a above, as well as insurance risk and the intra-group transactions risk;
 - Providing recommendations to the Board of Commissioners on the suitability of risk management and integrated risk management policies to ensure BNI has adequately managed risks;
 - Exploring and giving opinions to the Board of Commissioners on the General Credit policy and other policies required by a regulator and submitted the Board of Directors for approval from the Board of Commissioners;
- Monitoring and evaluating the implementation of the Risk Management Committee and risk management work unit duties, in order to provide recommendations to the Board of Commissioners, including:
 - Monitoring the implementation of the Risk Management Work Unit work plan and the Risk Management Committee duties;
 - Monitoring the implementation of the Integrated Risk Management unit work plan and the Integrated Risk Management Committee duties;
 - Providing recommendations to the Board of Commissioners to enhance the effectiveness of risk management implementation at BNI, including the implementation of integrated risk management in the subsidiaries;
 - Providing evaluation results on risk-related regulator assessments to the Board of Commissioners.
- Carrying out other tasks related to the Risk Monitoring Committee function and scope as assigned by the Board of Commissioners.

RISK MONITORING COMMITTEE AUTHORITIES

1. Based on written assignments from the Board of Commissioners, the Risk Monitoring Committee can access records or information about employees, funds, assets and other resources owned by BNI relevant to the performance of its duties. The Committee shall report in writing the results of the assignments to the Board of Commissioners;
2. Risk Monitoring Committee is authorized to conduct testing and perform inspections of BNI branches/representatives/regions and business units, if necessary;
3. Members of Risk Monitoring Committee are authorized to communicate directly with parties related to Risk Monitoring Committee duties, including communicating matters related to financial and management information;
4. In carrying out its duties, Risk Monitoring Committee may cooperate with Risk Management Committee, Integrated Risk Management Committee, Risk Management Work Unit and relevant work units.

RISK MONITORING COMMITTEE RIGHTS AND OBLIGATIONS

1. Members of the Risk Monitoring Committee must carry out their duties properly by referring to the Risk Monitoring Committee Charter;
2. Members of the Risk Monitoring Committee from independent parties have the right to receive an honorarium from BNI, the amount to be determined by the Board of Commissioners based on the prevailing laws and regulations;
3. Members of the Risk Monitoring Committee must maintain the confidentiality of all documents, data, information, and everything related to the implementation of the Risk Monitoring Committee duties;
4. Before the current fiscal year, the Risk Monitoring Committee must prepare and submit an Annual Work Plan and Budget to the Board of Commissioners for determination, with copies submitted by the Board of Commissioners to the Board of Directors for information. Implementation of the Risk Monitoring Committee Annual Work Plan and Budget is reported to the Board of Commissioners;
5. Members of the Risk Monitoring Committee must prepare and submit reports to the Board of Commissioners, which are signed by Committee Chair and Committee Members as follows:
 - a. Reports on each duty implementation with recommendations if deemed necessary;
 - b. Quarterly report and annual report.

6. Every year, the Committee through the Board of Commissioners reports to the General Meeting of Shareholders on their responsibilities and achievements as well as other information that needs to be delivered;
7. Members of the Risk Monitoring Committee are prohibited from accepting gifts or gifts in kind related to their position;
8. Members of the Risk Monitoring Committee must provide sufficient time to carry out their duties and responsibilities optimally;
9. Committee members from independent parties must attend the Company's working days and hours under the following conditions:
 - a. At least 1 (one) day every week according to the day and attendance schedule determined by the Board of Commissioners and/or Committee Chairman, attend the Committee Meetings and carry out other duties according to assigned duties and obligations; as well as;
 - b. If necessary, at the request of the Board of Commissioners and/or Committee Chairman, Committee members from independent parties must attend the Board of Commissioners' Meetings or Committee Meetings, or activities that must be attended by the Board of Commissioners in accordance with the requirements outside the daily or routine attendance schedule.
10. In order to avoid overlapping duties among the Committees under the Board of Commissioners and cooperation in the duties' implementation, the Risk Monitoring Committee must coordinate with other Committees under the Board of Commissioners.

RISK MONITORING COMMITTEE MEETINGS

1. Risk Monitoring Committee shall meet at least 1 (one) time in 1 (one) month;
2. Risk Monitoring Committee Meetings shall only be conducted if attended by at least 51% (fifty one percent) of the total number of members including an Independent Commissioner and Independent Party members;
3. Risk Monitoring Committee meeting shall be led by the Risk Monitoring Committee Chairman or most senior Risk Monitoring Committee Member, if absent;
4. If deemed necessary, Risk Monitoring Committee may invite other parties related to the meeting to attend Risk Monitoring Committee Meetings;
5. Committee meeting decisions shall be made on the basis of consensus;
6. In the absence of consensus, decision-making shall be based on majority votes with the principle of 1 (one) person 1 (one) vote;

7. Risk Monitoring Committee meetings decisions shall be considered valid if approved by more than (one-half) of the Risk Monitoring Committee members present. The principle of votes for members shall be 1 (one) person 1 (one) vote;
8. Committee meetings results shall be recorded in meeting minutes signed by all members of Committee present and documented in accordance with the laws and regulations;
9. Any dissenting opinions that occur in committee meetings shall be clearly detailed in the meeting minutes;
10. Committee Meetings shall be recorded in meeting minutes by the Committee Secretary, or by one Committee member who is an independent party, in the absence of the Committee Secretary;
11. Committee Meeting Minutes shall be submitted in writing by the Risk Monitoring Committee to the Board of Commissioners;
12. Attendance of Committee Members at meetings shall be reported in quarterly reports and annual reports of the Committee.

RISK MONITORING COMMITTEE MEETINGS AGENDA

In 2021, Risk Monitoring Committee (RMC) held 16 (sixteen) meetings, either internal meetings or joint meetings with related divisions with the following agenda:

Risk Monitoring Committee Meetings Agenda

NO.	DATE OF MEETING	MEETING AGENDA	KPR MEMBER	MEETING PARTICIPANTS
1	February 24, 2021	Development of Task Force for Loans at Risk (LAR) and Loan restructuring	<ul style="list-style-type: none"> Pradjoto Joni Swastanto ¹⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Managing Director Risk Management, Corporate Banking, Managing Director MSME Business, LaR Optimaisan Team, Senior Credit Officer (SCO), and related divisions
2	March 22, 2021	Evaluation of the BNI Risk Management function during 2020 and the work plan for the Enterprise Risk Management Division in 2021	<ul style="list-style-type: none"> Pradjoto Joni Swastanto ¹⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Enterprise Risk Management Division
3	March 24, 2021	Updating Development of Deepening the Quality of BUMN Debtor Groups	<ul style="list-style-type: none"> Pradjoto Joni Swastanto ¹⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Managing Director Risk Management, Managing Director Corporate Banking, Managing Director Institutional Relations, and Related Divisions
4	April 5, 2021	Recovery of BNI Written-off Loans	<ul style="list-style-type: none"> Pradjoto Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Audit Committee, Integrated Governance Committee Independent Member, Managing Director Risk Management, SevP Remedial & Recovery and Related Divisions
5	April 7, 2021	Lar BNI control efforts with focus on 50 largest debtors in the corporate and medium segments	<ul style="list-style-type: none"> Pradjoto Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Audit Committee, Integrated Governance Committee Independent Member, Managing Director Risk Management, Managing Director Corporate Banking, BNI LaR Optimization Team, SCO and Related Divisions
6	May 5, 2021	Updating the condition of the debtor development group and the negative impact on BNI	<ul style="list-style-type: none"> Pradjoto Ratih Nurdianti Septian Hario Seto Dwita Suherlina 	KPR, Audit Committee, Managing Director Risk Management, Managing Director Corporate Banking, Managing Director Treasury & International, and Related Divisions and KCLN
7	June 7, 2021	Updating the Development of Efforts to Repair BNI LaR and Updating the Latest Conditions of Debtor Group Loan Facilities	<ul style="list-style-type: none"> Pradjoto Ratih Nurdianti Dwita Suherlina 	KPR, Audit Committee, Managing Director Risk Management, Managing Director Corporate Banking, SCO and Related Divisions

Risk Monitoring Committee Meetings Agenda

NO.	DATE OF MEETING	MEETING AGENDA	KPR MEMBER	MEETING PARTICIPANTS
8	June 23, 2021	Updating the debtor group facilities administration development	<ul style="list-style-type: none"> Pradjoto Ratih Nurdianti Dwita Suherlina 	KPR, Audit Committee, Managing Director Risk Management, Managing Director Corporate Banking, LaR Optimization Team SCO-SCO and Related Divisions
9	August 16, 2021	Internal Discussion on Preparation of Debtor Group Credit Consultation	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	KPR, President Commissioner
10	August 23, 2021	Updating Development of Efforts to Repair BNI LaR	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	KPR, Audit Committee, Managing Director Risk Management, Managing Director MSME Business, SevP Remedial & Recovery, LaR Optimization Team, Senior Credit Officer (SCO), and Related Divisions
11	September 8, 2021	Report on Development of BNI Remedial Debtors & Recovery Handling up to July 2021	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	KPR, Audit Committee, SevP Remedial & Recovery, and Related Divisions
12	November 29, 2021	a. Deepening the risk related to credit risk, market risk, liquidity risk, operational risk, legal risk, risk, compliance, strategic risk, reputation risk, intra group risk and BNI insurance risk b. Evaluating the Risk Management Committee and the Integrated Risk Management Committee duties realization	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	Audit Committee, Managing Director Risk Management, Related Divisions and LaR Optimization Team
13	November 9, 2021	Readiness of BNI HC Policies, Organization for Piloting Plan and Launching Limited Activities for the BNI Xpora Program concerning the OJK Letter	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Ratih Nurdianti Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	Managing Director MSME Business, Managing Director Service and Network, Managing Director IT & Operations, Managing Director Human Capital and Compliance and Related Divisions
14	November 9, 2021	BNI's readiness for the APU PPT program application based on risks related to Business Email Compromise (BEC), specifically the steps for improvement and prevention of potential risks that can occur, concerning the OJK letter.	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Ratih Nurdianti Dwita Suherlina Nurani Raswindriati ³⁾ 	Audit Committee, Managing Director Human Capital and Compliance, Managing Director IT & Operations, and Related Divisions
15	November 29, 2021	Evaluation of the Compliance Director's execution of duties report for the first semester of 2021.	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Septian Hario Seto Dwita Suherlina Nurani Raswindriati ³⁾ 	Audit Committee, Managing Director Human Capital & Compliance, Managing Director IT & Operations, and Related Divisions
16	December 22, 2021	Handling the operational risk load	<ul style="list-style-type: none"> Pradjoto Erwin Rijanto Slamet ²⁾ Ratih Nurdianti Dwita Suherlina Nurani Raswindriati ³⁾ 	Managing Director Risk Management and Related Divisions

Note:¹⁾ Ceased serving as a member of KPR on March 29, 2021²⁾ Served as a KPR member since August 16, 2021³⁾ Served as an Independent KPR member since July 15, 2021

RISK MONITORING COMMITTEE MEETING FREQUENCY AND ATTENDANCE LEVEL

During 2021, the Risk Monitoring Committee held 16 (sixteen) KPR meetings, both internal KPR meetings and meetings with related Directors, divisions or units. The attendance of each KPR member at the KPR Meetings is as shown in the table below:

Risk Monitoring Committee Meeting Attendance Level

NAME	POSITION	NUMBER OF MEETINGS	ATTENDANCE	PERCENTAGE
Pradjoto	Committee Chairman/Vice President Commissioner/Independent Commissioner	16	16	100%
Joni Swastanto ¹⁾	Member/Commissioner	3	3	100%
Ratih Nurdianti	Member/Commissioner	16	13	81.25%
Septian Hario Seto	Member/Independent Commissioner	16	12	75%
Erwin Rijanto Slamet ²⁾	Member/Independent Commissioner	7	7	100%
Dwita Suherlina	Independent Member	16	16	100%
Nurani Raswindriati ³⁾	Independent Member	8	8	100%

Note:

¹⁾ Ceased serving as a member of KPR on March 29, 2021

²⁾ Ceased serving as a member of KPR on August 16, 2021

³⁾ Ceased serving as a independent member of KPR on July 15, 2021

BRIEF REPORT ON THE RISK MONITORING COMMITTEE'S ACTIVITIES

Throughout 2021, the Risk Monitoring Committee implemented all programs/Work Plans set in early 2021 in order to assist the implementation of the Board of Commissioners duties. The mechanism for implementing Risk Monitoring Committee activities/duties was through:

- Holding Risk Monitoring meetings by inviting related Directors, related divisions/units.
- Attending the Board of Commissioners and Board of Commissioners' Meetings with the Board of Directors where the agenda related to KPR duties;
- Reviews/evaluations outside the meeting forum

The Risk Monitoring Committee Meeting and monitoring results, reviews/evaluations are submitted to the Board of Commissioners as reports and recommendations both in writing and in the Board of Commissioners meeting forum. During 2021 KPR has held 16 (sixteen) virtual meetings and made 80 (eighty) reviews/evaluations. The Risk Monitoring Committee's activities included the following:

1. Reviewing and meetings related to BNI Bank Health Level, BNI Risk Profile, Integrated Risk Profile and the duties of the Risk Management Committee and the BNI Integrated Risk Management Committee;
2. Meeting and reviewing related to main issues of Operational Risk, Legal Risk, Compliance Risk, Strategic Risk, Reputational Risk, Credit Risk, Market Risk and Liquidity Risk, Insurance Risk and Intra-Group Risk;
3. Duties related to credit:
 - a. Meetings and reviews related to deepening the credit quality of the debtor group and BNI's large debtors;
 - b. Meetings and reviews related to the Development of Loan at Risk (LaR) Handling and loan restructuring;
 - c. Meetings and reviews related to loan consultations submitted by the Board of Directors to the Board of Commissioners;
 - d. Meeting and Review related to Recovery Discussion on Write-Off Loans;
 - e. Reviewing the Maximum Lending Limit Report.
4. Reviewing the updated Bank BNI Credit Policy proposed by the Board of Directors to the Board of Commissioners;
5. Reviewing the BNI 2021 Recovery Plan Document and the Recovery Plan Recovery Management Progress Report submitted by the Board of Directors to the Board of Commissioners as well as a reviewing the 2020 Recovery Plan Document Update proposed to the Board of Directors for approval;
6. Reviewing Bank BNI's 2020-2022 Business Plan;
7. Meetings and Reviewing Anti-Money Laundering and Prevention of the Financing of Terrorism (APU and PPT) as well as Anti-Fraud Strategies, namely:
 - a. Reviewing Reports on Anti-Money Laundering and Prevention of Terrorism Financing Programs (AML and CFT) and Anti-Fraud Strategies submitted by the Board of Directors;

- b. Reviewing the Application for Approval of Up-dating Policy on Anti-Money Laundering and Prevention of Terrorism Financing (APU and PPT) BNI Financial Institution Pension Fund;
- c. Risk-based APU PPT meeting based on a letter from the Financial Services Authority.
8. Reviewing with the Audit Committee and the Integrated Governance Committee the Application for Approval for the 2021 BNI Tier 1 Capital Strengthening Study;
9. Reviewing the 2019-2023 BNI Corporate Plan Revision;
10. Reviewing the Proposed Transfer of Shares in the Buyback;
11. Reviewing the Evaluation of the Proposed Use of Net Profit and Dividend Payout Ratio;
12. Reviewing the Revision of the Bank's Business Plan (RBB) 2021-2023.

RISK MONITORING COMMITTEE MEMBERS COMPETENCY DEVELOPMENT

Throughout 2021, the Company's Risk Monitoring Committee members participated in competency improvement programs in the form of training, workshops, conferences, seminars, as shown in the following table:

Audit Committee Competency Development

NAME	POSITION	COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	IMPLEMENTATION TIME AND PLACE	TYPE OF TRAINING AND ORGANIZER
Pradjoto	Committee Chairman/Vice President Commissioner/Independent Commissioner	The Risk Monitoring Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Ratih Nurdianti	Member/Commissioner	The Risk Monitoring Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Joni Swastanto ¹⁾	Member/Commissioner		-	
Septian Hario Seto	Member/Independent Commissioner	The Risk Monitoring Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Erwin Rijanto Slamet ²⁾	Member/Independent Commissioner	The Risk Monitoring Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Dwita Suherlina	Independent Member	BNI Sharing Session: Makro Ekonomi-Indonesia Economic Outlook	Webinar, BNI Corporate University	Jakarta, August 27, 2021
Nurani Raswindriati ³⁾	Independent Member	BNI Sharing Session: Makro Ekonomi-Indonesia Economic Outlook	Webinar, BNI Corporate University	Jakarta, August 27, 2021

Note:

¹⁾ Casaeed serving as a member of KPR since March 29, 2021

²⁾ Served as a KPR member since August 16, 2021

³⁾ Served as an Independent KPR member since July 15, 2021

INTEGRATED GOVERNANCE COMMITTEE

The PT Bank Negara Indonesia (Persero) Tbk Integrated Governance Committee was established based on the guidelines and prevailing laws and regulations, in particular with the guidance of POJK No. 18/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates and Minister for SOEs Regulation No. PER-12/MBU/12/2012 dated August 24, 2012 concerning Supporting Organs for the Board of Commissioners/Supervisory Board of SOEs, as amended by Minister for SOEs Regulation No. PER-06/MBU/04/2021 dated April 13, 2021.

BASIS FOR THE ESTABLISHMENT OF THE INTEGRATED GOVERNANCE COMMITTEE

Establishment of the Integrated Government Committee for the Financial Conglomerate in BNI is based on Board of Commissioners Decree No. Kep/006/DK/2015 dated June 22, 2015 concerning the Establishment of the Integrated Governance Committee. The Integrated Governance Committee shall be independent both in the execution of its duties and reporting and directly responsible to the Main Entity's Board of Commissioners.

INTEGRATED GOVERNANCE COMMITTEE CHARTER

The Company has an Integrated Governance Committee Charter that is continuously refined and updated in accordance with developments in applicable legal regulations and current conditions. The latest update/improvement of the BNI Risk Monitoring Committee Charter was carried out in 2020, as stipulated in the Board of Commissioners' Decree No. KEP/049/DK/2020 dated October 22, 2020 concerning the Integrated Governance Committee Charter. The Integrated Governance Committee Charter contains the legal basis; definitions; committee formation and structure; committee member requirements; committee membership; the committee's duties, responsibilities and authorities; appointment, dismissal and term of office of committee members; committee meetings, and reporting.

INTEGRATED GOVERNANCE COMMITTEE MEMBERS' REQUIREMENTS

1. General Requirements
 - a. Have good integrity, character, moral and sufficient work experience related to committee duties;
 - b. Have no personal interests/links that may have a negative impact and/or conflict of interest on the Financial Services Institutions in the BNI Financial Conglomerate.
2. Competency Requirements
 - a. Have adequate educational background, ability, knowledge and experience in banking or other financial services institutions;
 - b. Able to work together, have the ability to communicate properly and effectively, and provide enough time to carry out their duties;
 - c. Have sufficient knowledge and understanding of the principles and processes of Good Corporate Governance in general, as well as laws and regulations in the banking sector and other financial services institutions, especially related to operational activities of banking and other financial services institutions.
3. Independence Requirements
Independent Parties as Members of Integrated Governance Committee:
 - a. Shall be external parties who have no financial relationship, stewardship, share ownership and/or familial relationships with the Board of Commissioners, the Board of Supervisors, the Board of Directors and/or Controlling Shareholders of the Financial Services Institutions in the BNI Financial Conglomerate, or relationships with Financial Services Institutions in BNI's Financial Conglomerate that may affect their ability to act

independently. Financial relationship, stewardship, share ownership and/or familial relationship referred to above shall be in accordance with prevailing rules and regulations;

- b. Has no direct or indirect business relationship relating to the Financial Services Institution in BNI's Financial Conglomerate.

INTEGRATED GOVERNANCE COMMITTEE MEMBERSHIP

1. Members of the Integrated Governance Committee at least must consist of:
 - a. An Independent Commissioner who is the Chairman from one of the committees in the Main Entity, who concurrently serves as a member;
 - b. An independent Commissioner who represents and is appointed by each Financial Services Institution in the BNI Financial Conglomerate, as a member;
 - c. An independent party who serves as member. An independent party may come from an independent party Committee member in the Main Entity;
 - d. Members of the Sharia Supervisory Board of Financial Service Institution that carry out business activities based on Sharia principles in the BNI Financial Conglomerate as members, whose numbers are adjusted to the needs of BNI Financial Conglomerate as well as the efficiency and effectiveness of the Integrated Governance Committee duties.
2. The number and composition of Independent Commissioners as members of the Integrated Governance Committee, referred to in point 1 letter b above, are adjusted to the needs of the BNI Financial Conglomerate as well as the efficiency and effectiveness of the duties of the Integrated Governance Committee taking into account the minimum representation of each financial services sector.
3. The membership of Independent Commissioners in the Integrated Governance Committee, referred to in point 1 letter b above, can be in the form of permanent and non-permanent members, in accordance with the needs of the BNI Financial Conglomerate, where if necessary the Main Entity can add a non-permanent member as an Independent Commissioner who is not yet a member of Integrated Governance Committee.
4. Membership of Independent Commissioners, Independent parties and members of Sharia Supervisory Board, referred to in letter 1 above, in the Integrated Governance Committee in the BNI Financial Conglomerate are not considered as concurrent positions.

INTEGRATED GOVERNANCE COMMITTEE DUTIES, RESPONSIBILITIES AND AUTHORITIES

Integrated Governance Committee's duties and responsibilities include:

1. Evaluating Integrated Governance implementation at least through assessment of adequacy of internal controls, implementation of integrated compliance functions and implementation of Integrated Governance Guidelines.
When conducting the evaluations, Integrated Governance Committee obtains information from evaluations of internal audit and compliance functions in each Financial Services Institute for members of Board of Commissioners of each Financial Services Institution who are members in the Integrated Governance Committee.
2. Providing recommendations to the Main Entity Board of Commissioners regarding the Integrated Governance and improvement evaluations of Integrated Governance Guidelines.
3. Carrying out the duties of the Main Entity's Board of Commissioners to review and evaluate material related to the duties of the Integrated Governance Committee and/or other duties as determined by the Main Entity's Board of Commissioners.
4. Evaluating the suitability of the Integrated Governance Policy against the implementation of these policies and provide recommendations to the Board of Commissioners of the Main Entity for the Integrated Governance policies and their implementation to ensure that Integrated Governance management has been carried out adequately.
5. Prior to the current fiscal year, the Integrated Governance Committee must prepare and submit an Annual Work Plan and Budget to the Main Entity's Board of Commissioners for approval, a copy is submitted by the Main Entity's Board of Commissioners to the Main Entity's Board of Directors for information purposes. The implementation of the Integrated Governance Committee's Annual Work Plan and Budget is reported to the Main Entity's Board of Commissioners.
6. Members of the Integrated Governance Committee are required to 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 can only used for the benefit of carrying out their duties.

In carrying out its duties to assist the Main Entity's Board of Commissioners, the Integrated Governance Committee has the following powers:

1. Integrated Governance Committee may request an explanation or the necessary information about employees, funds, assets, and other resources related to the performance of its duties to the Institute of Financial Services in the BNI Financial Conglomerate, with due regard to the prevailing regulations. The Committee shall report in writing the result of the assignment to the Board of Commissioners.
2. Members of Integrated Governance Committee shall be authorized to communicate directly with the parties related to the Integrated Governance Committee duties.
3. To carry out its duties, the Integrated Governance Committee can cooperate or coordinate with other Committees under the Board of Commissioners, as well as relevant divisions/units/work units in the Main Entity or others in the Institute of Financial Services in the BNI Financial Conglomerate.

APPOINTMENT, DISMISSAL, AND TERM OF OFFICE OF INTEGRATED GOVERNANCE COMMITTEE MEMBERS

1. The Integrated Governance Committee Chairman and members shall be appointed and dismissed by the Main Entity Board of Commissioners.
2. Members of the Integrated Governance Committee can be members of the Main Entity Board of Commissioners or Board of Commissioners and Supervisory Board of the Financial Services Institutions:
 - a. term of office shall be equal to the period of appointment as member of Board of Commissioners or Supervisory Board stipulated by the GMS.
 - b. ceases by itself if the term of office as member of Board of Commissioners or Supervisory Board ends.
3. The term of office for independent party members of the Integrated Governance Committee is for a maximum of 3 (three) years and can be extended once for another 2 (two) years so that the total term of office for independent party members of the Integrated Governance Committee is for a maximum of 5 (five) years without prejudice to the right of the Board of Commissioners of the Main Entity to dismiss the member of the committee concerned at any time.
4. The Main Entity Board of Commissioners may dismiss any member of the Integrated Governance Committee if they are deemed to have not performed their duties as members of the committee as set forth in the Appointment Decree of the committee member concerned.

5. In the event a member of Main Entity Board of Commissioners who concurrently serves as Chairman of the Integrated Corporate Governance Committee resigns as a member of Main Entity Board of Commissioners, the Committee Chairman shall be replaced by another Independent member of the Main Entity Board of Commissioners who is one of the Main Entity's Committee Chairman within 30 (thirty) days at the latest.
6. Dismissal and appointment of Committee members shall be reported to the GMS.

INTEGRATED GOVERNANCE COMMITTEE STRUCTURE, MEMBERSHIP, AND EXPERTISE

In 2021, the structure and membership of the Integrated Governance Committee changed several times as explained in the tables below:

Integrated Governance Committee Structure, Membership and Expertise as per December 31, 2021

NAME	POSITION	PERIOD	DESCRIPTION	EXPERTISE
Agus Dermawan Wintarto Martowardojo	Chairman	January 1-December 31, 2021	President Commissioner/ Independent-PT Bank Negara Indonesia (Persero) Tbk	Economics, Finance, Banking
Askolani	Member	January 1-December 31, 2021	Commissioner-PT Bank Negara Indonesia (Persero) Tbk	Economics, Finance
Susyanto	Member	January 1-December 31, 2021	Commissioner-PT Bank Negara Indonesia (Persero) Tbk	Law
Parikesit Suprpto	Anggota	1 Januari- 31 Desember 2021	PT BNI Life Insurance President Commissioner/Independent	Economic Development
Utang Ranuwijaya	Member	January 1-December 31, 2021	Independent Sharia Supervisory Board - PT BNI Life Insurance	Sharia Economics
Rosa De Lima Dwi Mutuari	Member	January 1-December 31, 2021	President Commissioner/ Independent-PT BNI Multifinance	Banking (Credit)
Eddy Siswanto	Member	January 1-December 31, 2021	Independent Commissioner-PT BNI Asset Management	Finance, tax and accounting, capital market, pension fund
Boyke Wibowo Mukiyat	Member	January 1-December 31, 2021	President Commissioner/ Independent-PT BNI Sekuritas	Banking
Bambang Setyogroho ¹⁾	Independent Member	January 18-December 31, 2021	Independent Party	Banking (Loans)
Indrayeti ²⁾	Independent Member	January 18-December 31, 2021	Independent Party	Finance, Banking

Note:

¹⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

²⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

Integrated Governance Committee Structure, Membership, and Expertise (Membership Term Expired in 2021)

NAME	POSITION	PERIOD	DESCRIPTION	EXPERTISE
Max R. Niode ¹⁾	Member	January 1-February, 2021	Independent Commissioner of PT Bank BNI Syariah	Law
Hasanuddin ²⁾	Member	January 1-February, 2021	Sharia Supervisory Board of PT Bank BNI Syariah	Sharia Economic Law

Note:

¹⁾ Casaed serving as a member of the Integrated Governance Committee since February 1, 2021

²⁾ Casaed serving as a member of the Integrated Governance Committee since February 1, 2021

INTEGRATED GOVERNANCE COMMITTEE PROFILES

AGUS DERMAWAN WINTARTO MARTOWARDOJO INTEGRATED GOVERNANCE COMMITTEE CHAIRMAN

Profile can be found in the Board of Commissioners Profiles

ASKOLANI INTEGRATED GOVERNANCE COMMITTEE MEMBER

Profile can be found in the Board of Commissioners Profiles

SUSYANTO**INTEGRATED GOVERNANCE COMMITTEE MEMBER**

Profile can be found in the Board of Commissioners Profiles

PARIKESIT SUPRAPTO**INTEGRATED GOVERNANCE COMMITTEE MEMBER**

(PRESIDENT COMMISSIONER/INDEPENDENT OF PT BNI LIFE INSURANCE)

Born in 1951. Obtained a Bachelor's degree in Corporate Economics from Sekolah Tinggi Manajemen Industri (1980), Master (economic development) from Indiana University/USA (1990), Doctorate (economic development) from University of Notre Dame/USA (1995).

Has been a member of the Integrated Governance Committee since December 2018. Previously served as Commissioner of PT Indocement Tunggul Perkasa Tbk (2001-2006), Commissioner of PT Bank Negara Indonesia (Persero) Tbk (2008-2010), President Commissioner of PT Pusri (Persero) (2008-2012), Commissioner of PT Indosat (Persero) Tbk (2011), Commissioner of PT Telkom (Persero) Tbk (2012-2014), Commissioner of PT KPEI (2013-2016), Independent Commissioner of PT Bank Bukopin Tbk (2013-2018), Director of Analysis Information at Financial Services Business Ministry of State-Owned Enterprises/State-Owned Enterprises President Commissioner of PT BNI Life Insurance (2018-present), Investment and Development Agency (2000-2001), Director of Restructuring and Privatization, Directorate General of SOE Development, Ministry of Finance (2001-2002), Assistant Deputy for Restructuring and Privatization of Financial Services Business, Construction and others (2002-2005), Expert Staff to the Minister of State-Owned Enterprises for Small Business Partnerships (2005-2008), Deputy for Banking and Financial Services at the Ministry of State-Owned Enterprises (2008-2010), Deputy for Services Business at the Ministry of State-Owned Enterprises (2010-2012).

UTANG RANUWIJAYA**INTEGRATED GOVERNANCE COMMITTEE MEMBER**

(MEMBER OF THE SHARIA SUPERVISORY BOARD AT PT BNI LIFE INSURANCE)

Born in 1958. Obtained a Bachelor's degree from the Syarifah Faculty of IAIN "SGD" Bandung (1984), a Bachelor's degree (S2) from IAIN "Syahid" Jakarta (1992) and a Bachelor's degree (S3) IAIN "Syahid" Jakarta (1998).

Has been a member of the BNI Integrated Governance Committee since January 2017. Previously served as Dean of the Faculty of Sharia and Islamic Economics IAIN "SMH" Banten (2011-2015), Postgraduate Director of IAIN SMH Banten (2015-2017).

ROSA DE LIMA DWI MUTIARI**INTEGRATED GOVERNANCE COMMITTEE MEMBER**

(PRESIDENT COMMISSIONER/INDEPENDENT OF PT BNI MULTIFINANCE)

Born in 1956. Obtained a Bachelor's degree (S1) in Corporate Economics from v(1980) and a Bachelor's degree (S2) from Sekolah Ilmu Ekonomi IPWI (1995).

Has been a Member of BNI's Integrated Governance Committee since October 2016. Previously held various positions from 2004 with the last position as Head of the BUMN and Government Institutions Division at PT Bank Negara Indonesia (Persero) Tbk. (2012-2014), Indonesian Professional Certification Authority, Competency Assessor at the Banking Professional Certification Institute (LSPP) (2012-present), Lecturer and Credit Consultant at BNI Corporate University PT Bank Negara Indonesia (Persero) Tbk. (2014-present).

EDDY SISWANTO**INTEGRATED GOVERNANCE COMMITTEE MEMBER**

(INDEPENDENT COMMISSIONER OF PT BNI ASSET MANAGEMENT)

Born in 1956. Graduated as a Bachelor of Accounting at v-Medan (1982) and obtained a Master's degree in Finance and Banking at Universitas Gadjah Mada-Yogyakarta (1993). Has tax brevet A, B, and C as well as WMI Capital Market certification and has obtained WPPE and WPEE.

Has been a Member of of the Integrated Governance Committee since September 2017. Previously served in the BNI Group since 1982. In 2001-2010 he served as Accountant in the Finance Division of PT BNI Sekuritas (2001-2004), Investment Director at BNI Pension Fund (2004-2006), Head of Budgeting & Financial Control Division at PT Bank Negara Indonesia (Persero), Tbk (2006-2009), President Director at PT BNI Sekuritas (2009-2010), and President Director at PT Tri Handayani Utama (a subsidiary of BNI Pension Fund) (2011-December 2018).

BOYKE WIBOWO MUKIYAT
INTEGRATED GOVERNANCE COMMITTEE MEMBER
 (PRESIDENT COMMISSIONER/INDEPENDENT COMMISSIONER OF PT BNI SEKURITAS)

Born in 1958. Holds a bachelor's degree in management from Universitas Indonesia in 1993.

Has been a Member of the Integrated Governance Committee since November 17, 2020. Previously held various strategic positions, including President Commissioner/Independent Commissioner of PT BNI Sekuritas (2020-present), Independent Commissioner of PT Indika Energy Tbk. (2016-2020), President Commissioner of PT. Rukun Raharja Tbk. (2014-2019), President Director of PT Truba Jaya Engineering (2014-2018), President Commissioner of PT Jakarta Propertindo (2015-2016), Commissioner of PT Pertamina EP Cepu (2014-2015), President Director of PT Perusahaan Pengelola Asset (2008-2013), President Director of PT Bahana Pembinaan Usaha Indonesia (2006-2008), President Commissioner of PT Bahana TCW Investment Management (2003-2009), Commissioner of PT Bahana Artha Ventura (2003-2009), Director of PT Bahana Pembinaan Usaha Indonesia (2001-2006), President Commissioner of PT. Bahana Securities (2001-2003), President Director of PT Niaga Asset Management (1999-2001), Investment Director of PT Niaga Asset Management (1997-2001).

BAMBANG SETYOGROHO
INTEGRATED GOVERNANCE COMMITTEE INDEPENDENT MEMBER

Born in 1958. Obtained a Bachelor's degree in Geological Engineering, Universitas Padjadjaran (1985), and a Master's degree in Business Administration, Universitas Indonesia (2001).

Has been an Integrated Governance Committee member of PT Bank Negara Indonesia (Persero), Tbk. Financial Conglomerate since January 18, 2021. Previously served as Independent Commissioner and Audit Committee Chairman at PT Sarana Multi Infrastruktur (Persero) (2014-2017), experienced in banking since 1990 at PT Bank Mandiri (Persero) Tbk., and PT Bank Dagang Negara (Persero) holding various positions including EVP Corporate Banking, SVP Commercial Risk, SVP Central Operations Group, VP Corporate Credit Risk Management Group and RM Corporate & Commercial Credit.

INDRAYETI
INTEGRATED GOVERNANCE COMMITTEE INDEPENDENT MEMBER

Born in 1972. Obtained a Bachelor's degree in economics and accounting from Universitas Trisakti (1995) and a Master's degree in commerce from the University of New South Wales, Australia (2000).

Has been an Integrated Governance Committee member of PT Bank Negara Indonesia (Persero), Tbk. Financial Conglomerate since January 18, 2021. Previously served as Financial Services Adviser (2020-present), Risk Management Monitoring Committee and Integrated Governance Committee at PT Bank BRI (Persero) Tbk. (2014-2019).

Integrated Governance Committee Profile (Membership Term Expired in 2021)

MAX R. NIODE
INTEGRATED GOVERNANCE COMMITTEE MEMBER
 (INDEPENDENT COMMISSIONER OF PT BANK BNI SYARIAH)
 (PERIOD JANUARY 1-FEBRUARY 1, 2021)

Born in 1957. Obtained a law degree from Universitas Hasanuddin Makassar (1983) and a Masters degree in Law from Universitas Indonesia, Jakarta (1999).

Has been a member of the Integrated Governance Committee since June 2019. Previously served as Commissioner of PT Asuransi Tri Pakarta (2014-2015), Head of BNI's Internal Audit Unit (2011-2014), Head of Bank BNI Legal Division (2004-2011), President Commissioner of PT Swadharma Surya Finance (2003-2006), and Commissioner of PT Swadharma Surya Finance (2000-2003).

HASANUDDIN
INTEGRATED GOVERNANCE COMMITTEE MEMBER
 INDEPENDENT COMMISSIONERS OF PT BANK BNI SYARIAH
 (PERIOD JANUARY 1-FEBRUARY 1, 2021)

Born in 1961. Obtained a Bachelor's degree from the Sharia Faculty Tribhakti Islamic University, Kediri in 1985, Bachelor of Universitas Islam Tribhakti (IAIN- now UIN) Syarif Hidayatullah, Jakarta in 1998, and completed a Doctoral program in 2008 in the study of Sharia Studies from the same university.

Has been a member of the BNI Integrated Governance Committee since January 2017. Served as a member of the LPPOM-MUI Expert Team in 2006, and currently serves as Deputy Chair of the MUI National Sharia Board (BPH-DSN) Daily Executive Board. Active in academic activities and has served as Dean of the Sharia IIQ Faculty, Jakarta in 1993-1997 and 1999-2002 and has been a lecturer in Islamic Law at UIN and IIQ until now.

INTEGRATED GOVERNANCE COMMITTEE EDUCATION, QUALIFICATIONS AND WORK EXPERIENCE

The Integrated Governance Committee chairman and members educational qualifications and work experience at the end of 2021 is as follows:

Integrated Governance Committee Education and Work Experience as Per December 31, 2021

NAME	POSITION	PERIOD	EDUCATION	WORK EXPERIENCE
Agus Dermawan Wintarto Martowardojo	Chairman	January 1-December 31, 2021	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
Askolani	Member	January 1-December 31, 2021	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
Susyanto	Member	1 Januari- 31 Desember 2021	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
Parikesit Suprpto	Member	1 Januari- 31 Desember 2021	<ul style="list-style-type: none"> Bachelor's degree in Economics Master's Degree in Economic Development Doctoral in Economic Development 	<ul style="list-style-type: none"> Commissioner of PT Indocement Tunggal Perkasa Tbk Commissioner of PT Bank Negara Indonesia (Persero) Tbk President Commissioner of PT Pusri (Persero) Commissioner of PT Indosat (Persero) Tbk Commissioner of PT Telkom (Persero) Tbk Commissioner of PT KPEI Independent Commissioner of PT Bank Bukopin Tbk Director of Information Analysis of Financial Services Business Ministry of State-Owned Enterprises/State-Owned Enterprises Investment and Development Agency Director of Restructuring and Privatization, Directorate General of SOE Development, Ministry of Finance Assistant Deputy for Restructuring and Privatization of Financial Services, Construction and others Expert Staff to the Minister of State-Owned Enterprises for Small Business Partnerships Deputy for Banking and Financial Services at the Ministry of State-Owned Enterprises Deputy for Service Business at the Ministry of State-Owned Enterprises
Utang Ranuwijaya	Member	January 1-December 31, 2020	<ul style="list-style-type: none"> Bachelor's Degree in Religious Courts Master's Degree in Islamic Studies PhD in Islamic Studies 	<ul style="list-style-type: none"> Director of Postgraduate IAIN SMH Banten Dean of the Faculty of Sharia and Islamic Economics IAIN "SMH" Banten Head of Central MUI 2020-2025 Plenary Management of the National Sharia Council 2020-2025

Integrated Governance Committee Education and Work Experience as Per December 31, 2021

NAME	POSITION	PERIOD	EDUCATION	WORK EXPERIENCE
Rosa De Lima Dwi Mutiari	Member	January 1-December 31, 2021	<ul style="list-style-type: none"> Bachelor's degree in Corporate Economics Master's degree in Economics 	<ul style="list-style-type: none"> Head of BUMN and Institution Division Government at PT Bank Negara Indonesia (Persero) Tbk. Head of Corporate Division 1 at PT Bank Negara Indonesia (Persero) Tbk National Agency for Professional Certification (Indonesian Professional Certification authority) Competency Assessors in Institutions Banking Professional Certification (LSPP) Lecturers and Consultants Credit at BNI Corporate University PT Bank Negara Indonesia (Persero) Tbk.
Eddy Siswanto	Member	January 1-December 31, 2021	<ul style="list-style-type: none"> Bachelor's degree in Accounting Master's degree in Finance and Banking 	<ul style="list-style-type: none"> President Director of PT Tri Handayani Utama (Subsidiary of BNI Pension Fund) President Director of PT BNI Sekuritas Head of the Budgeting & Financial Control Division of PT BNI (Persero) Tbk Director of Investment at BNI Pension Fund Accountant in the Finance Division of PT BNI Sekuritas
Boyke Wibowo Mukiyat	Member	January 1-December 31, 2021	Bachelor's degree in Management	<ul style="list-style-type: none"> President Commissioner of PT Krakatau Industrial Estate Cilegon President Commissioner/Independent Commissioner PT BNI Sekuritas Independent Commissioner of PT Indika Energy Tbk. President Commissioner of PT Rukun Raharja Tbk. President Director of PT Truba Jaya Engineering President Commissioner of PT Jakarta Propertyindo Commissioner of PT Pertamina EP Cepu President Director PT Asset Management Company President Director of PT Bahana Pembinaan Indonesian Business President Commissioner of PT Bahana TCW Investment Management Commissioner of PT Bahana Artha Ventura Director of PT Bahana Pembinaan Usaha Indonesia President Commissioner of PT Bahana Securities President Director of PT Niaga Asset Management Investment Director of PT Niaga Asset Management

Integrated Governance Committee Education and Work Experience as Per December 31, 2021

NAME	POSITION	PERIOD	EDUCATION	WORK EXPERIENCE
Bambang Setyogroho ¹⁾	Independent Member	January 18-December 31, 2021	<ul style="list-style-type: none"> Bachelor's degree in Geological Technology Master's degree in Business Administration 	<ul style="list-style-type: none"> Independent Commissioner & Committee Chairman-PT Sarana Multi Infrastruktur (Persero) (2014-2017) EVP Corporate Banking, SVP Commercial Risk, SVP Central Operations Group, VP Corporate Credit Risk Management Group PT Bank Dagang Negara (Persero) and PT Bank Mandiri (Persero)
Indrayeti ²⁾	Independent Member	January 18-December 31, 2021	<ul style="list-style-type: none"> Bachelor's degree in Accounting Master's degree in Commerce 	<ul style="list-style-type: none"> Financial Services Advisor (2020-now) Risk Management Monitoring Committee and Integrated Governance Committee-PT Bank BRI (Persero), Tbk (2014-2019)

Note:¹⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021²⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021**Integrated Governance Committee Educational and Work Experience (Membership Term Expired in 2021)**

NAME	POSITION	PERIOD	EDUCATION	WORK EXPERIENCE
Max R. Niode ¹⁾	Member	January 1- February 1, 2021	<ul style="list-style-type: none"> Bachelor's degree in Law (Civil) Master's Degree in Law (Legal Science) 	<ul style="list-style-type: none"> Advisor Law Firm Rahmad Irwan and Partners Commissioner-PT Asuransi Tri Pakarta Head of Internal Audit Unit-BNI Member of the BNI Pension Fund Supervisory Board Legal Division Head-BNI Middle Credit Center Head Bandung-Bank BNI President Commissioner-PT Swadharma Surya Finance Commissioner-PT Swadharma Surya Finance

Integrated Governance Committee Educational and Work Experience (Membership Term Expired in 2021)

NAME	POSITION	PERIOD	EDUCATION	WORK EXPERIENCE
Hasanuddin ²⁾	Member	January 1-February 1, 2021	<ul style="list-style-type: none"> Bachelor's degree in Sharia Faculty from Tribhakti Islamic University Bachelor's degree Sharia Faculty, Other State Islamic Institutes (now UIN) Master's degree in Islamic Studies (Sharia Concentration) from UIN Syarif Hidayatullah PhD in Islamic Studies (Sharia Concentration) from UIN Syarif Hidayatullah. 	<ul style="list-style-type: none"> Chairman of the Sharia Supervisory Board-PT Bank BNI Syariah, PT Toyota Astra Finance Services (Sharia Business Unit, PT Trimegah Asset Management (Sharia Mutual Funds), PT Sarana Multigriya Finansial (Persero) (Sharia Business Unit) Member of the Sharia Supervisory Board-the Sharia Business Unit of Bank Danamon Deputy Chairperson-Badan Pelaksana Harian Dewan Syariah Nasional. Lecturer in Islamic Law at UIN and liq Dean of the Faculty of Sharia-LIQ, Jakarta Member of LPPOM Expert Team-MUI Member of Sharia Accounting Committee (KAS)-LAI Members of the OJK Kpjks Working Team Member of the Indonesian Stock Exchange (IDX) Sharia Capital Market Development Team Deputy Chairperson-Komisi Fatwa MUI

Note:

¹⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

²⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

INTEGRATED GOVERNANCE COMMITTEE INDEPENDENCE

Members of the Integrated Governance Committee display a fair and balanced assessment of all relevant conditions and are not influenced by personal interests or other parties in expressing their opinions.

Integrated Governance Committee Independence per December 31, 2021

INDEPENDENCE ASPECT	AGUS DERMAWAN WINTARTO MARTOWARDOJO	ASKOLANI	SUSYANTO	PAKESIT SUPRPTO	UTANG RANUWIJAYA	ROSA DE LIMA DWI MUTIARI	EDDY SISWANTO	BOYKE WIBOWO MUKIYAT	BAMBANG SETYOGROHO ¹⁾	INDRAYETI ²⁾
No financial relationship with the Board of Commissioners and the Board of Directors	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
No management relationship in the Company, subsidiaries or affiliated companies	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
No shareownership in the company	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Integrated Governance Committee Independence per December 31, 2021

INDEPENDENCE ASPECT	AGUS DERMAWAN WINTARTO MARTOWARDOJO	ASKOLANI	SUSYANTO	PAKESIT SUPRAPTO	UTANG RANUWIJAYA	ROSA DE LIMA DWI MUTIARI	EDDY SISWANTO	BOYKE WIBOWO MUKIYAT	BAMBANG SETYOGROHO ¹⁾	INDRAYETI ²⁾
No familial relationship with the Board of Commissioners, the Board of Directors and/or other members of Integrated Governance Committee	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Not serving on boards of political parties, government officials	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Note:

¹⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

²⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

Integrated Governance Committee Independence (Membership Period ended in 2021)

INDEPENDENCE ASPECT	MAX R. NIODE ¹⁾	HASANUDDIN ²⁾
No financial relationship with the Board of Commissioners and the Board of Directors	✓	✓
No management relationship in the Company, subsidiaries or affiliated companies	✓	✓
No shareownership in the company	✓	✓
No familial relationship with the Board of Commissioners, the Board of Directors and/or other members of Integrated Governance Committee	✓	✓
Not serving on boards of political parties, government officials	✓	✓

Note:

¹⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

²⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

INTEGRATED GOVERNANCE COMMITTEE MEETINGS

1. Integrated Governance Committee shall meet at least 1 (one) time in 1 (one) semester;
2. Integrated Governance Committee Meetings shall only be conducted if attended by at least 51% (fifty one percent) of the total number of members;
3. Integrated Governance Committee meeting shall be led by the Integrated Governance Committee Chairman or most senior Integrated Governance Committee Member, if absent;
4. If deemed necessary, the Integrated Governance Committee may invite other parties related to the meeting to attend Risk Monitoring Committee Meeting;
5. The committee meeting must be attended by Independent Commissioners from the Financial Services Institutions in the BNI Financial Conglomerate who are members of the Integrated Governance Committee. In the event that the independent

Commissioner concerned is unable to attend the Integrated Governance Committee meeting, other Commissioners who are not members of the Integrated Governance Committee or officials at the relevant Financial Services Institution may be asked to attend the Integrated Governance Committee meeting by filling in the meeting, but not will not be counted in the attendance quorum and voting to reach a decision at the meeting;

6. Committee meetings decisions shall be made on the basis of consensus;
7. In the absence of consensus, decision-making shall be based on majority votes. Integrated Governance Committee meetings decisions shall be considered valid if approved by more than 1/2 (one-half) of Integrated Governance Committee members present. The principle of votes for members shall be 1 (one) person 1 (one) vote;

8. Committee meetings results shall be recorded in minutes of meeting signed by all members of Committee present and documented in accordance with the laws and regulations;
9. The results of the Committee's meeting shall be stated in the minutes of the meeting signed by all Committee members present and properly documented;
10. Any dissenting opinions that occur in committee meetings shall be clearly detailed in the minutes of meeting along with reasons for dissent;
11. Attendance of Committee Members at meetings shall be reported in the quarterly reports and annual reports of the Committee.

INTEGRATED GOVERNANCE COMMITTEE MEETINGS IMPLEMENTATION

Throughout 2021 the Integrated Governance Committee has held 6 (six) meetings with the agenda and meeting participants as follows:

Integrated Governance Committee Meetings Agenda

NO.	DATE OF MEETING	MEETING AGENDA	MEETING PARTICIPANTS
1.	January 20, 2021	<ul style="list-style-type: none"> Subsidiaries Financial Performance as of December 2020. Subsidiaries Business Strategy Plan for 2021. 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Parikesit Suprpto Max R. Niode Rosa De Lima Dwi Mutiari Eddy Siswanto Boyke Wibowo Mukiyat Bambang Setyogroho Indrayeti
2.	March 23, 2021	<ul style="list-style-type: none"> Compliance Culture Self-Assessment Results by each Subsidiary BNI Financial Conglomerate Anti-Fraud Strategy effectiveness evaluation Implementation of Action Plan for Root Cause Improvement in Integrated Risk Management, including Improvements in the Integrated Risk Management Information System 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Susyanto Parikesit Suprpto Utang Ranuwijaya Rosa De Lima Dwi Mutiari Eddy Siswanto Boyke Wibowo Mukiyat Bambang Setyogroho Indrayeti
3.	May 25, 2021	<ul style="list-style-type: none"> Improving the quality and number of auditors in subsidiary Integrated internal control system effectiveness evaluation Subsidiaries internal audit results and follow-up 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Susyanto Parikesit Suprpto Rosa De Lima Dwi Mutiari Eddy Siswanto Boyke Wibowo Mukiyat Bambang Setyogroho Indrayeti
4.	August 18, 2021	<ul style="list-style-type: none"> Integrated compliance function Semester I/2021 implementation evaluation Integrated governance, structure, process and Semester results I/2021 evaluation 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Susyanto Parikesit Suprpto Utang Ranuwijaya Rosa De Lima Dwi Mutiari Eddy Siswanto Boyke Wibowo Mukiyat Bambang Setyogroho Indrayeti

Integrated Governance Committee Meetings Agenda

NO.	DATE OF MEETING	MEETING AGENDA	MEETING PARTICIPANTS
5.	October 27, 2021	<ul style="list-style-type: none"> Integrated Governance Guidelines review Independent Party Members Presentation: Integrated Governance Committee Work Plan 2022 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Susyanto Parikesit Suprpto Utang Ranuwijaya Rosa De Lima Dwi Mutiari Eddy Siswanto Boyke Wibowo Mukiyat Bambang Setyogroho Indrayeti
6.	December 22, 2021	<ul style="list-style-type: none"> Subsidiaries internal control and compliance function adequacy evaluation. Bancassurance and Mutual Funds issued by BNI Life Insurance (Subsidiary) evaluation 	<ul style="list-style-type: none"> Agus Dermawan Wintarto Martowardojo Askolani Susyanto Parikesit Suprpto Rosa De Lima Dwi Mutiari Eddy Siswanto Bambang Setyogroho Indrayeti

INTEGRATED GOVERNANCE COMMITTEE MEETINGS FREQUENCY AND ATTENDANCE

In 2021 the Integrated Governance Committee held 6 (six) meetings with the following attendance levels:

Integrated Governance Committee Meeting Attendance as per December 31, 2021

NAME	POSITION	PERIOD	TOTAL MEETINGS	NUMBER OF MEETINGS	PERCENTAGE
Agus Dermawan Wintarto Martowardojo	Chairman	January 1-December 31, 2021	6	6	100%
Askolani	Member	January 1-December 31, 2021	6	6	100%
Susyanto	Member	January 1-December 31, 2021	6	5	83%
Parikesit Suprpto	Member	January 1-December 31, 2021	6	6	100%
Utang Ranuwijaya	Member	January 1-December 31, 2021	6	3	50%
Rosa De Lima Dwi Mutiari	Member	January 1-December 31, 2021	6	6	100%
Eddy Siswanto	Member	January 1-December 31, 2021	6	6	100%
Boyke Wibowo Mukiyat	Member	January 1-December 31, 2021	6	5	83%
Bambang Setyogroho ¹⁾	Independent Member	January 18-December 31, 2021	6	6	100%
Indrayeti ²⁾	Independent Member	January 18-December 31, 2021	6	6	100%

Note:

¹⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

²⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

Integrated Governance Committee Meeting Attendance (Membership Term Has Ended in 2021)

NAME	POSITION	PERIOD	TOTAL MEETINGS	NUMBER OF MEETINGS	PERCENTAGE
Max R. Niode ¹⁾	Member	January 1- February 1 2021	1	1	100%
Hasanuddin ²⁾	Member	January 1- February 1 2021	1	0	0%

Note:

¹⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

²⁾ Ceased serving as a member of the Integrated Governance Committee since February 1, 2021

BRIEF REPORT ON THE INTEGRATED GOVERNANCE COMMITTEE'S ACTIVITIES IN 2021

In carrying out its duties and responsibilities in 2021, the Integrated Governance Committee has carried out activities and provided suggestions/recommendations on the following activities:

1. Reviewing and discussing the subsidiaries performance and strategy for developing subsidiaries in line with the PT Bank Negara Indonesia (Persero) Tbk vision to become a financial institution that excels in service and performance so that the subsidiaries corporate plan is integrated with the parent company's corporate plan;
2. Encouraging and providing suggestions to improve subsidiaries synergy as part of the BNI Group, including synergies in financing cooperation, sharing know your customer information, exploring prospective new products and optimizing business opportunities from PT Bank Negara Indonesia (Persero) Tbk as the holding company;
3. Evaluating and providing recommendations to the Board of Commissioners on Integrated Governance including evaluating the adequacy of integrated internal control; evaluation of the integrated compliance function; implementation of integrated risk management; implementation of Integrated Governance Guidelines, and achievement of subsidiaries performance;
4. Evaluating and providing advice on the Anti-Fraud Strategy and Anti-Money Laundering and Prevention of the Financing of Terrorism (APU-PPT) in all members of the BNI Financial Conglomerate;
5. Reviewing and recommending updates to the Integrated Governance Policy, Integrated Risk Management Policy and Integrated Capital Management;
6. Evaluating and providing advice on the adequacy of the integrated internal control methodology and issues based on the audit results of the Main Entity and its subsidiaries;
7. Evaluating and providing advice on the preparation of the integrated risk profile, integrated risk appetite, and limits for all integrated exposures;
8. Encouraging acceleration and providing advice so that BNI Incorporated runs well and has an impact on the profitability of each subsidiary accompanied by adequate risk management and internal control, fulfillment of quality human capital, and good governance;
9. Discussing and recommending resolution of governance problems that occur in subsidiaries and improvement to the integrated compliance function;
10. Reviewing and ensuring the Integrated Governance Report to the Financial Services Authority has identified the strengths and weaknesses of the integrated governance and ensuring that an action plan/improvement measures have been made for existing weaknesses;
11. Preparing an Evaluation report on Integrated Governance together with recommendations for improvements for the Board of Commissioners;
12. Conducting monthly reviews and monitoring of the subsidiaries financial performance in order to achieve business targets as one of the results of integrated governance;
13. Reviewing and providing advice on the 2021 BNI RBB and 2022 RBB revision for approval by the Board of Commissioners;
14. Upgrading joint commitment by all subsidiary Commissioners and Members of the Integrated Governance Committee that carrying out supervision must be based on the context of risks to the main entity;
15. Monitoring and ensure that the OJK findings and internal audits of the Main Entity and its subsidiaries findings have been followed up and providing suggestions for improvements related to human capital, database requirements, completeness of regulations including those related to conflicts of interest in subsidiaries;
16. Ensuring that subsidiaries anticipate any changes in external conditions, including fluctuations in the rupiah exchange rate, and the digital era that is currently trending and developing in society;
17. Reviewing the effectiveness and providing recommendations to the Board of Commissioners on integrated internal control and audit results in subsidiaries;
18. Reviewing and updating the Integrated Governance Committee Charter in line with the progress in the Integrated Governance Committee duties;
19. Reporting on the Integrated Governance Committee's duties every quarter to the Board of Commissioners;
20. Developing the Integrated Governance Committee work program for 2022 with a focus on: improving the quality of the integrated compliance function, improving the quality of integrated internal control, improving the quality of integrated risk management, monitoring the effectiveness of integrated governance results.

INTEGRATED GOVERNANCE COMMITTEE COMPETENCY DEVELOPMENT

During 2021, members of the Company's Integrated Governance Committee participated in competency improvement programs in the form of training, workshops, conferences, seminars, as shown in the following table:

Integrated Governance Committee Competency Development per December 31, 2021

NAME	POSITION	PERIOD	COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	IMPLEMENTATION TIME AND PLACE	TYPE OF TRAINING AND ORGANIZER
Agus Dermawan Wintarto Martowardojo	Chairman	January 1-December 31, 2021	The Integrated Governance Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Askolani	Member	January 1-December 31, 2021	The Integrated Governance Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Susyanto	Member	January 1-December 31, 2021	The Integrated Governance Committee Competency Development can be seen in the competency development section of the Board of Commissioners Company Profile Chapter in this Annual Report		
Parikesit Suprpto	Member	January 1-December 31, 2021	1. Claim Risk Management: Identifying and Preventing Insurance Company Losses due to Crime and Insurance Mafia, as well as Minimizing Losses due to Improper Claims	January 28, 2021	ITIKAD AKADEMI
			2. Anticipating Megashift Risk on the Insurance Industry Market in Indonesia	February 25, 2021	ITIKAD AKADEMI
			3. Expatriates/ Executives Development Program Webinar Series	March 12, 2021	ISEA
			4. Member Gathering & International Webinar "Amplifying Business Resilience with Digital Technology: Exploit the Opportunity & Manage the Risk"	March 31, 2021	IRMAPA
			5. Machine Learning With Supercomputer: Case Of Financial Service	April 7, 2021	AAMAI

Integrated Governance Committee Competency Development per December 31, 2021

NAME	POSITION	PERIOD	COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	IMPLEMENTATION TIME AND PLACE	TYPE OF TRAINING AND ORGANIZER
Utang Ranuwijaya	Member	January 1-December 31, 2021	6. Virtual Hands-On Workshop on Big Data Analytics in Financial Services Using DGX	April 7, 2021	AAMAI
			7. Indonesia Insurance 2022: Risk & Opportunity from Macroeconomics, Pandemic COVID-19, and Insurance 4.0	August 31, 2021	ITIKAD AKADEMI
			8. Evaluation of Risk Management and Actuarial Technical Basis in Insurance Companies	September 25, 2021	ITIKAD AKADEMI
			1. Competency Certification of "Sharia Supervisor by the Professional Certification Institute of the Indonesian Ulema Council in the Field of Sharia Economics	June 02, 2021	Badan Nasional Sertifikasi Profesi
			2. Pra-Ijtima Sanawi Workshop Webinar (Annual Meeting) Sharia Supervisory Board 2021-Sharia Banking Sector	October 4-5, 2021	DSN-MUI
			3. 2021 Prz-Ijtima Sanawi Webinar Workshop (Annual Meeting) for the Sharia Supervisory Board-Insurance and Sharia Pension Funds	October 4 & 7, 2021	DSN-MUI
			4. POJK Socialization Webinar No. 44/ POJK.05/2020 for DPS AASI Member Companies	December 8, 2021	AASI

Integrated Governance Committee Competency Development per December 31, 2021

NAME	POSITION	PERIOD	COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	IMPLEMENTATION TIME AND PLACE	TYPE OF TRAINING AND ORGANIZER
Rosa De Lima Dwi Mutiari	Member	January 1-December 31, 2021	1. Strengthening the Role of the Board of Directors & Board of Commissioners of Non-Bank Financial Services Providers in Supporting the Effectiveness of the APU-PPT Program Implementation"	Jakarta, February 09, 2021	Webinar untuk Direksi & Dewan Komisaris, OJK
			2. Growing in the Midst of a Pandemic (Multifinance 2021)	Jakarta, February 23 2021, 2021	Webinar untuk Direktur, Komisaris, Pemegang Saham Pengendali dan Dewan Pengawas Syariah, APPI
			3. Sustainable Finance National Economic Recovery	Jakarta, June 15, 2021	Webinar, LPPI
			4. Understanding of Fraud and Corruption Prevention for Financing Institutions	Jakarta, November 2, 2021	Sosialisasi, OJK
			5. Development Direction for Indonesian Banking in 2022 Amid Efforts Towards Banking Digitization	Jakarta, December 8, 2021	Webinar, FKDKP
Eddy Siswanto	Member	January 1-December 31, 2021	How Indonesia's Financial Institutions & Stakeholders Respond to Climate-Related Financial Risks	Online, February 18, 2021	LPPI
			Engagement Program-Stronger Together with RACE	Online, April 10, 2021	Inpiring KITA
			Kelengkapan Identifikasi TKM Pasar Modal-PPATK	Online, November 26, 2021	Internal (RCD-APUPPT)
Boyke Wibowo Mukiyat	Member	January 1-December 31, 2021	BNI Sharing Session: Makro Ekonomi - Indonesia Economic Outlook	August 27, 2021	Webinar, BNI Corporate University
			Market Outlook 2022: Indonesia Towards 2022- Economic Recovery Stability or Growth?	December 9, 2021	Webinar, BNI Corporate University
Bambang Setyogroho ¹⁾	Independent Member	January 18-December 31, 2021	BNI Sharing Session: Makro Ekonomi- Indonesia Economic Outlook	Jakarta, August 27, 2021	Webinar, BNI Corporate University
Indrayeti ²⁾	Independent Member	January 18-December 31, 2021	BNI Sharing Session: Makro Ekonomi- Indonesia Economic Outlook	Jakarta, August 27, 2021	Webinar, BNI Corporate University

Note:¹⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021²⁾ Served as an independent member of the Integrated Governance Committee since January 18, 2021

Board of Directors

Supporting Organs

CORPORATE SECRETARY

The company as a legal entity is a capital partnership, established based on an agreement, and conducts business activities using authorized capital divided into shares, and fulfills the requirements stipulated in laws and regulations. Therefore, the Company needs to manage its capital properly based on good corporate governance mechanisms. By implementing such governance a positive impact on the sustainability of the Company's business can be realized, so as to increase the trust of shareholders and other stakeholders.

The Company as a legal entity has 3 (three) organs to run the Company, namely the General Meeting of Shareholders, the Board of Commissioners, and the Board of Directors. The Board of Directors as the Company's organ is collegially tasked and responsible for managing the Company. For this management, the Board of Directors must ensure smooth communication between the Company and stakeholders, one way by empowering the function of Corporate Secretary. With the economy development, especially in the Capital Market sector, the role of the Corporate Secretary becomes increasingly important, not only in relation to administrative and communication functions, but also to ensure the company's compliance with laws and regulations, and corporate governance implementation improvement. The Corporate Secretary is also expected to continuously update information on regulations that must be complied with by the Company, and provide important information to the Board of Directors and the Board of Commissioners for decision-making.

The Corporate Secretary is required to have qualifications in accordance with their duties and responsibilities, as well as increase their knowledge and ability to support them in carrying out their duties. The corporate secretary provides a positive value in assisting the management of Issuers or Public Companies, so as to increase the trust of shareholders, as well as other stakeholders.

The Corporate Secretary is an individual or person in charge of a work unit that carries out the function of a Corporate Secretary. The Corporate Secretary is appointed and dismissed based on a Board of Directors decision. Based on the Company's Articles of Association, the Board of Commissioners is authorized to approve the appointment and dismissal of the Corporate Secretary. The Corporate Secretary is prohibited from holding concurrent positions in other Issuers or Public Companies.

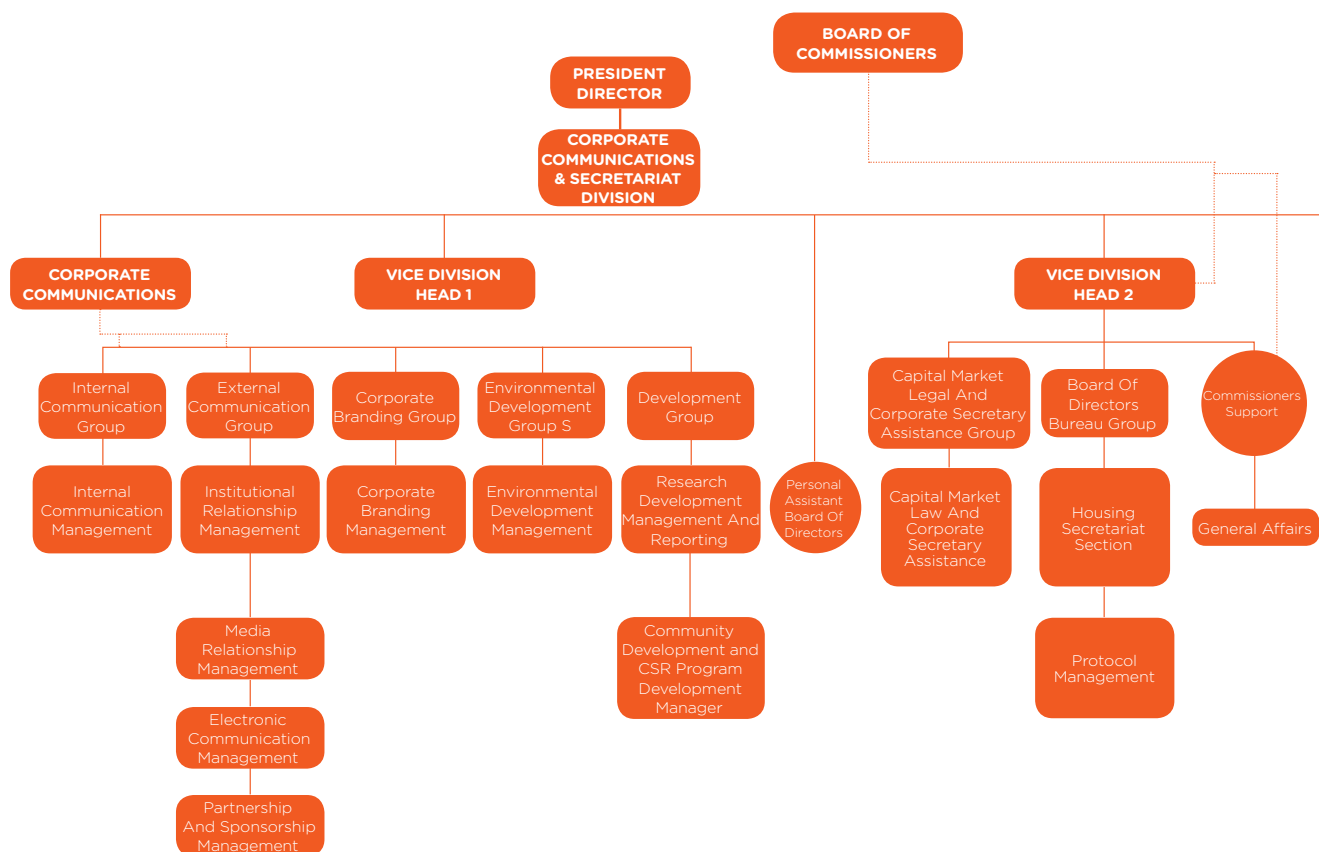
LEGAL BASIS

Regulations and laws that serve as references in the establishment, appointment and Duties of the Corporate Secretary, include:

1. BNI's Articles of Association;
2. OJK Regulation No. 35/POJK.04/2014 concerning Corporate Secretary of Issuers of Public Companies;
3. PT Bursa Efek Indonesia's Board of Directors Decree No. Kep-00001/BEI/01-2014 concerning Amendments to Law No. I-A: concerning Registration of Shares and Equity In addition to Shares Issued by a Listed Company;
4. Ministry of SOEs Regulation No. PER-01/MBU/2011 concerning Implementation of Good Corporate Governance (GCG) in SOEs, as amended by PER-09/MBU/2012;
5. 2003 Law No. 19 concerning State-Owned Enterprises;
6. Ministry of SOEs Regulation No. KEP117/M-MBU/2002 dated July 31, 2002;
7. BEJ's Board of Directors Decision No. 339/BEJ/07-2001 dated July 20, 2001 concerning Amendment to Provision letter C.2.e Listing Rule Number I-A: concerning General Provision on the Registration of Equity Securities Exchange;
8. Bapepam Chairman Decree No. IX.I.4 No. Kep 63/PM/1996 dated January 17, 1996.

CORPORATE SECRETARY STRUCTURE

The BNI Corporate Secretary function is carried out by the Head of the Corporate Communications & Secretariat Division. Based on the Board of Directors Decree No. KP/089/DIR/R dated February 19, 2020 as updated through Memo REN No. REN/2/160/R dated 06 July 2021 with an overview of the structure as follows:



CORPORATE SECRETARY DUTIES AND RESPONSIBILITIES

BNI's Corporate Secretary shall be directly responsible to the President Director with a mission to support the creation of a consistent and continuous good corporate image through an effective management communication program to all stakeholders. The Corporate Secretary shall have access to relevant Company information and material and control of rules and regulations in the field of capital markets, especially with regard to information disclosure.

Referring to the OJK Regulation No. 35/POJK/2014 concerning Corporate Secretary of Public Companies, the Corporate Secretary functions include:

- Following the development of Capital Market, especially the legislation in force in the Capital market;
- Providing input to the Board of Directors and Board of Commissioners to comply with the rules and regulations in the Capital Market;
- Assisting the Board of Directors and Board of Commissioners in the corporate governance implementation including:
 - Information Disclosure to the public, including the availability of information on the Company website;
 - Submitting timely reports to OJK;
 - Implementing and documenting the General Meeting of Shareholders;
 - Organizing and documenting the Board of Directors and/or the Board of Commissioners Meetings;
 - Organizing the Company's orientation program for the Board of Directors and/or Board of Commissioners.
- Acting as a liaison between the Issuer or Public Company with the shareholders of the Issuer or Public Company, OJK and other stakeholders.

In line with the OJK Regulation above and in achieving and to implement the Corporate Secretary vision and mission in line with the BNI vision and mission, the BNI Corporate Secretary's functions and duties set out in the Company Guidelines for Corporate Communications and Secretariat Division, include:

1. The Corporate Secretary principal functions are as follows:
 - a. Following developments in the Capital Markets, particularly the regulations prevailing in the Capital Market;
 - b. Providing the public with any information needed by investors (investor relations) with respect to the Bank condition;
 - c. Providing the public with all information needed by stakeholders (public relations) related to the Bank condition;
 - d. Providing input to the Board of Directors to comply with the provision of Law No. 8 Year 1995 concerning Capital Markets and its regulations;
 - e. Actin as a contact person between the Bank and OJK and the public.
2. In addition to carrying out these principal functions, the Corporate Secretary also performs the following duties.
 - a. Attending Board of Directors Meetings and making minutes of meeting;
 - b. Preparing a Special Register related to the Board of Directors, the Board of Commissioners and their families both in the Company and its affiliates including share ownership, business relations and other roles that may give rise to a conflict of interest with the Company;
 - c. Preparing a List of Shareholders including those with ownership of 5% (five percent) or more;
 - d. Being responsible for the GMS. Preparing materials required with regard to reports/routines of the Board of Directors to be submitted to external parties. Preparing materials needed on Board of Directors' decisions with regard to the Company's management;
 - e. Organizing routine and non-routine Board of Directors meetings.

Corporate Secretary Profile

Mucharom has held the position of Corporate Secretary since December 2020.



MUCHAROM, S.E., M.M

Corporate Secretary
(December 23, 2020–Present)

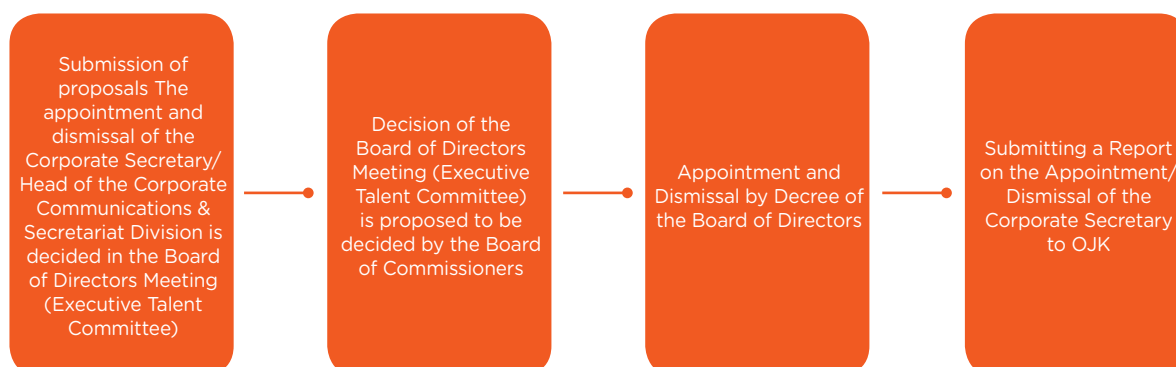
Indonesian citizens. Currently 52 years old. Obtained a Masters in Management, especially in the field of International Management, Universitas Gadjah Mada (1997)

Served at BNI during the 1998 economic crisis as a Credit Information System Analyst. Subsequently, became active for more than 10 years in the field of Risk Management and held a final position as Deputy Head of the Operational Risk Division (2008-2011). Subsequently, became Makassar Regional Head (2012-2014), General Manager of BNI Hong Kong (2015-2016), Policy Governance Division Head (2016-2017), Strategic Planning Division Head (2017-2021), Senior Vice President of Communication Division Corporate & Secretarial (2021-Present).

Currently serves as Corporate Communications and Secretariat Division Head based on Board of Directors Decree No. KP/428/DIR/R dated December 22, 2020.

He does not have concurrent positions that are prohibited at BNI or other Public Companies as regulated in OJK Regulation No. 35/POJK.04/2014 concerning Corporate Secretary of Issuers or Public Companies.

FLOW OF APPOINTMENT/DISMISSAL OF CORPORATE SECRETARY



The appointment of Mucharom as Corporate Secretary was reported by the Company on December 23, 2020 to OJK, Indonesia Stock Exchange and the Ministry of SOEs.

CORPORATE SECRETARY COMPETENCY DEVELOPMENT PROGRAM

The Corporate Secretary competency development programs in 2021 included:

NO.	TRAINING/WORKSHOP	TRAINING DATE	ORGANIZER
1.	Internalization of Morals for Senior Leaders C-1	March 5, 2021	PT Bank Negara Indonesia (Persero) Tbk
2.	POJK No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions	March 25, 2021	Indonesia Corporate Secretary Association (ICSA)
3.	Internalization of Akhlak for Senior Leaders C-1	April 19, 2021	PT Bank Negara Indonesia (Persero) Tbk
4.	Board of Directors, Board of Commissioners, Nomination & Remuneration Committee, Audit Committee, and Corporate Secretary Duties and Functions	April 30, 2021	ICSA
5.	POJK No. 15/POJK.04/2020 concerning GMS Plan and Implementation for Public Companies, and POJK No. 16/POJK.04/2020 concerning Public Company GMS Electronic Implementation	May 27, 2021	ICSA
6.	POJK No. 03/POJK.04/2021 concerning Implementation of Activities in the Capital Market Sector	June 23, 2021	ICSA
7.	Deepening POJK 15/POJK.04/2020 & POJK 16/POJK.04/2020 and Implementation of the e-Proxy Module & e-Voting Module in the eASY.KSEI Application	July 1, 2021	Asosiasi Emiten Indonesia (AEI)
8.	Deepening POJK 17/POJK.04/2020 concerning Material Transactions and Changes in Business Activities	July 22, 2021	ICSA
9.	Socialization of OJK Regulation No. 3/Pojk.04/2021 Concerning the Implementation of Activities in the Capital Market Sector (POJK in Lieu of PP No. 45/1995).	August 12, 2021	AEI
10.	Preparation of Annual Report & Sustainability Report	November 3, 2021	ICSA

CORPORATE SECRETARY DUTIES AND RESPONSIBILITIES

BNI's Corporate Secretary shall be directly responsible to the President Director with a mission to support the creation of a consistent and continuous good corporate image through an effective management communication program to all stakeholders. The Corporate Secretary shall have access to relevant Company information and material and control of rules and regulations in the field of capital markets, especially with regard to information disclosure.

Referring to the OJK Regulation No. 35/POJK/2014 concerning Corporate Secretary of Public Companies, the Corporate Secretary functions include:

1. Following the development of Capital Market, especially the legislation in force in the Capital market;
2. Providing input to the Board of Directors and Board of Commissioners to comply with the rules and regulations in the Capital Market;
3. Assisting the Board of Directors and Board of Commissioners in the corporate governance implementation including:
 - a. Information Disclosure to the public, including the availability of information on the Company website;
 - b. Submitting timely reports to OJK;
 - c. Implementing and documenting the General Meeting of Shareholders;
 - d. Organizing and documenting the Board of Directors and/or the Board of Commissioners Meetings;
 - e. Organizing the Company's orientation program for the Board of Directors and/or Board of Commissioners.
4. Acting as a liaison between the Issuer or Public Company with the shareholders of the Issuer or Public Company, OJK and other stakeholders.

In line with the OJK Regulation above and in achieving and to implement the Corporate Secretary vision and mission in line with the BNI vision and mission, the BNI Corporate Secretary's functions and duties set out in the Company Guidelines for Corporate Communications and Secretariat Division, include:

1. The Corporate Secretary principal functions are as follows:
 - a. Following developments in the Capital Markets, particularly the regulations prevailing in the Capital Market;
 - b. Providing the public with any information needed by investors (investor relations) with respect to the Bank condition;
 - c. Providing the public with all information needed by stakeholders (public relations) related to the Bank condition;
 - d. Providing input to the Board of Directors to comply with the provision of Law No. 8 Year 1995 concerning Capital Markets and its regulations;
 - e. Act as a contact person between the Bank and OJK and the public
2. In addition to carrying out these principal functions, the Corporate Secretary also performs the following duties.
 - a. Attending Board of Directors Meetings and making minutes of meeting;
 - b. Preparing a Special Register related to the Board of Directors, the Board of Commissioners and their families both in the Company and its affiliates including share ownership, business relations and other roles that may give rise to a conflict of interest with the Company;
 - c. Preparing a List of Shareholders including those with ownership of 5% (five percent) or more;
 - d. Being responsible for the GMS. Preparing materials required with regard to reports/routines of the Board of Directors to be submitted to external parties. Preparing materials needed on Board of Directors' decisions with regard to the Company's management;
 - e. Organizing routine and non-routine Board of Directors meetings.

IMPLEMENTATION OF CORPORATE SECRETARY DUTIES IN 2021

Activities related to stakeholders carried out by the Corporate Secretary in 2021 included:

1. Organizing Corporate Action, namely:
 - a. Annual GMS for Fiscal Year 2020 on March 29, 2021;
 - b. Dividend Payment on April 30, 2021.
2. Following the development of the Capital Market in accordance with the prevailing Capital Market regulations;
3. GCG Awareness for BNI's Board of Directors and Board of Commissioners including updates on new GCG policies and issues;
4. Conducting Information Disclosure in accordance with applicable regulations;
5. In an effort to manage communication with the capital market community, especially investors and analysts to ensure information disclosure or transparency, BNI holds Analyst Meetings and Public Expose, accepts Investor/Analyst Visits and Conference Calls, organizes Analyst Gatherings, Economic Outlooks, and publishes BNI Monthly Reports;
6. Participating in Non Deal Roadshows both at home and abroad, in Asia, Europe and America;
7. Providing access to up-to-date information that is widely accessed by the public, including building a stock database, developing website applications, preparing the Annual Report for Fiscal Year 2020;
8. Optimizing the GCG implementation strategy of the Company's organs (GMS, Board of Commissioners, Board of Directors) through programs implemented internally or in collaboration with external parties;
9. Submitting routine and incidental reports to regulators, including Securities Holder Registration Report, Shareholder Register, Foreign Currency Debt Report, etc.;
10. Managing the Fit and Proper Test for the Board of Directors and the Board of Commissioners;
11. Documenting the Company's data legality, including the GMS Resolution Deeds, Changes in the Management Composition Deeds, etc.;

12. Organizing press conferences and teleconferences with stakeholders;
13. Maintaining communication with the Ministry of State-Owned Enterprises, Ministry of Finance, State Secretary, Financial Services Authority, Self Regulatory Organizations (Indonesian Stock Exchange, Indonesian Central Securities Depository, and Indonesian Clearing and Guarantee Corporation), Securities Administration Bureau, and other related institutions;
14. Participating actively in hearings and working visits with the DPR-RI;
15. Attending all Board of Commissioners and Board of Directors meeting and preparing Minutes of the Board of Commissioners and Board of Directors Meeting results.
16. Participating in training in order to understand the capital market development, especially the prevailing laws and regulations in the capital market sector;
17. Providing input to the Company's Board of Directors and Board of Commissioners to comply with the provisions in the capital market legislation;
18. Acting as a liaison between the Company and Shareholders, Regulators and other Stakeholders.

CORPORATE SECRETARY REPORT FOR FISCAL YEAR 2021

In line with the Corporate Secretary Report as regulated in Article 11 of the OJK Regulation No. 35/POJK/2014 which states that:

1. The Corporate Secretary is required to make periodic reports at least 1 (one) time in 1 (one) year on the implementation of the Corporate Secretary functions to the Board of Directors with a copy to the Board of Commissioners;
2. Issuers or Public Companies are required to disclose a brief description on the implementation of the Corporate Secretary functions and information concerning Corporate Secretary education and/or training in the annual report of the Issuer or Public Company.

Corporate Secretary Function Implementation Report:

NO	FUNCTIONS ACCORDING TO OJK	PROGRAM	REALIZATION
1.	Following the development of Capital Market, especially the legislation in force in the Capital market;	Related to the development of the Capital Market, particularly the Capital Market laws and regulations	<ul style="list-style-type: none"> • Provided responses to the Financial Services Authority as the capital market regulator regarding the 2019 OJK Draft Regulations • Attended socialization and discussion on the application of Capital Market regulations and systems
2.	Providing input to the Board of Directors and Board of Commissioners to comply with the rules and regulations in the Capital Market	Providing input to the Board of Directors and the Board of Commissioners to comply with Capital Market regulations	<ul style="list-style-type: none"> • Reviewed and provided proposals for the the Board of Directors and the Board of Commissioners decisions and/or policies as well as for units under the Board of Directors, based on the Capital Market regulations; • Socialized information on changes to Capital Market regulations to the Board of Directors and the Board of Commissioners; • Submitted reminders on Capital Market regulations to the Board of Directors and the Board of Commissioners
3.	Assisting the Board of Directors and Board of Commissioners in the corporate governance implementation including:	Assisting the Board of Directors and the Board of Commissioners in implementing Good Corporate Governance, including ensuring shareholders rights, Board of Commissioners and Board of Directors functions and roles, stakeholder participation, information disclosure.	<ul style="list-style-type: none"> • Assisted the Board of Directors in holding GMS with due observance of Capital Market regulations and best practices. The Annual GMS was held on March 29, 2021 in compliance with prevailing regulations, including those related to voting, Board of Directors and Board of Commissioners members attendance, minutes of the GMS being available on the Company's website; • Assisted the Board of Directors in improving the quality of the Company's communication with Shareholders or Investors; • Assisted the Board of Directors in developing the Company's communication policies with shareholders or investors; • Assisted the Board of Directors and the Board of Commissioners in improving their members competencies through training; • Assisted the Board of Directors in preventing insider trading through by preparing the Company's Insider Trading Guidelines; • Assisted the Board of Directors and the Board of Commissioners in providing long term incentives to Directors and Employees in coordination with the Human Capital Strategy Division and the Human Capital Services Division; • Improved the implementation of information disclosure, through the Company website, and other media, including twitter, facebook, instagram, linkedin, and youtube.
		Submission of reports to Supervisors & Regulators in accordance with prevailing regulations.	The Company submitted periodic and incidental reports to the regulators through reporting media regulated by each regulator.
		Organizing and documenting Board of Directors Meetings, Board of Commissioners Meetings, and Board of Directors Meetings with the Board of Commissioners.	Assisted the Board of Directors in holding Board of Directors, Board of Commissioners, and Board of Directors with the Board of Commissioners periodic meetings in accordance with prevailing regulations. All Board of Directors, Board of Commissioners and Board of Directors Meetings with the Board of Commissioners meetings minutes have been well documented, and kept in hardcopy and softcopy.

NO	FUNCTIONS ACCORDING TO OJK	PROGRAM	REALIZATION
		Organizing orientation programs for the Company's Board of Directors and/or Board of Commissioners.	Organized Orientation Programs for the Board of Directors and/or the Board of Commissioners including discussions related to: <ul style="list-style-type: none"> • Vision, mission, the organizational structure of the bank, business activities and operational network; • Annual Report, the Bank's Work Plan and Budget (RKAP), and the Bank's Business Plan (RBB), Bank's Code of Ethics, • BNI's Corporate Cultures, the Boards of Commissioners Manual, Corporate Governance Handbook, and the Articles of Association. • Good Corporate Governance (concurrent positions, share ownership, and independent commissioners); • The Board of Commissioners and the Board of Directors' duties, authority, and responsibilities, the Board of Commissioners' delegation of authority and limits of authority in conducting supervisory duties on the bank based on the applicable laws and regulations; • Committees under the Board of Commissioners, which are established and directly responsible to the Board of Commissioners, Secretary of the Board of Commissioners, and Secretariat of the Board of Commissioners, which facilitates the duties of the Board of Commissioners; • Remuneration and facilities provided to members of the Board of Commissioners.
		Other matters related to GCG implementation	<ul style="list-style-type: none"> • Together with the Compliance Division, prepared a Self-Assessment Report on the Company's GCG Implementation; • Board of Directors and the Board of Commissioners GCG Commitment/Integrity Pact; • GCG Socialization; • Stock Management; • Share Ownership Disclosure by the Company's Board of Directors and Board of Commissioners; • Board of Directors and the Board of Commissioners Remuneration • External Parties Awards and GCG Assessments related to the Corporate Secretary Function.
4.	Liaison between Issuers and Shareholders of Issuers or Public Companies, the Financial Services Authority, and Other Stakeholders	Carrying out strategies to improve the quality of the Company's communication with all stakeholders.	Communicated with regulators, shareholders or investors, and all stakeholders to provide a clear understanding of the Company situation and other information. In this regard, in 2021 the Corporate Secretary submitted periodic reports, information disclosure related to business conditions or prospects and performance, as well as the Good Corporate Governance implementation. <p>This Company commitment to Shareholders or investors is contained in the Company's Investor Relations guidelines No. IN/41/KMP/001 dated 26 January 2015 which includes policies on investor relations activities such as analyst meetings, preparation of annual reports,, investor meetings, public expose, and roadshow. The policy includes strategies, programs, and timing of communication, as well as guidelines that support shareholders or investors to participate in communications. The existence of a communication policy with shareholders or investors shows that BNI as a public company is committed to communicating with shareholders or investors.</p>
		Intensifying effective communication with the public/investors to increase stakeholder satisfaction.	In 2021, with the Investor Relations Division, the Company held: <ul style="list-style-type: none"> • Analyst Meetings; • Public Expose; • Domestic Non Deal Roadshows/Conferences Dalam Negeri; • Overseas Roadshows/Conferences; • Investor and Analyst Visits; • Teleconferences; • Analyst Gatherings.

INVESTOR RELATIONS FUNCTIONS

Investor Relations activities are part Investor Relations is a strategic function within the company that is part of corporate public relations activities. Investor Relations has the accountability to build and maintain mutually beneficial relationships with shareholders and other financial communities in order to maximize the company's market capitalization. The Main Functions of the Investor Relations Division include:

1. Manage cooperative relationships with parties related to the Indonesian capital market, including fund managers, analysts, stock brokers, investment bankers, rating agencies, as well as parties related to the Association of Indonesian Issuers (AEI);
2. Communicating the company's performance and strategy to analysts and investors in order to achieve an optimal BNI share valuation in the long term through analyst meetings, conference calls, roadshows and related events;
3. Representing BNI management in meetings with analysts and investors both on a one-on-one basis and through public presentations in order to communicate opinions, attitudes and reactions to company challenges and/or opportunities and convey strategic follow-up for BNI management;
4. Manage activities related to company performance and rating;
5. Monitor and analyze the development of stock performance of companies, exchanges, peer groups;
6. Manage company performance database, stocks, investors, contact reports, mailing list fund managers, and other related parties;
7. Maintain openness, accuracy and timeliness of disclosure of information to capital market players.

The following is a summary of Investor Relations activities during 2021 carried out in order to carry out the main functions of Investor Relations:

INVESTOR RELATIONS ACTIVITIES	2021
Analyst Meetings	4
Public Exposés	1
Conference Calls	51
Non-Deal Roadshow	15
Meeting with Investors	150
Total	221

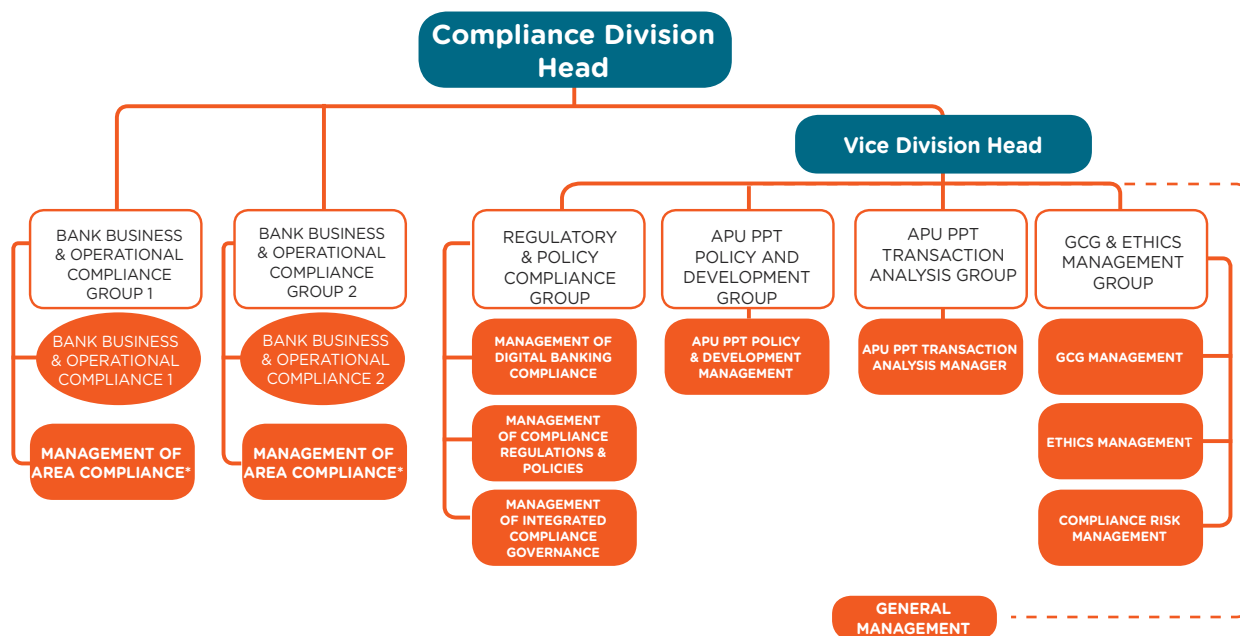
COMPLIANCE FUNCTION

BNI is a financial institution that carries out activities based on the principle of trust. In order for the Bank to be able to grow in a healthy and sustainable manner, it requires a strong good corporate governance foundation and consistent application of prudential banking principles, one of which is through the Bank compliance. Based the above, BNI has targeted one of its goals in its sixth mission, namely "Becoming the Reference for the Implementation of Compliance and Good Corporate Governance for Industry".

Based on this mission, the implementation of compliance is more than merely fulfilling regulatory compliance but is also an organizational must. Thus, compliance must be built into an internalized and organized culture.

Compliance Work Unit Organizational Structure

For compliance, BNI has appointed a Director in charge of the compliance function and has established a Compliance Division to carry out the compliance function. In addition, BNI's Board of Commissioners is also involved in carrying out active supervision of the implementation of Bank compliance.



* Regional Management of Area Compliance has a function to ensure the application of APU and PPT in the Regional Offices, Branches and Centers.

Active Supervision of the Board of Commissioners Compliance Function

The Board of Commissioners active supervisory function as well as compliance with POJK related to Compliance Function Implementation in Commercial Banks is carried out by:

1. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year;
2. Providing suggestions to improve the implementation of the Bank's compliance function quality.

Either directly or through the Committees under them, the Board of Commissioners actively supervises and provides suggestions for improvements through meetings or through periodic reports, such as:

1. Regular Board of Commissioners meetings with the Director in charge of the Compliance function;
2. Periodic meetings of the Committees under the Board of Commissioners (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, Compliance Report, Integrated Compliance Function Implementation Report, and the implementation of Anti-Money Laundering and Prevention of Terrorism Financing (APU-PPT) program Reports.

Director in charge of Compliance Function

The current Director in charge of compliance function at BNI is Bob Tyasika Ananta as BNI's Director of Compliance. The appointment and implementation of the Director in charge of the compliance function duties is carried out based on the applicable regulations, in particular the provisions concerning the Implementation of the Compliance Function, General Provisions, the Provisions for the Fit and Proper Test, as well as the provisions for the Use of Expatriate Employees in the Banking Sector, that regulate:

1. Must obtain approval from the OJK before carrying out duties and functions in their position. Based on OJK letter No. 22/KDK.03/2020 dated May 20, 2020, OJK approved the appointment of Bob Tyasika Ananta as Director of Compliance;

2. Must fulfill independence requirements, namely not having financial, management, share ownership and/or familial relations up to the second degree with members of the Board of Commissioners, the Board of Directors and/or Controlling Shareholders or relationship with the Bank that may affect their ability to act independently;
3. Must have adequate integrity and knowledge regarding banking regulations and prevailing laws and regulations;
4. Are prohibited from appointing or using expatriate employees;
5. Does not hold concurrent positions as President Director and/or Vice President Director;
6. Not in charge of the following functions: operational business, risk management that makes decisions on banking activities, treasury, finance, accounting, logistics, procurement, information technology and internal audit.

Based on the applicable BNI organizational structure, the BNI Compliance Director oversees the following:

- a. Compliance Division
- b. Legal Division
- c. Human Capital Strategy Division;;
- d. Human Capital Management Division
- e. BNI Corporate University

In general, the Director in charge of the compliance function duties and responsibilities include:

1. Formulating strategies to encourage the creation of a compliance culture;
2. Proposing compliance policies or compliance principles to be approved by the Board of Directors;
3. Establishing compliance systems and procedures to formulate the Bank's internal provisions and guidelines;
4. Ensuring that all policies, regulations, systems and procedures as well as the Bank's business activities are in accordance with the provisions of the Financial Services Authority, Bank Indonesia and the prevailing laws and regulations;
5. Minimizing the Bank's Compliance Risk;
6. Taking preventive measures so that the policies and/or decisions made by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority, BI and the prevailing laws and regulations;
7. Performing other duties related to Compliance Function, such as monitoring and maintaining the Bank's compliance with the commitments made by the Bank to the Financial Services Authority, BI and other supervisory authorities;
8. In addition to the above duties and responsibilities, in order to implement the integrated compliance function, the Director in charge of the compliance function has duties to direct, monitor and evaluate the implementation of the Integrated Compliance function as well as follow up on directions or advice from the Board of Commissioners of the Main Entity or the Integrated Governance Committee in order to improve Integrated Compliance Function.

Compliance Work Unit

The work unit carrying out the compliance function is the Compliance Division. The Compliance Division is an independent unit directly responsible to the Director in charge of the compliance function. In addition, the Compliance Division is also designated as an Integrated Compliance Unit.

Integrated Compliance Work Unit

In the context of implementing OJK Regulation No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates, the Compliance Division as the Integrated Compliance Unit (SKKT) BNI has carried out the task of monitoring and evaluating the implementation of the compliance function in each Subsidiary Company, by:

1. Ensuring the implementation of the compliance function and the implementation of Anti-Money Laundering and Prevention of the Financing of Terrorism (APU and PPT);
2. Aligning the Compliance Risk Management methodology including the implementation of the APU and PPT provisions;
3. Integrating and aligning compliance function policies and procedures, including AML and CFT policies and procedures;
4. Ensuring Subsidiaries' compliance with the implementation of internal and external reporting obligations;
5. Developing HC Compliance Unit in the BNI Financial Conglomerate.

Head of the Compliance Work Unit Profile



SURYO UTOMO

Head of Compliance Division
(August 22, 2019–present)

Indonesian citizen, 50 years old. Obtained a Bachelor's degree in Economy and Accountant from the Faculty of Economy, Department of Accounting, Universitas Airlangga in 1995, and obtained a Master's degree in Accounting Science at the Postgraduate Faculty of Universitas Diponegoro in 2009. Served as Head of Compliance Division since August 22, 2019 until now. Previously served as Vice President of Internal Audit Unit and Deputy Head of Surabaya Regional Office.

In determining and setting the Head of Compliance Division, management always pays attention to the following minimum requirements:

1. Fulfilling independence requirements;
2. Mastering banking regulations and applicable laws and regulations;
3. Not carrying out other duties outside the compliance function;
4. Having high commitment to implementing and developing a compliance culture.

Head of Compliance Unit Development

COMPETENCY DEVELOPMENT/TRAINING MATERIAL	DATE	ORGANIZING AGENCY
Suryo Utomo		
Compliance Division Head as a resource person for BNI's internal environment, as follows:		
Implementation of New Compliance Index (CIX) in all Regions	April 7, 2021	BNI - Network Management Division
Operational Risk Refreshment to all Deputy Branch Managers	May 7, 2021	
Socialization of Anti-Bribery Management System (SMAP) for BNI Partners	July 22, 2021	BNI - Compliance Division
Socialization of Gratification Control and Integrity Pact Signing	December 17, 2021	BNI - Asset Management & Procurement Division
In House Training:		
Internalization of AKHLAK Core Values for Senior Leaders (C-1)	March 5, 2021	BNI Corporate University
Operational Risk Management	June 4, 2021	BNI Corporate University
Digital Mindset for Leader	June 7, 2021	BNI Corporate University
Instructional System Design (ISD) & Module Developer Digital Learning Batch 8	August 24-26, 2021	BNI Corporate University
Prevention of Corruption in the Banking Sector	September 21, 2021	BNI Corporate University
Public Training:		
State Officials Wealth Report (LHKPN)	February 26, 2021	Corruption Eradication Commission
Integrated Whistleblowing System	March 2, 2021	Corruption Eradication Commission
Effectiveness of the Board of Commissioners Supervision in order to Maintain Bank Compliance Towards the Era of Principle Based Regulations.	March 25, 2021	Banking Compliance Director Communication Forum
PLPS No. 1 of 2021 concerning Commercial Bank Resolution Plans	May 27, 2021	Deposit Insurance Agency

COMPETENCY DEVELOPMENT/TRAINING MATERIAL	DATE	ORGANIZING AGENCY
Training on Countering the Financing of Proliferation of Weapons of Mass Destruction for Financial Institutions (FIs) and Fis' Supervisors	June 22-24, 2021	Otoritas Jasa Keuangan
Sipendar Application Implementation	June 29, 2021	Financial Transaction Reports and Analysis Center
Information Exchange Platform on the Prevention and Eradication of Money Laundering Funding	August 2, 2021	Financial Transaction Reports and Analysis Center
Effective Communication	October 25, 2021	Dunamis
Banking Digital Transformation Blueprint	October 26, 2021	Otoritas Jasa Keuangan
Strategic Discussion Forum & Sharing Best Practices with the theme "Executive Insight - Leadership Series"	November 2-4, 2021	Pertamina Training & Consulting
Bank Indonesia - Fast Payment (BI - FAST)	December 21, 2021	Bank Indonesia

Compliance Work Unit Duties and Responsibilities

Based on the Board of Directors Decree No. KP/133/DIR/R dated April 7, 2021, the duties and responsibilities of the Compliance Division are broadly divided into the following functions.

1. Implementing Compliance Function;
2. In charge of the Implementation of the APU and APU Programs;
3. Implementing Functions responsible for the implementation of Good Corporate Governance and Integrated Governance in BNI;
4. In charge of Integrated Compliance Function.
5. In charge of Gratuity & Anti-Bribery Control.

Compliance Work Unit Competency Development

To develop the Compliance Division as a strategic partner for each line of the organization, the Compliance employees continuously enhance their competencies by participating in certification/seminars/workshops/training, such as:

COMPETENCY DEVELOPMENT/TRAINING MATERIAL	DATE	ORGANIZING AGENCY
Certification		
Debriefing and Level 1&2 Compliance Certification Test	2021	Banking Compliance Director Communication Forum
Debriefing and Testing Risk Management Level 1-4 Certification	2021	Risk Management Certification Agency
Integrity Builder Expert	2021	Banking Professional Certification Institute
Debriefing and Testing Risk Management Level 1 Batch 15 Year 2021 Certification (BSMR)	July 2-5 2021	Risk Management Certification Agency
Brevet for goods and services procurement	August 2-September 3 2021	BNI Corporate University
In House Online Training :		
"e-Learning Mandatory", with material for: <ul style="list-style-type: none"> • Anti-Fraud Awareness • Anti-Money Laundering & Prevention of Terrorism Financing (APU - PPT): Division/Unit/Region • Work Culture: AKHLAK Core Value • Good Corporate Governance • Gratification and Anti-Bribery • Risk Culture • Sustainable Finance 	January 2021	BNI Corporate University
Training on "Minister of State-Owned Enterprises Regulation Per-08/MBU/12/2019 concerning Standard Guidelines for the Procurement of Goods & Services with Provisions for Subsidiaries and Affiliated Companies of SOEs on How to Carry Out Their Mandates"	January 28-29, 2021	BNI Corporate University

COMPETENCY DEVELOPMENT/TRAINING MATERIAL

	DATE	ORGANIZING AGENCY
Online Workshop, Webinar & Socialization of External Provisions:		
Bank Indonesia Regulation No. 22/8/PBI/2020 concerning Integrated Licensing through Front Office Licensing and PADG No. 22/12/PADG/2020 concerning the Regulation of Integrated Licensing through Front Office Licensing	January 29, 2021	Bank Indonesia
Banking Gratification and Anti-Bribery Control	February 22, 2021	Banking Compliance Director Communication Forum
Executive Discipline Culture Refreshment	Executed in 4 batches (February-March 2021)	BNI Corporate University
Brevet Credit for non-credit	March 16-19, 2021	BNI Corporate University
Trade Base Money Laundering	March 18, 2021	David Kane – Head of World Custom Organization Daniel Strack – Australian Border Marcy Forman – Citigroup
LTF FTV & RIM PLM (PBI No. 23/2/PBI/2021 dated February 26, 2021 concerning Third Amendment to PBI No. 20/8/PBI/2018 concerning Loan To Value Ratio for Property Loans, Financing To Value Ratio for Property Financing, and Down Payments for Loans or Motor Vehicle Financing)	April 9, 2021	Bank Indonesia
Bank Indonesia Regulation No. 22/20/PBI/2020 dated December 22, 2020 concerning Bank Indonesia Consumer Protection	April 12, 2021	Bank Indonesia
DHE SDA (PADG No. 21/26/PADG/2019 concerning Foreign Exchange Export and Foreign Exchange Import Payments Results as amended by PADG No. 23/2/PADG/2021, PBI No. 21/14/PBI/2019 concerning Foreign Exchange Export and Foreign Exchange Import Payments Results as amended by PBI No. 22/21/PBI/2020)	April 15, 2021	Bank Indonesia
Integrated Governance, Risk & Compliance (GRC)	April 22-23, 2021	Asia Strategy Consulting
Internal Audit and Forensic Audit for detecting fraud and preventing Corruption (Tipikor) and digital audit's role in reducing fraud	April 28-29, 2021	National Public Policy Institute
Cyber Crime Typology & Cross Border Money Laundering	April 29, 2021	FKDKP
Integrity Enforcement in the Credit Process and Signing of Employee Integrity Pact	May 10, 2021	BNI Corporate University
ISO 37001:2016 Awareness Training	May 25, 2021	BNI – Compliance Division
PLPS No. 1 of 2021 concerning Commercial Banks Resolution Plan	May 27, 2021	Deposit Guarantee Agency
Bribery Risk Assessment Training	June 4, 2021	PT Robere Manajemen Indonesia (Robere & Associates)
Strengthening Sismontavar (PBI No. 23/5/PBI/2021 concerning Monitoring System for Foreign Exchange Against Rupiah Transactions)	June 9, 2021	Bank Indonesia
Fraud Awareness Series – BUMN Governance	June 10, 2021	BNI Corporate University
Talkshow “Erick Thohir Says Hello”	June 14, 2021	KBUMN
General Bank APU / PPT Apolo Module Report implementation as stipulated in No. 63/POJK.03/2020	June 16, 2021	OJK
SMAP “Good Corporate Governance”	June 21, 2021	BNI Corporate University & PT Robere Manajemen Indonesia (Robere & Associates)
Strengthening Sismontavar (PBI No. 23/5/PBI/2021 concerning Monitoring System for Foreign Exchange Against Rupiah Transactions)	June 24, 2021	Bank Indonesia
International Banking Literacy Program Training – Beginner Level	July-September 2021	BNI Corporate University
Gratification Talk (GTalk – Ep. 4 “Building Competency through Anti-Corruption Certification”	July 28, 2021	BNI Corporate University
BNI Expert Sharing related to Go Global with BNI KCLN	August 12, 2021	BNI Corporate University
Turning Compliance Into Competitive Advantage	August 19, 2021	Kathiravan Manoharan, Mike Hooper

COMPETENCY DEVELOPMENT/TRAINING MATERIAL

	DATE	ORGANIZING AGENCY
Dynamic Archive Management	August 25-27, 2021	PFA and ANRI Division (National Archives of the Republic of Indonesia)
Fraud Awareness Series – IT Fraud	September 1, 2021.	BNI Corporate University
OJK Regulation (POJK) No. 12/POJK.03/2021 concerning Commercial Banks, POJK No. 13/POJK.03/2021 concerning Implementation of Commercial Bank products, and OJK Circular (SEOJK) No. 12/SEOJK.03/2021 concerning Commercial Bank Business Plans	September 1, 2021	OJK
Bank Indonesia Regulation (PBI): PBI No. 23/6/PBI/2021 concerning PBI Payment Service Providers, PBI No. 23/7/PBI/2021 concerning Payment System Infrastructure Organizers, PBI No. 23/11/PBI/2021 concerning National Payment System Standards, Pembayaran PBI No. 23/10/PBI/2021 concerning Money Market	September 1, 2021	Bank Indonesia
Acceleration of Banking Sector Digital Transformation (Socialization of the Impact of the Personal Data Bill and Komen Communication and Information 10 of 2021)	September 9, 2021	OJK
Prevention of Corruption in the Banking Sector	September 21, 2021	BNI Corporate University
OJK (Financial Services Authority) Teaching “Prevention of Bribery in the Financial Services Industry”	September 21, 2021	OJK
Risk Management Refreshment Series – Fraud Awareness in the Digital Environment	September 23, 2021	BNI Corporate University
ATMR Market Risk (FGD) (POJK No. 11/POJK.03/2016 concerning Obligations for Commercial Banks Minimum Capital Requirement, as amended by POJK No. 34/POJK.03/2016; SEOJK No. 38/SEOJK.03/2016 concerning Guidelines for Using Standard Methods for Calculating Obligations for Commercial Banks Minimum Capital Requirement by taking into account market risk)	October 19, 2021	OJK
PADG No. 23/25/PADG/2021 concerning Implementing Bank Indonesia-Fast Payment (PADG BI-FAST)	November 25, 2021	Bank Indonesia
Minimum Mandatory Giro and Macprudential Intermediation Ratio (GWM RIM)	December 15, 2021	Bank Indonesia
Registration of PSE Scope SOE Private Sector	December 20, 2021	KOMINFO
Internal Sharing Session:		
Technical Guidance and Gratification Control Sharing Session	May 27, 2021	BNI – Compliance Division
Friday Sharing Session on “Funding for the Proliferation of Weapons of Mass Destruction”	July 2, 2021	APU PPT Policy and Development Group (AMP) Compliance Division
Friday Sharing Session on “Casual Talk about Covid-19”	July 16, 2021	BNI – Compliance Division
Friday Sharing Session on “Use of Digital Signatures in a Pandemic Era”	August 20, 2021	Regulatory & Policy Compliance Group (CRP) KPN Division
Implementation of Quality Month Day (HBM) with the theme “Goods and Services Procurement (Updating PP)”	September 10, 2021	Bank Operational and Business Compliance Group 2 (CBG 2) Compliance Division

Compliance Work Unit Duties Implementation in 2021

In carrying out operational activities with increasing business complexity, in line with developments in technology information, globalization and financial market integration, resulting in greater challenges and risk exposures, so BNI continues to mitigate the Bank's business activities risks, both preventive (ex ante) and curative (ex-post). In line with the OJK Regulation No. 46/POJK.03/2017 regarding Implementation of Commercial Bank Compliance Function for the need to increase in the compliance role and function.

To encourage the realization of a compliance culture in all organization units, the following compliance programs have been implemented:

1. Realizing the implementation of a compliance culture at all organizational levels and in bank business activities;
 - a. Delivering compliance material through quality month days, video conferences, emails (BNI Menyapa) including fraud prevention material, frequent negligence cases, sanctions/fines from authorities, audit findings, APU PPT and WBS material;
 - b. Delivering a Compliance Reminder (CORE) each period to improve the employee compliance culture and the implementation of a Daily Exercise Employee Program (DEEP), related to the Legal Governance Risk & Compliance (LGRC) material in the online exam media conducted every working day for all BNI employees;
 - c. Exercising intensive supervision and coordination with other units related to policies, systems and procedures, as well as new operational and technical guidelines, and issues that need to be considered, related to fraud prevention, negligence cases, external sanctions and formulating recommendations and corrective actions to be followed up in accordance with each unit's authority;
 - d. Handling Gratification Control in BNI's work areas, in collaboration with the Corruption Eradication Commission (KPK) to improve Good Corporate Governance (GCG) and Compliance Culture;
 - e. Developing system a Compliance Information Management System (CIMS) application, an information, database and monitoring system of online compliance review results, and implementation of APU PPT;

- f. Preparing a Measurement of Compliance Index (CIX) as a reference to measure and ensure that the compliance function is running well;
 - g. Monitoring the effectiveness of the Good Corporate Governance and Integrated Governance implementation at BNI.
2. Managing the compliance risks faced by the Bank; Compliance risk is a risk arising from the failure to comply with and/or not implementing the prevailing laws and regulations. Based on such matters, the Compliance Division actively strives to minimize compliance risk. The composite compliance risk profile assessment includes an assessment of the inherent risks and assessment of the quality of Risk Management implementation so that it reflects the compliance risk control system. In a composite manner, BNI's Compliance Risk Profile in 2021 stood at level 2 (low to moderate), with the following details:
 - a. BNI's Inherent Risk in 2021 was at level 2 (low to moderate);
 - b. The Quality of Risk Management Implementation (KPMR) was at level 2 (satisfactory).

The Compliance Division continues to make improvement efforts to minimize Compliance Risk, including:

 - a. Identifying, monitoring and periodically disseminating the fulfillment of obligations and matters prohibited by regulations as a preventive measure;
 - b. Reminding organization units they in charge of the fulfillment of obligations periodically;
 - c. Making corrective actions based on the compliance risk database;
 - d. Preparing sanctions from regulators/supervisors as a source of compliance risk into the Compliance Index, and making the compliance index part of the unit Key Performance Indicators (KPI).
3. Ensuring that policies, regulations, systems and procedures as well as the Bank's business activities are in accordance with the OJK/BI provisions, as well as the prevailing laws and regulations. As one of the preventive measures to prevent compliance risks from arising and to support healthy and sustainable growth, the Compliance Division takes preventive (ex-ante) measures by conducting compliance tests to ensure that all internal regulations and certain banking activities comply with applicable banking principles. The compliance test activities include:

- a. Test of compliance on drafts of policies, as well as on new/updated systems and procedures;
 - b. Compliance test/review of existing policies, systems and procedures;
 - c. Compliance test on the design of publishing or new/updated products/activities;
 - d. Compliance checklist on the fit and proper test of prospective controlling shareholders, members of the Board of Directors, and/or the Board of Commissioners;
 - e. Compliance checklist on the plan for implementing new activities in the form of bancassurance and mutual fund selling agents;
 - f. Compliance test/Credit Compliance Review (C2R) for the proposed Credit Application Tool (PAK);
 - g. Compliance test/Procurement Compliance Review (PCR) for the proposed Procurement of Goods and/or Services Document;
 - h. Compliance test/review on plans for opening and relocating Bank offices (regional offices, branch offices, sub-branch offices, and functional offices);
 - i. Compliance test/review of branch and center operational activities.
4. Ensuring bank compliance with commitments made by the bank to OJK/BI and other supervisory authorities. Monitoring commitments to the supervisory authority is carried out together with the Internal Audit Unit (IAU).
 5. Developing the Compliance Division organization in response to changes and developments in BNI's business, which has increased due to the additional number of BNI organizational units, and will increase the Compliance Division's role as the second line of defense in guarding the BNI organization goals adherence to the prudential banking pillar.
 6. Expanding C2R carried out by the Compliance Division with the following criteria:
 - a. Providing new and additional funds with the Middle, Regional, Divisional, and Head Office Committees authority;
 - b. Restructuring the Intermediate, Regional, Divisional, and Head Office committees authority;
 - c. Reviewing the provision of funds, where at least 1 (one) Credit Committee member is from the Board of Directors;
 - d. Modifications include, but are not limited to, changes in structure, release of collateral, changes in requirements where at least 1 (one) Credit Committee member is from the Board of Directors;
 - e. Proposals for the provision of funds after consultation with the Board of Commissioners, or the provision of funds to Bank related parties must obtain permission from the Board of Commissioners.

7. Developing the BNI AML System in line with the POJK concerning the implementation of APU and PPT programs by ensuring there is a system that effectively identifies, analyzes, monitors and provides reports on the customer transaction characteristics carried out automatically.

Integrated Compliance Work Unit Work Program in 2021

To show the implementation of the functions mentioned above, the Compliance Division carried out the following:

1. Analyzed the latest external provisions that impacted Subsidiaries, and submit it to the PA for follow-up, including SEOJK No. 1/SEOJK.05/2021 Assessment of the Health Level of Insurance, Sharia Insurance Companies, Reinsurance Companies, and Sharia Reinsurance Companies, SEOJK No. 3/SEOJK.03/2021 concerning Reports and Requests for Debtor Information through the Financial Information Service System, POJK No. 9/POJK.05/2021 concerning Status Determination and Follow-Up Supervision of Non-Bank Financial Services Institutions, POJK No. 14/POJK.03/2021 concerning Amendment to POJK No. 34/POJK.03/2018 concerning Reassessment for Main Parties of Financial Services Institutions, POJK No. 12/POJK.03/2021 concerning Commercial Banks, and SEOJK No. 20/SEOJK.04/2021 concerning Stimulus Policy and Relaxation of Provisions Related to Issuers or Public Companies in Maintaining Capital Market Performance and Stability Due to the Spread of COVID 19 Disease;
2. Reviewed the adequacy of policies/procedures related to the Compliance Function in Subsidiaries, namely the Financial Information Service System Policy/SLIK from BNI Multifinance, Policy for Handling Customer Complaints from BNI Asset Management, Standard Operating Procedures (SOP) for Handling Customer Complaints from BNI Asset Management, Policy for Handling Customer Service & Customer Complaints from BNI Life Insurance, Standard Operating Procedures for Customer Complaints Service from BNI Sekuritas, BPP for Service and Settlement of Consumer Complaints from BNI Multifinance, Policies and/or Procedures for Implementation of Anti-Money Laundering and Prevention of Terrorism Financing Programs (APU PPT)) in all Subsidiaries, and Monitoring and Reporting Policies for Net Adjusted Working Capital (MKBD) as a Regulatory Business Conduct that must be managed by BNI Sekuritas and BNI Asset Management;

3. Monitored on a monthly basis the business conduct of the Subsidiaries based on the regulations of each Subsidiary, carried out by using a self-assessment method reported periodically as a means of monitoring the compliance of the Subsidiaries' compliance with the fulfillment of business conduct parameters;
4. Implemented the Compliance Index (CIX) in the Subsidiaries as a means of monitoring the compliance function in Subsidiaries by using the parameters of Fraud, Cases of Negligence, Sanctions and Fines from Regulators, Pending Findings of External and Internal Auditors, Updating Customer Data and Regulatory Business Conduct from each each BNI Subsidiary;
5. Analyzed the Compliance Function Implementation Report submitted by Subsidiaries to the BNI Compliance Division on a quarterly basis on the Implementation of the Company's Compliance Function on External Regulations, and the APU-PPT Implementation;
6. Supervised each Subsidiary in the BNI Financial Conglomerate with discussion topics including the Subsidiaries' Follow-up progress on BNI's Recommendations on the Implementation of the Compliance Function, and Anti-Money Laundering & Prevention of Terrorism Financing (APU and PPT), Action Plans for Follow Up on KPN-BNI Recommendations and the BNI TKT Committee on the Implementation of the Compliance Function, and APU-PPT, and Discussion of issues on the Implementation of the Compliance Function, and APU and PPT that occurred in several Subsidiaries;
7. Instigated efforts to improve the Human Capital competencies for Compliance Employees in Subsidiaries through Sharing the implementation of SMAP ISO 37001 with all Subsidiaries in an effort to assist in the SMAP ISO 37001 certification in Subsidiaries, a webinar sharing session entitled "Integration of Compliance in the BNI Financial Conglomerate" was held for all Subsidiary employees that included material such as Go-AML Implementation at BNI, Procurement Policies/ Procedures in Applications, Credit Compliance Review (C2R) and Procurement Compliance Review (PCR), Implementation of the Whistle Blowing System (WBS) at BNI, and preparing plans for training cooperation within the BNI Financial Conglomerate through an automation-based joint training platform for Subsidiaries and their employees.

Evaluation of Compliance Function Effectiveness

Overall, the compliance function has been carried out well, with the following explanation:

Governance Structure

1. Implementation of the Compliance Function has been carried out independently and separately from the operational work unit. The working relationship with other organizational units is as an independent partner in order to review compliance with operational activities to ensure that the Bank's policies, procedures, systems and business activities are in accordance with prevailing external regulations.
2. Management has fulfilled the need for qualified human capital as a Compliance Work Unit, by:
 - a. Determining certain qualifications and competencies for members of the Compliance Work Unit;
 - b. Involving the Compliance Unit in training, competency certification programs, and seminars.

Governance Process

The Compliance Division as the Compliance Unit has carried out its compliance function in accordance with OJK Regulation No. 46/POJK.03/2017 concerning the Implementation of Compliance Function for Commercial Banks, which includes:

1. Building a compliance culture for all BNI organizational lines, through the Compliance Awareness Program, Employee Understanding Test through the Daily Exercise Employee Program (DEEP);
2. BNI's Compliance Risk Management refers to OJK Regulation No. 18/POJK.03/2016 and SEOJK No. 34/SEOJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks;
3. Playing an active role in monitoring and maintaining the Bank's policies, procedures, systems and business activities do not deviate from the provisions;
4. Ensuring the results of regulatory examinations have been followed up in accordance with the commitments made and reporting the follow-up results to regulators.

Governance Outcome

For its monitoring of the compliance function, the Compliance Unit submits Compliance Reports to the Managing Director Compliance and Company Risk, President Director, the Board of Commissioners, Financial Services Authority, and other related parties including:

1. Compliance Work Plan Report contained in the Bank's Business Plan to the Financial Services Authority through the Strategic Planning Division;
2. Quarterly Compliance Function Implementation Report to the Compliance Director, President Director and the Board of Commissioners, as well as semi-annually to the Financial Services Authority.

INTERNAL AUDIT UNIT

The Internal Control System at BNI is aimed at supporting the bank's achievement of its performance goals, increase value for stakeholders, minimize potential losses and maintain compliance with applicable laws and regulations. Therefore, BNI has implemented an effective and efficient Internal Control System by separating functions between the Risk Taking Unit (1st Line of Defense), the Risk Control Unit (2nd Line of Defense), and the Risk Assurance Unit (3rd Line of Defense).

IAU plays a role as the Third Lines of Defense, ensuring the adequacy and effectiveness of risk management and internal control in each line. IAU continues to improve its audit methodology and innovate the use of audit tools to ensure that assurance and consulting is in line with business developments, and has a good impact on encouraging improvements in the risk management quality and effectiveness as well as the internal control adequacy and effectiveness, including ensuring the quality of performance achievement.

The Assurance Function includes a Risk Based Audit on the risk assessment analysis results, while the consulting function is carried out formally and informally, and involves independent reviews of the launch of new products or activities (according to OJK regulations) and special assignments requested by management or at the initiative of IAU.

To strengthen BNI's internal control system, IAU not only continuously improves its audit methodology and audit tools but also plays a role in strengthening the internal control function by standardizing work methodologies and supporting tools for Internal Control (1st Line of Defense).

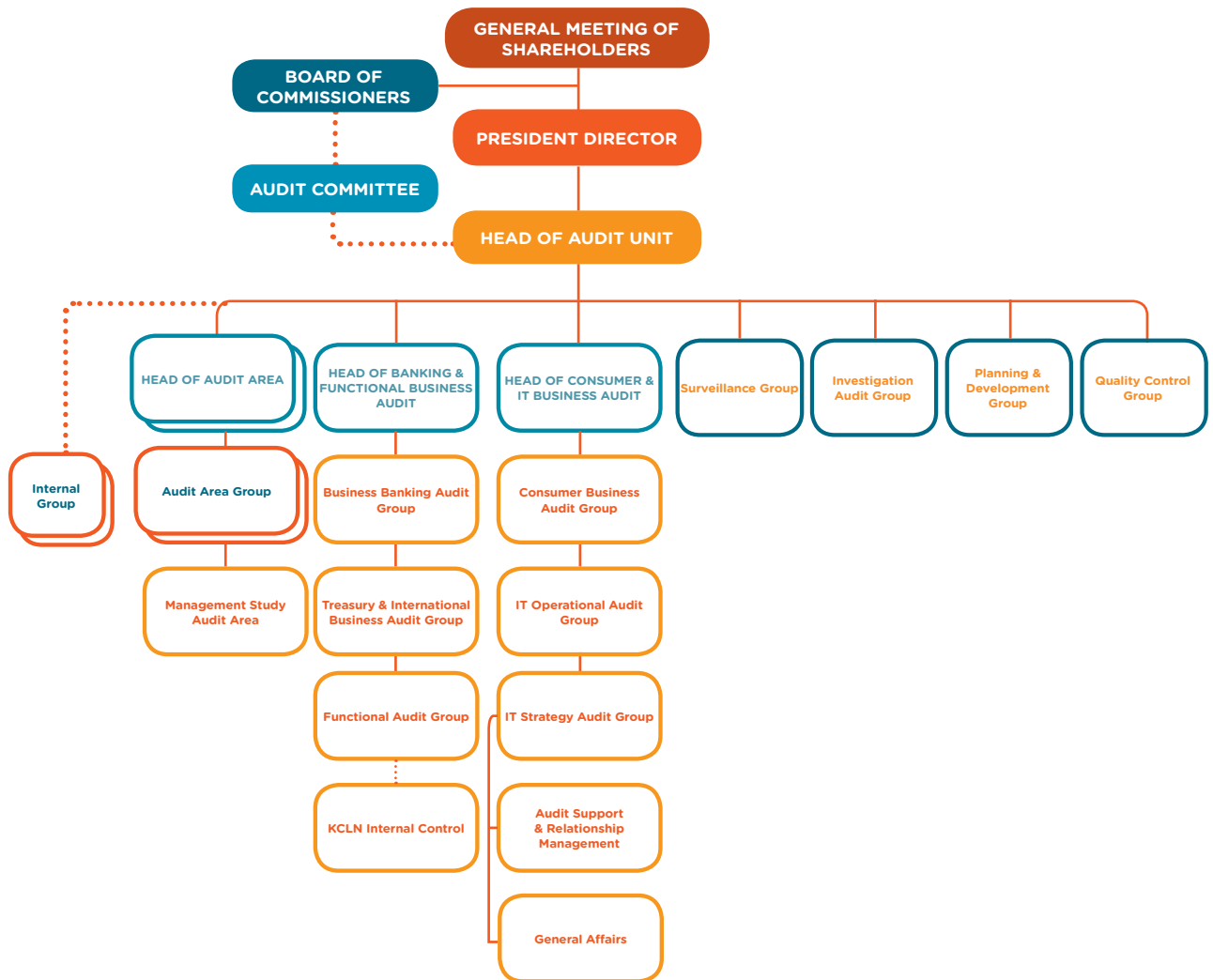
In connection with the implementation of POJK No. 1/POJK.03/2019 concerning the Implementation of the Internal Audit Function in Commercial Banks, and POJK No. 18/POJK.03/2014 and SEOJK No. 15/SEOJK.03/2015 concerning Implementation of Integrated Governance for Financial Conglomerates, the Integrated Internal Audit Unit function is carried out by IAU. In this role, IAU routinely establishes communication and coordination with the Subsidiary's Internal Audit Unit, through joint communication forums, implementation of knowledge sharing on audit methodologies and integrated audit planning, implementation and reporting to support the implementation of integrated governance for the BNI Financial Conglomerate.

POSITION OF INTERNAL AUDIT UNIT

IAU's position in the BNI organization is directly below the President Director with a dotted line to the Board of Commissioners/Audit Committee, as stipulated in the Board of Directors Decree No. KP/347/DIR/R dated July 30, 2021 concerning Organizational Arrangement of the BNI Board of Directors, and in Board of Directors' Decree No. KP/068/DIR/R dated February 18, 2021 concerning Organizational Arrangement of the Internal Audit Unit.

The Head of IAU is appointed and dismissed by the President Director upon approval from the Board of Commissioners by considering the Audit Committee recommendations and is reported to the Financial Services Authority (OJK). The President Director may dismiss the Head of IAU after obtaining approval from the Board of Commissioners after considering the recommendations of the Audit Committee.

INTERNAL AUDIT UNIT ORGANIZATION STRUCTURE



HEAD OF INTERNAL AUDIT UNIT PROFILE

The Internal Audit Unit is led by Anang Basuki, effective February 16, 2021, with the position of Executive Vice President based on the Board of Directors Decree No. KP/057/DIR/R. The brief profile of the Head of IAU is as follows:



ANANG BASUKI, CIA

Chief Audit Executive Internal Audit Unit

Currently 52 years old, has experience in the Banking Industry, in the areas of Internal Audit, Information Technology (IT) Audit, Credit Risk Management and Operational Banking.

Started as an Auditor at BNI in 1996, then in 2011, served as Deputy General Manager of Internal Audit in charge of IT Audit, Strategic Function Audit and Fraud Investigation. Has an important role in the development of the BNI Internal Audit organization starting from long-term planning, Audit System Development and Quality Assurance, so in 2015, was assigned as Chief Audit Executive (CAE) in the Internal Audit Unit. Throughout his career at BNI, in addition to having experience in the Internal Audit field, he gained experience in BNI Business operations, both as a Branch Manager and as a Regional Office Head, and served as Division Leader in several Divisions, namely the Head of the Credit Administration Division (2015-2017) and Head of the BNI Corporate University Division (2017-2021). He has a strong passion for developing Human Capital and was assigned as Chief Learning Officer at BNI Corporate University. With his experience, expertise and insight, in February 2021, he was reassigned as CAE to the BNI Internal Audit Unit.

HEAD OF INTERNAL AUDIT UNIT DEVELOPMENT

COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	ORGANIZER	DATE
Anang Basuki		
The Head IAU leader is a resource person for Audit/Internal Control, Governance, Risk & Compliance for BNI's internal environment, and as a speaker at the Internal Audit Professional Organization Conference		
Speaker for Regional Leaders Training • Session: Operational Risk & Leadership Sharing	BNI Corporate University	June 2021
Speaker in Supplementing Knowledge for BNI Hi Movers session: Story Telling Leader BNI	BNI Corporate University	August 2021
Speaker in IIA Conference 2021 "Internal audit Back To The Future-Emerging From The Crisis" • Session: Fostering an Innovative Internal Audit Function for The Future	The Institute of Internal Auditor	October 2021
Public Training		
BUMN Digital Academy Program Product Validation (PV) Phase	Indonesia Telecommunication & Digital Research Institute	March 2021
In House Online Training		
Learning Modul Development • Instructional System Design & Module Developer Digital Learning	BNI Corporate University	January 2021
Personal Competency Development For Leaders	BNI Corporate University	April 2021
Risk Management Refresher Program	BNI Corporate University	September 2021
Data Influence Mindset	BNI Corporate University	December 2021

INTERNAL AUDIT CHARTER

In carrying out its duties, the Internal Audit Unit adheres to the Internal Audit Charter signed by the President Director and the Board of Commissioners and stipulated in the Board of Directors Decree No. KP/139/DIR/R dated April 14, 2021. The Internal Audit Charter was prepared based on OJK Regulation No. 1/POJK.03/2019 concerning the Internal Audit Function in Commercial Banks and the prevailing professional audit standards, and includes the IAU Vision and Mission, the IAU Structure and Position, the IAU Duties and Responsibilities, Authorities, Code of Ethics, Independence and Objectivity, Objectives and Scope of Audit Activities, Auditor Requirements and Development, Audit Risk and Legal Protection to Head and Auditors, Audit Quality Control Program, IAU Integrated Governance Function, and IAU Relations with external auditors.

INTERNAL AUDIT UNIT DUTIES AND RESPONSIBILITIES

The implementation of the internal audit function as stipulated in the OJK Regulation concerning the Implementation of the Internal Audit Function at Commercial Banks is the responsibility of the Board

of Directors, the Board of Commissioners, the Audit Committee and the Internal Audit Unit, and includes:

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 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.

In addition, the Head of IAU duties and responsibilities are 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 plan or schedule and audit 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 IAU 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 immediately any audit findings that are thought may interfere with BNI's business continuity to the President Director and the Board of Commissioners, with copies to the Audit Committee and the director in charge of the compliance function, as well as monitoring the follow-up;
8. Carrying out follow-up monitoring of audit results as well as periodically submitting a Pending Follow-up Report on Audit Results to the President Director and the Board of Commissioners; and
9. Ensuring the use of external party services is only temporary in nature so as not to affect the independence and objectivity of the IAU function, and is in accordance with the BNI internal audit charter.

INTERNAL AUDIT UNIT AUTHORITIES

To carry out their duties and responsibilities with optimal results, IAU is authorized 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.

INTERNAL AUDIT UNIT OBJECTIVITY

The Internal Audit Unit provisions govern the implementation of audit assignments to maintain objectivity, and include:

1. It is regulated in the Code of Ethics that must be obeyed by all auditors.
2. They are not allowed to be involved/conduct business/operational activities, including:
 - a. Having the authority and responsibility or being involved in/or conducting operational activities in BNI or its subsidiaries/affiliates/financial service institutions;
 - b. Holding concurrent duties and positions for the implementation of operational activities BNI or its subsidiaries/affiliates/financial service institutions; and
 - c. Being involved in making decisions on BNI operational activities.
3. Does not have a relationship that creates a potential conflict of interest, such as:
 - a. Having a familial relationship with employees in the auditee unit up to the second degree, both horizontally and vertically;
 - b. The auditor has been an employee in the auditee unit, both as a Head or Non-Head;
 - c. Is conducting an audit of an audit object where the internal auditor was previously involved in providing consulting services/other tasks regarding the object.

4. Not being involved in activities or having a relationship that will cause a conflict of interest
5. Regulated in the cooling-off period policy, including:
 - a. Reassignment of the auditor to the unit/auditee where a potential conflict of interest can be given at least after the audit of the auditee unit conducted 1 (one) time and/or after a period of 1 (one) year has passed; and
 - b. Not allowed to audit an auditee 2 (two) times in a row as team leader.

In addition, the Internal Audit Unit has a code of ethics that must be obeyed by all auditors, as follows:

1. Integrity

- a. Carrying out their duties honestly, diligently, and responsibly;
- b. Complying with the law and making disclosures in accordance with the laws and regulations and the profession;
- c. Not intentionally/consciously becoming involved in prohibited/illegal activities, not taking actions that can damage IAU's credibility and internal audit profession;
- d. Supporting goals of BNI and IAU.

2. Confidentiality

- a. Being careful in using and maintaining information obtained in the execution of their duty; and
- b. Not using information for the benefit of anyone and/or in any way that would conflict with the law and/or Company provisions.

3. Competency

- a. Carry out duties in accordance with their knowledge, skills, and experience;
- b. Carry out audits in accordance with the Standards for the Bank's Internal Audit Function and/or other applicable audit standards; and
- c. Improve competence continuously.

AUDIT QUALITY CONTROL

Audit quality control program (Quality Assurance) and Improvement Program designed to evaluate the Internal Audit activities conformity with standards and evaluate the application of a code of ethics, including in the developing an audit methodology and refining audit programs to suit the development of existing business processes as well as best practices.

Quality control of the Internal Audit Unit is carried out by internal and external parties. Quality control carried out by internal parties involves forming a separate unit, the Quality Control Group, whose duties include reviewing the quality of implementation and audit results and ensuring that the auditor's code of ethics has been complied with.

External quality control is carried out by an independent party, a Public Accountant every 3 (three) years. The last review in 2021 was carried out by PT RSM Indonesia Consultant with the following results:

1. "Internal Audit Activities are In General In Accordance With the Provisions of OJK Regulation No.1/POJK.03/2019 concerning the Implementation of the Internal Audit Function in Commercial Banks, as well as OJK Regulation No.38/POJK.03/2016 and OJK Letter No.21/SEOJK.03/2017 concerning the Implementation of Risk Management in the Use of Information Technology by Commercial Banks, particularly related to the Internal Audit Process".
2. The effectiveness in using the Audit Management System (FAST) application for Application Controls and General Controls **has been running well**, where the application has become the catalyst for the digital-based audit implementation process.

In addition, a review of conformity with the IPPF International Standard (International Professional Practices Framework) has been carried out.

IAU Audit Methodology

IAU's vision is to become a professional, independent and objective business partner to management to support BNI becoming a financial institution that excels in service and performance. The IAU has prepared an Audit and Consultation Work Plan in line with BNI's main focus, to ensure the quality of BNI's business growth, balanced with the establishment of strong corporate governance in all operational areas. The Audit and Consultation Plan preparation is carried out through Macro Assessment and Micro Assessment stages.

The Macro Assessment was carried out on BNI's overall performance and risk indicators, with the aim of identifying certain themes/topics that will be the focus of the audit with an orientation on the business process implementation. Selection of an audit theme began by identifying and assessing activities related to the BNI, General Policy of Directors (KUD) BNI, Consider Risk Profile according to the Risk Management Committee (RMC), input or concern of the Board of Directors and Senior Management, conditions/issues that occur based on BNI business developments.

Micro Assessment assesses the risk level of the auditee units, and is carried out by assessing the risk level in the unit based on set risk parameters. Identification of high-risk audit objects, determines audit priorities.

Several initiatives for improvement and development of audit tools carried out by IAU included:

1. Continuous development of the Audit Management System (FAST) application to support audit activities;
2. IAU transformation program to strengthen the IAU function and improve the quality of output, both in terms of Organization, Methodology, Environment and Capability as well as IAU Ratings for Divisions;
3. Updating audit tools, including re-designing the Audit Results Reporting Tool to more effectively communicate audit results to management that focus on significant issues;
4. Strengthening the integrated audits through a Memorandum of Understanding (MOU) on Integrated Governance for BNI's Financial Conglomerate in order to develop audit quality for BNI financial conglomerates.

In addition, in accordance with the SK Organizational Changes SAI No. KP/068/DIR/R dated February 18, 2021 to strengthen BNI's internal control system, IAU has been reorganized, by migrating Dedicated Auditors who were previously under IAU supervision to Internal Control under the Regional Office supervision, in order to strengthen the internal control function with higher ownership of risk as well as higher responsiveness and flexibility in decision making and problem solving.

To support this, IAU played a role in perfecting the functions and roles of Internal Control related to the Internal Control Methodology, including:

1. Standardization of work processes;
2. HC competencies;
3. Reporting flow;
4. Implementation of the Audit Management System (FAST) for IP, including training on the use of applications and continuous development related to IP review activities.

INTERNAL AUDIT UNIT WORK PROGRAM IN 2021

To support BNI's 2021 strategy achievement, IAU developed an initiative strategy as outlined in the IAU 2021 Business Plan and work program, and in the 2021 Annual Audit Plan, as follows:

1. Carry out risk-based audits to oversee potential significant business risks through compliance with audit coverage;
2. Supervise the expansion of the National Economic Recovery Program (PEN) and other Government programs;
3. Carry out activity/thematic audits for business process improvements in line with the latest critical and risk issues, as well as IT Activity Audits in line with IT Major Risk and IT Transformation;
4. Carry out mandatory audits in accordance with regulatory provisions;
5. Implement value-added services through the Consulting function based on user needs through Independent Reviews as a form of IAU control for the issuance of new products as one of the regulator (Financial Services Authority) requirements, and other non-formal consultative forms;
6. IAU transformation program to strengthen its function and improve the quality of output, in terms of Organization, Methodology, Environment and Capability as well as IAU Ratings for Divisions;
7. Participate in perfecting the Internal Control function and role for the Internal Control Methodology, including Standardization of work processes & HC competencies, reporting flow, Internal Control Independence, and conducting continuous Internal Control Audit Management System (FAST) development, including training on application usage;
8. Optimize the Surveillance function to assist audits through the detection of potential risks as an Early Warning System or Continuous Audit/Monitoring;
9. Optimize the effectiveness of the Integrated Internal Audit Unit with Subsidiaries;
10. Increase learning and growth through improved audit methodology and tools, improved applications, and support for IT infrastructure for IAU, which is currently being done digitally through the Audit Management System (AMS) Application, and continues to be enhanced periodically as well as increase employee capability competencies.

IAU performs independent and objective assurance and consulting functions and integrates with Subsidiaries SKAI, while remaining a professional, independent and objective business partner for management to support BNI's vision. BNI's business acceleration supervision is carried out by aligning the IAU strategy with BNI's business strategy, to provide added value by increasing the effectiveness of risk management, control and governance processes.

Based on the results of the Company's directives review in 2021, risk assessment, audit priorities, as well as availability of human resources, and in connection with the pandemic conditions, the auditors mobility limitation, IAU established a 2021 audit strategy, as follows:

1. Carry out Off-Site Audits on delivery channel unit (Branch Offices, Credit Centers and Regional Offices) using system data by optimizing the IAU Surveillance Unit Exception Report (ER) data;
2. Oversee the expansion of the National Economic Recovery Program (PEN) and other Government programs;
3. Expand consultative functions, including Independent Reviews on the issuance of new products as a condition for obtaining permits from the regulator (Financial Services Authority) and reviews of digital activities.

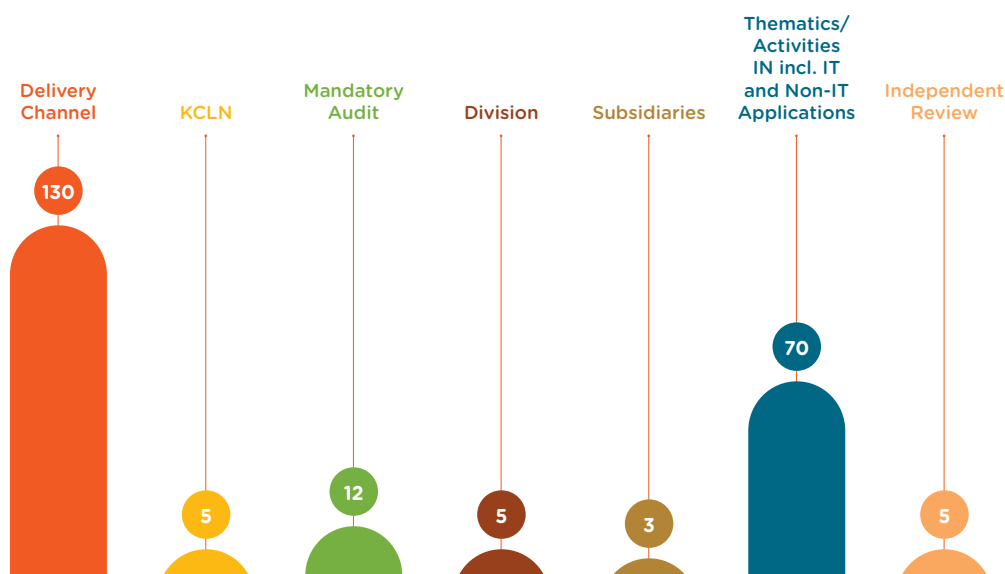
The 2021 audit and consultation plan was as follows.

1. Activities or Thematic Audit on small business loan activities, medium segment loan activities, consumer segment loan activities, network & services activities, corporate loan activities and the effectiveness of the procurement process;
2. Mandatory audits;
3. The Audit Unit from the audit divisions, domestic and overseas branches, regional offices, Small Loan Centers, Medium Loan Centers and Consumer Loan Centers; and
4. Information & Technology Activities and Application Audits; as well as
5. Informal and formal consultations including Independent Reviews of new product/activity launches.

IAU Audit & Consultation Realization in 2021

The 2021 audit realization reached 100.88% of its target, with audit delivery channels, Divisions, KCLN and Subsidiaries reaching 100.7%, and Thematic Audits, IT Activities, Non-IT Applications, IT Applications, Independent Reviews, and Mandatory Audits reaching 101.16%, as follows:

2021 Audit Realization

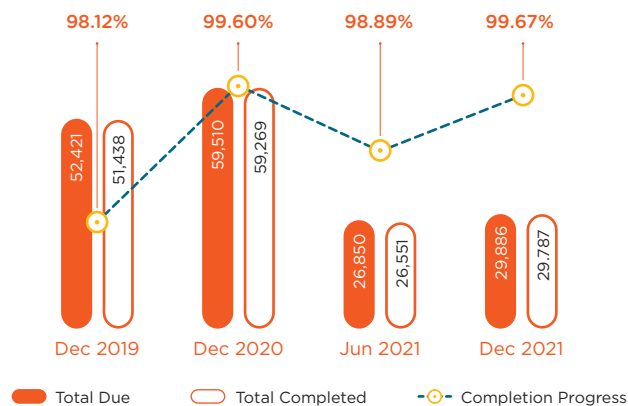


Audit Results Follow-up Completion

As part of the audit process/stages, after reporting the audit, the audit activity that must be carried out is monitoring the audit results. Monitoring activity is an activity to find out and ensure the implementation of follow-up audit results including the completion of IAU Recommendations and Disposition of the Board of Directors, both by the auditee and other related parties.

Every Quarter, IAU conveys the progress of the completion of the follow-up audit results in the form of a Pending Report on the Follow-up Audit Results to the Board of Directors and the Board of Commissioners through the Audit Committee.

The following is the follow-up data for pending completion of Audit Results, IAU Recommendations and Disposition of the Board of Directors on the results of the 2021 IAU audit.



In addition to monitoring the IAU audit results, IAU functions as a liaison with external parties (OJK, BI, BPK and KAP), IAU also monitors the follow-up to the external party audit results. During 2021, the follow-up on the external audit results shown in the following table.

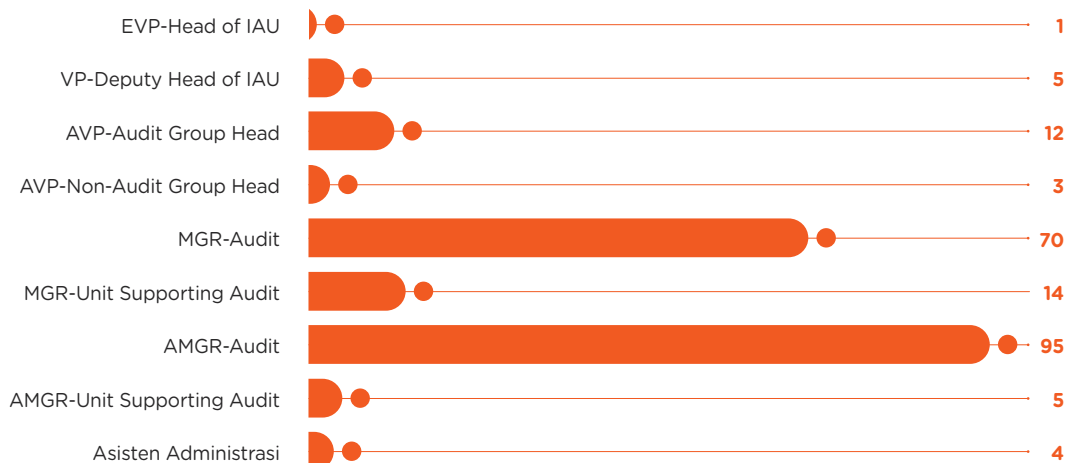
AUDIT

	PERIOD TO DECEMBER 2021	
	FINISHED	IN PROGRESS
Bank Indonesia (BI)	17	-
Otoritas Jasa Keuangan (OJK)	748	23
Badan Pemeriksa Keuangan RI (BPK RI)	287	57
Kantor Akuntan Publik (KAP)	51	1

IAU HC COMPETENCY COMPOSITION AND DEVELOPMENT

IAU HC Personnell

The Internal Audit Unit has 209 (two hundred and nine) employees as shown in the following diagram:



IAU HC COMPETENCY DEVELOPMENT

The Internal Audit Unit is committed to developing the auditors' competencies and capabilities. To support competency development, IAU has established a of training policy with a refreshment period at least every year, meaning that all auditors are required to participate in a capability development program at the same time. The competency development carried out by IAU during 2021 was follows:

COMPETENCY DEVELOPMENT/ TRAINING MATERIALS	ORGANIZING AGENCY	TIME OF EXECUTION
Annual Training		
Regular Auditor Annual Training	BCV	January-February 2021
Dedicated Auditor Annual Training	BCV	January-February 2021
Online Workshop & Webinar		
Webinar "Audit Report Writing: Bring Your Report to Management's Attention"	IAIB	March 2021
Webinar "Digital Banking: The Basic, Environment, and Challenges's"	IAIB	April 2021
Workshop "Audit Internal dan Audit Forensik"	Lemiknas	April 2021
Public Training "Urgency and Implementation of Financial Audits and Audits of State Losses and Tax Audits in BUMN/BUMD & Private Ministries, as well as GCG as Strategic and Concrete Steps in Preventing Corruption"	BCV	September 2021
IIA Conference "Internal Audit for The Future-Emerging from the Crisis"	IIA Indonesia	October 2021
Seminar "Risk Forum: Asset Liability Management in Uncharted New Normal-Strategy & Optimization"	BARA	October 2021
Certification Training Programs		
Online Course Risk Management Certification level 1 to 3	SMR/LSPP	September-December 2021
Online Course for Bank Internal Audit Certification level 1 to 2	IAIB	September-December 2021
Coaching Clinic CIA Certification (Certified Information System Auditor)	IIA Indonesia	November 2021
Online Review Course for CISA (Certified Information System Auditor) Certification	Learning Platform CISA	October-December 2021
Online Training IT IL (Information Technology Infrastructure Library)	Graha Karya Informasi	September-November 2021
Online Training ISO 9001 : 2015	SGS	September-November 2021
In House Online Training		
Mandatory e-Learning	BCV	January-December 2021
<ul style="list-style-type: none"> • Gratuity & Anti-Bribery-Anti-Fraud Awareness • Anti Money Laundering • Work Culture • Good Corporate Governance • Risk Culture • Sustainable Finance 		

**COMPETENCY DEVELOPMENT/
TRAINING MATERIALS****ORGANIZING AGENCY****TIME OF EXECUTION**

In addition to the above auditor's competency development, IAU continues to improve the auditor's competency through internal sharing sessions routinely held every week. This is carried out to improve audit capabilities and accelerate auditors' knowledge of the latest BNI business developments

Internal Sharing Session

Lesson Learned Fraud IT Series 1 SMS Banking Presented	IAU in collaboration with BNI Corporate University	June-December 2021 (Every week)
Audit Technique Training		
Credit Activities and Communication Skill		
Branch Infrastructure Management		
Calculating Financial Losses Due to Fraud		
Internal Control COSO Framework		
Offsite Audit in Pandemic Circumstances		
Introduction to Data Processing & RC with IDEA Applications		
Risk Awareness-Understanding Corruption Category Criminal Actions		
Effective Communication to Overcome Audit Obstacles		
Audit Value Chain		
Fraud Awareness (Account Take Over)		
Standardization & Security of Branch Offices and ATMs		
Pemeriksaan Single Customer View (SCF)		
Fraud Skimming		
Execution Culture Discipline		
Account Take Over		
Socialization of Customer In-Absentia Transactions		
Lesson Learned Regarding Central Branch Operations		
Review of KUR Distributors-Farmers/Seasonals		
Optimization of BNI's Interest Income		
Top 5 Issues of Credit Activities in the Corporate Segment		
Book Review of Askrendo Claim Results & Fraud Awareness of Pre Embossed Credit Card Activities		
Assets in Completion and Prepurchase		

INTERNAL AUDIT UNIT CERTIFICATION**a. Head of IAU Certification**

IAU is committed to continuously improving the auditors competencies and knowledge through continuous education and training so they achieve adequate qualifications. The certifications held by the Head of IAU are as follows:

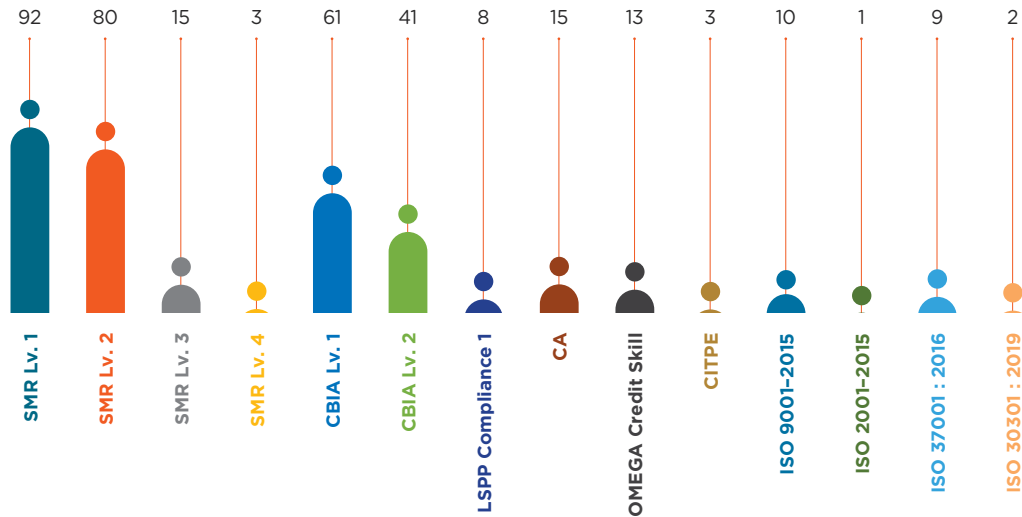
- Risk Management Certification Level 1-4;
- Certified Internal Auditor from The Institute of Internal Audit;
- Certified Six Sigma (Green Belt) from Pivotal Resources Asia;
- Silver Certificate 4 Disciplines of Execution (4DX) Leader;
- ISO 9001:2015 Interpretation & Documented Information.

b. Sertifikasi Auditor Satuan Audit Internal

The certification obtained by IAU employees until 2021 are as follows:

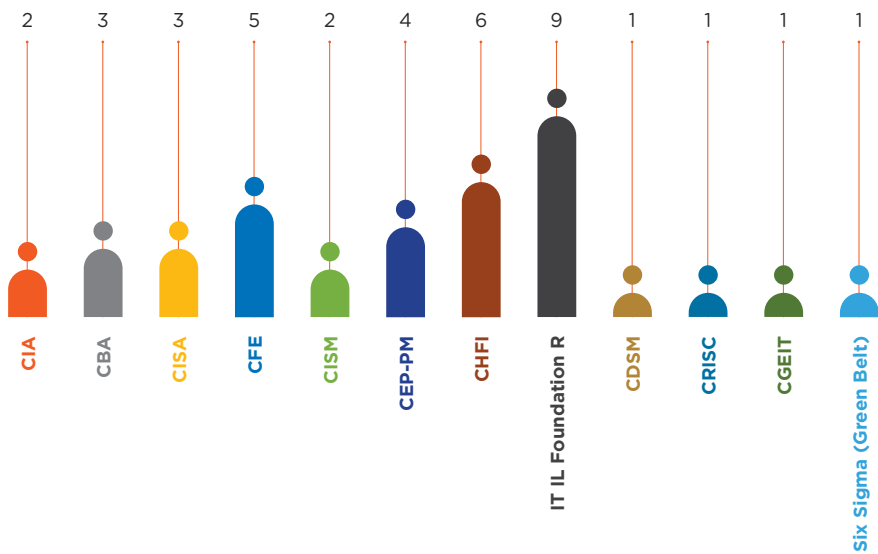
National Certification

IAU AUDITORS NATIONAL CERTIFICATION up to December 2021



International Certification

IAU AUDITORS INTERNATIONAL CERTIFICATION up to December 2021



IAU MEETINGS WITH THE BOARD OF COMMISSIONERS, BOARD OF DIRECTORS AND AUDIT COMMITTEE

In 2021, the Internal Audit Unit held 22 (twenty two) meetings with the agenda and attendance level for each member of the Internal Audit Unit as follows:

NO.	DATE OF MEETING	MEETING AGENDA	PARTICIPANTS
1	January 12, 2021	<ul style="list-style-type: none"> Evaluation on IAU RKAT Semester II 2020 Evaluation on Audit Results Key Points Follow-up on IAU Examination Follow-up on External Auditor Examination 	Audit Committee
2	February 18, 2021	Internal Audit Unit (IAU) Work Plan and IAU Internal Audit Charter	Board of Commissioners
3	April 21, 2021	Discussion with DIR KM	Board of Directors
4	May 3, 2021	Establishment of Anti-Fraud Unit	Board of Directors
5	May 7, 2021	Update on Anti Fraud Unit	Board of Directors
6	May 20, 2021	Discussion on Approval of IAU Review Function Service in 2021 Cfm. SAI Letter No. SAI/16/1003/R April 16, 2021	Board of Commissioners
7	June 8, 2021	<ul style="list-style-type: none"> Evaluation on IAU RKAT QI 2021 Evaluation on Audit Results Key Points Follow-up on IAU Examination Follow-up Examination on External Auditor Report on OJK inspection of BNI Tangerang KCU Report on WEM Transitory Account 	Audit Committee
8	July 15, 2021	Evaluation of BNI's Internal Control including effectiveness of BNI's IAU	Board of Commissioners
9	July 28, 2021	Follow-up on SAI Examination Results (Updating and Follow-up on Makassar Cases)	Audit Committee
10	August 9, 2021	Audit Committee Meeting Agenda for Discussion on SM I 2021 Audit Results Key Points	Audit Committee
11	August 27, 2021	Presentation and discussion on IAU review results by RSM Consultants	Audit Committee
12	September 1, 2021	Presentation on BNI (Persero) Internal Audit Unit Functions Review Results for the Period July 1, 2018 - June 30, 2021 with PT RSM Indonesia Consultant	Board of Directors
13	September 3, 2021	Audit Committee Meeting Agenda for Discussion on Q2 2021 Audit Results Key Points	Audit Committee
14	September 5, 2021	BPK Material Discussion: <ul style="list-style-type: none"> Discussion on the latest BNI financial performance position Discussion on non-performing loans (Pre NPL, NPL and Write Off) Discussion on the PEN Program at BNI 	Board of Directors
15	September 9, 2021	Presentation on the BNI IAU function review results by RSM	Board of Commissioners
16	September 16, 2021	Audit Committee Update on the Provision of KUR at the Mataram Branch Office, and Presentation by IAU to the Board of Commissioners on the progress of completing the IAU Audit results follow-up, and IAU recommendations in the Audit Results Report (LHA)	Board of Commissioners
17	October 19, 2021	Discussion on the special IAU AYDA, PSB and DAS audit results	Audit Committee
18	November 4, 2021	<ul style="list-style-type: none"> Preparation for Radekom Meeting IAU special audit results on Foreclosed Assets (AYDA), Bank Temporary Participation (PSB) and Debt to Asset Swap (DAS) 	Board of Directors Board of Commissioners
19	November 23, 2021	Discussion on the FAST application and IAU supporting applications	Audit Committee
20	December 14-15, 2021	Board of Commissioners meeting with Domestic Regional Offices, Divisions, and Overseas Branch Offices (IAU in attendance): <ul style="list-style-type: none"> Performance Exposure Follow-up Discussion on Internal/External Auditor Examination Results 	Board of Commissioners
21	December 21, 2021	<ul style="list-style-type: none"> Evaluation of RKAT SAI Quarter III 2021 Evaluation of Audit Results Key Points Follow-up on IAU Examination Follow-up on External Auditor Examination 	Audit Committee
22	December 22, 2021	Discussion on BNI Consolidated Financial Statements for Fiscal Year 2021 Audit Progress with KAP Tanudiredja, Wibisana, Rintis & Rekan	Audit Committee

FREQUENCY OF MEETINGS AND ATTENDANCE OF THE INTERNAL AUDIT UNIT

The frequency and level of attendance of Internal Audit Unit meetings can be seen in the table below:

Tingkat Kehadiran Rapat Satuan Audit Internal

NO.	DATE OF MEETING	PARTICIPANTS	
1	January 12, 2021	IAU	Present
2	February 18, 2021	IAU	Present
3	April 21, 2021	IAU	Present
4	May 3, 2021	IAU	Present
5	May 7, 2021	IAU	Present
6	May 20, 2021	IAU	Present
7	June 8, 2021	IAU	Present
8	July 15, 2021	IAU	Present
9	July 28, 2021	IAU	Present
10	August 9, 2021	IAU	Present
11	August 27, 2021	IAU	Present
12	September 1, 2021	IAU	Present

NO.	DATE OF MEETING	PARTICIPANTS	
13	September 3, 2021	IAU	Present
14	September 5, 2021	IAU	Present
15	September 9, 2021	IAU	Present
16	September 16, 2021	IAU	Present
17	October 19, 2021	IAU	Present
18	November 4, 2021	IAU	Present
19	November 23, 2021	IAU	Present
20	December 14-15, 2021	IAU	Present
21	December 21, 2021	IAU	Present
22	December 22, 2021	IAU	Present
Number of Meetings		22	
Total Attended		22	
% Attended		100%	

Internal Audit Unit at the Meeting Attendance Recapitulation

INTERNAL AUDIT UNIT	NUMBER OF MANDATORY MEETINGS	TOTAL ATTENDANCE	% ATTENDANCE
SAI	22	22	100%

INTEGRATED INTERNAL AUDIT UNIT (SKAIT)

For the implementation of the Integrated IAU function as referred to in OJK Regulation No. 18/POJK.03/2014 dated November 18, 2014 and Circular No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance for Financial Conglomerates, the Integrated IAU has carried out its duties and responsibilities.

To support the BNI Financial Conglomerate growth in a healthy, prudent and sustainable manner with high competitiveness, BNI as the Main Entity has implemented IAU in the main entity and the SKAI Subsidiaries as a commitment to carry out audit quality development for the Financial Conglomerate in carrying out the audit function for integrated internal control to ensure the implementation of the internal control function runs effectively in all operational activities of the Subsidiaries at all management levels.

SKAIT duties and responsibilities stipulated in the TKT guidelines are as follows:

1. Evaluating and providing input on the adequacy of the Subsidiary's SKAI audit methodology, policies and procedures in accordance with the size, characteristics

and complexity of the subsidiary, both at the stages of audit planning, audit implementation, reporting of audit results and monitoring of follow-up completion;

2. Submitting a report on the main results of the integrated audit to the President Director and the Board of Commissioners of the Main Entity with a copy to the Director in charge of the Main Entity's Compliance Function;
3. Monitoring the follow-up of internal audit results in an integrated manner and report the results to the President Director and the Board of Commissioners of the Main Entity with a copy to the Director in charge of the Main Entity's Compliance Function;
4. Submitting the integrated internal audit report to the President Director, the Director appointed to carry out the supervisory function of LJK in the Financial Conglomerate and the Main Entity's Board of Commissioners as well as the Director in charge of the Main Entity's Compliance Function;
5. Monitoring and follow-up on recommendations from the Integrated Governance Committee;

6. IAU as the Third Line of Defense ensures internal control in each line in the BNI Financial Conglomerate, by conducting audits and consulting with subsidiaries. IAU can conduct audits and consultations on Subsidiaries without requiring prior approval from the Subsidiary's Board of Commissioners;
7. IAU carries out internal supervision over all areas, operational and business activities as well as coordinates with the internal control function in the Subsidiary;

To carry out these duties and responsibilities, including developing audit quality, the Subsidiary's IAU and SKAI integrate the internal audit function with a scope that includes:

1. Audit Methodology

IAU with the Subsidiary's SKAI conducts alignment/evaluation according to the size, characteristics, and complexity of the subsidiary, including, risk-based audit methodology as well as audit policies and procedures of each Subsidiary, through:

- a. IAU coordinating the alignment of the risk-based audit methodology used by the Subsidiary SKAI;
- b. IAU providing input on the adequacy of Subsidiary Company Audit Policy and SOP.

2. Audit Planning

IAU with the Subsidiary's SKAI prepare an Integrated annual Audit plan with the following mechanisms:

- a. IAU input on the annual audit plan prepared by the Subsidiary SKAI;
- b. Information concerning the Subsidiary SKAI audit results to be used by IAU as evaluation material in preparing an integrated audit plan;
- c. IAU consolidates the integrated annual audit plan and submits it to the President Director and the Board of Commissioners of the Main Entity.

3. Audit Implementation

The integrated audit can be carried out using the following mechanism:

- a. The audit is carried out individually;
- b. Join Audit;
- c. IAU places its auditor as the Head of SKAI in the Subsidiary Company;
- d. Subsidiary SKAI reports on the implementation and main points of audit results to IAU containing audit results, main points of audit results and progress of completing follow-up on internal and external audit results carried out by Subsidiary SKAI.

4. Joint Training

IAU with Subsidiary SKAI develop auditors through the following mechanisms:

- a. IAU with Subsidiary SKAI attend joint training held by IAU, namely Refreshing Auditor;
- b. IAU and Subsidiary SKAI hold joint workshops;
- c. IAU and Subsidiary SKAI provide internship opportunities for their auditors at Subsidiaries and IAU.

COMMITTEES UNDER THE BOARD OF DIRECTORS

In carrying out their duties, the Board of Directors establishes committees to assist the Board of Directors in terms of effectiveness and efficiency, including in making strategic decisions on the Company's operational activities. The committees under the Board of Directors are as follows:

1. Credit Committee;
2. Credit Policies and Procedures Committee;
3. Product Committee;
4. Asset & Liability Committee;
5. Human Capital Committee (HC);
6. Performance Management Committee;
7. Risk Management and Anti Fraud Committee;
8. Technology Management Committee;
9. Integrated Risk Management Committee.

CREDIT COMMITTEE

CREDIT COMMITTEE STRUCTURE AND MEMBERSHIP

The Credit Committee (KK) consists of Head Office Level KK, Division Level KK, Regional Level KK, and Small Segment KK with the following levels:

1. Credit Committee at Head Office level
 - a. Head Office KK-4 (KKP-4)
 - b. Head Office KK-3 (KKP-3)
 - c. Head Office KK-2 (KKP-2)
 - d. Head Office KK-1 (KKP-1)
2. Divisional Credit Committee
 - a. Division KK (KKD)
3. Regional Credit Committee
 - a. KK Regional Office (KK Kanwil)
 - b. Intermediate KK
4. SME Business Center Credit Committee (SBE)
 - a. Small KK 2
 - b. Small KK 1
5. KK Branch Office Level (KC)
 - a. KK KC 2
 - b. KK KC 1

HEAD OFFICE CREDIT COMMITTEE

CREDIT COMMITTEE (KK)	MAXIMUM CREDIT	CREDIT COMMITTEE MEMBERS	
		BUSINESS	RISK
KK Pusat-4 (KK P-4)	up to BMPK	Radisi Meetings Attended by more than (one half) of the total members of the Board of Directors plus SEVP as follows: Minimum 50% of business functions including the Sector Director who proposes/Managing Directors of Business Functions plus SEVP carrying out the business functions	
		Minimum 50% of business functions including the MR Director who proposes/Managing Director of Risk Functions plus SEVP carrying out the risk functions	
KK P-4 or Radisi is the highest level Credit Committee at BNI			
KK Pusat-3 (KK P-3)	up to Rp10 trillion	2 Business + 3 Risk	
		<ul style="list-style-type: none">Proposing Sector Managing Director/Managing Directors of Business FunctionsManaging Directors of business function or SEVP of business function	<ul style="list-style-type: none">Managing Director of MR/Managing Directors of risk functions2 Managing Directors of risk functions or SEVP of risk functions
KK Pusat-2 (KK P-2)	up to Rp2 trillion	2 Business + 2 Risk	
		<ul style="list-style-type: none">Proposing Sector Managing Directors/Managing Directors of Business FunctionsManaging Directors of business function or SEVP of business function	<ul style="list-style-type: none">Managing Director of MR/Managing Directors of risk functions1 Managing Director of risk functions or SEVP/SCO of risk functions
KK Pusat-1 (KK P-1)	s.d. Rp750 miliar	1 Business + 2 Risk	
		<ul style="list-style-type: none">Proposing Sector Managing Director/Managing Director of Business Functions or SEVP*)	<ul style="list-style-type: none">Managing Director of MR/ManagingDirector of risk function1 Managing Director who carries out the risk function or SEVP/SCO who carries out the risk function

*) Specifically for credit proposals from the RR unit, the official acting as the Managing Director of the proposing sector is the SEVP RR (SRR)

DIVISION CREDIT COMMITTEE

CREDIT COMMITTEE (KK)	NEW OR ADDITIONAL			REVIEW		
	MAXIMUM CREDIT	CREDIT COMMITTEE MEMBERS		MAXIMUM CREDIT	CREDIT COMMITTEE MEMBERS	
		BUSINESS	RISK		BUSINESS	RISK
Corporate Segment						
Division KK (KKD))	up to Rp300 billion	<ul style="list-style-type: none">• Business Division Head/SCO• Deputy Head of Business Divisions	<ul style="list-style-type: none">• Managing Director MR/Managing Directors of Risk Functions• Risk Division Head/SCO• Deputy Head of Risk Divisions	up to BMPK	<ul style="list-style-type: none">• Business Division Head/SCO• Deputy Head of Business Divisions	<ul style="list-style-type: none">• Risk Division Head/SCO• Deputy Head of Risk Divisions
Medium-Large Commercial Segment						
Division KK (KKD)	up to Rp200 billion	<ul style="list-style-type: none">• Business Division Head/SCO• Deputy Head of Business Divisions	<ul style="list-style-type: none">• Managing Director MR/Managing Directors of Risk Functions• Risk Division Head/SCO• Deputy Head of Risk Divisions	up to Rp500 billion	<ul style="list-style-type: none">• Business Division Head/SCO• Deputy Head of Business Divisions	<ul style="list-style-type: none">• Risk Division Head/SCO• Deputy Head of Risk Divisions
Medium Commercial Segment						
Division KK (KKD)	up to Rp100 billion	<ul style="list-style-type: none">• Business Division Head/SCO• Deputy Head of Business Divisions	<ul style="list-style-type: none">• Risk Division Head/SCO• Deputy Head of Risk Divisions	The review authority is the same as the new & additional authority		

REGIONAL CREDIT COMMITTEE

CREDIT COMMITTEE (KK)	NEW OR ADDITIONAL			REVIEW	
	MAXIMUM CREDIT	CREDIT COMMITTEE MEMBERS		MAXIMUM CREDIT	CREDIT COMMITTEE MEMBERS
		BUSINESS	RISK		BUSINESS
Middle Commercial Segment					
Regional Offices KK	up to Rp40 billion	<ul style="list-style-type: none">Deputy Head of Commercial Business AreaSBK Leader	<ul style="list-style-type: none">Regional LeaderRBW	The review authority is the same as the new & additional authority	
Middle KK	up to Rp20 billion	<ul style="list-style-type: none">SBK Leader	<ul style="list-style-type: none">RBW	The review authority is the same as the new & additional authority	
Small Commercial Segment					
Small Segment	up to Rp15 billion	<ul style="list-style-type: none">Deputy Head of Commercial Business Area/ Vice Leader of SME & Consumer Business Area (as per Service)	<ul style="list-style-type: none">RBW		

SMALL SEGMENT BANKING BUSINESS CREDIT COMMITTEE

CREDIT COMMITTEE (KK)	MAX. CREDIT	CREDIT COMMITTEE MEMBER*)	
		BUSINESS	RISK
Small Segment			
Small KK - 2	up to Rp15 billion	SBE Leader	RBC
Small KK - 1	up to Rp1 billion	SBE Deputy Leader	RBC

BRANCH LEVEL CREDIT COMMITTEE

CREDIT COMMITTEE (KK)	KELAS CABANG	MAX. CREDIT	CREDIT COMMITTEE MEMBER*)	
			BUSINESS	BUSINESS
Small Segment				
Branch KK -2	Class I	up to Rp15 billion	Branch Leader	RBC
	Class II	up to Rp10 billion		
	Class III	up to Rp5 billion		
Branch KK -1	Class I	up to Rp1 billion	Business Marketing Leader (PBP)	RBC
	Class II			
	Class III			

*) If the Branch does not have a PBP, the authority to decide on credit rests with the Branch Manager + RBC Leader

CREDIT COMMITTEE PROFILES AND CERTIFICATION

The profiles and certifications for each committee member can be seen in the discussion of the Board of Directors' Profile and the Senior Executive President's Profile.

CREDIT COMMITTEE JOB DESCRIPTION AND RESPONSIBILITIES

Credit Committee Job Description is as follows:

1. Approve or reject proposals in accordance with the credit limit or types of credit authority established by the Board of Directors;
2. Be responsible for credit decisions based on financing feasibility, credit safety considerations, compliance with lending policies and procedures as well as the credit limit provisions
3. Coordinate with the Treasury Division on credit funding aspects;
4. Reject requests and or influence from parties with an interest in the credit applicants that provides credit that is merely a formality;
5. Carry out their duties, especially in connection with the provision of appropriate credit approval authority based on professional, honest, objective, accurate and thorough skills.

IMPLEMENTATION OF CREDIT COMMITTEE DUTIES IN 2021

During 2021, the Credit Committee carried out the following duties and authorities:

Credit Approval Authority of Corporation Segment

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
KK Pusat-4 (KKP-4)	up to BMPK	63
KK Pusat-3 (KKP-3)	up to Rp10 trillion	50
KK Pusat-2 (KKP-2)	up to Rp2 trillion	43
KK Pusat-1 (KKP-1)	up to Rp750 billion	41
Total		197

Authority to Terminate Loans in the Medium Large Commercial KK Central Segment

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
KK Pusat-4 (KKP-4)	up to BMPK	1
KK Pusat-3 (KKP-3)	up to Rp10 trillion	7
KK Pusat-2 (KKP-2)	up to Rp2 trillion	22
KK Pusat-1 (KKP-1)	up to Rp750 billion	30
Total		60

Authority to Terminate Loans in the Medium Commercial KK Central Segment

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
KK Pusat-4 (KKP-4)	up to BMPK	0
KK Pusat-3 (KKP-3)	up to Rp10 trillion	5
KK Pusat-2 (KKP-2)	up to Rp2 trillion	62
KK Pusat-1 (KKP-1)	up to Rp750 billion	151
Total		218

KK Division

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
Corporate Segment KKD	up to Rp300 billion	11
Middle Large Commercial-1 Segment KKD	up to Rp200 billion	9
Total		20

Credit Approval Authority of Consumer Segment

LOAN WRITE-OFF OFFICER (PPK)	MAXIMUM CREDIT	NUMBER OF MEETINGS
Director Level Credit Committee		
• President Director, Vice President Director, Managing Director Consumer Business, Managing Director Risk Management	> Rp150 billion	-
• Vice President Director, Managing Director Consumer Business, Managing Director Risk Management	up to Rp150 billion	1
• Managing Director Consumer Business and Managing Director Risk Management	up to Rp75 billion	4
Total		5

Credit Approval Authority of Bank Financial Institution Segment

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
KK BL Pusat-4	up to BMPK	-
KK BL Pusat-3	up to Rp10 trillion	-
KK BL Pusat-2	up to Rp2 trillion	-
KK BL Pusat-1	up to Rp750 billion	-
KK BL Divisi	sup to 300 billion	1
Total		1

Credit Approval Authority of Overseas Branch Office Segment

CREDIT COMMITTEE	MAXIMUM CREDIT	NUMBER OF MEETINGS
KK Pusat-4 (KKP-4)	s.d. BMPK	2
KK Pusat-3 (KKP-3)	up to Rp10 trillion	1
KK Pusat-2 (KKP-2)	up to Rp2 trillion	2
KK Pusat-1 (KKP-1)	up to Rp750 billion	2
KK Divisi (KKD)	up to Rp300 billion	17
Total		24

INTEGRATED RISK MANAGEMENT COMMITTEE

As the Main Entity, BNI formed an Integrated Risk Management Committee (KMRT), cfm SK No. KP/193/DIR/R dated May 26, 2015, which was updated in accordance with the changes in the organization of the Board of Directors, cfm. Board of Directors Decree No. KP/384/DIR/R dated November 9, 2018, with the following membership composition:

INTEGRATED RISK MANAGEMENT COMMITTEE STRUCTURE AND MEMBERSHIP

In the Company's structure, the Integrated Risk Management Committee is positioned under the Board of Directors. The Integrated Risk Management Committee is chaired by the Risk Management Director-BNI as the Director who oversees the Bank's Risk Management function. The Integrated Risk Management Committee members composition is as follows:

NO.	COMPOSITION OF MEMBERS OF INTEGRATED RISK MANAGEMENT (KMRT)	
1.	Chairman	Risk Management Director-BNI as Director supervising the Bank's Risk Management function
2.	Secretary	Head of the Bank's Risk Management Division-BNI
3.	Permanent Members	<ul style="list-style-type: none"> Finance Director-BNI Compliance Director-BNI Head of Compliance Division-BNI Head of Internal Audit Unit-BNI Head of Subsidiary Development Division-BNI Head of Strategic Planning Division-BNI Head of Legal Division-BNI Head of Corporate Communications and Secretarial Division-BNI Director who supervises Risk Management-BNI Syariah Director who supervises Risk Management-BNI Sekuritas Director who supervises Risk Management-BNI Life Director who supervises Risk Management-BNI Multifinance Director who supervises Risk Management-BNI Asset Management Division Head in charge of Risk Management-BNI Syariah Division Head in charge of Risk Management-BNI Sekuritas Division Head in charge of Risk Management-BNI Life Division Head in charge of Risk Management-BNI Multifinance Division Head in charge of Risk Management-BNI Asset Management
4.	Non Permanent Members	Directors and Heads of Divisions/Units related to meeting materials from both BNI and Subsidiaries.

INTEGRATED RISK MANAGEMENT COMMITTEE PROFILES AND CERTIFICATION

The profiles and certification of each committee member can be found in the discussion on the Board of Directors' Profiles, Senior Executive President's Profiles, and Senior Officers Profiles

INTEGRATED RISK MANAGEMENT COMMITTEE CREDIT COMMITTEE JOB DESCRIPTION AND RESPONSIBILITIES

The Integrated Risk Management Committee Duties and Responsibilities are to provide recommendations to Board of Directors including:

1. Preparation of Integrated Risk Management policies;
2. Integrated Risk Management policy repairs or improvements based on evaluation results;
3. Determination of methodology and evaluation of integrated risk profile for BNI Financial Conglomerate;

IMPLEMENTATION OF INTEGRATED RISK MANAGEMENT COMMITTEE DUTIES IN 2021

During 2021, the Integrated Risk Management Committee held two meetings with the following agenda:

NO.	KMRT	DATE	AGENDA
1	KMRT/01	February 8-9, 2021	<ul style="list-style-type: none"> Integrated risk profile assessment as of December 31, 2020 Integrated KPMM position as of December 31, 2020
2	KMRT/02	August 9-10, 2021	<ul style="list-style-type: none"> Integrated risk profile assessment as of June 30, 2021 Integrated KPMM position as of June 30, 2021

ASSET & LIABILITY COMMITTEE (ALCO)

The Asset & Liability Committee (ALCO) is a permanent committee at BNI which has the following authorities and function:

1. Establishing policies and management of BNI assets and liabilities, including managing capital adequacy to cover risks and support the bank's business strategy
2. Determining the policies and management of assets and liabilities including
 - a. Liquidity Management;
 - b. Interest Rate Management;
 - c. Foreign Exchange Management;
 - d. Earnings & Investment Management.

The Asset & Liability Committee (ALCO) was restructured based on the Board of Directors Decree No. 437/DIR/R dated September 22, 2020 concerning the Arrangement of the Asset & Liability Committee (ALCO).

ASSET & LIABILITY COMMITTEE STRUCTURE AND MEMBERSHIP

NO.	ASSET AND LIABILITY COMMITTEE (ALCO) MEMBERSHIP COMPOSITION	
1.	Chairman	President Director
2.	Deputy Chairman	Vice President Director
3.	Secretary	Head of Treasury Division (concurrently as permanent Member)
4.	Permanent members at the Board of Directors & SEVP level (Voting members)	<ul style="list-style-type: none"> Managing Director-Treasury & International Managing Director-Corporate Banking Managing Director-Institutional Relations Managing Director-MSME Business Managing Director-Service & Network Managing Director-Consumer Business Managing Director-Risk Management Managing Director-Finance SEVP Treasury
	Non-permanent members at the Board of Directors level (Non-voting members)	Managing Director-Human Capital & Compliance
	Non-permanent members at the Board of Directors & SEVP level (Non-voting member)	<ul style="list-style-type: none"> Managing Director-IT & Operations Corporate Transformation SEVP Remedial & Recovery SEVP Operational SEVP Digital Business SEVP

NO.	ASSET AND LIABILITY COMMITTEE (ALCO) MEMBERSHIP COMPOSITION	
	Permanent members at Division/Unit level (Non-voting members)	<ul style="list-style-type: none"> • International Division Head • Corporate Business 1 Division Head • Corporate Business 2 Division Head • Corporate Business 3 Division Head • Corporate Solutions & Syndication Division Head • Institutional Relations 1 Division Head • Institutional Relations 2 Division Head • Commercial Business 1 Division Head • Commercial Business 2 Division Head • SME Business Division Head • Small Business & Programs Division Head • Wholesale Solutions Division Head • Retail Solutions Division Head • Consumer Product Management Division Head • Wealth Management Division Head • Corporate Credit Risk Division Head • Commercial & SME Credit Risk Division Head • Consumer Credit Collection & Processing Division Head • Corporate Credit Remedial & Recovery Division Head • Commercial & SME Credit Remedial & Recovery Division Head • Network Management Division Head • Subsidiary Development Division Head • Head of the Chief Economist Office • Strategic Planning Division Head • Budgeting & Financial Control Division Head • Policy Governance Division Head • Bank Risk Management Division Head • Compliance Division Head • Head of Internal Audit Unit
	Non-voting members	Division/Unit Heads and Directors of Subsidiary Companies related to the topic of discussion

IMPLEMENTATION OF ASSET AND LIABILITY (ALCO) COMMITTEE DUTIES IN 2021

In 2021, ALCO held eight meetings with the following agenda:

NO.	DATE	MEETING AGENDA
1	January 26, 2021	<ul style="list-style-type: none"> • Lesson Learned 2020 • Highlight Assets & Liabilities and 2021 Work Plan • Fund Interest Rate Review • Conclusion and Proposals
2	February 23, 2021	<ul style="list-style-type: none"> • Minutes of ALCO Directors Meeting • Development of Internal Conditions • Banking Book Strategy: Securities Management and NOP Management • Conclusion and Proposals
3	March 9, 2021	<ul style="list-style-type: none"> • Minutes of ALCO Meeting • Development of Internal Conditions • CASA Acquisition Program • Conclusion and Proposals
4	April 1, 2021	<ul style="list-style-type: none"> • Minutes of ALCO Meeting • Development of Internal Conditions • Idul Fitri Cash Needs & Cashflow Projections • Review of Deposits Counter Rate • Conclusion and Proposals
5	June 16, 2021	<ul style="list-style-type: none"> • ALCO Decision Monitoring • Development of Assets & Liabilities • Review of TPF Interest Rates • Fixed Rate Hedging • Conclusion and Proposals

NO.	DATE	MEETING AGENDA
6	August 3, 2021	<ul style="list-style-type: none"> ALCO Decision Monitoring Development of Internal Conditions Cost of Funds Efficiency Strategy Conclusion and Proposals Update on the Uo Deposito Race Program via E-Channel
7	October 11, 2021	<ul style="list-style-type: none"> ALCO Decision Monitoring Development of Internal Conditions CASA Development Review of Deposits Counter Rate Conclusion and Proposals
8	December 23, 2021	<ul style="list-style-type: none"> Lesson Learned 2021 Assets & Liabilities Projection Assets & Liabilities Strategy Cashflow Projection Conclusion and Proposals

RISK MANAGEMENT AND ANTI FRAUD COMMITTEE (KRA)

The Risk Management & Anti Fraud Committee (KRA) is a permanent committee at BNI with the authority to provide recommendations to the Board of Directors on the formulation, determination of policies and risk management including: Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputational Risk, Strategic Risk, and Compliance Risk; determination of policies and management of anti-fraud strategies in all organizational units, as well as determination of Environmental, Social & Governance (ESG) policies and management. The Risk Management & Anti-Fraud Committee (KRA) was reorganized based on the Board of Directors Decree No/484/DIR/R dated October 26, 2021 concerning the Structuring of the Risk Management and Anti-Fraud Committee.

The Risk Management & Anti Fraud Committee has 3 (three) sub committees, namely:

1. Risk Management Sub Committee (RMC).
2. Anti Fraud Sub Committee.
3. Environmental, Social & Governance (ESG) Sub Committee.

RISK MANAGEMENT & ANTI FRAUD COMMITTEE-RISK MANAGEMENT SUB COMMITTEE (KRA-RMC)

Risk Management & Anti Fraud Committee-Risk Management Sub Committee (RMC) Structure and Membership

NO.	COMPOSITION OF THE RISK MANAGEMENT & ANTI FRAUD COMMITTEE (KRA)-RISK MANAGEMENT SUB COMMITTEE	
1.	Chairman	President Director
2.	Deputy Chairman	Vice President Director
3.	Secretary	Head of the Bank's Risk Management Division (concurrently as a permanent member)
4.	a. Permanent members at the Board of Directors and SEVP level (Voting members)	<ul style="list-style-type: none"> Managing Director-Finance Managing Director-Corporate Banking Managing Director- IT & Operations Managing Director-MSME Business Managing Director-Service & Network Managing Director-Consumer Business Managing Director-Treasury & International Remedial & Recovery SEVP Treasury SEVP Operational SEVP Digital Business SEVP

Risk Management & Anti Fraud Committee-Risk Management Sub Committee (RMC) Structure and Membership

NO.	COMPOSITION OF THE RISK MANAGEMENT & ANTI FRAUD COMMITTEE (KRA)-RISK MANAGEMENT SUB COMMITTEE	
	Permanent members at the Board of Directors level (Non-Voting members)	Director Human Capital and Compliance
	b. Permanent members at Division/Unit level (Non-voting members)	<ul style="list-style-type: none"> Treasury Division Head Corporate Credit Risk Division Head Commercial & SME Credit Risk Division Head Consumer Credit Collection & Processing Division Head Strategic Planning Division Head Compliance Division Head Budgeting & Financial Control Division Head Head of Internal Audit Unit Legal Division Head Corporate Communication & Secretarial Division Head Policy Governance Division Head Credit Operations Division Head Corporate Solutions & Syndication Division Head Head of Anti-Fraud Unit
	c. Non-voting member	Directors/SEVP/Division Heads related to the topic of discussion.

Note:

*) Specifically, the Managing Director-Human Capital & Compliance has specific duties and responsibilities that are regulated in the committee's work guidelines.

Risk Management and Anti Fraud Committee-Risk Management Sub Committee (KRA-RMC)

The KRA-RMC duties and responsibilities are to evaluate and provide recommendations related to Risk Management, including:

1. Formulating Risk Management Policies and Strategies and their amendments;
2. Developing Risk Management framework and contingency plans to anticipate abnormal conditions;
3. Improving the Risk Management process periodically as well as incidentally as a result of changes in the Bank's external and internal conditions that affect capital adequacy, the Bank's Risk Profile, and the ineffective implementation of Risk Management based on evaluation results;
4. Establishing policies and/or business decisions that deviate from normal procedures, such as significant excesses of business expansion compared to the Bank's Business Plan that has been previously determined or taking positions/risk exposures that exceed the predetermined limits;
5. Establishing policies for managing capital adequacy to protect risks and support the Bank's business strategy, including measurement, structure (tier 1/tier 2), allocation and contingency plans for capital.

IMPLEMENTATION OF RISK MANAGEMENT COMMITTEE & ANTI FRAUD RISK MANAGEMENT SUB COMMITTEE (KRA-RMC) DUTIES IN 2021

During 2021, KRA-RMC held 5 (five) meetings with the following agenda:

NO.	FORUM	DATE OF MEETING	AGENDA
1	RMC/01	January 19, 2021	<ul style="list-style-type: none"> BNI only health level position December 31, 2020 BNI only risk profile position December 31, 2020 Review of BNI's 2021 Risk Appetite Statement
2	RMC/02	April 20, 2021	BNI only risk profile position March 31, 2021
3	RMC/03	July 21, 2021	<ul style="list-style-type: none"> BNI only health level position June 30, 2021 BNI only risk profile position June 30, 2021
4	RMC/04	October 25, 2021	BNI only risk profile position September 30, 2021

RISK MANAGEMENT AND ANTI FRAUD COMMITTEE-ANTI FRAUD SUB COMMITTEE (KRA -KAF)

In accordance with POJK No. 39/POJK.03/2019 dated December 19, 2019 concerning the Implementation of Anti-Fraud Strategies for Commercial Banks, as a form of commitment to increasing the effectiveness of implementing the Anti-Fraud Strategy, BNI formed an Anti-Fraud Committee to foster anti-Fraud culture and concern at all levels of the organization.

Risk Management & Anti Fraud Committee-Anti Fraud Sub Committee Structure and Membership

Based on the Decree of the Board of Directors No. KP/484/DIR/R dated October 26, 2021 concerning the Structuring of the Capital and Risk Management Committee (KRM), the Risk Management & Anti Fraud Committee, Anti Fraud Sub Committee structure and membership, is as follows:

NO.	RISK MANAGEMENT & ANTI FRAUD COMMITTEE-ANTI FRAUD SUB COMMITTEE MEMBERSHIP	
1.	Chairman	Vice President Director
2.	Deputy Chairman	Managing Director-Risk Management
3.	Secretary	Head of Anti Fraud Unit (concurrently a permanent member)
4.	a. Permanent members at Director and SEVP level (Voting members)	<ul style="list-style-type: none"> Managing Director-Consumer Business Managing Director-IT & Operations Managing Director-Service & Network Digital Business SEVP Operational SEVP
	b. Permanent member at Director level (Non-voting member)	Managing Director-Human Capital & Compliance *
	c. Permanent members at Division/Unit level (Non-voting members)	<ul style="list-style-type: none"> Risk Management Division Head Policy Governance Division Head Compliance Division Head Head of Internal Audit Unit Head of Human Capital Strategy Head of Human Capital Services Legal Division Head Network Management Division Head
	d. Non Permanent member (Non-voting member)	Directors/SEVP/Division Heads related to the topic of discussion

Note:

*) Specifically, the Managing Director-Human Capital & Compliance has specific duties and responsibilities regulated in the committee's work guidelines.

Fraud Sub Committee Duties and Responsibilities

The Anti-Fraud Committee duties and responsibilities are:

1. Identifying, evaluating and determining follow-up actions for fraud that originate from activities in all BNI work units'
2. Developing a culture and concern for Anti-Fraud at all levels of the organization;
3. Establishing anti-fraud policies and strategies;
4. Monitoring the implementation of Anti-Fraud policies and Strategies at BNI and periodically reviewing the impact of implemented policies and strategies.

In carrying out its duties and responsibilities, the Anti-Fraud Committee is assisted by the Compliance Division with the following functions:

1. Managing policies and implementation of Anti-Fraud Strategy in coordination with related units/divisions;
2. Reviewing the Anti-Fraud Strategy SOP;
3. Reporting periodically and incidentally to internal parties (President Director and the Board of Commissioners) and external parties (Financial Services Authority) regarding the Anti-Fraud Strategy;
4. Acting as liaison for data and reporting to other Divisions/Units as well as to external parties regarding the Anti-Fraud Strategy and managing the data base related to Fraud in BNI;
5. Monitor the initiation and implementation of the Anti- Fraud Strategy and its improvements.

RISK MANAGEMENT & ANTI FRAUD COMMITTEE ENVIRONMENTAL, SOCIAL, & GOVERNANCE (ESG) SUB COMMITTEE STRUCTURE AND MEMBERSHIP

Based on the Board of Directors Decree No. KP/484/DIR/R dated October 26, 2021 concerning Structuring of the Risk Management and Anti-Fraud Committee (KRA), the structure and membership of the Risk Management &

Anti-Fraud Committee, Environmental, Social, & Governance (ESG) Sub-Committee is as follows:

NO.	RISK MANAGEMENT & ANTI-FRAUD COMMITTEE-ENVIRONMENTAL, SOCIAL, & GOVERNANCE (ESG) SUB-COMMITTEE MEMBERSHIP	
1.	Chairman	Vice President Director
2.	Deputy Chairman	Managing Director-Risk Management
3.	Secretary	Risk Management Division Head (concurrently a non-voting member)
4.	a. Permanent members at the Board of Directors and SEVP level (Voting members)	<ul style="list-style-type: none"> • Managing Director-Finance • Managing Director-Corporate Banking • Managing Director-Institutional Relations • Managing Director-MSME Business • Managing Director-Treasury & International • Managing Director-Consumer • Managing Director-Service & Network • Treasury SEVP
	Permanent members at the Board of Directors level (Non-voting members)	Managing Director-Human Capital & Compliance *
	b. Permanent members at Division/Unit level (Non-voting members)	<ul style="list-style-type: none"> • Risk Management Division Head • Corporate Communication & Secretarial Division Head • Policy Governance Division Head • Investor Relations Division Head • Data Management & Analytics Division Head • Budgeting & Financial Control Division Head • Strategic Planning Division Head • International Division Head • Subsidiary Development Division • Treasury Division Head • Compliance Division Head • Human Capital Strategy Head • Corporate 1 Division Head • Corporate 2 Division Head • Corporate 3 Division Head • Commercial 1 Division Head • Commercial 2 Division Head • Corporate Credit Risk Division Head • Commercial & SME Credit Risk Division Head • Consumer Product Management Division Head • Network Management Division Head • SME Business Division Head • Small Business & Programs Division Head
	c. Non-voting members	Directors/SEVP/Division Heads related to the topic of discussion.

Note:

*) Specifically, the Managing Director-Human Capital & Compliance has specific duties and responsibilities regulated in the committee's work guidelines.

Risk Management & Anti-Fraud Committee-Environmental, Social, & Governance (ESG) Sub-Committee Duties and Responsibilities

The Anti-Fraud Committee duties and responsibilities included:

1. Developing environmental, social and governance (ESG) policies and management strategies and their changes;
2. Identifying potential ESG risks that have an impact on both BNI and BNI stakeholders;
3. Monitoring the implementation of the Sustainable Finance strategy;
4. Monitoring, evaluating and providing recommendations on the results of the BNI ESG Assessment;
5. Evaluating the implementation of the ESG strategy in all BNI business lines.

PRODUCT COMMITTEE

The Product Committee (PRC) is a forum for policy management and product/activity monitoring at BNI to ensure success in creating maximum profits. The Product Committee was formed based on the Board of Directors Decree No. KP/448/DIR/R dated September 20, 2012, and the composition of the PRC cfm membership was changed through REN Memo No. REN/2/819 July 9, 2020 concerning Updating the Product Committee Membership.

Product Committee Structure and Membership

NO.	OF PRODUCT COMMITTEE COMPOSITION	
1.	Chairman	President Director
2.	Deputy Head and concurrently a Permanent Member	Vice President Director
3.	Permanent Members	<ul style="list-style-type: none"> • Managing Director-Finance • Managing Director-Service and Network • Managing Director-Risk Management • Managing Director-IT & Operations • Managing Director-Human Capital and Compliance • Policy Governance Division Head • Budgeting and Financial Control Division Head • Network Management Division Head • Risk Management Division Head • Consumer Credit Processing and Collection Division Head • Information Technology Security and Solutions Division Head • Operations Division Head • Compliance Division Head • Legal Division Head
4.	Non Permanent Members	Members of the Board of Directors/SEVP who act as Director/SEVP Sponsors, Division/Unit/ Heads related to the topics discussed
5.	Secretary	Strategic Planning Division Head

PRODUCT COMMITTEE PROFILES AND CERTIFICATION

The profiles and certification of each committee member can be found in the discussion on the Board of Directors' Profiles and Senior Executive President's Profiles.

PRODUCT COMMITTEE DUTIES AND RESPONSIBILITIES

The Product Committee duties and responsibilities include:

1. Establishing a strategy for business scale and development 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 relevant Sector Directors;
3. Conducting monitoring on products/activities implemented at BNI and making decisions on the sustainability of products/activities based on the Supporting Staff Group/product owner recommendations;
4. As an arbitration institution in cross-cutting issues related to Performance Management System (PMS) in implementing new products/activities.

PRODUCT COMMITTEE IMPLEMENTATION OF DUTIES AND FREQUENCY IN 2021

During 2021, the Product Committee held 2 (two) meetings with the following agenda:

NO.	DATE OF MEETING	MEETING AGENDA
1.	May 20, 2021	Monitoring the Development of New Products and Activities and Proposed New Activity Products for the 2021 RBB Revision
2.	October 19, 2021	Proposed Bank Products Implementation Plan for 2022

PERFORMANCE MANAGEMENT COMMITTEE

The Performance Management Committee (PMC) is a permanent committee at BNI as a forum for managing budget monitoring policies and expediting the performance management process at BNI to ensure strategic planning alignment, facilitating target setting and performance appraisal processes, in accordance with the Board of Directors Decree No. KP/353/DIR/R dated June 21, 2017 concerning the Arrangement of the Performance Management Committee (PMC), and the change in the PMC cfm membership composition through REN Memo No. REN/2/842 dated July 16, 2020 concerning Updating the Performance Management Committee Membership.

PERFORMANCE MANAGEMENT COMMITTEE STRUCTURE AND MEMBERSHIP

NO.	PERFORMANCE MANAGEMENT COMMITTEE MEMBERSHIP COMPOSITION	
1.	Chairman	President Director
2.	Deputy Head and concurrently a Permanent Member	Vice President Director
3.	Permanent Members	<ul style="list-style-type: none"> • All members of the Board of Directors & SEVP • Strategic Planning Division Head • Budgeting & Financial Control Division Head • Human Capital Strategy Division Head • Network Management Division Head • Head of Internal Audit Unit • Data Management & Analytics Division Head • Corporate 3 Division Head • SME Business Division Head • Consumer Product Management Division Head • Institutional Relations 1 Division Head • Treasury Division Head • Retail Solutions Division Head • Head of Commercial & SME Credit Risk Division Head
4.	Non Permanent Members	Division/Unit Heads related to the meeting material
5.	Sekretaris 1 (Bidang Target Setting)	Budgeting & Financial Control Division Head
6.	Sekretaris 2 (Bidang <i>Strategic Planning</i> dan Bidang Penilaian Kinerja)	Strategic Planning Division Head

NO.	PERFORMANCE MANAGEMENT COMMITTEE MEMBERSHIP COMPOSITION	
7.	Supporting Staff Group	<ul style="list-style-type: none"> Corporate Budget Group - Budgeting & Financial Control Division Head Financial Performance Analysis Group - Budgeting & Financial Control Division Head Strategic Planning Group - Strategic Planning Division Head Work Management System Group - Strategic Planning Division Head Business Performance Monitoring Group - Network Management Division Head AVP Human Capital System - Human Capital Strategy Division Planning & Development Group - Head of Internal Audit Unit Strategy & Data Quality Group - Data Management & Analytics Division Head Division/Unit/Group Head related to the topic discussed - Non-Permanent Member

Performance Management Committee Profiles and Certification

The profiles and certification of each committee member can be found in the discussion on the Board of Directors' Profiles, the Senior Executive President Profiles, and the Executive Officers Profiles.

PERFORMANCE MANAGEMENT COMMITTEE DUTIES AND RESPONSIBILITIES

The Performance Management Committee Duties includes:

1. Target Setting
 - a. Approving and establishing an annual schedule and responsible for planning and budgeting;
 - b. Supervising and monitoring the planning and budgeting activities development;
 - c. Deciding on CAPEX proposals with certain criteria (business cases).
2. Strategic Planning
 - a. Reviewing and ensuring alignment between RBB, Corporate Plan and budgets, and recommending adjustments as needed;
 - b. Reviewing and approving recommended targets/budget adjustments (forecasting) and recommend RBB/Corporate Plan changes if necessary as arbitrator on issues related to performance measurement.
3. Performance Assessment
 - a. Reviewing and approving KPI at the sector level;
 - b. Reviewing and providing BNI KPI recommendations;
 - c. Providing recommendations to sectors and divisions during the process of determining and decreasing KPIs and targets;
 - d. Reviewing the Performance Management process on an ongoing basis/suggesting policy initiatives/amendments to improve efficiency;
 - e. Providing KPI Business Unit & Functional Unit design insight;
 - f. Reviewing and determining PMS scores (Q1, Q2 and Q3);
 - g. Reviewing the feedback from the Sector Director and providing PM4 Q4 insight score before being decided in the PMC Forum.

IMPLEMENTATION OF PERFORMANCE MANAGEMENT COMMITTEE DUTIES AND MEETING FREQUENCY

During 2021, the Performance Management Committee held 1 (one) Performance Management Committee Meetings, with the following agenda:

NO.	DATE	MEETING AGENDA
1.	January, 26 2021	Finalization of PMS Unit Q4 2020 score

TECHNOLOGY MANAGEMENT COMMITTEE

The Technology Management Committee is one of the permanent committees at BNI with the authority to provide recommendations to the Board of Directors concerning the formulation, determination of policies and strategies for BNI's information technology development. This committee was formed with the aim of assisting the Board of Commissioners and the Board of Directors in carrying out supervision of Information Technology (IT) activities.

The Technology Management Committee was established based on the Board of Directors Decree No. KP/201/DIR/R dated June 14, 2011 concerning the Arrangement of the Technology Management Committee, and last updated through cfm. Board of Directors Decree No. KP/364/DIR/R dated August 13, 2021 concerning Structuring the Technology Management Committee (KMT).

TECHNOLOGY MANAGEMENT COMMITTEE STRUCTURE AND MEMBERSHIP

NO	TECHNOLOGY MANAGEMENT COMMITTEE MEMBERSHIP	
1.	Chairman	President Director
2.	Deputy Head concurrently a Permanent Member	Managing Director IT & Operations
3.	Secretary	IT Strategy & Architecture Division Head (concurrently a Non-voting Permanent Member)
4.	Permanent members at Director & SEVP level (Voting members)	<ul style="list-style-type: none"> • President Director • Managing Director Corporate Banking • Managing Director MSME Business • Managing Director Treasury & International • Managing Director Risk Management • Managing Director Finance • Managing Director Service & Network • Managing Director Institutional Relations • Managing Director Consumer Business • Corporate Transformation SEVP • Treasury SEVP • Remedial & Recovery SEVP • Operational SEVP • Digital Business SEVP
5.	Director level permanent member * (Non-voting member)	Managing Director Human Capital & Compliance
6.	Permanent members at the of Division/Unit Head level (Non voting member)	<ul style="list-style-type: none"> • IT Strategy & Architecture Division Head • IT Development Division Head • Digital Development Division Head • IT Operations Division Head • Information Security Division Head • Data Management & Analytics Division Head • Retail Solutions Division Head • Wholesale Solutions Division Head • Strategic Planning Division Head • Risk Management Division Head • Compliance Division Head • Human Capital Strategy Division Head • Budgeting & Financial Control Division Head • Asset Management & Procurement Division Head • Head of Internal Audit Unit
7.	Non-Permanent Member	Division/Unit Heads and Directors of Subsidiary Companies related to the topic discussed

Note :

*) Specifically, the Managing Director-Human Capital & Compliance has specific duties and responsibilities regulated in the committee's work guidelines.

TECHNOLOGY MANAGEMENT COMMITTEE DUTIES AND RESPONSIBILITIES

The of the Technology Management Committee duties and responsibilities cover various fields, including:

1. IT Strategic Policy Formulation
 - a. Providing recommendations to the Board of Directors regarding key IT policies and procedures, specifically related to aspects of developing and procuring IT systems, IT and communication network operational activities, information security, end user computing, e-banking activities, use of IT service providers, and policies and procedures related to the application of risk management used by BNI IT;
 - b. Providing recommendations concerning the IT Strategic Plan (RSTI)/Information Technology Strategic Plan and Information Technology Development Plan (RPTI), in line with BNI's strategic business plan, taking into account efficiency, effectiveness and implementation plans (roadmap), required resources, as well as the costs and benefits obtained when the plan is implemented;
 - c. Conducting evaluations and recommendations on the conformity of the approved projects with the Information Technology Strategic Plan (RSTI) and Information Technology Development Plan (RPTI);
 - d. Approving IT and information security budget recommendations;
 - e. Establishing and evaluate IT Governance.

2. IT Project Portfolio Management

- Evaluating the IT project portfolio, including proposed projects, projects approved in principle, ongoing projects (on going progress), and projects completed;
- Determining the priority status of critical IT projects that have a significant impact on BNI's operational activities;
- Providing decisions on the continuation, de-prioritizing or termination of a project;
- Conducting evaluations and recommendations on the adequacy and allocation of available resources;
- Monitoring project implementation, ensuring timeline and resource requirements are met;
- Conducting evaluations and recommendations on problematic or risky projects;
- Reviewing the financial aspects of ongoing IT projects (total project cost, project profit & loss, budget realization).

3. IT Risk Management

- Providing recommendations on steps to minimize risk on BNI investments in the IT sector so that investments will contribute to the achievement of BNI's business objectives;
- Conducting evaluations and recommendations on efforts to resolve IT-related problems that cannot be resolved by the IT user & provider unit;
- Identifying key issues, mitigation plans and next steps/actions needed.

4. IT Performance Measurement and Evaluation

- Conducting evaluations and recommendations on the conformity between IT and the needs of a Management Information System to support the management of BNI's business activities;
- Conducting evaluations and recommendations on the conformity between the implementation of IT projects and the agreed project charter;
- Monitoring the performance and efforts of IT improvement.

Technology Management Committee Implementation of Duties and Meeting Frequency In 2021, the Technology Management Committee held two meetings with the following agenda:

NO	DATE	AGENDA
1	August 16, 2021	IT Organization, IT Projects and IT Architecture.
2	December 13, 2021	IT Projects & Portfolio 2021-2022, IT Standardization Initiative, IT Development Strategy & Digital Development, IT Performance Management & Monitoring, and Cybersecurity Report

CREDIT & BUSINESS POLICIES COMMITTEE

The Credit & Business Policy Committee is a permanent committee at BNI which has the authority and function to determine the Bank's Credit Policy, Treasury & International Business Policy, establish credit operational procedures and provisions, and determine/decide on bundling pricing for customer business in accordance with applicable authorities.

The Credit & Business Policy Committee includes the Credit Policy Sub-Committee (KKP), Credit Procedure Sub-Committee (KPP) and the Business Sub-Committee (KBI). The Credit & Business Policy Committee (KRB) was established based on the Decree of the Board of Directors No. KP/333/DIR/R dated August 21, 2019 with renewed membership via Memo REN/2/828 dated July 13, 2020.

The Credit & Business Policy Committee is chaired by the President Director. In the structure of the Bank, the position of the Credit & Business Policy Committee is under the Board of Directors.

CREDIT & BUSINESS POLICIES COMMITTEE (KRB) MEMBERSHIP COMPOSITION

NO	CREDIT & BUSINESS POLICIES COMMITTEE MEMBERSHIP COMPOSITION	
1.	Chairman	President Director
2.	Deputy Chairman	Vice President Director

• Credit Policy Sub Committee (KKP) Structure and Membership

NO	CREDIT POLICY SUB COMMITTEE (KKP) MEMBERSHIP COMPOSITION	
1.	Chairman	Managing Director Human Capital & Compliance
2.	Secretary	Policy Governance Division Head
3.	Permanent Members	<ul style="list-style-type: none"> • Managing Director Corporate Banking • Managing Director Institutional Relations • Managing Director Consumer Business • Managing Director MSME Business • Managing Director Treasury & International • Managing Director Finance • Managing Director Risk Management • SEVP Remedial & Recovery • Policy Governance Division Head • Risk Management Division Head • Compliance Division Head • Head of Internal Audit Unit
4.	Non-Permanent Members	Directors/SEVP/Division/Unit/Heads related to the meeting material

• Credit Procedure Sub Committee (KPP) Structure and Membership

NO	CREDIT POLICY SUB COMMITTEE (KPP) MEMBERSHIP COMPOSITION	
1.	Chairman	Managing Director Human Capital & Compliance
2.	Secretary	Policy Governance Division Head
3.	Permanent Members	<ul style="list-style-type: none"> • Managing Director Corporate Banking (specifically material related to the Corporate segment) • Managing Director Consumer Business (specifically material related to the Consumer segment) • Managing Director MSME Business (specifically material related to the Medium & Small Business segment) • Managing Director Risk Management • Managing Director Information Technology & Operations (specifically material related to Credit Operations) • Managing Director Treasury & International (specifically material related to Treasury & International Business) • Credit Rescue & Settlement SEVP (specifically material related to credit rescue & settlement)
4.	Non-Permanent Members	Directors/SEVP/Division/Unit/Heads related to the meeting material

• Business Sub Committee (KBI) Structure and Membership

NO	CREDIT POLICY SUB COMMITTEE (KBI) MEMBERSHIP COMPOSITION	
1.	Chairman	Managing Director Corporate Business/Managing Director Institutional Relations*)
2.	Secretary	Head of Value Chain Management Unit
3.	Permanent Members	<ul style="list-style-type: none"> • Managing Director Corporate Business/Director of Institutional Relations*) • Managing Director MSME Business • Managing Director Consumer Business • Managing Director Treasury & International • Managing Director Service and Network Network Business Optimization • Operational SEVP • Head of Corporate Business 1 Division (KPS1)/Corporate Business 2 Division (KPS2)/BUMN & Corporate Business 3 Division (KPS3)/Institutional Relations 1 Division (HLB1)/Institutional Relations 2 Division (HLB1) • Treasury Division Head • Client Service Team (CST) Head • Heads of Divisions/Business Units involved in the material and/or decisions in committee meetings
4.	Non-Permanent Members	Director/SEVP/Division Leader/Unit/Regional Office/Branch/Central related to material and/or decisions in committee meetings

Note:

*adjusted to the CST customer management division to be discussed in the committee, where:

- CST customers are managed by KPS 1/KPS 2/KPS 3, the committee chair is the Managing Director Corporate Business and the Managing Director Institutional Relations as a permanent member.
- CST customers are managed by HLB 1/HLB 2, so the committee chair is the Managing Director Institutional Relations and Managing Director Corporate Business as a permanent member.

CREDIT AND BUSINESS POLICY COMMITTEE MEMBERS PROFILES AND CERTIFICATION

The profiles and certification for each committee member can be found in the discussion on the Board of Directors' Profiles and the Senior Executive President's Profiles.

CREDIT AND BUSINESS POLICY COMMITTEE DUTIES AND RESPONSIBILITIES

A. Credit Policy Sub Committee (KPP)

The Credit Policy Credit Policy Sub Committee duties and responsibilities are as follows:

1. Establishing Bank Credit Policy (KPB), especially with regard to formulation of the precautionary principle in credit subject to approval from the Board of Commissioners.
2. Establishing Treasury and International Business/Financial Institution Policies, especially with regard to the formulation of the precautionary principle.
3. Supervising so that KPB can be applied and enforced consequently and consistently and reviewing if there are barriers/obstacles in the implementation of KPB.
4. Conducting periodic review on the maximum period of three 3 (three) years of the KPB and if necessary determine changes/improvements to KPB.
5. Monitoring and evaluating:
 - a. Development and overall quality of credit portfolio;
 - b. Improve implementation of loan approval authority;
 - c. Improve granting process, development and quality of loans granted to parties related to the Bank and certain large debtors;

- d. Improve implementation of BMPK, Good Corporate Governance and Risk Management;
- e. Adherence to legislation and other regulations provisions in the credit provision;
- f. Settlement of non-performing loans as stipulated in the KPB;
- g. Bank's efforts in meeting the adequacy of allowance for credits.
6. Delivering periodic written reports to the Board of Commissioners, on the results of monitoring the application and implementation of KPB and the results of monitoring and evaluating matters referred to in point 4 above.
7. Formulating and recommending measures to perfect the implementation of Bank Credit activities.

B. Credit Procedures Sub Committee (KKP)

The Credit Procedures sub committee duties and responsibilities are as follows:

1. Establishing procedures and operational Credit provisions.
2. Establishing Lending Model.
Lending Model contains operating policies and procedures related to specific credit financing schemes with the terms and conditions specially adapted to the market segment, industry or area of interest with regard to prudential banking principles and good corporate governance.
3. Establishing operational procedures and provisions for Treasury and International Business/Financial Institutions.
4. Delivering Credit Procedure Sub-Committee's decision reports periodically to the Credit Policy and Procedures Committee.

C. Business Sub Committee (KBI)

The Business Sub Committee duties and responsibilities are as follows:

1. Determining which customers are included in the management with the Client Service Team (CST) work pattern and the customer tier according to the potential and size of the customer's business;
2. Establishing the Client Service Team (CST) customer value chain business strategy;
3. Agreeing and committing to the strategy implementation and the achievement of CST customer business targets;
4. Determining the bundling pricing for CST customer's business in accordance with the applicable authority;
5. Establishing a conversion mechanism for product profitability that loses in bundling pricing;
6. Monitoring and evaluating strategic initiatives and business/project initiatives related to value chain development including the CST customer's business supply chain;
7. Discussing and resolving strategic business problems including alliances between work units and alliances with Regions/Centers/Branches and Subsidiaries;
8. Delegating authority to appointed officials to decide and carry out operational business matters.

IMPLEMENTATION OF CREDIT & BUSINESS POLICY COMMITTEE DUTIES AND MEETINGS FREQUENCY 2021

In 2021, the Credit Policy and Procedure Committee held 10 (ten) meetings with the following agenda:

NO	DATE	AGENDA
1	April 1, 2021	Significant limit on sale of FVOCI securities
2	April 14, 2021	Authority to terminate cooperation in providing consumer credit with marketing channels and with institutions
3	May 5, 2021	Authority to decide Counterparty Limit and Bilateral Loan
4	July 16, 2021	Providing credit for acquisition and financing to holding
5	July 28, 2021	Cashtrade Counterparty Limit Terms
6	September 24, 2021	Advisory in lending to the corporate, commercial and international segments
7	September 27, 2021	Principle license for debtor management outside segmentation by commercial segment (dhi. SBK) in transition
8	October 27, 2021	<ol style="list-style-type: none"> 1. Authority to decide on organic consumer loan restructuring processed through SKK Jakarta 2. Authority to decide write-off of non-principal/BDO (Interest, Fines, and Costs) loans for Pre-NPL, NPL and write-off loans: <ol style="list-style-type: none"> a. Processed at SKK Jakarta b. Processed at SKK Outside Jakarta, or Consumer Loan Processing Branch Offices In Jakarta and Outside Jakarta 3. Matters that need to be considered as mitigation when submitting an application for BDO relief (Interest, Fines, and Fees)
9	December 8, 2021	Provisions regarding the PDM Division becoming an Incubator for Digital Consumer Lending cooperation with the BNI Fleksi Distribution Cooperation Scheme through Digital-based Fintech/ Multifinance, e-Commerce and P2P Lending
10	December 22, 2021	Authority for money market transactions (money market) trading book

HUMAN CAPITAL COMMITTEE (HC)

The Human Capital Committee (HC) is a permanent committee in BNI, staffed by all members of the Board of Directors and several Division Heads, with the following powers:

1. Decide on policies/regulations in the field human resource management related:
 - a. Planning Officer;
 - b. Recruitment and Selection;
 - c. Competency Training and Development;
 - d. Employee Performance Assessment;
 - e. Career Paths and Succession;
 - f. Remuneration;
 - g. Industrial relations;
 - h. Work Culture.
2. Decide on approval for the realignment/promotion program for the positions of Division Head and Region Head.
3. Evaluate the performance of Division Head and Regional Head.
4. Decide on the approval for administrative sanctions for the positions of Division Head and Regional Head.
5. Approve the delegation of authority in human resource management.

The Human Resources Committee was established based on the Board of Directors Decree No. KP/235/DIR/R dated July 18, 2011 concerning the Amendment to the Human Capital Committee (HC), which has been updated through memo No. REN/2/254/R dated June 3, 2016.

HUMAN CAPITAL COMMITTEE (HC) STRUCTURE AND MEMBERSHIP

NO.	HUMAN CAPITAL COMMITTEE (HC) MEMBERSHIP COMPOSITION	
1.	Chairman	President Director
2.	Permanent Members	<ul style="list-style-type: none"> Director supervising the Human Capital Division (Concurrently as Substitute Chair) * Director supervising the Compliance Division *
3.	Non-Permanent Members	Segment Director and/or Supervising Officer Division/Unit (if there is no Segment Director related to meeting material *)
4.	Secretary	Human Capital Strategy (HCT) Division Head

Note:

*In the absence of a Director's position, the position is replaced by the SEVP or the Supervising Officer Division/Unit related to the meeting

HUMAN CAPITAL COMMITTEE (HC) PROFILES AND CERTIFICATION

The profiles and certification for each committee member can be found in the discussion on the Board of Directors' Profiles and Senior Executive President's Profiles.

HUMAN CAPITAL COMMITTEE (HC) DUTIES AND RESPONSIBILITIES

The Human Capital Committee (HC) duties and responsibilities are as follows:

1. Ensuring the human capital policies/provisions are consistent and aligned with strategic policy planning. The human capital policies/provisions include Human Capital management, Remuneration System management and Reward and Punishment mechanisms for all BNI employees;
2. Ensuring the availability of qualified human resources and placing them in the right positions to support the leadership positions including Division Head and Regional Head;
3. Evaluating the performance of the Division Head's leadership positions;
4. Ensuring the delegation of authority in human capital management is in accordance with the needs and purposes.

TEAMS UNDER THE HUMAN CAPITAL COMMITTEE (HC)

Human Capital Management System Policy Formulation and Assessment Team

NO.	TEAMS UNDER THE HUMAN CAPITAL COMMITTEE (HC) MEMBERSHIP COMPOSITION	
1.	Chairman	Human Capital Strategy (HCT) Division Head
2.	Permanent Members	<ul style="list-style-type: none"> Strategic Planning (REN) Division Head (Concurrently Substitute Chairman) Compliance (KPN) Division Head
3.	Non Permanent Member	Division/Unit/Head related to the meeting material
4.	Secretary	Group Leaders in the Human Capital Strategy Division (HCT) related to the discussion agenda (Not Concurrent Members)

Policy Assessment and Formulation Team for Human Capital Management System Duties and Responsibilities include:

1. Managing the research, assessment and evaluation of the effectiveness and quality as well as recommend proposed changes/improvements to operational policies and mechanisms for policies related to human capital management:
 - a. Employee planning;
 - b. Recruitment and selection;
 - c. Training and competency development;
 - d. Employee Performance Assessment;
 - e. Career Paths and succession;
 - f. Remuneration;
 - g. Industrial relations;
 - h. Corporate culture.
2. Managing the proposed delegation of authority in human capital management.

ADVISORY TEAM FOR MANAGEMENT REALIGNMENT

NO.	ADVISORY TEAM FOR MANAGEMENT REALIGNMENT MEMBERSHIP COMPOSITION	
1.	Chairman	Human Capital Strategy (HCT) Division Head
2.	Permanent Members	<ul style="list-style-type: none"> Division/Unit/Heads who supervises the related unit (Concurrently Substitute Chairman) Division/Unit/Heads related to the meeting material
3.	Non Permanent Members	Group Leader in the Human Capital Division Strategy (HCT) related to the discussion agenda (Not Concurrent Member)

Duties and Responsibilities of the Leadership Transfer Advisory Team, for managing planning and candidate search activities based on predetermined conditions and recommending the relevant candidates to be transferred/promoted as leadership staff.

ADMINISTRATIVE SANCTION CONSIDERATION TEAM

Head Office

NO.	ADVISORY TEAM FOR ADMINISTRATIVE SANCTIONS MEMBERSHIP COMPOSITION	
1.	Chairman	Human Capital Services (HCT) Division Head (Concurrently Member)
2.	Permanent Member	<ul style="list-style-type: none"> Compliance Division Head (KPN) Legal Division Head (HUK) Head of Division/Unit related to the events/cases or their representatives
3.	Non Permanent Member	Head of Internal Audit (IAU) (Not Concurrently Member)

Regional Office

NO.	ADVISORY TEAM FOR ADMINISTRATIVE SANCTIONS MEMBERSHIP COMPOSITION	
1.	Chairman	CEO Region
2.	Permanent Member	<ul style="list-style-type: none"> Deputy Regional Head who supervises the incidents/cases occurrence unit One other Deputy Regional Head appointed by the CEO Region Head of Division/Unit related to the events/cases or their representatives

The Advisory Team for Administrative Sanctions Duties and Responsibilities, namely Managing the analysis and assessment activities for the recommendations for administrative sanctions received from the case processing unit, to then recommends to the decision maker or provides an administrative sanction verdict against the employee related to the case in accordance with the applicable authority matrix.

IMPLEMENTATION OF HUMAN CAPITAL COMMITTEE (HC) DUTIES IN 2021

During 2021, the Leadership Transfers Consideration Team (TPMTP) scheduled at least 2 (two) regular meetings a week to discuss Branch and Center Managers transfers. The decisions to transfer Divisional Leaders and Regional Leaders were made through 9 (nine) Board of Directors' Meetings. The Administrative Sanctions Consideration Team held 4 (four) discussion meetings.

Independent External Auditors

BNI has appointed a Public Accounting Firm (KAP) to carry out independent supervisory function on the financial aspects of the Bank. The appointment of External Auditor to audit BNI's financial statements for the Fiscal Year 2021 was determined by the Annual GMS by taking into account the Board of Commissioners and Audit Committee recommendation. The selection was carried out in accordance with the applicable procurement of goods and services mechanism. To ensure the independence and quality of the audit results, the appointed External Auditor may not have a conflict of interest with the Bank.

IMPLEMENTATION OF EXTERNAL AUDIT FUNCTION

For its operational activities, in addition to the internal auditors and the Financial Services Authority, the Bank is also supervised by external auditors from the Financial Services Authority, Bank Indonesia, the Republic of Indonesia Audit Board, and a Public Accounting Firm.

APPOINTMENT OF PUBLIC ACCOUNTANT

Following up on the General Meeting of Shareholders ("GMS") resolutions for the Fiscal Year 2020, the Board of Commissioners appointed KAP Tanudiredja, Wibisana, Rintis & Partners (member of PricewaterhouseCoopers) as the external auditor for examining the Bank's Financial Statements and other reports for the Fiscal Year 2021. Fiscal year 2021, is the first audit year period for KAP Wibisana, Rintis & Rekan (firma anggota jaringan global PwC).

Basis of appointment was as follows:

1. Based on OJK Regulation No. 13/POJK.03/2017 dated March 27, 2017, on the Use of Public Accountant Services and Public Accounting Firms in Financial Service Activities, Article 16 paragraph 1 states that the Public Accountant conducting the annual financial audit services cannot be used for more than 3 (three) consecutive fiscal year audits.
2. Based on OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Financial Statements in conjunction with OJK Circular Letter No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports, Article 4 paragraph 2 states that Banks must include the name of the Public Accounting Firm conducting the annual financial statements audits, together with the name of the Public Accountant, partner in charge of the audit, including the opinion given in the announcement of the Quarterly Publication Report for the position at the end of December.
3. The appointment process for KAP Wibisana, Rintis & Rekan (firma anggota jaringan global PwC) as the external auditor was carried out through an Auction mechanism.

PUBLIC ACCOUNTING FIRM, ACCOUNTANT NAME AND FEES

The Public Accounting Firms, accountant names, fees, and KAP permits for the last 5 (five) years are as follows:

YEAR	PUBLIC ACCOUNTING FIRM	NAME OF RESPONSIBLE ACCOUNTANT (PARTNER)	PERIOD	AUDIR SERVICES FEE (RUPIAH)	KAP LICENCE
2021	Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan (firma anggota jaringan global PwC)	M. Jusuf Wibisana	1 Year	14.525.000.000	241/KM.1/2015
2020	KAP Purwantono, Sungkoro dan Surja (Ernst and Young)	Danil Setiadi Handaja	1 Year	12.650.000.000	603/KM.1/2015
2019	KAP Purwantono, Sungkoro dan Surja (Ernst and Young)	Danil Setiadi Handaja	1 Year	12.900.000.000	603/KM.1/2015
2018	KAP Purwantono, Sungkoro dan Surja (Ernst and Young)	Danil Setiadi Handaja	1 Year	8.500.000.000	603/KM.1/2015
2017	KAP Purwantono, Sungkoro dan Surja (Ernst and Young)	Yasir	1 Year	7.200.000.000	603/KM.1/2015

In addition to BNI's consolidated financial statements audit, the scope of audit work by Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan (firma anggota jaringan global PwC) for the fiscal year 2021 included:

1. Audit of Consolidated Financial Statements (Audited);
2. Audit of Published Financial Reports (Newspaper Format-Audited);
3. Audit of Financial Statements Audit and Annual Micro and Small Business Funding Program;
4. Audit of Financial Institution Pension Fund Financial Report (Audited) and DPLK Financial Institution Pension Fund Investment Report (Audited);
5. Independent Accountant's Report on the Application of Procedures agreed upon in connection with the Custodian Work Unit activities;
6. Audit of Financial Statements for PSA 62 (Compliance);
7. Subsidiaries, namely BNI Sekuritas (including BNI Asset Management), BNI Life, and BNI Multifinance;
8. Review of the BNI Performance Evaluation Report;
9. Management Letter.

AUDIT RESULTS

The audit results carried out by the external auditor contain an opinion on the Financial Statements. For 2021, BNI's Consolidated Financial Statements Opinion was "presented fairly, in all material respects". This shows that BNI has presented the Consolidated Financial Statements accurately and in accordance with applicable standards and is free from material misstatements.

AUDIT FEES

The audit service fee for the BNI Annual Financial Report, the Micro and Small Business Funding Program Report (PUMK), and other audit services for the 2021 Fiscal Year is Rp12.8 billion (exclude the Subsidiary audit service fee of Rp1.7 billion). The total fee for the audit service includes Out of Pocket Expense (OPE) and Value Added Tax (VAT).

OTHER SERVICES PROVIDED BY PUBLIC ACCOUNTANTS

Throughout 2021, other services provided by Public Accountants are as follows:

1. Issuance of Tier 2 Capital Bond 2021 with the following details:
Audit and reissue the Independent Auditor's report on the Consolidated Financial Statements BNI and Subsidiaries dated December 31, 2020, 2019 and 2018 and Comfort Letter for support BNI corporate action in the context of Issuance of Tier 2 Capital Bond 2021 by KAP Purwanto, Sungkoro and Surja (member of Ernst and Young).
2. Issuance of Additional Tier 1 Capital Bond 2021 with the following details:
 - a. Audit and reissue the Independent Auditor's report on the Financial Statements Consolidation of BNI and Subsidiaries as of 31 December 2020, 2019 and 2018 and 30 June 2020 and a Comfort Letter to support BNI's corporate action in the issuance of Additional Tier 1 Capital Bond 2021 by KAP Purwanto, Sungkoro and Surja (member of Ernst and Young);
 - b. BNI Consolidated Financial Reports, Audit Published Financial Reports and publish back to the Independent Auditor's report on the Consolidated Financial Statements of BNI and its Entities Children on June 30, 2021 to support BNI's corporate action in the context of publishing Additional Tier 1 Capital Bond 2021 by Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan (firma anggota jaringan global PwC).

Throughout 2021, the total cost of Public Accountant services for the issuance of Tier 2 and the issuance of Additional Tier 1 Capital Bond 2021 is Rp25,225,000,000.

Public Accounting Firm Profile

Kantor Akuntan Publik Tanudiredja,
Wibisana, Rintis & Rekan (firma anggota jaringan global PwC)
WTC 3
Jl. Jend. Sudirman Kav. 29-31
Jakarta 12920
INDONESIA
Tel: +62 21 50992901/31192901
Fax: +62 21 52905555/52905050

COORDINATION BETWEEN THE EXTERNAL AUDITOR AND AUDIT COMMITTEE

In order to implement its monitoring function on the audit results conducted by external auditors, namely Bank Indonesia (BI)/OJK, the Supreme Audit Agency (BPK), the Financial Transaction Reports and Analysis Center (PPATK), and KAP, the Audit Committee has evaluated the follow-up actions taken by the Management on the audit results of the said external auditors. Complete coordination can be seen in the description of the Audit Committee Report.

EXTERNAL AUDIT EFFECTIVENESS AND BANK COMPLIANCE WITH PROVISIONS CONCERNING RELATIONSHIPS BETWEEN THE BANK, THE PUBLIC ACCOUNTANTS AND BANK INDONESIA

BNI has conducted an effective external audit and the Bank's compliance with the provisions concerning the relationship between the Bank, Public Accountants and Bank Indonesia for the Bank, including the following:

1. As stated in PBI No. 7/50/PBI/2005, an Amendment to PBI No. 3/22/PBI/2001 concerning Transparency of the Bank's Financial Condition, in giving Financial Statements audit assignments, BNI is required to appoint a Public Accountant and a Public Accounting Firm that are registered with Bank Indonesia. Through the Board of Commissioners letter No. DK/21 dated February 26, 2021, the Board of Commissioners appointed Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan (firma anggota jaringan global PwC) as the external auditor in examining the Company's Financial Statements and other reports for fiscal year 2021;
2. Based on OJK Regulation No. 13/POJK.03/2017 dated March 27, 2017 concerning the Use of Public Accountant Services and Public Accounting Firm in Financial Services Activities, article 16 paragraph 1 states that the party carrying out financial services activities is required to limit the use of audit services on annual historical financial information from the same PA to no more than 3 (three) consecutive reporting fiscal years;
3. The appointment of the same Public Accountant and/or Public Accounting Firm by BNI must be based on a work agreement;
4. The Public Accountant who audit the Bank's Annual Financial Statements is required to conduct audits in accordance with the Public Accountant Professional Standards, the work agreement, and the audit scope. The Public Accountant and/or Public Accounting Firm is required to observe the Bank Confidentiality as regulated in the Law No. 7 of 1992 on Banking, as amended by Law No. 10 of 1998;
5. In the framework of preparing and implementing the audit, the Public Accountant may request information from Bank Indonesia regarding the condition of the Bank to be audited;
6. Bank Indonesia and/or the Financial Services Authority can request information from a Public Accountant even though the work agreement has ended.

Risk Management



To anticipate domestic and global economic challenges, as well as to increase risk exposure that may arise in carrying out its business activities, BNI has established an effective and integrated risk and capital management system. In addition to minimizing the impact of challenges faced by BNI, this system is aimed at supporting the achievement and growth of sustainable performance and increasing the Company's competitiveness.

BNI's risk management is proactive and forward looking to maximize shareholders added value, manage capital comprehensively, and ensure profitability and sustainable business growth. In addition to its own individual risk management, BNI as a Financial Services Institution with a number of subsidiaries who are members of the BNI Financial Conglomerate, also has implemented an integrated risk management system.

The regulations governing the risk management implemented by BNI include:

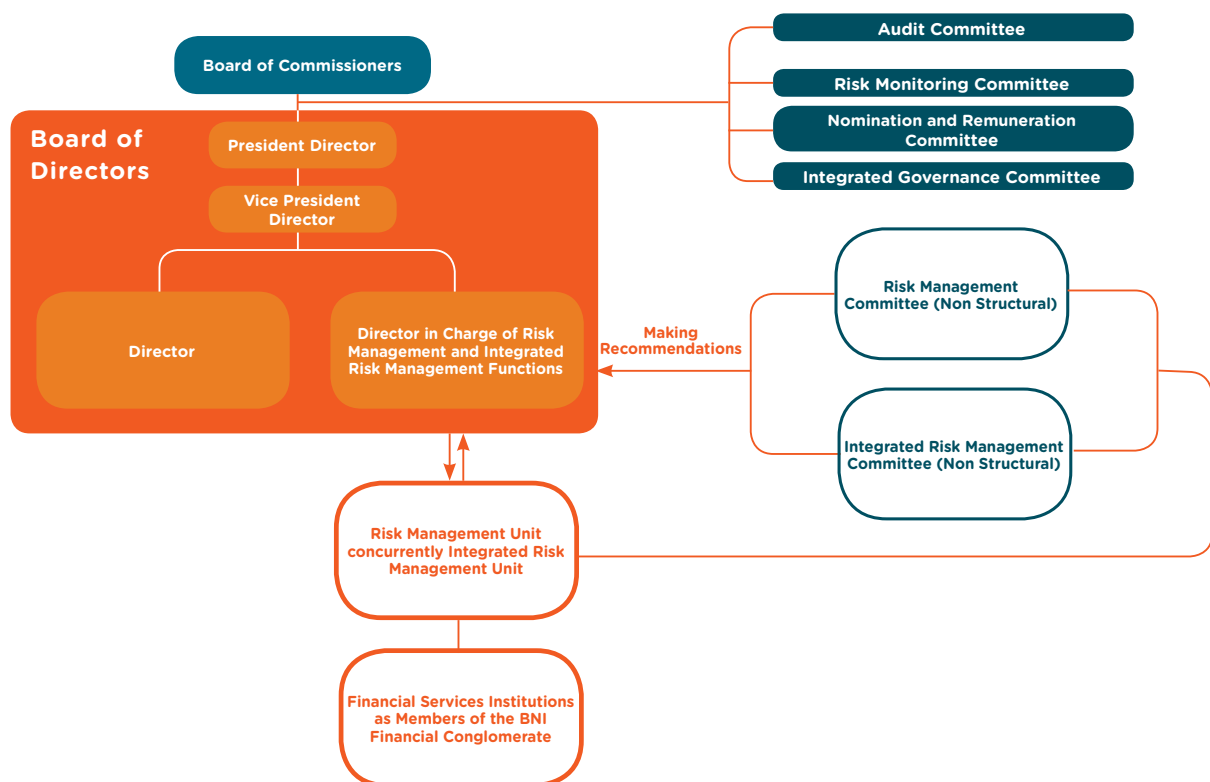
1. Risk Management Implementation
 - a. OJK Regulation No. 18/POJK.03/2016 dated March 16, 2016, concerning Risk Management Implementation in Commercial Banks.
 - b. OJK Circular No. 34/SEOJK.03/2016 dated September 1, 2016, concerning Risk Management Implementation in Commercial Banks.
2. Consolidated Risk Subsidiaries' Management Implementation
 - a. OJK Regulation No. 38/POJK.03/2017 dated July 12, 2017, concerning Consolidated Risk Management Implementation for Banks Exercising Control over Subsidiaries.
 - b. OJK Circular No. 43/SEOJK.03/2017 dated July 19, 2017, concerning Prudential Principles and Report for Implementation of Consolidated Risk Management for Banks Exercising Control over Subsidiaries.
3. Financial Conglomerate Integrated Risk Management Implementation
 - a. OJK Regulation No. 17/POJK.03/2014 dated November 18, 2014, concerning Implementation of Financial Conglomerate Integrated Risk Management;
 - b. OJK Regulation No. 26/POJK.03/2015 dated December 04, 2015, concerning Financial Conglomerate Integrated Minimum Capital Adequacy Requirement;
 - c. OJK Circular Letter No. 14/SEOJK.03/2015 dated May 25, 2015 concerning Implementation of Financial Conglomerate Integrated Risk Management.
4. Commercial Bank Products and/or Activities Risk Management
 - a. OJK Regulation No. 39/POJK.04/2014 dated December 29, 2014 concerning Mutual Funds Selling Agent;
 - b. OJK Regulation No. 8/POJK.03/2016 dated January 26, 2016 concerning Prudential Principles in Carrying Out Agency Activities for Foreign Financial Products by Commercial Banks;
 - c. OJK Regulation No. 9/POJK.03/2016 dated January 26, 2016 concerning Prudential Principles for Commercial Banks that Transfer Part of the Implementation of Work to Other Parties;
 - d. OJK Regulation No. 57/POJK.03/2016 dated December 7, 2016 concerning Risk Management in Commercial Banks Performing Prime Customer Service;
 - e. OJK Regulation No. 7/POJK.03/2016 dated January 26, 2016 concerning Prudential Principles in Implementing Structured Product Activities for Commercial Banks, as amended by OJK Regulation No. 6/POJK.03/2018 dated April 19, 2018;
 - f. OJK Regulation No. 12/POJK.03/2018 dated August 6, 2018 concerning Provision of Digital Banking Services by Commercial Banks.
 - g. OJK Regulation No. 12/POJK.01/2017 dated March 16, 2017 concerning Anti-Money Laundering and Prevention of Terrorism Financing Programs in the Financial Services Sector, as amended by OJK Regulation No. 23 /POJK.01/2019;
 - h. OJK Regulation No. 39/POJK.03/2019 dated December 19, 2019 concerning Anti-Fraud Strategy for Commercial Banks;
 - i. OJK Regulation No. 38/POJK.03/2016 dated December 01, 2016 concerning Risk Management when Using Information Technology by Commercial Banks, as amended by OJK Regulation No. 13/POJK.03/2020 dated March 24, 2020;
 - j. OJK Regulation No. 13/POJK.03/2021 dated July 30, 2021 concerning Commercial Bank Product Operations;
 - k. OJK Circular No. 33/SEOJK.03/2016 dated September 1, 2016 concerning Risk Management in Banks Conducting Marketing Cooperation Activities with Insurance Companies (Bancassurance);
 - l. OJK Circular No. 4/SEOJK.03/2017 dated January 16, 2017 concerning Risk Management in Banks Conducting Mutual Funds Activities;
 - m. OJK Circular No. 11/SEOJK.03/2017 dated March 17, 2017 concerning Prudential Principles for Commercial Banks that Transfer Part of the Work to Other Parties;
 - n. OJK Circular No. 21/SEOJK.03/2017 dated June 6, 2017 concerning Application of Risk Management in the Use of Information Technology by Commercial Banks;
 - o. OJK Circular No. 32/SEOJK.03/2017 dated July 22, 2017 concerning Anti-Money Laundering and Prevention of Terrorism Financing Program in the Financial Services Sector.

5. Internal Control System

- OJK Regulation No. 1/POJK.03/2019 dated January 29, 2019 concerning Implementation of Internal Audit Function in Commercial Banks;
- OJK Circular Letter Number 13/SEOJK.03/2017 dated March 17, 2017 concerning Governance Implementation in Commercial Banks;
- OJK Circular No. 35/SEOJK.03/2017 dated July 7, 2017 concerning Standard Guidelines for Internal Control Systems in Commercial Banks.

RISK MANAGEMENT ORGANIZATIONAL STRUCTURE

BNI's Risk Management organization and functions and Integrated Risk Management for BNI's Financial Conglomerate are prepared and determined as follows:



BNI's Financial Conglomerate is organized and determined as follows:

- BNI's Board of Directors and Board of Commissioners are authorized and responsible for ensuring the implementation of BNI's Risk Management individually or in an integrated manner;
- In carrying out its functions to supervise the implementation of BNI's Risk Management and Integrated Risk Management, BNI's Board of Commissioners is assisted by the Risk Monitoring Committee, Audit Committee, Nomination and Remuneration Committee and Integrated Governance Committee;
- BNI's Directors in charge of the Risk Management function carry out the Risk Management function for BNI, and also the Integrated Risk Management function for BNI's Financial Conglomerate;
- In carrying out its functions to implement an effective risk management, the Board of Directors is assisted by a Risk Management sub-committee of the Risk and Capital Committee (KRK-RMC) and an Integrated Risk Management Committee (KMRT);
- If necessary, the Director in charge of Risk Management can discuss Risk Management issues in other committee meetings at the Board of Directors' level, or at the Board of Directors' meetings;
- In implementing BNI's Risk Management, the Board of Directors is assisted by the Risk Management Work Unit (SKMR) that also functions as an the Integrated Risk Management Work Unit (SKMRT);

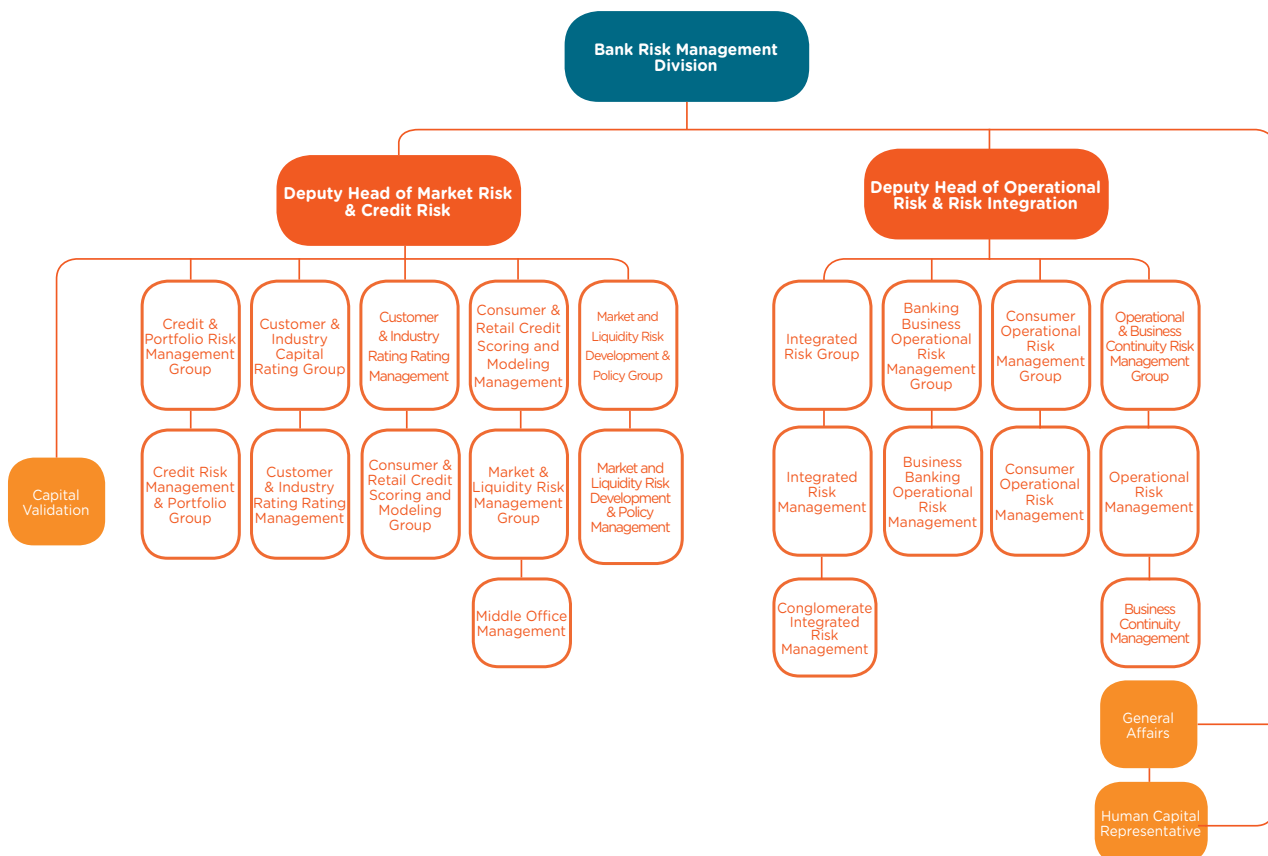
7. The Risk Management Unit is responsible for facilitating and coordinating with BNI risk management units, and all LJK members of the Financial Conglomerate in managing 8 (eight) types of risks in BNI: credit risk, market risk, liquidity risk, operational risk, legal risk, strategic risk, compliance risk, and reputation risk, and 10 (ten) types of risks in BNI's Financial Conglomerate, including intra-group transaction risk and insurance risk;
8. The Risk Management Work Unit in carrying out its functions, authorities and responsibilities is independent to the Operational Work Unit (risk taking unit) and does not carry out activities related to the Bank's business.

In carrying out its functions, the Risk Management Work Unit can escalate issues up to Risk Management subcommittee of the Risk and Capital Committee (KRA-RMC), or the Director in charge of the Risk Management function. Whereas the Integrated Risk Management Work Unit can escalats issues up to the Integrated Risk Management Committee or Director in charge of the Integrated Risk Management function.

BANK'S RISK MANAGEMENT DIVISION

The Bank's Risk Management Division (ERM), as the Risk Management Work Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT) at BNI are under and directly responsible to the Managing Director Risk Management as the Director in charge of Risk Management function and Integrated Risk Management function.

Bank's Risk Management Division



BANK'S RISK MANAGEMENT DIVISION HEAD PROFILE

The Bank's Risk Management Division Head reports directly to the Managing Director Risk Management. Since June 23, 2021, the Bank's Risk Management Division has been led by Fitri Windari, ST, MM.



Fitri Windari, ST, MM

Acting Bank Risk Management Division Head
(June 23, 2021 – present)

Indonesian citizen, 51 years old, obtained a Bachelor's Degree from Faculty of Electrical Engineering Universitas Gajah Mada (1994), and a Master's Degree in Internal Auditing management from Universitas Gajah Mada (1997). Appointed as Acting Bank Risk Management Division Head based on the Board of Directors Resolution letter No. No.KP/285/DIR/R Date June 25, 2021. Previously served as Deputy Head of Operational Risk & Risk Integration Division - Bank Risk Management Division.

Development of Bank Risk Management Division Leader

COMPETENCY/TRAINING DEVELOPMENT MATERIAL	DATE	ORGANIZING AGENCY
Fitri Windari		
Instructional System Design & Modul Developer Digital	January 12-14, 2021	BCV
Enterprise Risk Scorecard	April 22, 2021	BCV
Integrated GRC	April 23, 2021	BCV
Refreshment of Risk Management Certification Series	September 23, 2021	BCV
OJK Teaching - Development of Digital Financial Innovations and Beware of Illegal Investments in Indonesia	October 7, 2021	OJK
Developing Indonesian Future Leaders	November 16-17, 2021	Ministry of SOEs

RISK MANAGEMENT DIVISION DUTIES AND RESPONSIBILITIES

As the Risk Management Work Unit (SKMR) and Integrated Risk Management Work Unit (SKMRT), the Bank's Risk Management Division has the following duties and responsibilities:

1. Risk Management Work Unit
 - a. Preparing proposal for the Bank's risk management strategies and policies;
 - b. Monitoring overall risk position (composite), per type of risk, and per type of functional activity, as well as performing stress testing;
 - c. Developing and evaluating the accuracy of models used to measure risk;
 - d. Reviewing new products and activities proposals from a risk aspect;
 - e. Providing recommendations to operational work units (risk taking unit) based on the authority owned;
 - f. Evaluating the independence and effectiveness of the Bank's risk management infrastructure on a regular basis;
 - g. Supervising the risk management implementation, through the integrated risk control system and risk exposure limit determination;
 - h. Preparing and submitting risk reports regularly to the Board of Directors through the Director in charge of risk management function;
 - i. Independent of the risk taking unit, carrying out the risk management supervisory function, to ensure the Bank's risks and portfolios are well managed, through determination of risk parameters and limits;
 - j. Responsible for managing 4 (four) main risks, credit risk, market risk, liquidity risk, and operational risk, including measuring credit, market, and operational risks, through the Internal Rating System, Market Risk Management Model, and Operational Risk Tools.

2. Integrated Risk Management Work Unit

- a. Giving input to the Board of Directors of the Main Entity related to the preparation of Integrated Risk Management Policies;
- b. Monitoring the implementation of Integrated Risk Management Policies including developing the procedures and tools for risk identification, measurement, monitoring, and control;
- c. Monitoring Risks in BNI's Financial Conglomerate based on the assessment results of:
 - i) Risk Profile of each Financial Service Institution (FSI) in the Financial Conglomerate;
 - ii) Integrated Risk level for each risk type;
 - iii) Integrated Risk Profile.
- d. Preparing proposal for determining the integrated Risk Appetite Statement;
- e. Conducting stress testing;
- f. Periodically reviewing the adequacy of Integrated Risk Management implementation, and Risk Management implementation in each FSI member of the Financial Conglomerate;

- g. Reviewing proposals on new lines of business that are strategic in nature and can significantly influence the Financial Conglomerate Risk exposure;
- h. Providing information to the Integrated Risk Management Committee on matters requiring follow-up from the Integrated Risk Management implementation evaluation results;
- i. Providing input to the Integrated Risk Management Committee on the preparation and refinement of Integrated Risk Management policies.

Preparing and submitting the Integrated Risk Profile report regularly to the Board of Directors of the Main Entity in charge of Integrated Risk Management function, and to the Integrated Risk Management Committee.

RISK MANAGEMENT COMPETENCY DEVELOPMENT

To improve their competencies, the Bank's Risk Management Division has participated in a number of internal and external competency development activities. The competency development carried out in 2021 was as follows:

NO.	NAME OF EDUCATION AND DEVELOPMENT	ORGANIZER	DATE
1	Asset Liability Management in Uncharted New Normal-Strategy & Optimization	BARa Risk Forum	October 26, 2021
2	Brevet Dealer	BCV	February-March 2021
3	Business Acumen for Bankers	NuPMK Consulting	October 09, 2021
4	Derivatives & Structured Products Training	PT Sedyia Abiwara Inggil	November 25-26, 2021
5	Online Facilitator 2021	Learning Resources	October 21-22, 2021
6	FRTB Basel 4-Market Risk	PT Pasar Jasa Profesional	April 26, 2021
7	Getting Started: Bloomberg Basics	Bloomberg	December 16, 2021
8	Introduction to FX Functionalities	Bloomberg	November 03, 2021
9	International Banking Literacy (LIB) Intermediate Level	BCV	July 14-16, 2021
10	International Banking Literacy - Beginner Level	BCV	September 11, 2021
11	Powerful Presentation Skill	Strategic Learning Consulting	June 25-26, 2021
12	Risk Management Certification Level 1	BCV	November 5-8, 2021
13	Risk Management Certification Level 2	BNSP	April 09-10 2021
14	Risk Management Certification Level 3	BCV	June 04-07, 2021
15	Risk Management Certification Level 4	BNSP	June 11-12, 2021
16	Socialization of Commercial Bank Cyber Security Risk Management Policy	OJK	November 18, 2021
17	Workshop on Risk Assessment and Cyber Security (CSM) in the Banking Sector by BSSN	BSSN	June 16-17, 2021
18	Workshop Preparation for Implementation of Biometric Reader Devices and Electronic ID Cards	Divisi JAL dan PT. IDPay Asia Jaya	December 03-04, 2021
19	IT Maturity Assessment - Training & Workshop	Delloite	October 04-05, 2021
20	Module Developer Program	BCV dan Learning Resources	November 18, 2021

NO.	NAME OF EDUCATION AND DEVELOPMENT	ORGANIZER	DATE
21	Anti Gratification and Bribery	BCV	December 12, 2021
22	Anti Money Laundering	BCV	December 12, 2021
23	Anti Fraud Awareness	BCV	December 12, 2021
24	Sustainability Finance	BCV	December 12, 2021
25	Risk Culture	BCV	December 12, 2021
26	Good Corporate Governance	BCV	December 12, 2021
27	Fraud Awareness in a Digital environment	BCV	September 23, 2021
28	Anti-Bribery Management System	BCV	October 21, 2021
29	DigiLearn	Telkom	August 12, 2021
30	Refreshment of Risk Management Certification Series 2	BCV	September 23, 2021
31	BNI Mitigation Strategy	BCV	November 24, 2021
32	Impact of the Pandemic on the Economy and Financial System, and the Role of OJK in National Economic Recovery	OJK	November 12, 2021
33	Operational Risk Management Forum (FRO-3) BNI Mitigation Strategy in Facing Extreme Weather (La Nina)	ERM, BNPB & BCV	November 24, 2021
34	SOE Akhlak Reflection	BCV TV	December 30, 2021
35	Strategic ALM and Balance Sheet Optimization	BARa	October 26, 2021
36	6 Hours of Risk Management Certification Refreshment	BCV	September 23-30, 2021
37	Intrapreneur Fundamental in Digital Mindset	Telkom Indonesia -ITDRI	September 27, 2021
38	Visionary Leadership BUMN Digital behaviour and Mindset	Telkom Indonesia -ITDRI	September 05 2021
39	Building Business Acumen for Bankers	BNI-NuPMK Consulting-Industry Masters	October 09-16, 2021
40	BARa Risk Forum - Loan Covid Restructuration after Implementation of POJK No. 48 Tahun 2020	Bankers Association for Risk Management	August 05, 2021
41	Implementation of the Sustainable Finance Action Plan	GRC Academy	December 13, 2021
42	Leadership in Digital Era	PPM School of Management	July 17, 2021
43	KPSP & MRSI Socialization and Workshop	Bank Indonesia	September 23, 2021
44	ISO 37001:2016 Awareness Understanding Anti-Bribery Management System	Robere & Associates Learning, Consulting & Research	May 25, 2021

RISK MANAGEMENT CERTIFICATION

In 2021, risk management certification was obtained to to improve its professionalism, performance, develop self-potential and to support the implementation of risk management duties. The certifications received were as follows:

CERTIFICATION LEVEL	POSITION	NUMBER OF EMPLOYEES
1	Assistant	79
	Assistant Manager	1526
	Manager	95
	Assistant Vice President	12
2	Assistant	1
	Assistant Manager	210
	Manager	467
	Assistant Vice President	26

CERTIFICATION LEVEL	POSITION	NUMBER OF EMPLOYEES
3	Manager	43
	Assistant Vice President	111
4	Manager	1
	Assistant Vice President	1
	Vice President	14
	Senior Vice President	4
5	Executive Vice President	1

RISK MANAGEMENT SYSTEM

IMPLEMENTATION OF RISK MANAGEMENT TARGET AND STRATEGIC INITIATIVES IN 2021

The BNI's risk management targets and strategic initiatives in 2021 included the following.

1. Credit Risk

- Preparing a document review of Credit Risk Management Policies and Procedures;
- Reviewing the financial industry standards in 2021;
- Reviewing the Industry Risk Rating (IRR) in 2021;
- Reviewing the Industrial Risks in Priority Economic Sectors;
- Developing BNI Loan Exposure Limits (LEL) in 2021;
- Implementing Internal Rating System (IRS) for the Financial Institutions (FI)/Bank;
- Synchronizing the Early Warning System (EWS) and IRS;
- Monitoring the Business Banking debtor rating system in the corporate and middle segments;
- Developing and implementing debtor rating models and systems in the corporate, medium and small segments;
- Performing Credit Risk Weighted Assets (ATMR) calculations using the Standard Method;
- Preparing quantitative disclosures for Credit Risk exposure;
- Conducting credit risk stress testing;
- Developing credit risk measurement - Review of PSAK 71 impairment model;
- Reviewing Credit Risk Premium (CRP) calculations;
- Conducting analysis/study of loan portfolios including studies of 25 core debtors and Non-Performing Loans (NPL) analysis;
- Monitoring loan space available regularly;
- Conducting performance monitoring, review, calibration analysis, and developing new scoring and modeling for consumer credit products (Credit Cards and BNI Griya) and mass retail (BNI Wirausaha and KUR) through the use of internal (customer level) and external data;
- Piloting/full implementation of the application/behavior/collection scorecard for consumers mass retail credit products (BNI Wirausaha and KUR) with the loan application system/ Integrated Decision Automated System (IDEAS);
- Developing a Governance Scorecard related to monitoring and reviewing scoring and modeling for consumer credit and mass retail products (BNI Wirausaha and KUR) and Small Segment up to Rp3 billion
- Developing an Impairment Model related to the application of the latest accounting standards (IFRS 9);
- Validating the Business Banking Segment (Corporate, Medium and Small) Credit Risk models and Consumer Segments (consumer and mass retail) for both the new rating/scoring model or the existing models proposed for validation;
- Conduct an analysis/assessment of Credit Risk on new/existing Bank products, activities and transactions;
- Reviewing Credit Risk Appetite;
- Reviewing Credit Risk Profile parameters, measurements/ methodology;
- Monitoring the areas of concern for improving the Credit Risk Profile;
- Developing and implementing IRB model and debtor rating system in the corporate, medium and small segments;
- Performing credit risk stress test validation;
- Supporting preparation of the BNI Recovery Plan document;
- Preparing Sustainability Finance or Environment, Social & Governance (ESG) Reports;
- Performing preparation of the Unsecured and Secured LGD Model using the IFRS 9 calculation;
- Performing Analysis of BNI Credit Risk RWA Calculation;
- Implementing Credit Scorecard Application for Small Segment Loans up to Rp3 billion;
- Preparing analytical reports for consumer and retail portfolios.



2. Market Risk

- Reviewing the Market Risk Management Policies and Procedures documents;
- Reviewing and developing Market Risk Management Policies, Procedures and Methodologies;
- Reviewing policies, procedures, methodologies and IRRBB (Interest Rate Risk In Banking Book) reporting on an Individual and Consolidated BNI basis;
- Menyusun review limit risiko pasar, untuk portofolio BNI, yang meliputi:
 - a) Market Risk Limits (VaR, Budget Loss, Stress VaR);
 - b) Review of Forex EWS parameters;;
 - c) Review of Securities EWS parameters.
 - d) Review of Off Market Price parameter
 - e) Review of JIBOR Quotation Fairness parameter.
- Monitoring transactions and significant limits of securities;
- Monitoring and reviewing the Treasury and KCLN limit loss budget;
- Monitoring transaction authority/treasury dealer deal size and KCLN;
- Preparing quantitative disclosures of Market Risk exposure;
- Conducting stress testing of scheduled exchange rates and interest rates (business as usual), monitoring and analyzing the development of incidental market risk stress testing parameters and scenario analysis recovery plan;
- Backtesting Value at Risk (VaR).
- Performing Market Risk Weighted Assets (ATMR) calculations using the Standard method;
- Validating the Market Risk model;
- Conducting an analysis/assessment of Market Risk on new/existing Bank products, activities and transactions;
- Evaluating Net Open Position (NOP) calculations;
- Evaluating calculation of Interest Rate Risk in Banking Book (IRRBB);
- Reviewing calculation of risk level of forex, derivative and reverse repo transactions;
- Monitoring limits related to securities concentration;
- Preparing reports and evaluations of investment constraints and investment period per instrument;
- Preparing reports and evaluation of counterpart limits per instrument;
- Preparing reports and evaluation of counterpart limits;
- Preparing reports and evaluation of bond ratings (when buying and daily);
- Preparing reports and monitoring liquidity of Financial Institution Pension Funds (DLK);
- Preparing reports and monitoring of Mark to Market investments in bonds and mutual funds;
- Preparing reports and monitoring value at Risk (VaR) investments in bonds and mutual funds;
- Reviewing Market Risk Appetite;

- Reviewing parameters and measuring Market Risk Profile.
- Supporting preparation of the BNI Recovery Plan document;
- Implementing Global Risk Condor (KGR) Market Risk;
- Developing historical KCLN VaR method.

3. Liquidity Risk

- Preparing a document review of Liquidity Risk Management Policies and Procedures;
- Conducting limit reviews and developing Liquidity Risk Management Policies, Procedures and methodologies, including:
 - a) BNI Wide and Regional Rupiah and Foreign Currency cash ceilings;
 - b) Ideal SR Limits;
 - c) Maturity Profile Limits;
 - d) Early Warning Indicators.
- Reviewing and developing Policies, Procedures and methodologies for managing Domestic Liquidity Risk and Overseas Branch Offices;
- Preparing and reporting individual and consolidated BNI Liquidity Coverage Ratio (LCR) policy documents, procedures, and methodologies;
- Preparing and reporting individual and consolidated BNI Net Stable Funding Ratio (NSFR) policy documents, procedures, and methodologies;
- Monitoring and analyzing cash management by region;
- Preparing quantitative disclosures of Liquidity Risk exposure;
- Conducting stress testing on Liquidity Risk on schedule (business as usual), monitoring and analyzing the development of stress testing parameters for incidental liquidity risks and scenario analysis of recovery plans;
- Analyzing Liquidity Risk on the Bank's new/existing products, activities and transactions;
- Conducting a Risk Appetite Risk review;
- Reviewing parameters and measuring Liquidity Risk Profiles;
- Monitoring liquidity periodically;
- Preparing BNI Recovery Plan documents;
- Monitoring DLK Liquidity.

4. Operational Risk

- Conducting review of the Operational Risk Risk Appetite;
- Preparing a document review of Operational Risk Management Policies and Procedures;
- Conducting analysis/assessment of Operational Risk on new/existing Bank products, activities and transactions;

- Reviewing/calculating Risk Weighted Assets (RWA) for Operational Risk using the Basic Indicator Approach method;
- Preparing disclosure quantitative exposure to Operational Risk;
- Implementing Risk Control Self Assessment (RCSA), Loss Event Database (LED), Key Risk Indicator (KRI) and Business Continuity Management (BCM) operations in Divisions/Units, Regions, Domestic Branches, Sub-Branch Offices, Cash Offices, Central and Overseas Branch Offices;
- Supporting BNI Recovery Plan document updates;
- Coordinating preparation of the BNI Resolution Plan document;
- Preparing a Business Continuity Management (BCM) Policy and Procedure review document;
- Evaluating Business Continuity Management/BCM documents (Call Tree and CMT/ETF Organizational Decree, Threat and Risk Analysis/TRA), Business Impact Analysis/BIA and BCM Maintenance);
- Analyzing operational risk identification by reviewing risk issues in all organizational units;
- Conducting Internal and External Operational Risk analysis;
- Compiling the results of Operational Risk Monitoring in all organizational units;
- Preparing Quick Review and Operational Risk Assessment;
- Organizing an Operational Risk Management Forum (FRO) and managing the results follow-up;
- Conducting parameter review and measurement of the Operational Risk Profile;
- Compiling monitoring and evaluation results on the implementation of disaster-related BCM in all organizational units;
- Compiling monitoring and evaluation results for optimizing the Data Centre (DC), Disaster Recovery Center (DRC), BCM Centre and BCM Building functions and reviewing alternate sites for critical units;
- Conducting site visits, simulations and socialization of BCM in all units and preparing reports on the BCM activities' results;
- Conducting testing on critical work systems and unit applications;
- Developing and Implementing Merchant Fraud Scorecard;
- Reviewing and strengthening card skimming mitigation;
- Improving and reviewing business processes for data leads to mitigate data leaks;

- Improving and reviewing credit card fraud business processes;
- Improving and reviewing digital account opening business processes;
- Preparing digital risk framework, policies and procedures;
- Improving and reviewing end-to-end merchant business processes;
- Conducting assessment on the RAS VPN access for WFH employees;
- Taking an active role in providing operational risk analysis in various bank initiative projects such as Outlet Transformation – BCG, Himbara-Jalin, etc.

5. Legal Risk

- Reviewing the Legal Risk Management Policy.
- Reviewing Legal Policies;
- Conducting legal analysis/studies in the form of written and oral advice;
- Carrying out legal education/training;
- Conducting legal reviews of non-standard agreements using the scoring system calculation method;
- Assisting business units on their business activities;
- Handling and resolving legal cases;
- Supervising the handling of cases;
- Conducting analysis/assessment of Legal Risk on new/existing Bank products, activities and transactions;
- Reviewing parameters and measuring Legal Risk Profile;
- Conducting legal reviews and following the Credit Committee credit proposals approved by the Board of Directors.

6. Reputation Risk

- Reviewing the Reputation Risk Management Policy;
- Delivering letters of response to the mass media related to customer complaints/ grievances against BNI;
- Maintaining BNI's reputation and image for all stakeholders;
- Conducting analysis/assessment of Reputation Risk on new/existing Bank products, activities and transactions;
- Reviewing parameters and measuring Reputation Risk Profile.

7. Strategic Risk

- Reviewing the Strategic Risk Management Policy;
- Sharpening long-term strategies and targets in the 2021-2023 Corporate Plan to focus on developing a digital-based business;
- Preparing a short-term plan in the Board of Directors General Policy (KUD) by considering macroeconomic conditions and industrial competition, as well as competitive assessment of peers;
- Formulating a medium-term plan in the Bank's Business Plan (RBB) by strengthening the unit's strategic alignment in an effort to achieve corporate strategies and targets;



- Socializing the strategies and targets set in the KUD and RBB to all Divisions/Regions;
- Structuring business support functions, and reviewing business processes related to digital business models to improve sustainable organizations, especially by strengthening branch offices and regions;
- Sharpening information and commentary on the current global, national, regional and business economic conditions and business potential of subsidiaries to broaden horizons and assist in strategic decision making;
- Compiling studies related to BNI priority sectors (including Industry Overview, industry characteristics, Key Success Factors & Key Risk Factors, development of the industry under study, BNI's financing portfolio and lessons learned from these financing, and Industry Outlook);
- Evaluating and monitoring the achievement of strategies and targets set in the KUD, RBB and Business Plan Unit;
- Reviewing and monitoring new products and activities, especially related to digital products and activities;
- Conducting Strategic Risk assessments of new/existing Bank products, activities and transactions;
- Reviewing parameters and measuring Strategic Risk Profiles.

8. Compliance Risk

- Reviewing the Compliance Risk Management Policy;
- Creating a Compliance Culture at all levels of the organization and in the Bank's business activities;
- Ensuring the Policies, Regulations, Systems and Procedures and Business Activities carried out by the Bank are in accordance with prevailing laws and regulations;
- Monitoring and maintaining the Bank's compliance with commitments to Bank Indonesia, the Financial Services Authority and other authorities;
- Managing the Whistle Blowing System (WBS) and Anti-Fraud Strategy;
- Developing and perfecting compliance tools/systems and communication media (Compliance Forum);
- Implementing and evaluating the compliance index;
- Conducting Compliance Risk assessment of the Bank's new/existing products, activities and transactions;
- Reviewing parameters and measuring Compliance Risk Profile;
- Managing compliance risk;
- Gratification Control and Anti-Bribery;
- Monitoring the compliance function in Subsidiaries.

9. Integrated Risk

- Reviewing Risk Management Policies: General Risk Management Policies and Internal Control Systems;
- Reviewing and developing Integrated Risk Procedures: Risk Profile Assessment, Bank Soundness, Risk Appetite, Risk Culture, Internal Capital Adequacy Assessment Process (ICAAP), and Risk Management disclosure;
- Analyzing and assessing BNI's individual Health Level;
- Analyzing and assessing BNI's Risk Profile and providing suggestions and recommendations for improvement;
- Calculating BNI's Minimum Capital Adequacy Requirement (KPM) in accordance with the Risk Profile;
- Conducting analysis of 8 (eight) types of risk in the Internal Risk Report (IRR);
- Optimizing the preparation of risk strategies and Risk Appetites that are aligned with business objectives and strategies;
- Compiling documents on BNI's Risk management for the Bank's Business Plan;
- Monitoring Risk Appetite and Risk Tolerance;
- Preparing disclosure of the Bank's Risk Management Implementation;
- Conducting analysis/assessment of risk on new/existing Bank products, activities and transactions;
- Managing and developing the Bank's Risk Management Information Systems (RMIS) and Risk Management database;
- Review the Recovery Plan company guidelines.
- Analyzing and monitoring the Threshold Recovery Plan;
- Improving risk culture, and coordinating with culture specialist groups;
- Reviewing parameters and methodology for measuring BNI Risk Profile;
- Developing Branch Level Risk Profile initiatives (including calculation methodologies, parameters and implementation).

10. BNI Financial Conglomerate Integrated Risk

- Reviewing Integrated Risk Management policies: General Integrated Risk Management (KUMRT) Policy and Integrated Capital;
- Reviewing and developing procedures for implementing Integrated Risk Management (MRT):
 - a) MRT procedures;
 - b) Integrated Risk Profile Assessment Procedure;
 - c) Integrated Capital Procedures.
- Reviewing the 2021 Integrated Risk Appetite Statement and Integrated Risk Limit;
- Analyzing and monitoring integrated risk limits;

- Performing integrated Risk Appetite analysis and monitoring;
- Analyzing and evaluating BNI's Health Level on a Consolidated basis;
- Analyzing and assessing BNI's Risk Profile on a Consolidated and Integrated basis and providing suggestions and recommendations for improvement;
- Preparing Consolidated and Integrated calculations for BNI's Minimum Capital Adequacy Requirement (KPMM);
- Analyzing and monitoring the main risks of all FSI members of the BNI Financial Conglomerate through the Leading Risk Indicator (LRI);
- Preparing monitoring documents and reviewing the implementation of integrated Risk management in the BNI Financial Conglomerate (KK);
- Ensuring all Financial Services Institutions/ Subsidiaries have policies and procedures related to the application of Risk Management;
- Providing guidance and input to Subsidiaries on implementing Risk Management;
- Holding Integrated Risk Management Committee (KMRT) meetings, and providing input to KMRT for developing policy recommendations, strategies and framework for Integrated Risk Management.

BNI'S RISK MANAGEMENT IMPLEMENTATION

BNI's Risk Management implementation has the following objectives:

1. Managing risks inherent in BNI's relatively complex products, activities, and business activities;
2. Providing an overview to Management of possible losses that may occur in the future;
3. Improving methods and systematic decision-making process based on the information availability;
4. Maintaining and improving BNI's Risk Profile assessment in either individual, consolidated, or integrated manner as the Financial Conglomerate;
5. Managing adequate capital structure to cover risks that may arise;
6. Providing more accurate basis for measuring performance;
7. Creating and maintaining BNI's strategic position and reputation;
8. Creating competitive advantage and maintaining sustainable growth to increase BNI's shareholder value.

BNI's Risk Management implementation is carried out in accordance with the regulator's provisions, which involves the following 4 (four) pillars of Risk Management implementation:

ACTIVE MONITORING BY THE BOARD OF DIRECTORS AND THE BOARD OF COMMISSIONERS

Active monitoring of Board of Directors is performed by:

1. Preparing risk management policies, strategies, and framework, including risk limits, by considering risk appetite and risk tolerance according to BNI's condition, and measuring the risk impact on the capital adequacy;
2. Preparing, determining, and updating the procedures and tools to identify, measure, monitor, and control risks in BNI;
3. Preparing and establishing transaction approval mechanisms, including those that exceed the limits and authority for each position level;
4. Evaluating and/or updating risk management policies and strategies;
5. Determining BNI's organizational structure, including clear authorities and responsibilities at every position level related to the risk management;
6. Implementing risk management policies, strategies, and framework approved by the Board of Commissioners, and evaluating and providing guidance based on the Risk Management Work Unit reports, including BNI's Risk Profile Assessment;
7. Ensuring that all of BNI's material risks and impact caused by such risks have been addressed;
8. Ensuring the implementation of corrective actions on issues found by the Internal Audit Unit (IAU);
9. Ensuring the quantity and quality adequacy of human resources to effectively support BNI's risk management implementation;
10. Developing risk management culture in BNI including risk awareness at all organizational levels;
11. Ensuring the risk management function is applied independently.

The Board of Directors' supervisory function is carried out through the Board of Directors Meeting Forum (Radisi), Risk Management & Anti Fraud Committee Meeting (KRA), Risk Management Sub-Committee (RMC), Anti-Fraud Sub-Committee (KAF), Credit Policy Committee Meeting Forum, and Credit Procedure Committee (KPP).

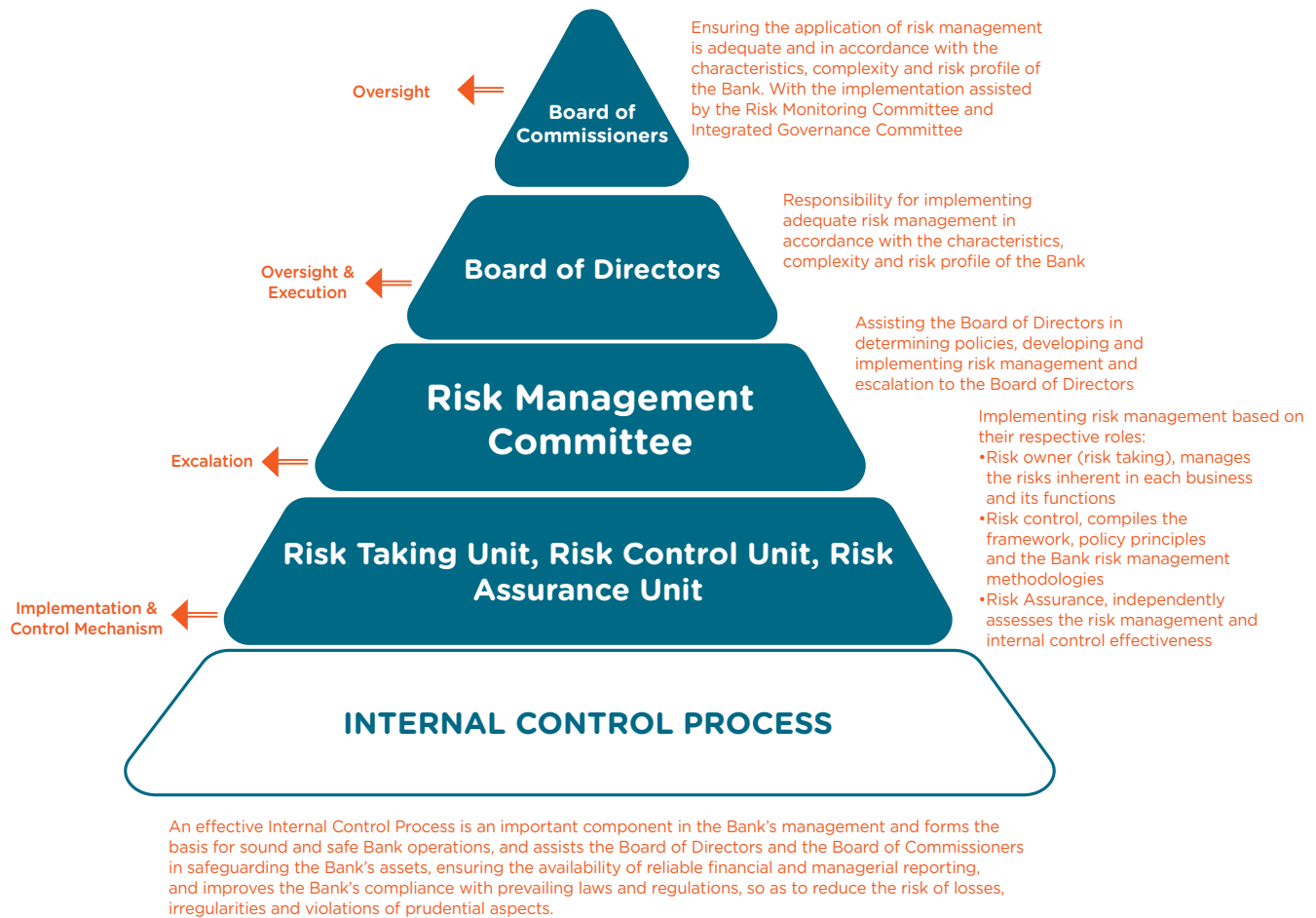
Active supervision by the Board of Commissioners is carried out by:

1. Approving BNI's risk management policies including risk management strategies and frameworks determined by the risk level to be taken (risk appetite) and risk tolerance;
2. Evaluating risk management policies and strategies;
3. Evaluating the Board of Directors accountability and providing direction for improvements to BNI's risk management policies;
4. Ensuring that risk management policies and processes are carried out effectively and are integrated into the overall BNI risk management process.

The Board of Commissioners' supervisory functions are carried out through the Board of Commissioners' Meeting (Radikom), as well as in Risk Monitoring Committee, Integrated Governance Committee and Audit Committee meetings.

To achieve effective Risk Management, the implementation is based on the established Risk Management. Risk Governance regulates the roles and responsibilities, the decision making process, the interrelationship between Risk management functions, and the establishment of policies to ensure Risks are well managed.

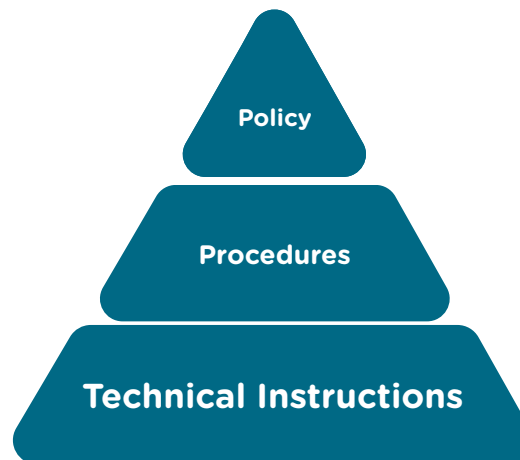
BNI RISK MANAGEMENT



ADEQUACY OF LIMIT POLICIES, PROCEDURES, AND ESTABLISHMENT

To support the effective implementation of Risk Management, BNI has developed comprehensive and integrated Risk Management policies and procedures. BNI already has Risk Management General Policies and an Integrated Risk Management General Policy that have been approved by the Board of Commissioners, and serve as a strategic and comprehensive basic reference. This General Policy has been translated into the Risk Management Policy and Procedures.

The Risk Management Policy and Procedures guide the implementation of Risk Management. On an individual basis, BNI's risk management manages 8 (eight) risk types: Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Strategic Risk, Compliance Risk, and Reputational Risk. Whilst overall BNI manages 10 (ten) risk types: the 8 (eight) risk types managed individually plus Intra-Group Transaction Risk and Insurance Risk. BNI already has policies and procedures that form the basis for managing each risk, with detailed provisions for each policy and procedure regulated in technical instructions. The hierarchy of policies, procedures, and technical guidelines is shown in the following chart:



In addition, BNI also has risk limits that are the thresholds to determine the intensity level of risk mitigation to be implemented by management as a method of risk control. The limit determination includes number of limits, such as limits per risk (credit risk, market risk, and liquidity risk), limits per functional activity, as well as overall limits.

The risk management policies, procedures, and risk limits carried out by BNI are reviewed periodically with approval up to the Board of Directors level through Committee Meetings or circulation to the Board of Directors according to their level of authority.

ADEQUACY OF PROCESS OF RISK IDENTIFICATION, MEASUREMENT, MONITORING, AND MANAGEMENT, AS WELL AS RISK MANAGEMENT INFORMATION SYSTEM

BNI's risk management process includes the ongoing identification, measurement, monitoring, and risk control processes for all material risk factors supported by the Risk Management Information System.

The risk identification process is carried out by analyzing the source, the level of possible risks and impacts. Several matters considered in risk identification process include:

1. Identifying all risks regularly;
2. Having a method or system to identify risks in all BNI's products and business activities;
3. Specifically identifying risks to new products and activities, before they are introduced or implemented.

The risk measurement process helps to determine the amount of risk exposure as a reference for controlling risk and meeting Capital Adequacy. Risk measurement is carried out quantitatively and/or qualitatively according to the measurement method determined by the regulator or by using internal methods for those not been specifically determined. BNI's Risk measurement also includes stress testing for credit risk, market risk, and liquidity risk to anticipate extreme conditions.

The risk monitoring process is carried out to ensure that risks are managed properly, and include monitoring established mitigation and risk limits. Risk monitoring is carried out by the Operational Work Unit (risk taking unit) as the risk owner and the Risk Management Work Unit as the risk control unit.

The risk control process is carried out primarily to manage risks that can disrupt BNI's business continuity. The risk control strategy undertaken by BNI includes reducing risk (risk mitigation), accepting risk (risk acceptance), avoiding risk (risk avoidance) and transferring risk (risk transfer).

BNI's Risk Management Information System supports the the processes of identification, measurement, monitoring and risk control, and ensuring the availability of accurate, complete, informative, timely and reliable information so that it can be used in the framework of Management's decision making.

INTERNAL CONTROL SYSTEM

The Company's Internal Control System uses the Three Lines of Defense model which consists of:

1. **First Line of Defense or Risk Taking Unit**

Carried out by the Operational Work Units as the risk owner who manages the risks inherent in the business and its functions (day-to-day risk management and control).

2. **Second Line of Defense or Risk Control Unit**

Conducted by the Bank's Risk Management Division, Policy Governance Division, and Compliance Division whose task is to encourage all organization levels to carry out their functions in accordance with internal regulations.

3. **Third Line of Defense atau Risk Assurance Unit**

Conducted by the Internal Audit Unit (IAU) as the Internal Audit Unit (SKAI). The Risk Assurance Unit is tasked with conducting independent assessments of the Risk Management suitability and the Internal Control System process through internally determined policies and procedures as well as compliance with regulatory provisions.

RISK MANAGEMENT STRATEGY

For the implementation of risk management, it is necessary to align the strategies and business objectives with the risk strategy and risk appetite. For the implementation of risk management, it is necessary to align the strategies and business objectives with the risk strategy and risk appetite. The risk strategy and risk appetite is translated into governance, processes, policies and tools and methodologies supported by information technology, human capital and a strong risk culture.



Risk management strategies are formulated according to the overall business strategy by considering the level of risk taken (risk appetite) and risk tolerance. The purpose of establishing a risk management strategy is to ensure that risk exposures are managed in a controlled manner in accordance with internal policies and procedures as well as prevailing laws and regulations and other regulations.

The risk management strategy consists of several principles, including:

1. Long-term oriented to ensure the BNI's business continuity;
2. Comprehensive in nature, can control and manage BNI's risk both individually and on a consolidated basis with Subsidiaries and integrated into BNI's Financial Conglomerate;
3. Fulfillment of the required capital adequacy and adequate allocation of resources.

The risk management strategy is prepared by considering the following matters:

1. Economic and industrial developments and their impact on BNI's risk exposure;
2. BNI organization, including the adequacy of human capital and supporting infrastructure;
3. Financial conditions include the ability to generate profits, and BNI's ability to manage risks arising as a result of changes to external and internal factors;
4. Mix and diversify the internal portfolio.

The risk management strategy is formulated according to the business strategy and to provide overall direction in the risk management activities. The risk management strategy consists of 4 (four) main components:

1. The risk level to be taken (risk appetite) and risk tolerance;
2. Risk management principles and policies;
3. Risk governance;
4. Types of risk exposure and market conditions.

The type and magnitude of risk exposures are measured using a risk measurement methodology in accordance with the Regulatory provisions and is linked to risk appetite, risk tolerance, predetermined limit, and capital availability and planning.

Risk management governance strategies:

1. The Risk Management Strategy is one of the references in determining the business strategy as outlined in BNI's Bank Business Plan (RBB), which is determined on an annual basis and submitted to the Regulator;
2. The risk management strategy is drafted and prepared by the Risk Management Work Unit, approved by the Board of Directors through the Risk Management Sector of the Risk and Capital Committee Meeting, as well as approved by the Board of Commissioners.

The Risk Management Strategy is communicated by the Board of Directors to the Divisions/Work Units and is regularly reviewed in line with changes in business strategies, by considering the economic conditions, banking business, changes in regulations by the Regulator and their impact on the Bank's financial performance.

RISK PROFILE AND MANAGEMENT

TYPE OF RISKS

There are at least 10 (ten) types or risks that shall be managed, which are:

1. Credit Risk

Credit risk is risk due to the failure of another party to meet the obligation to the Bank, including Credit Risk due to debtor's failure, credit concentration risk, counterparty credit risk, and settlement risk.

Credit risk can derive from various bank business activities, such as credit provision, securities purchases, acceptances, interbank transactions, trade finance transactions, exchange value and derivative transactions, as well as commitment and contingency obligations, where credit provision is the largest source of credit risk.

2. Market Risk

Market Risk is a risk in balance sheet and administrative account positions including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

Market risks include interest rate risk, foreign exchange risk, equity risk, and commodity risk.

As a Bank, BNI is prohibited from conducting equity (stock) and commodity transactions. The implementation of risk management for equity and commodity risk is applied in the case of consolidating with Subsidiaries.

3. Liquidity Risk

Liquidity risk is a risk due to the Bank's inability to meet the obligations due from the cash flow source of fund and/or from high quality liquid assets that can be pledged, without disturbing the Bank's activity and financial condition. BNI's Liquidity Risk can occur due to the inability to obtain a cash flow source of fund caused by:

- a. Inability to generate cash flows from productive assets or from the sale of assets including liquid assets; and/or
- b. Inability to generate cash flows from fund raising, interbank transactions, and loans received.

4. Operational Risk

Operational Risk is risk due to inadequacy and/or malfunction of internal process, human error, system failure, and/or external incidents affecting the Bank's operations. Operational risk arises among others from internal process, human resources, information technology system and infrastructure, and external events.

5. Legal Risk

Legal Risk is a risk as a result of lawsuits and/or weakness of juridical aspect. BNI's Legal Risk may arise among others from Absence/Change of Legislation, or weak agreement such as unfulfilled valid terms of a contract and incomplete collateral binding.

6. Reputation Risk

Reputation risk is a risk due to the decreasing level of stakeholders' trust caused by negative perception towards the Bank. BNI's Reputation Risk may among others arise due to negative media reporting and/or negative rumors about BNI, and BNI's ineffective communication strategy.

7. Strategic Risk

Strategic risk is the risk due to inaccuracy in making and/or implementing a strategic decision and failure to anticipate changes in the business environment.

BNI strategic risks can occur due to strategies being established that are not in line with the vision and mission of BNI, analysis of the strategic environment that is not comprehensive, and/or there is a mismatch of strategic plans between levels. In addition, BNI's strategic risks can also arise due to failures in anticipating changes in the business environment including failures in anticipating technological changes, changes in macroeconomic conditions, dynamics of competition in the market, and changes in relevant authority policies.

8. Compliance Risk

Compliance Risk is a risk due to the bank not complying with and/or not implementing the prevailing laws and regulations and provisions. BNI's compliance risk may arise from legal behavior, which is BNI's behavior/activity that deviates or violates the provisions or laws and regulations, and organizational behavior, which is BNI's behavior/activity that deviates or is contrary to the general standards.

9. Inter-Group Risk

Risk due to the dependence of an entity, either directly or indirectly, on other entities in one Financial Conglomerate to fulfill written and unwritten agreement obligations, followed by transfer of funds and/or not followed by transfer of funds.

10. Insurance Risk

Risk due to failure of the insurance company in meeting its liability to the policyholders as a result of insufficient risk selection process (underwriting), premium determination (pricing), use of reinsurance, and/or claim handling.

BNI'S RISK MANAGEMENT EFFORTS

To manage risk effectively and comprehensively, a risk management infrastructure is needed that includes Governance and Organization (including HC), Policies and Procedures, Risk Management Processes, Measuring Tools and Methods (including Quantification of Risk Models), supported by Information Technology and strong Risk Culture.

The Risk Management process for each risk developed and implemented to date in BNI is as follows:

CREDIT RISK

Credit risk identification is carried out to analyze the sources and possibilities of credit risk arising and its impact, which is carried out periodically according to the product characteristics and types of activities. Credit risk identification is also carried out by preparing a Industry Risk analysis in the priority economic sector.

Credit risk measurement is an integral part and series of the process of implementing credit risk management and is used as a reference for risk control.

To process the individual exposure of the business banking segment, BNI already has a debtor rating model in the internal rating system, while for the consumer segment, debtor scoring system is used to assist in analyzing the quality of debtors in the credit process.

To regulate the portfolio composition, BNI has a Loan Exposure Limit (LEL) that serves to limit the risk of concentration of loan exposure in each economic sector in each segment, and serves as a guideline for business units in expanding loans. To assess the risk for each type of industry, BNI has an Industry Risk Rating (IRR) and a Financial Ratio Standard that is used as one of the factors for assessing the quality of debtors from an industry viewpoint.

BNI uses the Standardized Approach method for calculating Risk Weighted Assets (RWA) for Credit Risk when assessing the adequacy of the Minimum Capital Requirement (KPMM).

To complement the credit risk measurement system, stress testing is carried out by estimating the Bank's potential losses in abnormal market conditions by using certain scenarios to see the sensitivity of BNI's performance against changes in risk factors, and to identify factors that have a significant impact on BNI's portfolio and capital adequacy. Stress testing is carried out periodically or can be done at any time according to the needs by considering the economic conditions or according to the needs/requirements of the regulator.

The ERM Division prepares stress testing methodology/models for credit risk by considering the product or activity characteristics and harmonizing them with the rules/requirements of the regulator.

Credit risk monitoring aims to see and ensure that the implementation of the entire credit risk management process is running well and the potential credit risk is still within the permissible risk limit. Credit risk monitoring is carried out on the loan portfolios, and covers growth, quality and concentration of loans, monitoring loan exposure compared to Loan Exposure Limit, and monitoring the Legal Lending Limit.

Credit Risk Control is carried out to prevent the occurrence of bigger losses due to Credit Risk and is supported by several credit risk management tools at the individual and portfolio exposure level.

MARKET RISK

Market risk identification, measurement, monitoring, and control is carried out by an independent unit from the business unit. Market Risk Identification is mainly carried out for each new product or activity.

The Market Risk Identification objectives include:

1. Determining transactions/products exposed to Market Risk;
2. Grouping the Market Risk based on the existing criteria;
3. Facilitating the measurement of Market Risk and its control.

Periodic Market Risk Measurement is carried out on all trading book and banking book portfolios exposed to Market Risk. BNI conducts Risk Market measurement by using a Standardized Method and an Internal Method. The Standardized Method is used to calculate the Minimum Capital Reserve Requirement (KPMM) of Market Risk, while the daily Market Risk management uses the Internal Method (Value at Risk).

The portfolio coverage calculated in KPMM by using Standardized Method is the trading book portfolio for interest rate risk and the trading book and banking book portfolio for domestic and overseas branch office's exchange rate risk.

The process of monitoring and reporting Market Risk is conducted periodically, including:

1. Monitoring and reporting the amount of Market Risk on all Bank portfolios exposed to Market Risk;
2. Monitoring and reporting on compliance with Market Risk limit (realization of Market Risk exposures compared to their limits);
3. Recommending follow-up for occurrence of exceeding limits, and/or occurrence of abnormal market conditions, and/or occurrence of other conditions that lead to increased Market Risk potential.

Market Risk Control is carried out to prevent the occurrence of bigger losses due to Market Risk by establishing market risk limits in the Treasury Division and Overseas Branch Offices, including:

1. Value at Risk Limit (VaR Limit), the maximum potential loss that may occur at any time in the future with certain confidence level;
2. Stress Value at Risk Limit (Stress VaR Limit), a measurement of market risk adjusted to abnormal conditions in the market or maximum potential loss when the market is not normal;
3. Budget Loss Limit, used to limit the realization of business activities losses;
4. Management Action Trigger (MAT), the Limit to take action against the risk of changes in loss value (early warning signal). MAT completes the loss limit in the form of a certain percentage of the budget loss limit;
5. Limit on securities purchases, which is used to limit the concentration of purchases of corporate securities by rating and type of currency of the securities;
6. The Interest Rate Risk in Banking Book (IRRBB) limit using the Net Interest Income (NII) method and the Economic Value of Equity (EVE) approach to limit interest rate risk in the banking book;
7. Nominal of open position limit, the maximum nominal of open position limit that a dealer can use;
8. Overall NOP internal limit (absolute), the maximum limit of NOP management.

LIQUIDITY RISK

Liquidity Risk Identification is the process of obtaining and analyzing the sources of Liquidity Risk inherent in all business activities/transactions/products that can financially impact the Bank. Every activity/product/transaction is analyzed and differentiated to ensure that every Liquidity Risk has been identified, measured accurately, managed according to the right method, and is well controlled.

Liquidity risk management aims to minimize the possibility of the Bank's inability to obtain cash flow source of fund, and builds the structural liquidity strength of the bank's balance sheet to support sustainable long- term growth.

Liquidity Risk Measurement Methods include liquidity ratio, maturity profile, cash flow projection, stress testing, and Liquidity Coverage Ratio (LCR). The monitoring process and/or reporting Liquidity Risk is conducted periodically, including:

1. Monitoring and reporting the amount of Liquidity Risk on all Bank activities/products exposed to Liquidity Risk;
2. Monitoring and reporting compliance with Liquidity Risk limit (realization of Liquidity Risk exposures compared to their limits);
3. Monitoring internal and external early warning indicators to determine the potential for increased Liquidity Risk;
4. Recommending follow-up on the occurrence of exceeding limits and/or occurrence of abnormal market conditions, and/or occurrence of other conditions that lead to increased Liquidity Risk potential.

In managing liquidity, in addition to managing the primary reserve (cash and GWM), BNI holds and maintains secondary reserves to ensure that liquidity is at a safe level. For the secondary reserve, BNI holds and maintains a tertiary reserve. Determination and monitoring of limits, including Cash Limit of BNI Wide, limit of Secondary Reserve Ideal (SR Ideal), Maturity Profile limit, and restriction of Foreign Exchange Credit based on the Availability of Funds is conducted periodically by the Bank's Risk Management Division (ERM) Division. Whereas, the availability of the entire reserve is monitored daily, weekly, and monthly by the Treasury Division (TRS) Division and ERM Division.

OPERATIONAL RISK

BNI's operational risk management consists of 5 (five) main continuous processes, identification, assessment, measurement, monitoring, and control.

1. Risk Identification

The method used to identify and measure operational risk includes: Risk Control Self-Assessment (RCSA), risk mapping, Key Risk Indicators (KRI), scorecards, event analysis, frequency matrix, quantitative methodologies, and qualitative methodologies. The method used to identify and measure operational risk in BNI is summarized in an application, namely PERISKOP (Operational Risk Tool). PERISKOP is a tool or device used for managing operational risk and includes recording loss events, compiling follow-up actions, and mitigating them.

2. Risk Assessment

Performed by each risk-owner unit through operational risk self-assessment methods, including assessment of impacts, frequency, and causes of risks and their solutions.

3. Risk Measurement

In accordance with the Regulatory provisions, the current operational risk measurement is the Basic Indicator Approach method.

4. Risk Monitoring

Performed by all units as the first line of defense on the main risks during ongoing operational activities. The Bank's Risk Management Division evaluates and prepares report/feedback on risk assessments based on self-assessment results as well as realization on operational risk losses that happen that includes:

- Report feedback for all divisions/units/areas/branches;
- Monthly reports on Operational Risk Expenses Monitoring, submitted to the Board of Directors;
- Operational Risk Profile Report.

5. Risk Control

The operational risk mitigation mechanism is reflected in the internal control process by implementing 4 (four) risk mitigation strategies, namely avoid, reduce, transfer and receive, with the aim of minimizing losses due to malfunctioning internal processes, human factors, systems and technology, and external events. The four risk mitigation strategies are contained in the Operational Risk mitigation procedures and include control procedures, transaction settlement and reconciliation procedures, accounting procedures, asset and custodian safekeeping procedures, product supply procedures and Fraud prevention procedures.

The process of implementing BCM is carried out as follows:

- Establishing the BCM organizational structure in all BNI work units;
- Assessing the potential risks and threats to gain a picture of disaster events with the highest likelihood and the greatest impact. As well as estimating the actions and facilities that must be prepared;
- Identifying critical business processes (Business Impact Analysis - BIA) for BNI business continuity in the event of an emergency/disaster. BIA is a reference for units in developing priorities and recovery strategies and recovery timeframes for their main business activities;
- Preparing a plan for handling emergency conditions as a reference for units in the prevention and handling of emergency conditions and as a reference for implementing building safety and safety standards;
- Preparing a Recovery Strategy including the decisions to make in an organized way in the event of an emergency that interferes with the bank's business activities;
- Creating a Return Strategy with the aim of providing a way to return functions and activities to the service levels before a disaster occurs.

The development of this tool is in line with the Regulatory requirements requiring banks to implement risk control processes to manage risks that could compromise a bank's business continuity, and also in line with the Basel II document requiring banks to have business continuity management and contingency plans to ensure the bank's ability to keep operating and to limit losses due to disruption on their business activities. Beside the Regulator and Basel II for Overseas Branch Office provisions, BCM is implemented by fulfilling BCM regulations in the local country.

BUSINESS CONTINUITY MANAGEMENT

Disruptions or disasters caused by natural factors, human actions, and systems may happen to BNI's critical business functions, causing disruptions on BNI'S business activities and services. To anticipate such events, BNI has implemented Business Continuity Management (BCM) in all domestic and overseas units to minimize operational risk in emergency events or disaster situations.

LEGAL RISK

The legal risk identification process is carried out by analyzing all legal risk sources, and is carried out on legal risk from BNI's products and business activities, as well as new products and business activities through a 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 the following indicators/parameters:

1. Litigation Factor;
2. Factors of Engagement Weaknesses;
3. The Factor of Absence/Change of Legislation.

Legal risk measurement is calculated using indicators/parameters for identifying legal risks compared to Bank capital. The legal risk measurement results are reflected in the Legal Risk Profile. Monitoring legal risk is carried out by evaluating exposure to inherent legal risk, especially those of a material nature or those may impact BNI's capital. The monitoring results including evaluation of legal risk exposure are reported regularly and include the necessary follow-up actions.

The legal risk control process is used by BNI to manage legal risks especially those that could endanger BNI's business continuity. Legal Risk control process is carried out by:

1. Conducting evaluations/assessments in the form of judicial reviews in the event of new products or new activities, or changes in/additional features on BNI's products;
2. Providing legal advice and/or legal assistance in the event of Legal Risks in the operational activities;
3. Periodically reviewing standard agreement formats, in particular credit agreements, to ensure compliance with laws and regulations and other applicable provisions;
4. Periodically reviewing contracts and agreements between BNI and other parties, especially for non-standard agreements or agreements that have not been standardized in the Company Guidelines;
5. Conducting intensive monitoring on legal issues, particularly lawsuits based on Actions Against the Law involving the Bank as Defendant or Co-defendant.

REPUTATION RISK

To identify and measure the impact of Reputation Risk, BNI uses several sources of information including mass media coverage, Bank websites, and analysis of social networks, customer complaints through customer service, and customer satisfaction questionnaires.

Monitoring of news management and crisis communication management and monitoring of news media/social media opinions/comments is conducted in a coordinated manner by the Bank's Risk Management Division and the Corporate Communication and Secretariat Division, while management of customer complaints/grievances is carried out in collaboration with BNI Contact Center (BCC).

The Corporate Communication and Secretariat (KMP) Division monitors and reports any Reputation Risk that occurs to the Board of Directors both incidentally at the time of the incident and periodically including the necessary follow-up actions. BNI has developed a mechanism for performing effective reputation risk control measures. In general, reputation risk control is carried out through 2 (two) activities:

1. Prevention of events leading to reputation risk;
2. Recovery of the Bank's reputation after a reputation risk incident occurs.

COMPLIANCE RISK

Compliance risk identification is carried out by analyzing factors that can increase compliance risk exposure such as the type and complexity of BNI's business activities, including new products and activities, the volume and materiality of the Bank's non-compliance with internal policies and procedures, as well as the prevailing laws and regulations and provisions as well as sound business ethics and practices.

Compliance Risk Measurement is carried out by using indicators/parameters such as:

1. Types and significance of violations committed;
2. Frequency of violation (BNI's compliance track record);
3. Violations against certain financial transaction provisions.

As part of the compliance risk measurement, the indicators/parameters and the amount of weight and ratio used to measure the compliance risk profile are determined by the Compliance Division with due regard of input from the Board of Directors, the Bank's Risk Management Division (ERM), and other Units as well as Regulatory provisions, if any.

The Compliance Division monitors and reports on the Compliance Risk that occurs to the Board of Directors either incidentally at the time the Compliance Risk occurs or periodically.

Compliance Risk Control is carried out through preventive actions or measures to ensure the policies, provisions, systems, and procedures, as well as business activities carried out by BNI are in accordance with the Regulatory provisions and prevailing laws and regulations, as well as to ensure BNI's compliance with the commitments made to the Regulators and/or other authorized supervisors. Compliance Risk Control is not only carried out on organizational units in the country but also includes organizational units overseas.

STRATEGIC RISK

Strategic risk identification is carried out to identify strategic risk factors inherent in every functional activity that could potentially harm BNI, for example inappropriate policies, low responsiveness to changes that occur, implementation of policies that are not according to plan, or because the implementation is not in line with the predefined schedule.

The Risk measurement approach used in measuring Strategic Risk Profile uses 4 (four) parameters: strategy suitability with the business environment conditions, high-risk strategies and low-risk strategies, BNI's business position against competitors, and the achievement of Bank's Business Plan (RBB).

The Strategic Planning Division (REN) monitors the realization of Business Plan Strategies for each Division/Unit so any problems can be identified when implementing the strategies and work programs, so they can be corrected immediately, so that the financial targets can be achieved.

INTRA-GROUP TRANSACTION RISK

Transactions Identification of intra-group transaction risk is carried out by analyzing the types of products and/or transactions between FSI in the BNI Financial Conglomerate that may pose an intra-group transaction risk in the BNI Financial Conglomerate.

Measurement of intra-group transaction risk ranks the risk level of intra-group transactions in the Financial Conglomerate. BNI as the main entity measures the intra-group transaction risk and compiles an intra-group transaction risk measurement methodology, and evaluates the suitability of the assumptions, data sources, and procedures used to measure intra-group transaction risk.

Monitoring intra-group transaction risk is carried out by evaluating the material Intra-group Transaction Risk exposure, or those that have an impact on the capital condition of the Financial Conglomerate; and to improve the process and scope of reporting, if there are material changes in business activities, products, transactions, and risk factors.

To assess material financial relationships in an intra-group relationship between the FSI in the BNI Financial Conglomerate, it is measured based on the value of BNI's financial transactions with FSI members of the BNI Financial Conglomerate, and between fellow FSIs in the BNI Financial Conglomerate.

The control of intra-group transaction risk in the BNI Financial Conglomerate is carried out by taking into account:

1. The composition of inherent risk parameters for intra-group transactions in the assessment of integrated risk profiles;
2. Fulfilling the principle of arm's length (fairness of transactions) related to intra-group transactions;
3. Availability and completeness of intra-group transaction documentation; and
4. Fulfilment of legal/regulatory provisions that apply to each intra-group transaction.

INSURANCE RISK

Group insurance risk identification is achieved by analyzing factors that can increase insurance risk exposure such as inadequate risk selection process (underwriting), determining premiums (pricing), reinsurance use, and/or claim handling. Risk measurement uses the Technical Risk, Insurance Risk Domination of the Overall Business Line, Product Risk Mix and Types of Benefits and Reinsurance Structure parameters.

BNI RISK PROFILE ASSESSMENT

The Risk Profile Assessment is an assessment of inherent Risk and Quality of Risk Management Implementation in the Bank's operational activities. Risks that must be assessed include the 8 (eight) risks types. When assessing the Risk Profile, the Bank must also pay attention to the scope of risk management as regulated by the regulator when assessing the Risk Profile.

INHERENT RISK ASSESSMENT

Inherent Risk Assessment is an assessment of the risks inherent in the Bank's business activities, whether quantified or not, which have the potential to affect the Bank's financial position.

The Bank's inherent risk characteristics are determined by internal and external factors, including business strategy, business characteristics, complexity of products and activities of the Bank, industry where the Bank conducts its business activities, and macroeconomic conditions.

Inherent Risk Assessment is carried out by considering quantitative and qualitative parameters/indicators. Determination of inherent risk level for each risk type refers to the general principles of assessing the Sound Level of Commercial Bank. Determination of inherent risk levels for each risk type is categorized into rank 1 (low), rank 2 (low to moderate), rank 3 (moderate), rank 4 (moderate to high), and rank 5 (high).

RISK MANAGEMENT IMPLEMENTATION QUALITY ASSESSMENT

The Risk Management implementation quality assessment reflects the assessment of the adequacy of Risk control system covering all Risk Management pillars as stipulated in the Financial Services Authority provisions for the Risk Management in Commercial Banks. Bank Risk Management varies greatly according to scale, complexity, and level of risk that the Bank can tolerate. Thus, when assessing the Quality of Risk Management, it is necessary to consider the characteristics and complexity of the Bank's business. The Risk Management quality assessment uses 4 (four) interrelated aspects:

1. Risk governance;
2. Risk Management Framework;
3. Risk Management process, adequacy of human capital, and adequacy of management information systems; and
4. Adequacy of the Risk control system, by considering the Bank's business characteristics and complexity.

RISK PROFILE ASSESSMENT RESULTS

BNI's Individual Risk Profile self-assessment results as of December 31, 2021 ranked 2 (low to moderate) with a low to moderate Inherent Risk Rating and a Satisfactory Risk Management Implementation Quality (KPMR) rating.

BASEL III IMPLEMENTATION

Referring to OJK Regulation No. 11/POJK.03/2016 dated February 2, 2016, concerning Minimum Capital Requirement (KPMR) for Commercial Banks, as amended by OJK Regulation No. 34/POJK.03/2016, the Bank must provide minimum capital in accordance with the Risk Profile.

Based on the results of BNI's capital calculation as of December 31, 2021, BNI's CAR of 19.74% is still above the required capital obligation of 11.30%, namely the requirements according to the Risk Profile (rank 2) and additional buffer capital, namely the Conservation Buffer 0% (based on POJK No. 48/POJK.03/2020, as an amendment to POJK No.11/POJK.03/2020 concerning National Economic Stimulus as a Countercyclical Policy Impact due to the Spread of Coronavirus Disease 2019, Banks Umum Konvensional, where Banks included in the group BUKU 3 and BUKU 4 banks may fail to meet the Capital Conservation Buffer of 2.5% of the RWA valid until March 31, 2022), 0% Countercyclical Buffer, and 1.5% Capital Surcharge.

In addition, to anticipate the implementation of Basel III related to liquidity, BNI has also improved liquidity risk management by applying Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) calculations that aim to strengthen and improve the quality of liquidity risk management. The LCR calculation aims to increase the short-term liquidity security of banks by maintaining adequate High Quality Liquid Assets (HQLA) to meet liquidity needs over the next 30 days in crisis conditions, while the NSFR aims to reduce liquidity risk related to funding sources for a longer time period by requiring BNI to fund activities with an adequate source of stable funds to mitigate any risk of funding difficulties in the future. Based on the position results as at December 31, 2020, BNI's LCR was 181% and BNI's NSFR was 136%, still above the minimum required requirement of 100%.

For improving and refining its risk management for future development, BNI has planned several initiatives to improve the capability and quality of risk management implementation, including:

1. Increased Credit Risk Capability

a. Improving risk management and credit processes - through the Development Project of Internal Rating Based (IRB) Model together with the Rating System Structure, as a solution for:

- Providing the best returns, evaluating and analyzing strategies and supporting the decision-making process by developing risk-based pricing, risk-based performance and portfolio management;
- Monitoring (monitoring tools) on the performance of Corporate, Medium, and Small debtors;
- Calculation of CKPN in accordance with PSAK 71.

The benefits of developing IRB Model for BNI include:

- Improving BNI's credit quality;
- Assisting business units in selecting prospective debtors;
- Becoming an early warning signal in monitoring managed debtors, to reduce the provision needed.

b. Implementing the Integrated Decision Automated System (IDEAS) is 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 credit scorecard through more comprehensive use of customer data on all customer life cycles.

c. Improving the end to end credit process for a more prudent, measurable loan process with consistent and disciplined control in an effort to build a better credit risk culture, as follows:

- Establishing selective expansion guidelines to direct the loan portfolio to sectors that are stronger in facing of the Covid-19 Pandemic;
- Establishing Risk Acceptance Criteria to implement aggressive, selective and quality BNI expansion. This is intended so BNI can expand and still maintain loan quality;
- Implementing a better control mechanism for debtors to ensure that monitoring tools are consistent, disciplined and of a good quality so that BNI can determine the right action plan for each debtor and monitor the implementation;

- Implementing faster and earlier remedial actions to accelerate performance improvement of debtors with potential problems and to mitigate potential risks;
- Conducting regular and in-depth credit training to increase credit knowledge and capabilities as well as increase awareness of risk culture.

2. Increased Operational Risk Capability

To meet the regulatory provisions and to better support and be more comprehensive in BNI's operational risk management, tools/solutions are needed to carry out the process of identifying, measuring, monitoring, and controlling operational risk, including Business Continuity Management (BCM).

These tools/solutions include the Operational Risk Management (ORM) solutions and Business Continuity Management (BCM) applications with the capability of:

- a. Risk Control Self-Assessment (RCSA).
- b. Loss Event Database (LED).
- c. Key Risk Indicator (KRI).
- d. Business Continuity Management (BCM).

The operational risk management tools/ solutions provide substantial benefits to BNI as follows:

- a. Ability to carry out operational risk management processes in all BNI units in an integrated solution to improve the Bank's risk management quality;
- b. Creating a comprehensive, accurate, and timely operational risk database;
- c. Providing data analysis and reporting on Operational Risk Management.
- d. Improving operational risk management and BCM.

3. Increased Market Risk Capability

To increase market risk capability, monitoring support tools have been developed to improve the quality and accuracy of monitoring results, including the following:

- a. In accordance with the regulatory provisions, all Banks are required to measure the impact of changes in interest rates on the Banking Book (Interest Rate Risk in The Banking Book/IRRBB). The calculation method

uses 2 (two) approaches, the Net Interest Income (NII) method and Economic Value of Equity (EVE) method. Banks are required to simulate interest rates using 6 (six) shock scenarios based on Basel and record the impact on the Bank's profitability and capital. By considering the complexity of data, products, and models used, the IRRBB calculation application is currently being developed to ensure the results obtained are more accurate;

- b. Off Market Price Limit monitoring application to monitor the fairness of transaction prices (likely and reasonable), in accordance with the range of daily fluctuations in the rate/market price (expected possible daily fluctuations) at that time;
- c. The transaction authority limit monitoring application monitors Transaction Limit (Deal Ticket Size), Position Limit, and Stop Loss Limit (Budget Loss Limit);
- d. Credit Counterparty Limit monitoring application where there is development in Forex Counterparty Limit calculation using Credit Conversion Factor (FKK);
- e. Value at Risk (VaR) monitoring application for HO and KCLN using the historical simulation method to be more accurate as it can cover non-linear risks.

4. Increased Risk Integration Capability

One of the initiatives to improve the Quality of Risk Management Implementation is through developing a strong risk culture. Risk culture is a collective form of values, attitudes, and perceptions of each individual or group in the company regarding risk and its management.

Having a Risk Culture greatly influences the effectiveness of risk management and ultimately the achievement of sustainable corporate performance. Matters to be addressed include evaluating the current BNI risk culture through a survey method, identifying gaps or weaknesses based on the survey results, and developing strategies for improvement efforts.

One of the initiatives to improve Risk Management monitoring to be carried out includes enhancing the Risk Management Information System (RMIS), especially for the Bank Health Level (TKB) calculation module and Branch Level Risk Profile calculation. This enhancement will provide a more detailed portrait of BNI Risk up to the Branch Office level to assist in Management decision making.

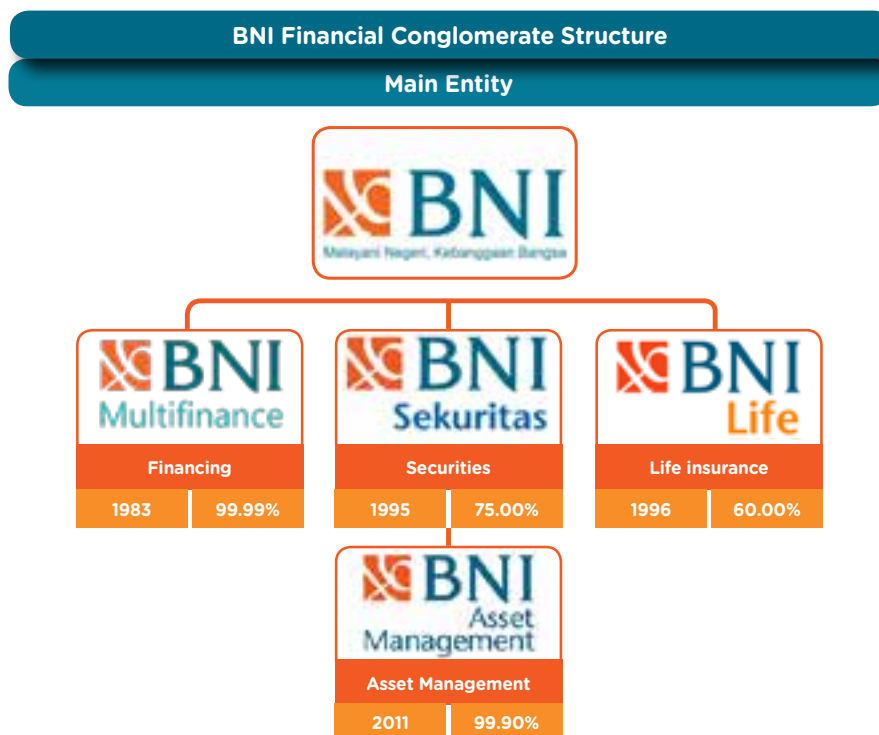
INTEGRATED RISK MANAGEMENT IMPLEMENTATION

Generally, the Integrated Risk Management scope follows the OJK Regulation No. 17/POJK.03/2014 concerning Implementation of Integrated Risk Management for Financial Conglomerates, and is as follows:

1. The Financial Conglomerate (KK) must implement Integrated Risk Management.
2. The Financial Conglomerate's Financial Services Institutions (FSI) are as follows:
 - a. Bank;
 - b. Insurance/Reinsurance Companies;
 - c. Securities Companies;
 - d. Financing Companies
3. The Financial Conglomerate must have a Main Entity. In the event that the Financial Conglomerate structure consists of a parent FSI and subsidiary FSI, the Main Entity is the parent FSI.

BNI has formed its Financial Conglomerate Structure, with BNI as the holding company the Main Entity with 4 (four) Financial Services Institutions as members of BNI's Financial Conglomerate, namely BNI Syariah, BNI Multifinance, BNI Life, BNI Sekuritas, and BNI Asset Management.

BNI's Financial Conglomerate Structure was submitted to OJK through Board of Directors' Letter No. Dir/128, dated February 19, 2021, as follows:



For Integrated Risk Management, BNI's Financial Conglomerate has a joint commitment to perform the duties and responsibilities of each FSI as stated in the Integrated Risk Management Pact, as approved and signed by the President Director and President Commissioner as well as all FSI Members of BNI's Financial Conglomerate.

Based on OJK Regulation No. 17/ POJK.03/2014, the Financial Conglomerate must implement an effective Integrated Risk Management that covers the following 4 (four) pillars:

1. Monitoring of the Main Entity's Board of Directors and Board of Commissioners;
2. Adequacy of Integrated Risk Management policies, procedures, and limit establishment;
3. Adequacy of integrated risk identification, measurement, monitoring, and control process, and an Integrated Risk Management Information System;
4. Overall internal control system on the implementation of Integrated Risk Management.

When implementing the Integrated Risk Management, BNI as the Main Entity carried out the following matters:

1. Pillar I: monitoring the Main Entity's Board of Directors and Board of Commissioners, by:
 - a. Establishing BNI's Financial Conglomerate Structure;

- b. Appointing a Director in charge of Integrated Risk Management function;
- c. Establishing the Integrated Risk Management Committee and the Integrated Risk Management Work Unit;
- d. Preparing a Corporate Charter, which has been signed by the President Director/President Director of all FSI Members of the BNI Financial Conglomerate;
- e. Conducting Integrated Risk Management Committee (KMRT) meetings at least 2 (two) times in a year;
- f. The Board of Directors prepares the Integrated Risk Management General Policies (KUMRT) and the Integrated Capital Policies as well as conducts review at least 1 (one) time in 1 (one) year;
- g. The Board of Commissioners gives their approval of the Integrated Risk Management (KUMRT) and the Integrated Capital Policies General Policies as well as conducts evaluations at least 1 (one) time in 1 (one) year;
- h. Determining the integrated risk appetite and risk tolerance in BNI's Financial Conglomerate.

2. Pillar II: Adequacy of Integrated Risk Management policies, procedures, and limit establishment by:
 - a. Preparing and reviewing the Integrated Risk Management (KUMRT) and the Integrated Capital Management General Policies;

- b. Preparing the Integrated Risk Management Procedures including Inter-Group Transaction Risk Management Procedures;
 - c. Preparing the Integrated Risk Profile Assessment Procedures;
 - d. Preparing the Integrated Capital Management Procedures; and
 - e. Establishing the integrated risk limit and mechanism of escalation of limit excess.
3. Pillar III: Adequacy of integrated risk identification, measurement, monitoring, and control processes, and the Integrated Risk Management Information system, by:
- a. Establishing the Integrated Risk Profile methodology and assessing every semester and reporting to OJK;
 - b. Establishing the Integrated Mandatory Minimum Capital Requirement (KPMR), calculated every semester and reporting to OJK;
 - c. Determining the integrated risk appetite parameters and methodology, monitoring every quarter, and reporting to the Director in charge of the Integrated Risk Management;
 - d. Determining the Integrated Risk Limit parameters and methodology, monitoring every quarter, and reporting to the Director in charge of the Integrated Risk Management;
 - e. Determining the Leading Risk Indicator (LRI) assessment parameters and methodology, monitoring every month, and reporting to the Director in charge of the Integrated Risk Management;
 - f. Conducting the integrated stress testing on volatility of exchange rates and interest rates in BNI's Financial Conglomerate;
 - g. Developing a technology-based Integrated Risk Management Information System.
4. Pillar IV: Overall internal control system for Integrated Risk Management, by:
- a. Disseminating the Integrated Risk Management to all FSI Members of BNI's Financial Conglomerate on a continuous basis.
 - b. Monitoring the Integrated Risk Management implementation by all FSI Members of BNI's Financial Conglomerate.

INTEGRATED RISK PROFILE ASSESSMENT RESULTS

The Integrated Risk Profile assessment results carried out on 10 (ten) Risk types as of December 31, 2021 were ranked 2 (Low to Moderate) with an Inherent Risk Rating of Low to Moderate and the Quality of Application of Risk Management (KPMR) Assessment was ranked Satisfactory, meaning:

1. The possibility of losses faced by the Financial Conglomerate as a whole is relatively low over a certain period of time in the future;
2. The composite quality of Risk Management Implementation is adequate, although there are minor weaknesses that need management attention, and these weaknesses can be resolved in normal business activities.

Internal Control System



The Internal Control System (SPI) is a monitoring mechanism established by the Bank's management on an ongoing basis that is implemented by all management and employees at every level of the Bank's organization. Therefore, an effective Internal Control System (SPI) is an important component in Bank management and is the basis for healthy and safe Bank operations. Implementation of the Internal Control System is the responsibility of all parties involved in the Internal Control System, as outlined in the duties and responsibilities of each party.

CONTROL PURPOSES

The purposes of Internal Control System in BNI are:

1. Compliance with the provisions and laws and regulations (Compliance objective).
This is intended to guarantee that all BNI's business activities are carried out in accordance with the provisions and laws and regulations, either provisions issued by the government, the Financial Services Authority, or internal policies and procedures established by BNI.
2. Availability of complete, accurate, effective, and timely financial and management information (Information objective).
This is intended to guarantee the availability of complete, accurate, effective, and timely reports necessary to make appropriate and accountable decisions.

3. Effectiveness and efficiency in BNI's business activities (operational objective).

This is intended to increase the effectiveness and efficiency of the use of assets and other resources to protect BNI from any risk of loss.

4. Increasing the effectiveness of risk culture in BNI's organization as a whole (risk Culture objective).

This is intended to identify weaknesses and assess deviations early, as well as reassess the reasonableness of the policies and procedures in BNI on an ongoing basis.

CONTROL ENVIRONMENT

The Control environment reflects the overall commitment, behavior, concern, and steps by the Board of Directors and the Board of Commissioners in implementing BNI's operational control activities.

Elements of BNI's control environment include:

1. Sufficient organizational structure;
2. BNI's leadership style and management philosophy;
3. Integrity and ethical values, as well as employees' competence;
4. Human Capital policies and procedures;
5. Attention and direction of BNI's management and other committees, such as the Risk Management Committee.
6. External factors affecting BNI's operations and the risk management implementation.

BNI's Internal Control System covers:

1. Strategic control, to ensure each strategy or policy is in accordance with BNI's objectives, vision and mission;
2. Operations control, to achieve operational efficiency and effectiveness;
3. Reporting control, to ensure the quality of all information/reporting produced and used in internal or external decision making;
4. Obedience control, to ensure the level of compliance with law, regulations and laws related to operations.

RISK ASSESSMENT

The risk assessment (measurement) system is used to measure risk exposure as a reference to controlling risk. Risk assessment cover 8 (eight) risk types managed by BNI as follows:

1. Credit Risk Assessment

Credit Risk Assessment is carried out including the following aspects:

- a. Amount, quality, and composition of exposure of balance sheet and administrative accounts;
- b. The level of credit risk of debtors/counterparties;
- c. Credit characteristics;
- d. Business environment condition;
- e. Internal rating system and scoring system.
- f. Credit risk stress testing.
- g. The use of internal ratings to determine asset quality and the amount of reserves by calculating the Expected Credit Loss (ECL) value, which reflects the estimation of potential credit losses through the calculation of 3 basic parameters, namely Probability of Default (PD), Loss Given Default (LGD), Exposure at Default (EAD).

2. Market Risk Assessment

Market risk assessment is carried out on all trading book and banking book portfolios. Market risk assessment on the trading book includes:

- a. Measurement of market risk sensitivity – standard method;
- b. Aggregation using Value at Risk (VaR) – internal model;
- c. Market risk stress testing;
- d. Budget loss;
- e. Back testing.

Market risk assessment on the banking book, includes:

- a. Measurement of interest rate risk on the banking book;
- b. Measurement of exchange rate risk on the banking book.

3. Liquidity Risk Assessment

Liquidity risk assessment is carried out to measure and monitor the need for sustainable net funding.

The liquidity risk assessment process includes:

- a. Assessment of liquidity ratios includes Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR);
- b. Maturity profile assessment;
- c. Projected cash inflows and outflows;
- d. Liquidity risk stress testing.
- e. Availability of liquid assets (Cash), Secondary Reserve (SR);
- f. Liquidity Ratio.

4. Operational Risk Assessment

One method that can be used to assess operational risk in BNI is Self Assessment, a series of activities carried out by each unit (risk owner) to identify operational risk issues in each unit, looking for causes, measuring potential losses that may arise, and finding solution to overcome them.

Operational risk is classified into categories and sub categories to facilitate risk assessment, control, and reporting of 7 (seven) operational risk events, which are:

- a. Internal fraud;
 - b. External crime;
 - c. Employment and occupational safety practices;
 - d. Clients, products, and business practices;
 - e. Damage to physical assets;
 - f. Business interruption and system failure; and
 - g. Execution, shipping, and process management.
5. Legal Risk Assessment
Legal risk assessment/measurement uses indicators/parameters in the form of:
- a. Potential losses arising from litigation claims;
 - b. Weakness in binding; and
 - c. The absence/occurrence of inregulations/laws changes that underlie the issuance of a product or service.
6. Strategic Risk Assessment
Strategic risk assessment/measurement uses indicators/parameters such as:
- a. Strategy suitability with business environment conditions;
 - b. High-risk strategies, and low-risk strategies;
 - c. BNI's business position towards competitors;
 - d. Achievement of the Bank's Business Plan (RBB).
7. Compliance Risk Assessment
Compliance risk assessment/measurement uses indicators/parameters such as:
- a. Type, significance, and frequency of violations against the applicable provisions; and
 - b. Violations against provisions of certain financial transactions.
 - c. Frequency of violations (BNI compliance track record).
8. Reputation Risk Assessment
Reputation risk assessment/measurement uses indicators/parameters such as:
- a. Reputation influence from the owner of BNI and related companies;
 - b. Violation of business ethics;
 - c. Product complexity, and BNI's business cooperation;
 - d. Frequency and materiality of the Bank's negative reporting; and
 - e. Frequency and materiality of customer complaints.

COMPLIANCE WITH COSO FRAMEWORK

BNI's Internal Control System refers to the OJK Circular No. 35/SEOJK.03/2017 dated July 7, 2017 concerning the Standard Guidelines for Internal Control Systems for Commercial Banks, in line with the COSO framework and the Basel Committee - Internal Control, covering 5 (five) key interrelated elements in the Bank's internal control system including:

1. Management culture Risk supervision and control;
2. Risk identification and assessment;
3. Control activities and separation of functions;
4. Accounting, information and communication systems;
5. Monitoring activities and deviations/weaknesses corrective actions.

CONTROL ACTIVITIES

Control activities are carried out to ensure that appropriate actions have been taken in controlling a risk.

CONTROL ACTIVITIES

1. General Control Activities

Control activities involve all employees including the Board of Directors, and are planned and carried out to ensure that management directives have been carried out. Control activities are contained in policies and procedures to ensure that every activity is carried out effectively and to encourage anticipatory actions against the risks inherent in each operational activity.

2. Control Activities According to Organizational Functions

An effective Internal Control System requires establishment of a control structure in accordance with the organizational structure, and includes:

a. Top Management Reviews

The Board of Directors actively requests presentations and performance reports on a regular basis, in order to evaluate BNI's progress towards its intended objectives. Determination of objectives are in accordance with the established risk management policy after considering the risk level to be taken (risk appetite), the level and type of risk that is maximally set (risk tolerance), and limit setting.

b. Operational Performance Review (Functional Reviews)

Reviews are periodically carried out by IAU.

c. Information System Control

Includes verification of the accuracy and completeness of transactions and authorizations, general control and application control.

d. Physical Asset Control

Physical Asset Control activities includes securing assets, limiting access to computers and data files.

e. Documentation, including adequacy of accounting policies documentation, procedures, systems & standards as well as audit processes.

3. Control Activities based on Type of Risk

Control activities have been set out in policy and procedure documents to identify risks (market, liquidity, credit, operation, legal, compliance, reputation, and strategic risks).

a. Credit Risk Control

- Credit supervision covers all credit aspects and all objects of supervision without exception;
- Internal credit control.

b. Market Risk Control

For control purposes, the process of identifying and measuring market risk is carried out by units independent of the business activities, and is carried out by the Risk Management Work Unit.

The Risk Management Work Unit authority and responsibilities in controlling market risk are:

- Approving and validating the proposed model/method used in measuring market risk;
- Developing market risk measurement models;
- Checking the correctness of the market risk calculation based on risk report received;
- Determining the confidence level used;
- Setting parameters for market risk stress testing;
- Proposing models and parameters used in measuring market risk by the Treasury Division;
- Measuring market risk;
- Conducting back testing and stress testing.

c. Operational Risk Control

Operational risk management and control is carried out through coordination between the Risk Management Work Unit and the Operational Work Unit in stages. BNI also has an Operational Risk Management Forum (FRO) as a means of formal coordination between work units to discuss operational risk issues as well as follow up on mitigation that must be taken. The roles and supports needed from the Operational Work Unit are:

- Submitting periodic/incidental risk exposure reports to the Risk Management Work Unit;
- Ensuring risk management is in each Operational Work Unit (risk taking unit/risk owner), so the units will be responsible for managing the risks inherent in transactions/activities on a daily basis.

Operational risk control also includes Business Continuity Plan (BCP) procedures. BCP is a formal mechanism/plan that combines the established strategies, policies, procedures, and organizations to ensure the continuity of operations of critical business functions at a certain service level during any disruption or disaster.

d. Liquidity Risk Control

Liquidity risk control is carried out by:

- Monitoring and taking alternative strategic steps for each Secondary Reserve (SR) traffic light, namely: Dark Green, Light Green, Light Yellow, Dark Yellow and Red;
- Conducting funding strategies, managing liquidity position and daily liquidity risk, managing liquidity position and intra-group liquidity risk as stipulated 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 BNI's agreements with third parties have secured BNI's interests.

Legal risk control is carried out by a Work Unit functioning to manage legal risk, and includes:

- Preparing assessments through a juridical study, in the event there are plans to add/develop new products and/or activities;
- Providing legal advice, and/or legal assistance in the event there are legal risks in operational activities;
- *Reviewing contracts and agreements with other parties periodically.*

f. Strategic Risk Control

Strategic risk control is carried out by:

- Conducting an effective, independent and objective review of strategic policies as outlined in the review of the implementation and performance achievement against the targets set in the Bank's Business Plan through Board of Commissioners meetings, meetings inviting the Board of Directors (Radekom), Board of Directors Meetings (Radisi), Sector Meetings and Business Reviews;
- Adequate testing and reviewing of management information systems.

g. Compliance Risk Control

Compliance risk control is carried out through ex-ante (preventive) actions aimed at:

- Ensuring policies, provisions, systems and procedures, as well as business activities at BNI are in accordance with the provisions of the regulator and prevailing regulations;
- Ensuring compliance with established commitments.

h. Reputation Risk Control

Reputation risk control is carried out by:

- Managing, following up and resolving customer complaints and lawsuits that can immediately increase reputation risk;
- Developing a reliable mechanism for effective reputation risk control measures

INFORMATION AND COMMUNICATION

The information system produces reports on business, financial conditions, risk management implementation, and fulfillment of provisions that support the implementation of the Board of Directors and the Board of Commissioners duties.

Such information includes:

1. Internal and external information obtained and submitted to Management related to the performance of achieving the Bank's goals.
2. The resulting information to be sufficient and timely, therefore, it can carry out its responsibilities effectively and efficiently.

The necessary information system includes:

1. BNI organizing a contingency recovery plan, and a back-up system to prevent high-risk business failures;
2. BNI owning and maintaining a management information system that is organized, in electronic and non-electronic format.

Necessary communication includes effective communication channels to ensure all employees understand, and comply with applicable policies and procedures in carrying out their duties and responsibilities, as well as having effective external communication channels to communicate required information to shareholders, regulators, customers, and other third parties. .

When processing information in electronic format, the system used shall have an adequate audit trail.

MONITORING ACTIVITIES

Monitoring of BNI's activities in business units and functional units is carried out through three lines of defenses, which are:

#1 RISK TAKING UNIT OR 1ST LINE OF DEFENSE	#2 RISK CONTROL UNIT OR 2ND LINE OF DEFENSE	#3 RISK ASSURANCE OR 3RD LINE OF DEFENSE
<p>Risk Owner, responsible for the risks taken, execution and results (Day to day risk management & control)</p> <ul style="list-style-type: none"> Responsible for managing and controlling risks inherent in day-to-day business activities or functions Identifying, measuring, mitigating, monitoring and reporting risks inherent in business activities/functions in accordance with the strategies/policies/risk parameters set by the 2nd line of defense 	<p>Risk Control, responsible for developing the Bank's risk management framework, policies, principles and methodology</p> <ul style="list-style-type: none"> Preparing proposals for risk management strategies and policies, including risk appetite & limits Developing frameworks, policies, principles, tools, methodologies and risk management standards As a risk oversight unit, carries out aggregation and overall risk reporting Advising or providing recommendations to the 1st line of defense on implementing risk policies according to authority Escalating issues/important decisions to Senior Management/Directors and/or Risk Management Committee and Anti Fraud, Risk Management Sub-Committee and/or Integrated Risk Management Committee (Risk Management Committees) 	<p>Risk Assurance, responsible for independently evaluating the effectiveness of risk management and internal control implementation</p> <ul style="list-style-type: none"> Conducting independent and periodic internal audits on the implementation of risk management and internal control Preparing corrective action recommendations and monitoring their implementation Reporting the audit results to the Audit Committee and key stakeholders according to their authority

INTERNAL CONTROL SYSTEMS IMPLEMENTATION EVALUATION

The Company's Internal Control System Guidelines (PP) are evaluated at least 1 (one) time in 1 (one) year or in the event there are changes in factors that significantly affect BNI's business activities.

The self assessment results on the adequacy of the BNI Internal Control System individually for 2021 were as follows:

BNI ONLY	CREDIT RISK	MARKET RISK	LIQUIDITY RISK	OPERATIONAL RISK	LEGAL RISK	STRATEGIC RISK	COMPLIANCE RISK	REPUTATION RISK	COMPOSITE RISK
Score	2.73	2.00	2.00	2.87	2.00	2.00	2.60	2.00	2.39

The adequacy of BNI's Internal Control System composite was ranked 2 (Low to Moderate), meaning it is adequate. In the event there are still minor weaknesses they will need management attention for follow-up improvements in the future.

STATEMENT OF THE BOARD OF DIRECTORS AND/OR BOARD OF COMMISSIONERS ON THE ADEQUACY OF THE INTERNAL CONTROL SYSTEM

The Board of Commissioners is responsible for and supervises the Internal Control System (SPI), including approving and monitoring the Board of Directors policies related to internal control. In carrying out its supervisory duties, authorities and responsibilities, the Board of Commissioners is assisted by the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, and the Integrated Governance Committee.

The Board of Directors is responsible for the application of a reliable and effective Internal Control System (SPI) and has made efforts to enhance an effective risk awareness culture at all organization levels. The Managing Director in charge of the compliance function plays an active role in preventing any deviations made by management when setting policies related to the precautionary principle.

On an ongoing basis, the Internal Audit Unit (IAU) evaluates internal control's effectiveness related to operations undertaken to achieve the Company targets, through unit and activities inspections.

The evaluation results are submitted to the Board of Directors and related units for follow up and monitoring. Improvements are always made to problems that arise and monitoring is carried out consistently to ensure that the SPI is running effectively. The Board of Commissioners through the Audit Committee plays an active role in evaluating the SPI through their reviews of the IAU inspection results.

INTRA-GROUP TRANSACTION POLICY AT BNI FINANCIAL CONGLOMERATE

The Financial Services Authority (OJK) has issued a number of regulations regarding the implementation of integrated risk management in conglomerates in the financial services industry, one of which is the Financial Conglomerate's obligation to manage intra-group transaction risk. BNI already has and implements the integrated risk management policy.

There is also information regarding the Intra-Group transaction policy at the BNI financial conglomerate which includes the definition of risk, risk management, risk management principles, types of transactions that may pose risks, as well as the adequacy of the identification, measurement, monitoring, and risk control processes as well as management information systems. The risk of intra-group transactions is presented in full in the discussion of "Intra-Group Transaction Policy at the BNI Financial Conglomerate", Sub-Chapter "Implementation of Integrated Governance", Chapter "Corporate Governance".

Legal Cases

During 2021, BNI faced a number of important cases in the form of civil cases accompanied by claims for compensation against BNI, as well as criminal cases including special criminal cases and general crimes, and these have been completed (permanent legal force/inkracht) or are still in the process of being resolved. Details of the important cases faced by BNI are as follows:

NO.	LAWSUIT	TOTAL	
		CIVIL	CRIMINAL
1.	Case Settled (has permanent legal force)	69	15
2.	Case In Settlement Process	266	4
Total		335	19

IMPORTANT CASES FACED BY THE COMPANY

in 2021, important cases faced by BNI can be seen in the following table:

CIVIL CASES

NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
1.	<p>- Case No. 16/ Pdt.G/2018/ PN.Klk</p> <p>Between:</p> <p>Plaintiff: Dr. HM Rosihan Anwar selaku Direktur CV Insan Cipta Karya</p> <p>Against</p> <p>Defendant: BNI</p>	<p>The lawsuit on the application for compensation payments to the Bank related to the alleged illegal act in the form of the transfer of credit collateral by the Bank which is controlled by the Plaintiff</p>	<p>The matter was settled on the Review Level with a verdict that essentially stated the Plaintiff's lawsuit was inadmissible.</p>	<p>The risk of paying compensation is equal to the value of the claim. However, after the Supreme Court of the Republic of Indonesia decision which has permanent legal force, the Bank is free from the risk of paying the compensation.</p>	<p>The Bank followed the process optimally until the Bank was declared the winner in accordance with the Supreme Court of the Republic of Indonesia decision.</p>	<p>None</p>	<p>Material: Rp1,631,713,390,541.60,-</p> <p>Immaterial: -</p>



NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
-	Case No. 20/ Pdt.G/2021/ PN.Klk Between: Plaintiff: Dr. HM Rosihan Anwar as Director of CV Insan Cipta Karya Against Defendant: BNI	Rosihan Anwar again filed a lawsuit for compensation for payment of compensation to the Bank regarding the alleged unlawful act in the form of transferring credit collateral goods by the Bank controlled by the Plaintiff.	In the process of examination in the Kuala Kapas District Court.	The payment of damages risk is equal to the claim value.	The Bank has submitted a Memorandum of Response to the Lawsuit that supports the Bank's position, arguing that the lawsuit is ne bis in idem (a case with the same party may not be filed a second time). This is because a case was filed by the same party for the same object of the lawsuit as the previous case which was inkraht (permanent legal force).	None	Material: Rp1,282,449,634,111.50,- Immaterial: -
2.	Case No. 390/ Pdt.G/2019/ PN.Jkt.Pst Between: Plaintiff: Anton Bambang Soegiarto Against Defendant: BNI	The lawsuit was due to the Bank's rejection of the application for additional credit facilities submitted by the Plaintiff's Company, causing losses to the Plaintiffs.	Based on information from the Case Information the Supreme Court of the Republic of Indonesia website, there was a Cassation Decision dated July 26, 2021 that essentially rejected the Plaintiff's Cassation application. Currently waiting for notification of the Cassation Decision contents.	The risk of paying compensation is equal to the value of the claim. However, with the Supreme Court of the Republic of Indonesia decision which has permanent legal force, the Bank is free from the risk of paying the compensation.	The Bank has followed the trial process optimally and the Bank was declared the winner according to information from the Supreme Court of the Republic of Indonesia Case Information Website.	None	Material: Rp1,189,113,614,671,- Immaterial: Rp2,000,000,000,000,-

NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
3.	<p>Case No. 776/Pdt.G/2020/P.Jkt.Brt</p> <p>Between:</p> <p>Plaintiff: Opap Investment Limited</p> <p>Against</p> <p>Defendant:</p> <ol style="list-style-type: none"> Hendrian Baehaki Bayu Andriana Nurul Ainulia M. Deni Setiawan Irfan Maulana BNI <p>Co Defendant:</p> <ol style="list-style-type: none"> OJK PPATK 	<p>The lawsuit related to the alleged failure to apply the prudential principle by the Bank in identifying and verifying when Defendant I and Defendant II opened an account in the name of CV Opap Investment Limited and did not carry out the obligation to monitor and report on customer fund transaction activities in the account on behalf of CV Opap Investment Limited which meets the criteria as a suspicious financial transaction</p>	<p>In the process of being examined at the West Jakarta District Court</p>	<ul style="list-style-type: none"> Risk of refund of the case value. Reputation Risk. 	<p>The Bank has followed the trial process optimally and is currently waiting for a decision</p>	<p>None</p>	<p>Material: €6,900,000</p> <p>Immaterial: Rp500,000,000,000,-</p>
4.	<p>Case No. 204/Pdt.G/2020/PN.Amb</p> <p>Between:</p> <p>Plaintiff:</p> <ol style="list-style-type: none"> Imran Laisouw Sitti Laila Latuapo, S.P. Risman Suriani Faisal Kotalima <p>Ageainst</p> <p>Defendent: BNI</p>	<p>Lawsuit concerning allegations of bank negligence which caused a burglary of customer funds carried out by bank employees who had been found guilty of criminal acts based on court decisions</p>	<p>In the process of examining the cassation level at the Republic of Indonesia Supreme Court.</p>	<ul style="list-style-type: none"> Risk of refund of the case value. Reputation Risk. 	<p>The Bank has submitted a Memorandum of Cassation in support of the Bank's position and is currently awaiting the Cassation Decision.</p>	<p>None</p>	<p>Materia: Rp2,866,250,000,-</p> <p>Immateriil: -</p>



NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
5.	<p>Case No. 112/ Pdt.G/2021/ PN.Amb</p> <p>Between:</p> <p>Plaintiff:</p> <ol style="list-style-type: none"> 1. Johnny Widjaya 2. Elya Puspita 3. Jovelin Jaguenetta Widjaya ahli waris Alm. Jongkie Widjaya 4. Fajar Madya 5. Muhamad La Bawe 6. Dustin Fendi Earja 7. Edwin Dorsalam <p>Against</p> <p>Defendant: BNI</p>	<p>A lawsuit related the alleged negligence of the Bank that caused the theft of Customer funds by unscrupulous Bank employees who have been found guilty of committing a criminal act based on a Court Decision.</p>	<p>In the process of examination at the Ambon High Court</p>	<ul style="list-style-type: none"> • Risk of refund of the case value. • Reputation Risk. 	<p>The Bank has submitted a Memorandum and Counter Memorandum of Appeal in favor of the Bank's position. Currently awaiting an appeal verdict.</p>	<p>None</p>	<p>Materiil: Rp29.777.316.513,-</p> <p>Immateriil: -</p>

NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
6.	<p>- Case No. 170/Pdt.G/2021/PN.Mks</p> <p>Between:</p> <p>Plaintiff:</p> <p>1. Hendrik</p> <p>2. Heng Pao Tek</p> <p>Against</p> <p>Defendant:</p> <p>1. BNI</p> <p>2. Melati B. Sombe</p>	<p>The Default lawsuit is due to the Bank's refusal to withdraw the deposit on behalf of the Plaintiffs, where in fact there was a forgery in the deposit slips carried out by unscrupulous Bank Employees (Defendant II) which has been reported as a crime by the Bank.</p>	<p>The case was settled at the District Court level with a verdict that essentially stated that the Plaintiffs' lawsuit was inadmissible.</p>	<p>The risk of paying compensation was equal to the value of the claim. However, with the Makassar District Court Decision that has permanent legal force, the Bank is free from the risk of paying the compensation.</p>	<p>The Bank has followed the trial process optimally until the Bank was declared the winner according to the Makassar District Court Decision.</p>	None	<p>Material: Rp17,000,000,000,-</p> <p>Immaterial: Rp4,500,000,000,-</p>
	<p>- Case No. 471/Pdt.G/2021/PN.Mks</p> <p>Between:</p> <p>Plaintiff:</p> <p>1. Hendrik</p> <p>2. Heng Pao Tek</p> <p>Against</p> <p>Defendant:</p> <p>BNI</p>	<p>Hendrik and Heng Pao Tek again filed a lawsuit against the Bank arguing illegal acts of law were committed as they rejected requests for disbursing deposits on behalf of the Plaintiffs, where in fact that there was a alleged forgery of bilyet deposits carried out by bank employees that have been reported criminally by the Bank.</p>	<p>In the process of examining in the Makassar District Court.</p>	<ul style="list-style-type: none"> • Risk of refund of the case value. • Reputation Risk. 	<p>The bank will file a memo for answers in a lawsuit that supports the Bank's position</p>	None	<p>Material: Rp16,250,000,000,-</p> <p>Immaterial: -</p>

CRIMINAL CASES

NO.	PARTIES	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY
1.	<p>Claimant: PT Bank Negara Indonesia (Persero), Tbk</p> <p>Defendant: FJ (Employee of BNI)</p>	<p>On October 7, 2019, there was a difference in cash shortages in 3 Sub-Branch Offices under the supervision of KC Ambon (KCP Aru, KCP Tual, and KCP Masohi) in the amount of Rp58.95 billion.</p> <p>The difference was due to several cash deposits/RTGS without cover to other parties/customers made at the request of an unscrupulous employee (FJ) related to fraudulent investments (clone buying and selling) offered by the employee with a return of 2% profit up to 10% per month.</p> <p>The results of an internal investigation show that the investment was carried out under a fonzi scheme where new investor funds were used to cover the next investor, and when the perpetrator did not find a new investor, the perpetrator uses bank cash by making a cash deposit/RTGS without cover.</p>	<p>The 8 defendants have received decisions from the Ambon District Court / Ambon High Court / Supreme Court of the Republic of Indonesia so currently all cases have permanent legal force (inkracht van gewijsde), with prison terms ranging from 9 to 20 years.</p>	<ul style="list-style-type: none"> • Legal Risk • Reputation Risk 	<p>Corrective action efforts so that similar cases do not happen again, including:</p> <ol style="list-style-type: none"> 1. Implementation of Know Your Employee (KYE). 2. Employment supervision attached to operational activities and review of activities / transactions at the outlets in remote area. 3. Improved Business Process related to RTGS, including those, related to the transaction limit. 4. Improved information technology Alert Tools cash ceil. 5. Compliance refreshment for transaction procedures. 6. Strengthening the anti-fraud strategy application. 	none

NO.	PARTIES	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY
2.	Claimant: PT Bank Negara Indonesia (Persero), Tbk Defendant: MBS (Employee of BNI)	Forgery of bank BNI deposit slips for the benefit of third parties allegedly carried out by unscrupulous Makassar Branch Office employee (MBS) with 9 deposit slips that resembled BNI deposit cards with a total of Rp110 billion that were not recorded in the BNI system. The modus operandi used was to duplicate printed scans of deposit slips on plain paper (same bilyet serial number) and allegedly falsify the signatures of BNI officials.	BANKI has reported this case to the National Criminal Investigation Police. The current status of the case file for the suspect (MBS) is in the process of delegating the case to the Makassar District Court, while other suspects are still in the process of being investigated at the National Police Criminal Investigation Department,	<ul style="list-style-type: none"> • Legal Risk • Reputation Risk 	1. Monitor the investigation and trial process. 2. Corrective action efforts so that similar case do not happen again, including: <ol style="list-style-type: none"> a. Strengthening the Know Your Employee (KYE). b. Strengthen attachments (Waskat) to operational activities and review risky activities / transactions. c. Improve information technology related to customer transaction documentation. d. Compliance refreshment on transaction procedures. 	None

TAX CASES

NO.	CASE	CASE LAWSUIT	CASE STATUS	RISK ON THE BANK	MANAGEMENT EFFORT	SANCTION IMPOSED BY THE AUTHORITY	CASE VALUE
1.	Case No. 007718.15/2019/PP Between: Appeal Applicant: BNI Against Defendant appeal: Direktorat Jenderal Pajak	The Directorate General of Taxes has issued a Tax Underpayment Assessment Letter to Banks related to the correction of the 2015 Tax Year Corporate Income Tax rate, among others related to NPL interest income and the imposition of receivables that are clearly uncollectible.	In the process of examination of appeal at the tax court.	The risk of paying the underpayment of Corporate Income Tax for Fiscal Year 2015 is in accordance with the Decree of the Directorate General of Taxes	The Bank has made efforts deemed necessary in relation to tax payment obligations in accordance with applicable regulations and has followed the trial process optimally. Currently waiting for the Tax Court Decision	None	Material: Rp1,212,516,578,432,- Immaterial: -

IMPACT OF LEGAL CASES ON THE COMPANY

BNI's policies and Standard Operating Procedures are adequate and prudent in protecting BNI's business interests. All of the legal issues mentioned above, both civil and criminal, did not result in any significant financial impact on BNI. This is reflected in the Legal Risk Profile for the 2021 period remaining in the Low to Moderate predicate.

EFFORTS TO MINIMIZE LEGAL RISKS

BNI strives to continuously minimize its legal risks by carrying out business activities that are broadly divided into 3 (three) stages as follows:

1. Pre-Transaction

- a. Providing legal studies and legal assistance through an assessment of plans for developing new products and activities, to protect BNI's interests, especially from the legal risk aspect. This is also a fulfillment of regulatory provisions that require legal analysis of each new product development and activity plan;
- b. Implementing the Legal Discussion Forum program consistently as an effort to prevent legal risk through virtual meetings to credit management and operational units, in order to prevent fraud and support the achievement of predetermined business targets;
- c. Providing legal education services in the form of Legal Blasts, Infographics, Reels and Video Learning that can be accessed anywhere and anytime by all BNI employees on sites managed by BNI Corporate University and/or platforms managed by the Legal Division, such as Instagram @divisi Hukum_bni. This is intended to minimize the potential risk of the business unit when running its business;
- d. Collaborating with BNI Corporate University to organize learning, webinars or sharing sessions related to legal issues, including Credit Law, Rescue Efforts and/or of Non-Performing Loan Settlement Legal Schemes, and Prevention of Deviations in Customer Banking Funds;
- e. Involving Legal Division employees in certification and training in collaboration with BNI Corporate University and other external training institutions.

The forms of certification or training provided include Risk Management Certification, Goods & Services Procurement Certification, Special Advocate Professional Education, Curator and Management Education, Capital Market Legal Consultant Professional Education, Legal Auditor Education, and other legal training, in order to create professional and competent corporate lawyers;

- f. Providing training for all Legal Division employees based on the competency assessment profile and results, employee needs, and business development, to improve core, personal, and leadership competencies of employees, to support BNI's business.

2. Transaction

- a. Providing advice or legal studies on transaction and operational activities, in accordance with the needs of the Division/Unit of the Regional/Branch/ Center Offices;
- b. Conducting legal reviews of credit documentation and providing adequate solutions/mitigation for legal risks that may arise in credit transactions, during the credit proposal process by the Credit Committee, in order to maintain prudent credit transactions, especially from a legal aspect, improving credit quality, and supporting the achievement of business targets;
- c. Improving the quality of legal advice or legal studies in the BNI Legal Work Unit, to support the smooth running of business/transaction and operational activities in all BNI Divisions/Units of Regional/ Branch/Center Offices, which is carried out through supervision of legal advice to all Legal Work Units.

3. Post-Transaction

- a. Implementing the Legal Review Agreement Program, conducted routinely every 3 (three) months to optimize the legal risk management through a process of risk identification, risk analysis, risk evaluation, and risk monitoring to measure legal risk that may arise from an agreement;
- b. Coordinating case handling routinely with all Legal Work Units at all BNI Regional Offices as a form of monitoring or case supervision throughout the Legal Work Unit.

LEGAL CASES FACED BY THE BOARD OF DIRECTORS AND THE BOARD OF COMMISSIONERS

During 2021, no current members of the BNI Board of Directors and the Board of Commissioners were involved in civil or criminal lawsuits in connection with BNI's business activities.

CASES FACED BY SUBSIDIARIES

During 2021, the Subsidiaries faced several cases in the form of civil cases accompanied by claims for compensation against the Subsidiaries, as well as criminal cases including general criminal cases that have entered the trial process, both those that have been completed with permanent legal force/inkracht, or those that are still in the process of completion. The cases faced by the Subsidiaries during 2021 were as follows:

SUBSIDIARY	LEGAL CASES	TOTAL	
		CIVIL	CRIMINAL
PT BNI Life Insurance	Cases completed (already has permanent legal force)	3	1
	Cases in the process of settlement	3	1
	Total	6	2
PT BNI Sekuritas	Cases completed (already has permanent legal force)	-	-
	Cases in the process of settlement	-	-
	Total	-	-
PT BNI Multifinance	Cases completed (already has permanent legal force)	-	-
	Cases in the process of settlement	-	-
	Total	-	-
BNI Remittance Ltd	Cases completed (already has permanent legal force)	-	-
	Cases in the process of settlement	-	-
	Total	-	-

IMPORTANT CASES FACED BY SUBSIDIARIES

Based on the number of cases faced by the Subsidiaries in the table above, the following describes the important cases faced by the Subsidiaries during 2021:

NO.	PARTIES	SUBSIDIARY	CASE LAWSUIT	CASE VALUE	CASE STATUS	EFFECT/RISK
1.	Case No. 660/Pdt.G/2021/PA.Ska Between: Plaintiff: Nur Farida Against Defendant: 1. Bank BSI Surakarta Branch Office 2. PT BNI Life Insurance Unit Syariah	PT BNI Life Insurance	Lawsuit for Unlawful Acts related to the refusal to disburse insurance claims by PT BNI Life Insurance as submitted by the Plaintiff (the heirs of the Debtor) as the cause of the death of the Debtor include a diseases that was excluded from the insurance policy. A decision was reached at the Semarang Religious High Court dated December 27, 2021	Material: Rp3.300.000.000,- Material: -	A decision by the Semarang Religious High Court dated December 27, 2021, which in essence confirmed the decision of the Surakarta Religious Court which rejected the Plaintiff's claim in its entirety. Currently PT BNI Life Insurance is monitoring the event if there is a cassation lawsuit from the Plaintiff.	The risk to PT BNI Life Insurance is the payment of claims in accordance with the sum insured, but this does not have a significant impact on the Bank.

Administrative Sanctions

Throughout 2021, no administrative sanctions from the relevant authorities (capital market, banking and others) were imposed on BNI.

Access to Company Information and Data

In an effort to provide transparent information to the public related to the Bank's business management development and implementation, BNI periodically updates information and provides easy access to information regarding the Bank's activities and performance to stakeholders to understand the Bank's condition in a clear and open manner. BNI also provides facilities that function as channels for information disclosure, through various media such as websites (in two languages), mass media, mailing lists, bulletins, meetings with analysts, the IDX official website etc. In this regard, the Bank's Investor Relations continuously builds the good image of the Bank through developing relationships with investors/analysts both interactively and by providing periodic information, especially concerning the Bank's performance.

Access to Company information and data related to corporate actions can be accessed through the Company's official website at <http://bni.co.id/>. Parties who need further information regarding corporate actions and Company data can contact via telephone at 021-5728387, Fax at 6221-5728053 or email to: ir@bni.co.id.

PRESS RELEASES IN 2021

Throughout 2021, BNI issued press releases discussing various matters related to the Bank, as follows:

NO.	DATE	TITLE	PLACE
1	January 2, 2021	BNI Emerald Customers Grows 12% Supported by Wealth Management Services	Jakarta
2	January 4, 2021	BNI trials Smartfarming in 5 provinces	Jakarta
3	January 10, 2021	BNI Fulfills Financial Transaction Needs in the PPKM Region	Jakarta
4	January 14, 2021	Boosting Consumer business during the pandemic through BNI power of digitalization	Jakarta
5	January 15, 2021	BNI Helps Mamuju Earthquake Victims	Jakarta
6	January 15, 2021	Managing Taspen Assets Entrusted to BNI Custodian	Jakarta
7	January 19, 2021	BNI Continues Assistance for North Sulawesi West Java Disaster and Flood Victims	Jakarta
8	January 20, 2021	Young People Promise BNI Ready to Take KPR For Millennials	Jakarta
9	January 27, 2021	Facing the Pandemic BNI Transformation	Jakarta
10	January 29, 2021	Welcoming 2021 BNI Strengthens Fundamentals and Transformation	Jakarta
11	February 1, 2021	BNI Cooperates with Agung Sedayu Group	Jakarta
12	February 8, 2021	BUMN plasma for Indonesia launched by the BNI Board of Directors as Donors	Jakarta
13	February 12, 2021	More Passionate, this is a challenge and opportunity for BNI working on the millennial market	Jakarta

NO.	DATE	TITLE	PLACE
14	February 15, 2021	BNI & BKPM Cooperation Making it easy to invest domestically and internationally	Jakarta
15	February 18, 2021	BNI Improves Kartu Tani Management	Jakarta
16	February 21, 2021	BNI and Covid-19 Task Force Socialize Mask Waste Handling	Jakarta
17	February 23, 2021	A Happy Story in the middle of the pandemic SME's still export	Jakarta
18	February 25, 2021	Capturing Business Potential 2021 BNI Consolidation and Transformation	Jakarta
19	February 28, 2021	Help MSMEs survive, an important role of BNI	Jakarta
20	March 3, 2021	Supporting the Government to Restore the Economy BNI Cuts Interest Rates	Jakarta
21	March 4, 2021	After 22 years BNI Workers Union is solid and ready to support transformation	Jakarta
22	March 9, 2021	BNI prepares assisted MSME as Global Players in the middle of a pandemic	Jakarta
23	March 9, 2021	BNI Credit Card JCB Wins Two JCB Indonesia 2020 Awards	Jakarta
24	March 10, 2021	Millennial Smartfarming Efforts, BNI Agriculture Future	Jakarta
25	March 15, 2021	Waspada Fake Accounts, BNI official account	Jakarta
26	March 19, 2021	BNI Creating Worldwide SMEs, BNI and Regional Government Support	Semarang
27	March 19, 2021	Working together with BNI Pertashop, now there is a business wing in Lampung	Lampung
28	March 22, 2021	BNI - Pertamina Offers Pertashop to Potential Customers	Jakarta
29	March 24, 2021	BNI Again Holds Mass KPR	Tangerang Selatan
30	March 25, 2021	BNI Travel Fair Ticket & Hotel Discounts up to Rp5 Million	Jakarta
31	March 25, 2021	Joint synergy for economic recovery and structural reform	Jakarta
32	March 25, 2021	Strengthening BNI Capital by issuing Tier 2 Subordinated Notes	Jakarta
33	March 29, 2021	BNI pays 25% dividends for 2020	Jakarta
34	March 30, 2021	BNI Holds Mass Credit for 4,675 Debtor KPR Sejahtera FLPP	Jakarta
35	April 5, 2021	Empowering SME Business Partners - SIG	Jakarta
36	April 5, 2021	Lighten the sorrow of NTT disaster victims, BNI Distributes Emergency Assistance	Jakarta
37	April 6, 2021	BNI is ready to relax loans for victims of NTT disaster	Jakarta
38	April 7, 2021	Korlantas Polri Gandeng Cooperates for BNI for SIM Online Precision during the Pandemic Era	Jakarta
39	April 8, 2021	BNI Give KUR for Prakerja Alumni	Jakarta
40	April 10, 2021	BNI Keeps Serving Customers After Malang Earthquake	Jakarta
41	April 11, 2021	Two Digit Growth Target at the BNI Overseas Branch Offices by Developing International Business	Jakarta
42	April 12, 2021	BNI cooperates with J.P. Morgan to make Money Transfers Easy	Jakarta
43	April 13, 2021	Extend and pay for SIM from the house through VA BNI	Jakarta
44	April 14, 2021	BNI Millennial Smartfarming Program in Sasar Klaten	Klaten
45	April 15, 2021	BNI Business Profits in Korea grow 73.9%	Jakarta
46	April 16, 2021	Inaugurating New Office in Seoul, and a Korea Desk BNI Ready to Meet Indonesian & Korean Employers	Seoul
47	November 19, 2021	Young and old can have a pension fund!	Jakarta

NO.	DATE	TITLE	PLACE
48	April 21, 2021	BNI Srikandi Becomes 'Support System' for MSME Women To Go Export	Jakarta
49	April 22, 2021	Kartini Srikandi Day, BNI Distributes Assistance to Fire Victims in Tambora Region	Jakarta
50	April 26, 2021	Digital Transformation Encourages BNI's Performance	Jakarta
51	April 26, 2021	BNI GOTF 2021 Presents Attractive Prices to Many Destinations	Jakarta
52	May 4, 2021	BNI Mobile Banking Best Among National Mobile Bank Apps	Jakarta
53	May 5, 2021	Easy Zakat Payments with Baznas Gaet BNI	Jakarta
54	May 6, 2021	Fulfilling the Lebaran needs, BNI Readies Rp12.9 trillion in cash	Jakarta
55	May 7, 2021	BNI Supports the Export of Ornamental Plants through KUR	Jakarta
56	May 12, 2021	BNI Digital Ecosystem is more reliable	Jakarta
57	May 14, 2021	BNI Lebaran Holiday Staycation Promo in Jakarta	Jakarta
58	May 15, 2021	Up in arms! Jerome Polin Opens Account at the Tokyo Branch BUMN Bank	Jakarta
59	May 18, 2021	Exim Bank Taiwan cooperates with BNI Give Relending Facility	Jakarta
60	May 23, 2021	Not only free transactions in this mobile banking prize	Jakarta
61	May 24, 2021	Free! The cost of transactions at the BNI ATM	Jakarta
62	May 25, 2021	BNI is the official supporter of National Badminton Team	Jakarta
63	May 25, 2021	Developing Smart City in Medan BNI Cooperates with Integrated Solutions	Jakarta
64	May 26, 2021	Free transactions at the Himbara ATM is real	Jakarta
65	May 28, 2021	Appreciation for MSMEs, BNI Holds MSME Heroes	Jakarta
66	May 30, 2021	As fast as lightning BNI is ready for student transactions	Jakarta
67	June 1, 2021	Himbara delay adjustment to ATM Link fee	Jakarta
68	June 2, 2021	Welcoming the 75th Anniversary BNI is Ready with Interesting Surprises	Jakarta
69	June 4, 2021	Actively Supporting Exports BNI Wins Consulate Award 2020	Jakarta
70	June 5, 2021	Coordinating Minister of Airlangga Appreciation for BNI KUR BNI, Continues the Kartu Prakerja Program	Jakarta
71	June 5, 2021	Fiki Naki Shock - There is a Lithuanian in BNI London	Jakarta
72	June 6, 2021	Fostered Partner IPB Farmers now touched by BNI KUR	Jakarta
73	June 10, 2021	Pushing aside US and Russian participants BNI Corpu Wins International Gold Predicate	Jakarta
74	June 11, 2021	Millennial Smartfarming in Bali Shows Farmers Export Capacity	Jakarta
75	June 12, 2021	BNI Mission to Save Nature Celebrated by Planting Thousands of Trees	Jakarta
76	June 14, 2021	75th Anniversary of BNI Releases Songs and Offers #Dancechallenge Prizes worth millions of rupiah	Jakarta
77	June 16, 2021	BNI's response to the news of the Makassar case	Jakarta
78	June 16, 2021	Developing Smart City Pemkot Palu Cooperates with BNI with Integrated Solutions	Jakarta
79	June 19, 2021	Care for Nature Sustainability BNI Develops Organic Forests	Jakarta
80	June 23, 2021	Realizing the Geo Project Dipa BNI Biayai 2 PLTP	Jakarta
81	June 23, 2021	Celebrating BNI Anniversary Planting 1,946 Coral in Likupang	Jakarta
82	June 25, 2021	BNI Financial Inclusion Agen46 will not die even though digitization is increasingly widespread	Jakarta
83	June 27, 2021	YouTuber Rosidah Jajal Cheapest Remittance in the World	Jakarta
84	June 28, 2021	Achieving a Virtual Mass Mass Virtual Record 750 BNI Agen46 BNI KUR Recipients	Jakarta

NO.	DATE	TITLE	PLACE
85	June 29, 2021	BNI Best BUMN Bank 2021	Jakarta
86	June 30, 2021	Cooperating with GP Ansor and Pos Indonesia BNI Expand BNI Agen46 Network	Jakarta
87	July 4, 2021	BNI Prepares Up to Rp500 Million Business Capital for RI Migrant Workers	Jakarta
88	July 5, 2021	Entering its Diamond age, BNI as an Indonesian international Bank	Jakarta
89	July 5, 2021	BNI 75th Anniversary, Sandiaga Share Tips for Starting Businesses	Jakarta
90	July 5, 2021	Looks Different, BNI Presents New BNI Mobile Banking on 75th Anniversary	Jakarta
91	July 8, 2021	Indonesia Bazaar 2021, BNI MSME Creative Boyong Products in Tokyo	Jakarta
92	July 12, 2021	The New BNI Mobile Banking, users and transactions continue to grow	Jakarta
93	July 12, 2021	BNI - PLN Launches Smart Books Hedging Strategy during Financial Market Volatility	Jakarta
94	July 26, 2021	BNI Accelerates Distribution of PKH Bansos & Basic Goods	Jakarta
95	July 28, 2021	BNI Holds Business Festival where 10 MSMEs Will Share Types of Export Business	Jakarta
96	July 28, 2021	Great Business Potential BNI Helps RI MSMEs in the UK Market	Jakarta
97	July 29, 2021	BNI Ready to Bring the RI MSME to the European Market	Jakarta
98	July 31, 2021	BNI Continues to Channel the Presidential Assistance program in micro businesses	Jakarta
99	August 2, 2021	Back to Nature, Embracing the World Market	Jakarta
100	August 3, 2021	BNI KICK OFF Campus Financial Ecosystem at UGM	Jakarta
101	August 3, 2021	Cooperating with the Indonesian Farmers' Community 3 Indonesian Business Becomes a Primadona	Jakarta
102	August 4, 2021	Key Innovations 2 Local Brands Can Compete in the Global Market	Jakarta
103	August 7, 2021	Take care of the economic recovery momentum for Symba Strengthening Synergy	Jakarta
104	August 9, 2021	Deliver Indonesian MSMEs to the Global Market	Jakarta
105	August 9, 2021	BNI Applies College Financial Ecosystems in Usakti	Jakarta
106	August 12, 2021	Cooperating with Ansor MSME, BNI - Pertamina Genjot Pertashop and Agen46	Jakarta
107	August 19, 2021	BNI Gives Badminton Contingent Rp6.4 Billion	Jakarta
108	August 21, 2021	Kartu Prakerja program reopened with interesting promo check from BNI	Jakarta
109	August 22, 2021	BNI KUR for farmers who have joined the Kredit Cair Ecosystem	Jakarta
110	August 23, 2021	BNI Bansos Pushes Realization of Fund Withdrawals	Jakarta
111	August 24, 2021	BNI Launches the BNIFX Web-Based Forex Transaction Platform	Jakarta
112	August 25, 2021	Inviting the Younger Generation to save, BNI achieves a MURI record	Jakarta
113	August 26, 2021	Gernas BBI #Pelangisulawesi launched, BNI Helps MSMEs Curation and Digitalization	Jakarta
114	September 2, 2021	Himbara Affirms Commitment to Government Strategic Partners to Accelerate National Economic	Jakarta
115	September 3, 2021	BNI Economic Growth Encourages Consistent Loan Increase	Jakarta
116	September 3, 2021	BNI XPORA	Jakarta
117	September 4, 2021	Harpelnas 2021, BNI Serves Digital Service Ecosystems	Jakarta

NO.	DATE	TITLE	PLACE
118	September 6, 2021	Consistent solid BBNI performance is worth collecting	Jakarta
119	September 7, 2021	Upgrading BNI Digital Services Strengthens Three Champion Products	Jakarta
120	September 9, 2021	Sharpen BNI KUR distribution relies on clusterization	Jakarta
121	September 10, 2021	IMI Gandeng BNI Cooperation to fulfill the current transaction needs	Jakarta
122	September 11, 2021	Explanation by BNI's Legal Attorney on News from the BNI Makassar Branch	Jakarta
123	September 10, 2021	BNI and Buka Warung collaborate to encourage QRIS transactions for MSME Merchants	Jakarta
124	September 13, 2021	Traveloka Cooperates with BNI for the Latest Payment Method with Traveloka Paylater 'Virtual Card Number'	Jakarta
125	September 13, 2021	Team RRQ Presents BNI King Of School 2021, The Largest Student Esports Tournament in Indonesia	Jakarta
126	September 14, 2021	Makassar doubtful customer banking bilyet deposits were only scanned copies	Jakarta
127	September 15, 2021	BNI Securities Pte. Ltd. Officially operates in Singapore	Jakarta
128	September 16, 2021	Strengthening Transactional Banking Business BNI Presents 3 Innovations	Jakarta
129	September 24, 2021	Airlangga Praises BNI Smartfarming Millennial Program	Klaten
130	September 28, 2021	Sudirman Cup BNI Helps Send Team to Vantaa-Finland	Jakarta
131	October 1, 2021	Sigi Wimala Bocorin Reveals Dapetin Cars using Selfie on BNI Mobile Banking!	Jakarta
132	October 2, 2021	Synergy with the Director General of Taxes and Peruri BNI to support the launch of e-stamp	Jakarta
133	October 2, 2021	Local software software must take a role in the Indonesian Digital Economy 2025	Jakarta
134	October 3, 2021	Srikandi Cyclist Community, BNI Supports Digitalization of MSMEs in Tourism Areas	Jakarta
135	October 4, 2021	Pertama di Indonesia BNI Terbitkan AT - 1 Bond	Jakarta
136	October 5, 2021	Chandra Asri Receives Balloon Payment Facilities USD 250 million from BNI with a tenor of up to 10 years for business expansion and growth	Jakarta
137	October 6, 2021	Regional Qualifier BNI King of School Starts	Jakarta
138	October 7, 2021	BI Cooperates with BNI Tebar for LCS Businessmen	Jakarta
139	October 9, 2021	Applications by Individual Companies Increases Payments through BNI	Jakarta
140	October 10, 2021	Thomas & Uber Cup 2020, BNI is behind the Indonesian team's victory	Jakarta
141	October 11, 2021	BNI Digitizes Customs services and National Logistics Ecosystem	Jakarta
142	October 13, 2021	BNI Strengthens Pertamina Lubricant Business	Jakarta
143	October 14, 2021	Cooperating with KONI BNI Launches Tapcash Sports Edition	Jakarta
144	October 17, 2021	BNI Calls for Replacement of Debit Chip Cards for Security	Jakarta
145	October 17, 2021	Collaboration to Gather 1,000 blood bags	Jakarta
146	October 17, 2021	Analyst Says BNI is worthy of acquisition as a digital bank	Jakarta
147	October 19, 2021	Supporting TEI Digital Edition 2021, BNI Prepares Many Innovations	Jakarta
148	October 21, 2021	Through Campus Financial Ecosystem BNI Digitalizes UNPAD	Jakarta
149	October 21, 2021	TEI 2021 BNI XPORA Support Officially Launched	Jakarta
150	October 24, 2021	BNI Materazzi support and PBSI successfully wins the Thomas 2020 Cup	Jakarta

NO.	DATE	TITLE	PLACE
151	October 25, 2021	BBNI 3Q21 Performance, Solid Optimal Digitalization Growth	Jakarta
152	October 28, 2021	BNI Supports UI Goes Digital through Campus Financial Ecosystem	Jakarta
153	October 28, 2021	Animo Berbisnis Tinggi Aku Saudagar Muda 2021 Receives 2,510 Registrants	Jakarta
154	October 30, 2021	Appreciation! Kemenkumham Ganjar BNI Managing Director Institutional Relations receives a Social Bhakti Award	Jakarta
155	October 31, 2021	Japanese and Malaysian Tembus Export Market Sikka Fisherman Success through BNI Xpora	Jakarta
156	November 2, 2021	BNI and Shopee Buka Helps Exports for 10,000 Indonesian MSEs	Jakarta
157	November 3, 2021	BNI EDC Tembus transactions reach Rp50 trillion	Jakarta
158	November 5, 2021	PMI Supports BNI to Optimize Program KAMI	Jakarta
159	November 6, 2021	Great - BNI Takes MSME to the Dubai Tembus Market	Jakarta
160	November 7, 2021	MSEs: BNI aggressiveness opens new markets	Jakarta
161	November 10, 2021	Commemorating Heroes' Day at BNI Santuni Keluarga Prajurit	Jakarta
162	November 10, 2021	INACRAFT Transformation as the Largest International Craft Exhibition in ASEAN	Jakarta
163	November 11, 2021	BNI Launches E-commerce Credit Cards in Collaboration with JD.ID	Jakarta
164	November 11, 2021	Fiki Naki Overseas Tourism with BNI Emerald	Jakarta
165	November 13, 2021	Megamendung Organic Forest, BNI Helps Farmers Group Build Ecotourism	Jakarta
166	November 17, 2021	BNI Collaborating with the Association of Indonesian Golf Course Owners (APLGI) Launches Credit Card for Golf Fans	Jakarta
167	November 17, 2021	BNI Wins Gold Sustainability Report Award	Jakarta
168	November 18, 2021	Dobrak Market Philippine, BNI Invites MSME Business Meeting	Jakarta
169	November 18, 2021	,500 Campus Financial Ecosystem Runners Ready to Enliven BNI-UI Half Marathon 2021	Jakarta
170	November 21, 2021	Celebrate 2020 Thomas Cup Victory, BNI Shoes its Appreciation to PBSI	Jakarta
171	November 23, 2021	Supporting BNI MSMEs Businesses and Cooperatives Digitization through Agent Network	Jakarta
172	November 17, 2021	Thanks to BNI Xpora MSME performance doubled	Jakarta
173	November 17, 2021	Lively Smart City BNI Offers Integrated Financial Solutions	Jakarta
174	November 27, 2021	Xpora Virtual Golf Tour 2021	Bali
175	November 29, 2021	XPORA Indonesian Food and Drinks Through Malaysia	Jakarta
176	November 30, 2021	Bilateral Credit GOOD	Jakarta
177	December 2, 2021	Thomas's Cup returns after 19 years away, Jokowi shows his appreciation in Bali	Bali
178	December 3, 2021	BNI Supports IPB University to Encourage Acceleration of Campus Financial Ecosystem through the IPB Cashless Application	Jakarta
179	December 3, 2021	BNI Asset Management Launches BNI 30G Mutual Funds as a Superior Investment Alternative in 2022	Jakarta
180	December 7, 2021	Supporting the recovery of National Tourism, Garuda Indonesia Travel Fair (GATF) held again with Ticket Discounts Up to 80%	Jakarta
181	December 8, 2021	BNI Wins Most Trusted Company Award at the CGPI Award 2020	Jakarta

SINERGI 46 MAGAZINE

BNI Hi-Movers Special Internal Media through a print magazine as a means of sharing information, experience, and knowledge and to improve BNI Hi-Movers engagement and a sense of pride in BNI. The main magazine themes are tailored to the latest conditions in BNI. Themes raised in the last edition of Sinergi magazine 46, included: BNI Hi-Movers Covid Rangers: Movement from #AyoBerubah to New Normal; Don't Ignore Health Protocols; BNI Hi-Movers, Yuk Follow #Maskerbnihimovers!, Twibbon Concert Competition Unites Energy for Indonesia in BNI Hi-Movers; and Preparing the Foundation for Growth, Healthy and Sustainable in the new era.

E-SINERGI 46

BNI Hi-Movers Special Internal Media through Mobile Apps and Web-Based as a means of sharing information, experiences, and realtime knowledge. The E-synergy46 application can be downloaded via the Google Play Store and the App Store by BNI Hi-Movers. The E-synergy46 is content not only in writing but also in the form of photos and videos.

To help readers find the news they want, the e-synergi46 application comes with several News Categories, including Think Bank; Regional & Branch news; Beyond; BNI Berbagi; BNI Go Green; Hot News; BNI HUT; Special info; Mudik info; Inspirations; Go for a walk; Family; Health; Finance; Quizzes; Services; Life Style; Motivation; Promos; Reviews & Films; HC; Interrupt; Shine; Figure; Technology.

This application is very interesting as the e-synergi46 material can not only be read but can also be shared on social media through chat applications such as Whatsapp; Facebook; Twitter and others. To find out the readers' responses, this application also has a like post and comment menu.

To make it more attractive to downloaders, the e-synergy46 application also provides a reward point program, a loyalty program where every activity in the e-synergy46 application receives points that can be redeemed or exchanged for: Topping-up mobile phones, Purchasing Data Packages, Purchasing PLN vouchers or bill payments, Top Up Link Aja, Top Up Go Pay, and Top Up OVO. This application also provides incentives to employees who send news from each work unit. Only BNI Hi Movers can access this application.

NO.	HEADLINE
1.	BNI and Lampung Provincial Government Synergy Supports for MSMEs GO Export Empowerment
2.	Implementation of Work From Home for BNI Head Office
3.	Economic Outlook Update: 1st Race Against the Pandemic
4.	Live Streaming BNI CorpU : "Dancing with the New Normal"
5.	BNI Hi-Movers Covid Rangers: Moving from #AyoBerubah to New Normal
6.	Live Talk Show : Share Energy to Unite

E-MAIL & SMS BNI MENYAPA

Internal communication tools such as email and SMS BNI Menyapa, consisting of:

1. Bank wide and high level corporate information submitted by the Board of Directors to all employees (Newsletter).
2. Bank wide and technical Corporate information conveyed by the KMP Division to all employees (Corporate Info).
3. Human capital and technical Information that must be conveyed immediately by the HCT Division to all employees (HC Messages).
4. Other bank wide information but not related to marketing, products or services

In 2021, 250 (two hundred and fifty) BNI Menyapa E-mails were sent, covering the following topics included:

NO.	EMAIL SUBJECT
1	BNI Menyapa - Don't Ignore Health Protocols
2	BNI Menyapa - Leadership Series: Elevating First Line Leadership to The Next Level
3	BNI Menyapa - BNI Hi-Movers #SukseskanVaksinasi
4	BNI Menyapa - Money Talks Power Lunch : BNI Strategy to Encourage Consumer Business in 2021
5	BNI Menyapa - BNI Berbagi : Together Helping Communities Affected by Natural Disasters
6	BNI Menyapa - Social Media Usage Guide
7	BNI Menyapa - Live Streaming BNI CorpU : Efforts to Prevent Deviation of Customer Funds in Banking
8	BNI Menyapa - Convinced that Economic Growth will Improve, BNI Relys on This Sector in 2021
9	BNI Menyapa - BNI's Transformation Challenges and Focus During the Pandemic
10	BNI Menyapa - There is a Pandemic, BNI is Ready to Transform Digital Banking
11	BNI Menyapa - BNI Transformation Steps To Keep Growing Healthy and Sustainably
12	BNI Menyapa - Knowledge Supplement Period February 3-5, 2021
13	BNI Menyapa - Achievements, RI's Capital Market IPO is the Highest in ASEAN
14	BNI Menyapa - Streaming BNI CorpU : Investment: ORI019 Virtual Socialization
15	BNI Menyapa - At the Front Guard, Erick Thohir Invites BUMN Employees to Donate
16	BNI Menyapa - Enjoy the Latest BNI Mobile Banking Features and Update Your BNI Mobile Now
17	BNI Menyapa - BNI Hi-Movers Support for Convalescent Plasma Donor Restores Indonesia
18	BNI Menyapa - Knowledge Supplement Period February 16-19, 2021
19	BNI Menyapa - BKPM Collaborates with BNI to Facilitate Domestic and Foreign Investments
20	BNI Menyapa - BNI Hi Movers Support Heals Indonesia Through Plasma Donor Screening
21	BNI Menyapa - BNI Supports Covid-19 Task Force for Mask Waste Handling Program
22	BNI Menyapa - Let's Join 7 Days #BNIGoGreenChallenge
23	BNI Menyapa - Sinergi 46 Magazine Again Wins InMa 2021 Award
24	BNI Menyapa - Through Consolidation and Transformation, BNI is Ready to Capture Business Potential in 2021
25	BNI Menyapa - Through MSMEs, BNI Encourages the Acceleration of RI's Economic Recovery
26	BNI Menyapa - Live Streaming BNI CorpU : MSME Webinar: Survive Amid the Challenges of Change
27	BNI Menyapa - Help SMEs Adapt to New Habits, This Is What BNI Does
28	BNI Menyapa - Commemorating the Anniversary, BNI Workers Union Remains Solid and Ready to Support the Transformation Program
29	BNI Menyapa - Live Streaming BNI CorpU : SR014 Series Retail Sukuk Socialization
30	BNI Menyapa - Workers Union V's LDP Graduation, Proof that BNI is Serious in Conducting Cadreization
31	BNI Menyapa - BNI JCB Credit Card Wins Two Awards at the 2021 JCB Indonesia Award
32	BNI Menyapa - National Public Lecture
33	BNI Menyapa - IT'S TIME TO SHARE : AKHLAK Series #2 "Aware, Competent and Harmonious
34	BNI Menyapa - Beware of Social Media Accounts Claiming to be BNI
35	BNI Menyapa - Staying Cautious Even After Receiving The Covid-19 Vaccine Twice
36	BNI Menyapa - AKHLAK Series: Why TRUST Matters?
37	BNI Menyapa - Commemoration of Isra Mi'raj Prophet Muhammad SAW 1442 H
38	BNI Menyapa - MSE Semarang Go Global
39	BNI Menyapa - Vaccination Center with BUMN for Central Java Officially Opened in Semarang!
40	BNI Menyapa - BNI Emerald Market Outlook 2021
41	BNI Menyapa - Covid-19 Vaccine Socialization
42	BNI Menyapa - KPR Contracts, BNI Offers Many Attractive Promos!
43	BNI Menyapa - Strengthening Capital, BNI Will Issue Tier 2 Subordinated Notes

NO.	EMAIL SUBJECT
44	BNI Menyapa - Earth Hour, One Hour For Earth
45	BNI Menyapa - Knowledge Supplement for March 31, and April 1, 2021
46	BNI Menyapa - BNI Shares 25% Dividend in 2020
47	BNI Menyapa - BNI Hi-Movers Commitment to Preserving the Earth
48	BNI Menyapa - QRIS Strategy and Roadmap as a QR Code-Based Payment Solution
49	BNI Menyapa - Alert! Don't Hit Click, Here's How To Distinguish Between Official and Fake Emails
50	BNI Menyapa - Want Gifts & Smart Money, Come Join BNI Investime Week!
51	BNI Menyapa - Empowering SMEs, BNI & GIS Develop Integrated Digital Value Chain Solutions
52	BNI Menyapa - Helping to Restore NTT, BNI Hands over Emergency Response Assistance for Disaster Victims
53	BNI Menyapa - Management and Safety of Covid-19 Handling Archives and Static Archives at BNI
54	BNI Menyapa - Attention! Attention! Don't Forget to Follow Health Protocols After the COVID-19 Vaccine
55	BNI Menyapa - Let's Check Indonesian Creative Industry Insights at BNI Creativepreneur Conference
56	BNI Menyapa - BNI CorpU : Appreciation and Motivation Awards for Learning Resources & Learner
57	BNI Menyapa - Happy Ramadan 1442 H
58	BNI Menyapa - Extend SIM from Home with SINAR and BNI Virtual Account
59	BNI Menyapa - AKHLAK Series: Harmonious and Collaborative Behavior
60	BNI Menyapa - Targeting Young Farmers, BNI Expands Millennial Smartfarming in Klaten, Central Java
61	BNI Menyapa - BNI Business Profit in Korea Grows 73.9%
62	BNI Menyapa - Inaugurating New Office in Seoul and Korea Desk, BNI is Ready to Meet Indonesian & Korean Entrepreneurs
63	BNI Menyapa - Srikandi BNI as a Role Model for BNI's Female Talent Achievement
64	BNI Menyapa - Srikandi BNI Becomes a 'Support System' for Female MSMEs Go Export
65	BNI Menyapa - Healthy Talk: Stay Healthy and Energetic During the Month of Fasting with the Right & Healthy Menu
66	BNI Menyapa - Dharma Shanti Saka New Year 1943 : Mulat Sarira to Achieving Self Harmonization
67	BNI Menyapa - Top! Digital Business Boosts BNI's Performance
68	BNI Menyapa - Audit Awareness: What Color is Your Certification & Why It is Important for Your Career
69	BNI Menyapa - Tik-Tok Challenge with #RamadannyaBNI
70	BNI Menyapa - 8 Areas Open for Mudik, Which Ones?
71	BNI Menyapa - Still a Pandemic Outside? Eat at Home Come on!
72	BNI Menyapa - AKHLAK Series: Change & Happiness
73	BNI Menyapa - Make Zakat Payments Easy, BAZNAS Gets BNI
74	BNI Hi-Movers Celebrate Eid Al-Fitr Solemnly & Stay Wise To Health Protocols
75	BNI Menyapa - Pushing Ornamental Plants to Enter Export Markets, BNI Distributes KUR Florist
76	BNI Menyapa - Live Streaming BNI CorpU : Enforcement of Integrity in the Credit Process
77	BNI Menyapa - Towards Digital Banking, Realizing BNI's e-Branch Transformation
78	BNI Menyapa - Awesome! Jerome Polin Opens Account at BNI Tokyo Branch
79	BNI Menyapa - 75 Years of Accelerated Achievement for Indonesia
80	BNI Menyapa - More Practical, Easy, and Cheap, Himbara Invites Customers to Make Cashless Transactions
81	BNI Menyapa - No need to go to a branch, 45,000 Link ATM are ready to serve customers' financial transactions
82	BNI Menyapa - BNI Becomes Official Supporter of National Badminton
83	BNI Menyapa - Welcoming the 75th Anniversary, BNI Prepares an Appreciation Event for MSMEs
84	BNI Menyapa - Develop Smart City, Medan City Government Collaborates with BNI to Implement Integrated Solutions
85	BNI Menyapa - Happy Tri Suci Vesak Day 2565 BE/2021
86	BNI Menyapa - Free Transactions at Himbara ATMs, Really Possible!
87	BNI Menyapa - Getting to Know State Owned Enterprises in Bank Negara Indonesia
88	BNI Menyapa - Fast as Lightning, BNI Makes it Easy for Students to Make Transactions

NO.	EMAIL SUBJECT
89	BNI Menyapa - Grand Final BNI Business Innovation Award (BINNOVA) League
90	BNI Menyapa - IICD 2021, BNI Wins The Best SOE & Top 50 Big Capitalization Public Listed Company
91	BNI Menyapa - BNI R.A.C.E Realizes BNI #LompatLebihTinggi
92	BNI Menyapa - Fiki Naki Surprises, There is a Lithuanian Intern at BNI London
93	BNI Menyapa - Go Shopping! BNI Early Month Promo
94	BNI Menyapa - IPB Fostered Farmers are Now Touched by BNI KUR
95	BNI Menyapa - Actively Supports Exports, BNI Wins Consulate Award 2020
96	BNI Menyapa - Coordinating Minister Airlangga Appreciates KUR BNI Continuing the Pre-Employment Card Program
97	BNI Menyapa - Live Streaming BNI CorpU : Fraud Awareness Series
98	BNI Menyapa - Mandatory webinar for all BNI Hi-Movers, #OneTreeOneEmployee Series
99	BNI Menyapa - BNI CorpU Wins Gold Predicate in GCCU Award 2021
100	BNI Menyapa - Video Contest #OneTreeOneEmployee
101	BNI Menyapa - Millennial Smartfarming in Bali Export-Capacity Farmers
102	BNI Menyapa - #LompatLebihTinggiDance Challenge
103	BNI Menyapa - Fast Break Towards the Golden Generation of BUMN
104	BNI Menyapa - Live Streaming BNI CorpU : Leadership Series: Innovation Leader
105	BNI Menyapa - Challenge Twibbon €œRangkai Stories with BNIâ€
106	BNI Menyapa - Exciting Promotion! Lots of Shopping with BNI
107	BNI Menyapa - Mandatory Webinar : Good Corporate Governance: Anti-Bribery Management System (SMAP)
108	BNI Menyapa - Even after Covid-19 Vaccination: Can You Still Be Infected?
109	BNI Menyapa - What Should Parents Know About Covid-19 In Children?
110	BNI Menyapa - To Prevent Office Clusters, What Should Be Prepared?
111	BNI Menyapa - Through BNI Xpora, BNI Encourages Indonesian SMEs to Go Worldwide
112	BNI Menyapa - Celebrating Anniversary, BNI Plants 1,946 Coral Reefs in Likupang
113	BNI Menyapa - Mandatory Webinar : Lively BNI Agen46: Role of BNI Agen46 Financial Literacy and Inclusion
114	BNI Menyapa - Get to know 4 Benefits of the Covid-19 Vaccine that You Shouldn't Miss
115	BNI Menyapa - BNI Corporate Transformation
116	BNI Menyapa - Youtuber Rosidah Jajal World's Cheapest Remittance
117	BNI Menyapa - Payday Savings Promo, Weekend Shopping with BNI
118	BNI Menyapa - Leadership and Talent Podcast (Mandatory for all BNI Hi-Movers)
119	BNI Menyapa - Prevent Covid-19, Here's How To Use The Correct Double Mask
120	BNI Menyapa - Webinar Asa of SMEs Dominate the International Market
121	BNI Menyapa - Corona Soaring: Record the 6 Most Risky Activities for Covid-19 Transmission
122	BNI Menyapa - Xpora, Exports Made Easy
123	BNI Menyapa - BNI Disburses Syndicated Loans, Funds Pertamina International Shipping
124	BNI Menyapa - Mandatory Webinar: Online Loans & Cryptocurrencies to be Prudent & Proportionate
125	BNI Menyapa - Collaborating with GP Ansor and Pos Indonesia, BNI Expands Agen46 Network
126	BNI Menyapa - New Corporate Batik Uniform, Brings the Spirit of Transformation to BNI
127	BNI Menyapa - Webinar Heroes of the Diaspora Jump Higher
128	BNI Menyapa - Things to Pay Attention to When Running Isoman
129	BNI Menyapa - Returning to Village, Indonesian Migrant Workers Successfully Become Agen46
130	BNI Menyapa - Let's Overcome the Delta Variant by Tightening the Health Protocols
131	BNI Menyapa - Already Vaccinated Can Still Get Covid-19, in vain?
132	BNI Menyapa - Global Mindset Journey : Introduction Launching Global Mindset Learning Game
133	BNI Menyapa - Let's Restore Indonesia, Apply 5M and 3T Discipline

NO.	EMAIL SUBJECT
134	BNI Menyapa - Weekend Discount! Shop with BNI Come on
135	BNI Menyapa - Guide to Self-Isolation for Children with COVID-19
136	BNI Menyapa - Cleverly & Wisely Responding to Issues Related to BNI, Check!
137	BNI Menyapa - Free Consultation and Medicine from the Indonesian Ministry of Health Telemedicine for those of you who are still Isoman
138	BNI Menyapa - People at Home Get Covid-19, What Should We Do?
139	BNI Menyapa - Tracing: Effective Detection of the Spread of Covid-19 Transmission
140	BNI Menyapa - Testing: Effective Solution to Prevent Corona Transmission
141	BNI Menyapa - Everyone Must Wear a Mask
142	BNI Menyapa - Let's just stay at home, so that Covid 19 doesn't spread anymore
143	BNI Menyapa - Isoman Starter Pack
144	BNI Menyapa - CEO Talk BNI "People First: The Key Aspect toward BUMN Go Global
145	BNI Menyapa - Recognize the Risk of Spreading Covid-19 in Closed Spaces and How to Prevent It
146	BNI Menyapa - BNI Transformation, Prepares World-Class Human Capital
147	BNI Menyapa - Productive & Effective WFH Tips, Check!
148	BNI Menyapa - The Contemporary Beverage Entrepreneur in the Era of the Pandemic, Profit or Loss?
149	BNI Menyapa - #1TahunAKHLAKBUMN
150	BNI Menyapa - Sales Championship Award 2021
151	BNI Menyapa - UK SME's Business Summit 2021: MSMEs Go Global with BNI
152	BNI Menyapa - BNI Seoul Meets Indonesian Exporters with South Korean Buyers
153	BNI Menyapa - Explore BUMN "Not Good at Kandang"
154	BNI Menyapa - Let's be more vigilant, these are the symptoms of Covid-19 that often occur in children
155	BNI Menyapa - Business Idea Festival
156	BNI Menyapa - These two BNI Directors were originally in sales. How To Get To The Peak Of A Career?
157	BNI Menyapa - BNI Again Distributes Productive Presidential Assistance Program for Micro Enterprises
158	BNI Menyapa - Hobby Shopping #GakPakeNanti, Must Check This!!!!
159	BNI Menyapa - Story Telling Leader BNI (eSteler BNI)
160	BNI Menyapa - Great, Embracing the Magic of Areca Leaves to Become High Export Value Items
161	BNI Menyapa - Podcast Series SP Academy "Bangga Berkarir di BNIâ€
162	BNI Menyapa - New BNI Mobile Banking Challenge Brings Fortune #GaPakeNanti Back Again!
163	BNI Menyapa - Healthy Talk: Comorbid Vulnerable to Covid 19
164	BNI Menyapa - UGM Becomes the First Campus to Use BNI's Campus Financial Ecosystem
165	BNI Menyapa - Collaborating with Farmer Community, These 3 Indonesian Businesses Become Prima Donna Overseas
166	BNI Menyapa - Already Negative for Covid-19 But Still Have Symptoms?
167	BNI Menyapa - Pray Together, BNI Workers Union and BNI Hi-Movers for the Indonesian Nation
168	BNI Menyapa - Knowledge Supplement period August 13, 2021
169	BNI Menyapa - BNI Implements Higher Education Financial Ecosystem at Usakti
170	BNI Menyapa - Recognize the Symptoms of Happy Hypoxia in COVID-19 and its Handling
171	BNI Menyapa - Maintaining Economic Recovery Momentum, Himbara Strengthens Synergy
172	BNI Menyapa - Bringing Indonesian MSMEs to the Global Market
173	BNI Menyapa - What are the types of masks that are effective in preventing Covid-19?
174	BNI Menyapa - Success as Global Banking, Here are a Series of Facts about BNI's Advantages
175	BNI Menyapa - Collaboration to Promote MSMEs, BNI, Pertamina and GP Ansor Offers Pertashop
176	BNI Menyapa - Welcome Onboard 50 Great Students participating in the 2021 Merdeka Campus Internship!
177	BNI Menyapa - Don't Leak, Keep Personal Data Safe!
178	BNI Menyapa - Who else cares about the environment, if not us!

NO.	EMAIL SUBJECT
179	BNI Menyapa - Supporting Ministry of Education and Culture, Research and Technology, BNI Techship Provides Flexibility for Independent Internships "Work From Anywhere"
180	BNI Menyapa - BNI Serves Digital Service Ecosystem
181	BNI Menyapa - SOENERGY - TALK : BNI Synergy to Build Digital MSMEs with PaDI MSMEs
182	BNI Menyapa - Leadership Series: Emphatic Leadership
183	BNI Menyapa - Solid Performance during the Pandemic, BBNI Shares Worth Collecting
184	BNI Menyapa - BNI, BCA, blu by BCA Digital, Jenius from Bank BTPN, and Twitter Indonesia Collaborate on Security Education Campaign #DatamuRahasiamu
185	BNI Menyapa - Scan the Barcode with PeduliLindung, what color do you have?
186	BNI Menyapa - BNI Digital Financial Solutions for MSMEs Together with Buku Warung
187	BNI Menyapa - Maintain the image of BNI, this is what BNI must do Hi Movers
188	BNI Menyapa - Webinar Global Mindset Journey 3: "Collaborate and Create with Culturally Different People"
189	BNI Menyapa - Live Streaming BNI CorpU : Leadership & Soft Skill Series: Growth Mindset
190	BNI Menyapa - BNI Securities Pte. Ltd. Officially Operating in Singapore
191	BNI Menyapa - Strengthening Transactional Banking Business, BNI Presents 3 Innovations
192	BNI Menyapa - Support BNI to become the favorite winner of the 2021 Dev Portal Awards
193	BNI Menyapa - Implement the Anti-Money Laundering and Terrorism Financing program, Indonesia is ready to become a member of FATF
194	BNI Menyapa - Mandatory Webinar! Socialization of Prevention of Corruption in the Banking Sector
195	BNI Menyapa - Collaborating with KPK, BNI Socializes Corruption Prevention Among BNI Hi-Movers
196	BNI Menyapa - Participating in TEI 2021, BNI Fully Supports the Government in Pushing Non-Oil and Gas Exports during the Pandemic
197	BNI Menyapa - Sudirman Cup, BNI Helps Team Go to Vantaa-Finland
198	BNI Menyapa - Relying on Integrated Digital Financial Solutions through BNI Smart City, BNI is Ready to Partner with Local Governments to Serve Modern Communities in the Society 5.0 Era
199	BNI Menyapa - Strengthening MSMEs to Accelerate Economic Recovery through BNI Xpora
200	BNI Menyapa - BNI Cyclist Srikandi Community Supports Digital Ecosystem & MSMEs Taman Mini Indonesia Indah during the Pandemic
201	BNI Menyapa - Encouraging Exports, BNI MSMEs and Global Buyers
202	BNI Menyapa - Proud, 2 Indonesian Youths Dominate European Market Thanks to BNI Xpora
203	BNI Menyapa - First in Indonesia, BNI Issues AT - 1 Bond
204	BNI Menyapa - BNI Provides USD 250 Million Financing to Chandra Asri Petrochemical
205	BNI Menyapa - BNI Supports Bank Indonesia in Disseminating LCS
206	BNI Menyapa - Healthy Talk: Internal Medicine Talk Show & Features of BNI Life Outpatient Services on Halodoc Application
207	BNI Menyapa - Time To Share BNI Corporate University : AKHLAK How Competent Am I?
208	BNI Menyapa - BNI King of School Regional Qualifier Begins, 1,024 Schools Become Champions
209	BNI Menyapa - PeduliLindung and BNI Mobile Banking will be integrated soon
210	BNI Menyapa - BNI Promo, All 50 Percent Shopping for Needs
211	BNI Menyapa - Great! BNI Takes Home Three AHI 2021 Awards
212	BNI Menyapa - BNI Digitizes Customs, Excise and National Logistics Ecosystem Services
213	BNI Menyapa - - Live Streaming BNI CorpU : Healthy Talk with Srikandi BNI: Breast Cancer Early Detection
214	BNI Menyapa - Stay Alert, Replace Your BNI Debit Card with a Chip-Based Debit Card and Change PIN Periodically
215	BNI Menyapa - Increase Business Profit, Pertamina Lubricants Optimizes BNI's Supply Chain Financing
216	BNI Menyapa - Returning from Abroad, What Are the Quarantine Rules?
217	BNI Menyapa - Live Streaming BNI CorpU : Talkshow Chat Santuy with BNI Agen46 & Young MSMEs from Papua
218	BNI Menyapa - Support TEI 2021, BNI Xpora is Officially Launched
219	BNI Menyapa - BBNI Solid 3Q21 Performance, Optimal Growth in Digitalization
220	BNI Menyapa - Podcast Series SP Academy Live Youtube Mandatory for all BNI Hi-Movers: "Move without using it later"

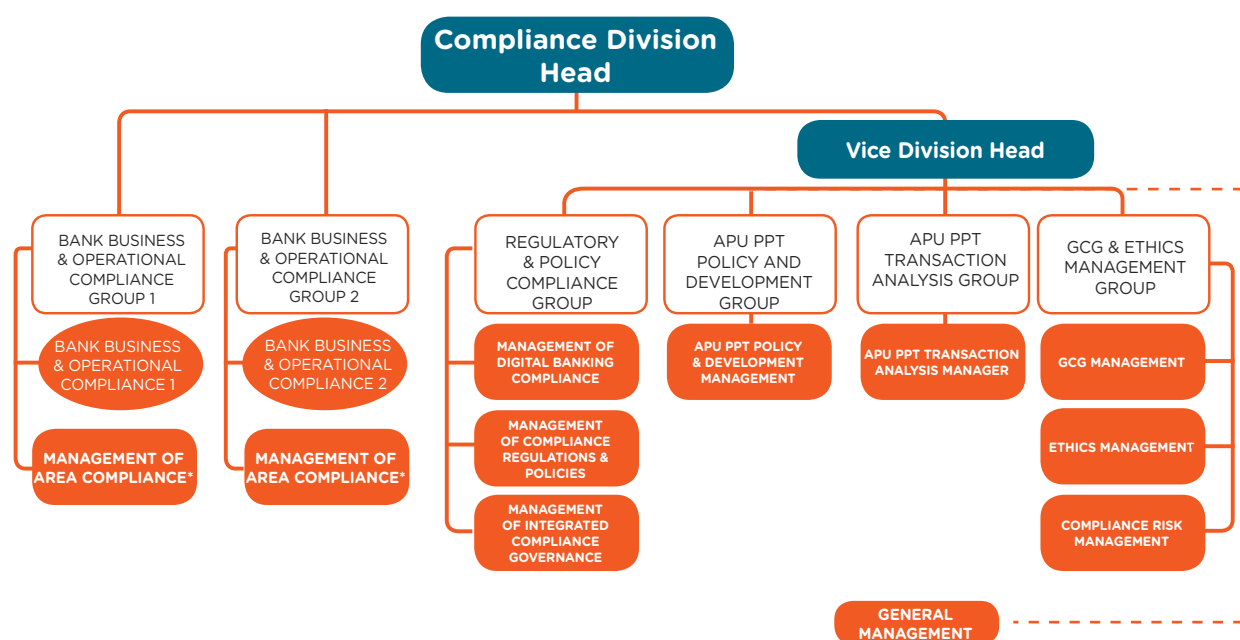
NO.	EMAIL SUBJECT
221	BNI Menyapa - Knowledge Supplement BCV Fraud Awareness Series "Risk Escort and International Business Development"
222	BNI Menyapa - Youth Pledge Day 2021, BNI Invites Millennialpreneurs to Launch the 'Young Definitely Can' Program
223	BNI Menyapa - Penetrating Japanese and Malaysian Export Markets, Sikka Maumere Fisherman Succeeds through BNI Xpora
224	BNI Menyapa - BNI - Sarinah Synergy Knowledge Supplement: Opportunity to Grow and Develop: Business with Digital Platform
225	BNI Menyapa - Beware of the Third Wave of Covid-19, Don't Neglect Protocols!
226	BNI Menyapa - Let's Support Gitaswara 46
227	BNI Menyapa - Great, BNI Delivers MSMEs to Dubai Market
228	BNI Menyapa - Knowledge Supplement - Community Entrepreneurship Graduation through the BNI Pre-Employment Card and Pre-Employment KUR Program
229	BNI Menyapa - Commemorating Hero's Day, BNI Supports Soldiers' Families
230	BNI Menyapa - BNI Launches E-Commerce Credit Card in Collaboration With JD.ID
231	BNI Menyapa - BNI Zero Fraud, Let's Race!
232	BNI Menyapa - Build Cijago Toll Road, BNI and PT SMI Distribute Rp2.6 Trillion Syndicated Loans to Translingkar Kita Jaya
233	BNI Menyapa - Proud! BNI Again Wins Most Trusted Company Award at the CGPI Award 2021
234	BNI Menyapa - BNI - UI Half Marathon 2021
235	BNI Menyapa - BNI Launches Credit Card for Golf Fans
236	BNI Menyapa - BNI Seizes Gold Rank at ASRRAT 2021
237	BNI Menyapa - Should know! This is how to avoid social engineering mode
238	BNI Menyapa - Christmas Celebration Service for BNI and its Subsidiaries in 2021 with the theme "Jesus, The Greatest Gift"
239	BNI Menyapa - IAU Awareness Letter - Trade Finance
240	BNI Menyapa - Celebrate Victory for the 2020 Thomas Cup, BNI Appreciates PBSI
241	BNI Menyapa - Environmental, Social, and Governance in BNI
242	BNI Menyapa - BNI's Mitigation Strategy in Facing Extreme Weather (La Nina)
243	BNI Menyapa - Thanks to BNI Xpora, MSME performance has doubled
244	BNI Menyapa - BNI Hi-Movers Anti Gratification
245	BNI Menyapa - Strengthening Diaspora Ecosystem, BNI Xpora Establishes Cooperation with House of Indonesia Econsia
246	BNI Menyapa - Merry Christmas 2021 & New Year 2022, Jump Higher to Achieve Peace
247	BNI Menyapa - Christmas Moment, BNI Encourages Entrepreneurial Creative Spirit
248	BNI Menyapa - Have Fun in the New Year by Maintaining Health Protocols
249	BNI Menyapa - The Spirit of International Business Transformation
250	BNI Menyapa - BNI Rewind 2021

Anti Money Laundering (APU) and Prevention of Terrorism Funding (PPT)

APU AND PPT PROGRAM APPLICATION ORGANIZATIONAL STRUCTURE

To support the APU and PPT program application, the Compliance Division was designated as the Special Work Unit (UKK) responsible for its application. The Compliance Division reports to, and is directly responsible to the Director in charge of the Compliance function in BNI (Human Capital and Compliance Director). The APU and PPT programs are also applied by Regional Compliance Officers (RCO) in all regional offices. The RCO has a supervision function of the APU and PPT program application in all branch offices in the region to ensure branch operational activities are in accordance with the APU and PPT program application.

The APU and PPT organizational structure in 2021 can be seen below:



* Regional Management of Area Compliance has a function to ensure the application of APU and PPT in the Regional Offices, Branches and Centers.

PROGRAMS FOR THE IMPLEMENTATION OF APU AND PPT PROGRAMS

In an effort to prevent and minimize the use of the Bank as a means of money laundering and terrorism financing, BNI has implemented APU and PPT programs through:

1. Risk assessment of the Bank TPPU and TPPT using a regular risk-based approach (RCS) that is periodically reviewed;
2. Active Supervision of the Board of Directors and the Board of Commissioners.

The active role of the Board of Directors and the Board of Commissioners is very necessary in creating the effectiveness of the APU and PPT Programs, given the roles of the Board of Directors and the Board of Commissioners will affect the level of achievement of organizational goals in APU and PPT Program application. The forms of active supervision by the Board of Directors and the Board of Commissioners includes:

- a. The Board of Directors' approves the appointment of the Compliance Division as a Special Work Unit (UKK) responsible for implementing the APU and PPT Programs;
 - b. The Board of Directors and the Board of Commissioners approve the APU and PPT Policies;
 - c. Periodic reports (monthly, quarterly and semi-annually) related to the reporting obligations and implementation of the APU and PPT Programs to the Board of Directors and the Board of Commissioners;
 - d. Board of Directors approve the report on the plan and realization of updating customer data;
 - e. Meetings of the Board of Directors and the Board of Commissioners discuss the implementation of the APU and PPT Programs.
3. Adequacy & Effectiveness of Policies and Procedures
- The Compliance Division has prepared APU and PPT and PPT procedures with periodic reviews/up-dating/improvements in accordance with prevailing regulations. To strengthen the APU and PPT application, each product procedure and banking activity is also regulated through the APU and PPT procedures to identify and conduct risk assessment of money laundering and/or criminal acts of terrorism funding in each product or activity. To ensure the APU and PPT programs are running they will be supervised by the Compliance Division. The APU PPT program policies and procedures are in line and in accordance with FATF recommendations and OJK Regulations (POJK) No. 12/POJK.01/2017, as amended by POJK No. 23/POJK.01/2019 concerning the APU and PPT application program in the financial services sector, which includes:
- a. Active supervision of the Board of Directors and Board of Commissioners;
 - b. Customer Due Diligence Procedures (CDD) and/or Enhanced Due Diligence (EDD) Against Prospective Customers/Beneficial Owners (BO) and Walk in Customers (WIC) include ensuring Potential Customers/Customers/Beneficial Owner (BO) and Walk in Customers (WIC) is not on the list of suspected terrorists and terrorist organizations (DTTOT) and/or a list of weapons proliferation of mass destruction (DPPSPM); and other watchlist lists (OFAC List, UN List);
 - c. Implementation of the APU PPT Program based on a Risk-Based Approach;
 - d. Procedures for Monitoring Customer Profile and Transactions;
 - e. Implementation of a Fund Transfer Procedure system;
 - f. Administration of Customer Documents and Transactions;
 - g. Application of AML and CFT Programs in Office and Subsidiaries Networks in the Financial Conglomerate;
 - h. Internal control; and
 - i. Human Capital and Training.
4. Effective internal control in the APU and PPT application, carried out by:
- a. Having adequate APU and PPT policies and procedures as well as internal monitoring;
 - b. There are clear boundaries for work units authorities and responsibilities related to the APU and PPT programs, either through the first line of defense (risk taking units), second line of defense and third line of defense; and
 - c. Inspections are conducted to ensure the APU and PPT Program effectiveness by the Internal Audit Work Unit.
5. Information Management System
- To optimize transaction monitoring in the APU and PPT Program, BNI continuously develops information system technology, including:
- a. Improving 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, both in batch and realtime, in the BNI AML System.
- The BNI AML System is used to support a more optimal implementation of the Know Your Customer Principle, particularly in detecting/monitoring customer transactions that have patterns of behavior and patterns of money laundering and terrorism financing transactions.
- 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) PPATK data utilization 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 that supports reporting obligations in accordance with the PPATK goAML reporting format requirements.
 - g. Developing the goAML interface system in support of reporting obligations that have been adjusted to the GoAML provisions.
6. Human Capital and Training
- BNI conducts training on the application of APU and PPT Programs for all employees on an ongoing basis. The training methods are as follows:
- a. Training, training methods can be carried out continuously, including:

- i) Electronic/Online base training, through APU PPT e-Learning at BNI Smarter with passing grade graduation, Training through the Zoom Meeting application equipped with Pre Test and Post Test for all participants, Learning Videos, Webinars and Podcasts facilitated by BNI Corporate University (BCV).
 - ii) Face-to-face training, using the following approaches:
 - Conducted interactively (including workshops), for priority employees on a regular basis, with topics tailored to the needs of participants;
 - Conducted in one direction (including seminars) for non priority employees, and conducted when there are significant changes in provisions, with topics including implementation of the APU and PPT Program.
 - b. Supervision and Socialization of the APU and PPT Program at sampled Branch Offices (based on the results of the Branch Risk Rating assessment), related Units and Divisions.
 - c. Submission of Reminder Letters related to typology, latest modes and lessons learned related to APU and PPT to all Branch Offices, Regions, Divisions, Units and Units.
7. Implementing customer data quality improvement programs for employees and customers through e-learning awareness learning videos to improve customer data quality, through email blasts, flyers, and use of digital media, such as: Instagram, digital videos in every Banking Hall.
 8. Establishing and fostering cooperation and coordination with regulators and Law Enforcement Officials, particularly in fulfilling customer data and/or information requests.
 9. Penerapan Program APU dan PPT pada perusahaan anak dan kantor cabang di luar negeri
Implementing the APU and PPT Program in subsidiaries and overseas branch offices as a form of responsibility for Banks with an international office network, to ensure that the APU and PPT is running effectively throughout the office network, with the Compliance Division also monitoring, analyzing and supervising the APU and PPT Programs in:
 - a. Domestic Subsidiaries, namely BNI Asset Management, BNI Sekuritas, BNI Multifinance and BNI Life;
 - b. Overseas Branch Offices, namely BNI New York, BNI London, BNI Tokyo, BNI Hong Kong, BNI Seoul, and BNI Singapore.

10. Taking an active role in the work programs and activities of the APU PPT regime organized by the regulator/government, including: regulator/pemerintah, antara lain:
 - a. Preparation of National TPPU and TPPT Risk Assessment (National Risk Assessment/NRA) and Sectoral (Sectoral Risk Assessment/SRA);
 - b. Implementation of PPATK's Financial Integrity Rating (FIR);
 - c. Resource person/piloting Bank for APOLO reporting, Go AML, and involved in various regulatory projects, including: Public Private Partnership (PPP), and Provision of PEP Database.

STRENGTHENING THE APU PPT PROGRAM

With the increasing complexity of banking products and services, as well as the increasing use of digital technology, there is the potential to increase the risk of banking being used as a means of money laundering by criminals. In this regard, the Bank needs to ensure that the APU and PPT are working properly and in accordance with the provisions, and in addition, it requires efforts to improve its implementation.

Several improvement initiatives carried out by Bank BNI, include:

1. Increasing employees awareness and competence concerning the implementation of APU PPT;
2. Improving the quality of customer data through customer data quality improvement programs, through email blasts, flyers, and the use of digital media, such as: Instagram, digital video in every Banking Hall;
3. Developing BNI AML System and other applications to support optimization of APU PPT implementation;
4. Improving the quality of customer data and analysis of reporting to regulators in accordance with regulations;
5. Following up all internal and external audit results both related to the APU PPT within the stipulated time;
6. Coordinating actively with Regulators and Law Enforcement Officials in fulfilling requests for data and providing information in an effort to prevent and eradicate money laundering and the prevention of the financing of terrorism crimes;
7. Updating policies and procedures as well as adjusting internal provisions in accordance with prevailing regulations.

Protection of Creditors' Rights

BNI has implemented an honest and transparent information disclosure system with equal treatment for all creditors without any discrimination to protect creditors' rights. This is in line with one of the ASEAN Corporate Governance Scorecard Governance principles.

Through information disclosure, all creditors and business partners can obtain relevant information based on to their needs so that all parties can make objective decisions based on fair, reasonable and accurate considerations

BNI always ensures the fulfillment of rights and maintains creditors' trust in the Bank. The Bank guarantees that the creditor's rights are carried out properly, as outlined in the agreement agreed by both parties. As part of the creditor rights, the Bank carries out its obligations as agreed in a timely manner and strives to avoid delays or negligence that could potentially cause losses to both parties.

Anti Corruption Program

BNI has anti-corruption guidelines set out in various policies including the Code of Ethics, Guidelines for Gratification Control, Guidelines for Anti-Bribery Management Systems (SMAP), and the Whistleblowing System. These guidelines have been implemented properly and are evaluated for their effectiveness every year.

Company Code of Ethics

BNI has a Code of Conduct as a form of commitment in carrying out the compliance function and serves as a code of conduct for all Bank employees. The Bank's Code of Ethics uses and applies the applicable basic principles that refer to the Bank's vision, mission, and main values as well as internal and external regulations. The Code of Ethics is also the principle and basis that guides the relationship between BNI Hi-Movers and stakeholders in doing business. The Code of Ethics contains a system of values, business ethics, work ethics, commitment, and enforcement of company regulations in conducting business and other activities, as well as interactions with stakeholders.

BNI always strives to run its business in accordance with the GCG principles. The BNI Code of Ethics was enacted on December 1, 2010, and was the result of the revitalization of the previous Code of Conduct (2001). The BNI Code of Ethics must be obeyed and implemented by all BNI Hi-Movers (Board of Commissioners, Board of Directors, BNI employees), as verified by the BNI Hi-Movers signing the Statement of Attitude for BNI Hi-Movers as a concrete manifestation of their commitment to implementing the BNI Code of Ethics.

CODE OF ETHICS PRINCIPLES

The main principles in the BNI Code of Ethics consists of 14 items which in principle require all BNI Hi-Movers to:

1. Acting professionally, by prioritizing the values of work culture of Prinsip 46;
2. Becoming a role model and remind other subordinates, superiors, colleagues and work partners to implement the BNI Code of Ethics;
3. Maintaining good relations with fellow BNI Hi-Movers;
4. Maintaining bank secrecy and confidentiality of position;
5. Maintaining job security;
6. Protecting health, natural resources and the environment;
7. Recording, reporting and administering work properly, honestly and accurately;
8. Preventing conflicts of interest that could harm BNI's interests;
9. Not giving or receiving gifts of any kind, directly or indirectly from any party, if related to our duties and responsibilities;
10. Acting as a resource, as long as for the benefit of BNI;
11. Not a member and donor of a political party;
12. Not disclosing false information about BNI
13. Not using BNI assets for personal gain
14. Not misusing BNI's Corporate Identity for personal gain.

COMPLIANCE WITH THE CODE OF ETHICS

The Code of Ethics is BNI's commitment to comply with legal provisions and the highest ethical standards wherever BNI conducts its business/operational activities. In addition to complying with the prevailing laws and regulations, the management of the Company must uphold ethical norms and values. The Code of Ethics applies to all employees of the Company, namely the Board of Commissioners, the Board of Directors and all employees. All Company personnel have the awareness to implement good ethics that will enhance and strengthen the Bank's reputation.

DISSEMINATION OF THE CODE OF ETHICS

To socialize and internalize the BNI Code of Ethics values, a BNI Code of Ethics pocket book has been published and distributed to all BNI Hi-Movers. In addition, the Code of Ethics is regularly disseminated through BNI internal seminars/socialization, BNI internal media (Sinergi Magazine and BNI Forum website), which can be accessed by all BNI employees, through sharing sessions during quality month held every month in every BNI organization unit, GCG and Code of Ethics training for BNI new and existing employees, as well as coaching conducted by employee leaders. Violations of the BNI Code of Ethics will be subject to strict sanctions in accordance with the regulations and Company policies that apply at BNI.

IMPLEMENTATION AND ENFORCEMENT OF THE CODE OF ETHICS

Implementation and enforcement of the Code of Ethics as part of the GCG implementation is always carried out through awareness programs and internalization. BNI is committed to developing and implementing GCG principles in all Company activities at all levels or organizational structures from the basic level to top management. For this reason, the Code of Ethics has become the behavioral reference for the Board of Commissioners, Board of Directors and employees as part of efforts to achieve the Company's Vision and Mission. Enforcement of the Code of Ethics is carried out by means of periodic Code of Ethics compliance monitoring and by providing facilities for reporting Code of Ethics violation complaints, separately from the violation reporting mechanism (Whistleblowing System). Every BNI Hi-Movers can report Code of Ethics deviations and the reporter's identity will be protected. All reports must be accompanied by accurate data and/or evidence so the violations can be processed further. Any Code of Ethics violation will be subject to sanctions in accordance with applicable regulations and the imposition of such sanctions is not discriminatory.

TYPES AND FORMS OF SANCTIONS FOR VIOLATION OF THE CODE OF ETHICS

BNI Hi-Movers at all levels, if proven guilty of committing BNI Code of Ethics violations, will be subject to sanctions in accordance with the regulations stated in the applicable policies and regulations.

The sanctions are as follows:

PRINCIPAL SANCTIONS	TYPES AND FORMS OF VIOLATIONS
Warning Letter (SP)	<ul style="list-style-type: none"> Neglecting to follow the working rules Violations of the procedure/obligation system due to negligence that does not cause harm
Reprimand Letter (STE)	<ul style="list-style-type: none"> Violation of conduct and discipline in the work environment Violation of the procedure/obligation system due to negligence that causes immaterial losses
Final Warning Letter (STK)	<ul style="list-style-type: none"> Violations of the procedure/obligation system due to negligence that causes material losses Serious violations that do not fulfill the elements of fraud/cheating/fictitious/engineering and/or gratification
Demotion	<ul style="list-style-type: none"> Violations of the procedure/obligation system that contain elements of intent and causes immaterial losses Serious violations that do not meet the elements fictitious/engineered fraud and/or gratification
Termination of Employment	<ul style="list-style-type: none"> Violations of the procedure/obligation system that contains elements of intent and causes material losses Violations that meet the elements of fictitious/engineered fraud and/or gratification

CODE OF ETHICS VIOLATIONS TYPES AND TREND IN 2021

During 2021, there were 76 (seventy six) Code of Ethics violations as follows:

PRINCIPAL SANCTIONS	2021	2020
Warning Letter (SP)	6	2
Reprimand Letter (STE)	3	4
Final Warning Letter (STK)	3	14
Demotion	4	2
Termination of Employment	60	38
Total	76	60

CORPORATE CULTURE

BNI Corporate Culture is identified with “AKHLAK” which is a demand for BNI Hi-Movers Behavior, and consists of:

BNI's Work Culture known as “AKHLAK” as a guide to the behavior of BNI Hi-Movers

Core Values

Amanah, Kompeten, Harmonis, Loyal, Adaptif, and Kolaboratif

Code of Conduct

1. Keeping promises and commitments;
2. Being responsible with the duties, decisions made, and actions taken;
3. Upholding moral and ethical values;
4. Improving self-competence to respond to ever-changing challenges;
5. Helping others to learn;
6. Accomplishing duties with highest quality;
7. Respecting everyone regardless of their background;
8. Enjoys helping others;
9. Building conducive work environment;
10. Maintaining the reputation of fellow employees, leaders, SOE, and the State;
11. Willing to sacrifice to achieve a greater goal;
12. Obeying the leader as long as not against the law and ethics;
13. Promptly adjusting oneself to be better;
14. Continuously making improvements;
15. Being proactive;
16. Providing opportunities for various parties to contribute;
17. Being open in working together to generate added values;
18. Mobilizing the use of various resources for common goals.

Anti-Gratification & Anti-Bribery Policy

BNI's Good Corporate Governance and Code of Conduct implementation includes the Gratification Control and Anti-Bribery Management System (SMAP). As an initial stage in implementing the Gratification Control program, the President Director signed a "Gratification Control Commitment" witnessed by the Chairman of the Corruption Eradication Commission (KPK) on October 17, 2016, which was attended by the Board of Commissioners, Board of Directors, Senior Leaders, and Customers, Debtors, and Notaries.

Subsequently, a Gratification Control Unit (UPG) was formed and assigned to the Compliance Division. Gratuity Control Company Guidelines have been prepared and can be accessed by all BNI Hi-Movers through BNI ePP. The Company Guidelines (PP) for Gratification Control adds to BNI guidelines related to gratification provisions previously regulated in the BNI Code of Ethics.

As an effort to improve gratification and bribery control at BNI on August 11, 2020, BNI obtained ISO 37001: 2016 certification regarding the Anti-Bribery Management System (SMAP/Anti-Bribery) in the scope of Goods and Services Procurement in the PFA Division, and is currently in the process of expanding the scope of certification to the Corporate Segment Lending Activities. The acquisition of this certification shows that BNI has managed the gratification, bribery and whistleblowing control system well, in accordance with international standards and practices set by ISO.

ANTI-GRATIFICATION & ANTI-BRIBERY CONTROL MANAGEMENT

Since the signing of the Anti-Gratification commitment, BNI has implemented Gratification control in its operational activities. The Gratification Acceptance/Rejection was reported to BNI UPG and forwarded to KPK through the Online Gratification (GOL) application. The Compliance Division has also provided oral and written consultations on Divisions/Units/Units' questions regarding Gratifications.

At the beginning of each year, all BNI Hi-Movers sign an Employee Integrity Pact, one of the points being: "Not giving, promising and/or receiving rewards in any form to or from customers, funding or debtors, vendors, partners, partners and customers./or other parties, both external and internal."

Furthermore, BNI Hi-Movers hold an Anti- Gratification & Bribery Declaration, as a reminder to all employees to report every gratification they receive to the Gratification Control Unit (UPG) as well as sanctions that will be imposed on employees for violating BNI gratification provisions.

In an effort to digitize paperless gratification reporting, since December 2018, BNI Hi-Movers can report gratification through the Compliance Information Management System (CIMS) portal at www.cims.bni.co.id Implementation instructions and technical instructions related to this report can be accessed through the BNI ePP and the BNI Forum.

ANTI-GRATIFICATION CONTROL WORK PROGRAM & ANTI-BRIBERY MANAGEMENT SYSTEM

Socialization and education on Gratification & Anti-Bribery has been carried out through webinars, the bni.co.id website, print media, and BNI internal media including BNI Forum, BNI Digi-HC, BNI Menyapa e-mail, Instagram Quickpose and Instagram BNI46. The activities carried out by UPG BNI during 2021 were as follows:

1. Awarding “Employees of Integrity” signed by the Director of Human Capital & Compliance (DIR. HC) to Active Gratification Reporters;
2. Showing the AKHLAK video series with the theme “BNI Hi-Movers Reject Gratification and followed by an employee understanding test;
3. Appeal to all Directors, Divisions/Units/Heads and Regional Offices not to give/accept gratification related to the religious holiday (Chinese New Year, Eid Al-Fitr & Christmas) was also broadcasted through the BNI Forum Application which can be accessed by all employees;
4. Socialization of Gratification Control and SMAP in Sharing Sessions on the C-1 Integrity Topic attended by all Division/Unit/Unit Leaders;
5. Socialization to all Head of Regions (HoR) throughout Indonesia regarding Gratification Control & Anti-Bribery Management System in Operational Risk Control Training for Regional Leaders;
6. Completing the Gratification and Anti-Declaration in the BNI Digi-HC Application as a reminder to all employees of the reporting obligations and provisions for gratification control at BNI;
7. Reporting any Acceptance and/or Rejection of Gratification for QI 2021 to QIV 2021 through memos to all Divisions/Units/Regions and broadcast in the BNI Forum;
8. Appeals related to Accepting and Giving Gratification on religious holidays (Imlek, Eid al-Fitr & Christmas) to BNI stakeholders through posters, the bni.co.id website and national mass media;
9. Mandatory webinar for all BNI Hi Movers on Good Corporate Governance – Anti-Bribery Management System (SMAP) delivered by the Gratification Control Unit (UPG) & Consultants;
10. Mandatory webinar for all BNI business partners/Partners regarding the Anti-Bribery Management System (SMAP) including Gratification Control material through BNICorpu Live Youtube, attended and witnessed by all business partners/partners and BNI Hi-Movers;
11. Videos & digital banners installed at BNI offices and on the BNI website related to the Anti-Bribery Management System (SMAP) and the commemoration of World Anti-Corruption Day (HAKORDIA) as a means of socialization to internal and external parties;
12. A webinar with the theme “Socialization on Prevention of Corruption in the Banking Sector”, was delivered by the Chairman of the Corruption Eradication Commission (KPK) and was attended by the entire Board of Commissioners, Board of Directors, Senior Leaders and all BNI Hi-Movers;
13. Submission of materials and questions on Gratification Control and Anti-Bribery as a Daily Exercise Employee Program (DEEP46) accessed by all BNI Hi-Movers through the BNI SMARTER & Digi-HC Application;
14. Submission of Anti-Corruption Program materials at the 2021 Anti-Corruption Counselor and Integrity-Building Expert Action Meeting (TAPAKSI-API) with the theme “Uniting Collaborative Action for Indonesia” organized by KPK on December 16, 2021;
15. Socialization of Gratification Control and Anti-Bribery to all PFA Vendors in the Vendor Gathering event on December 17, 2021;
16. Video showing the President Director’s Appeal regarding Gratification in Commemoration of Christmas & New Year’s Day via BNI Menyapa, Instagram Quickpose, BNI digital communication media and E-Sinergi magazine.

GRATIFICATION CONTROL MONITORING & EVALUATION BY KPK

BNI's Gratification Control Unit (UPG) reports the Gratification Control Program results to the Corruption Eradication Commission (KPK) on a quarterly basis, then the KPK conducts an assessment of gratification control based on 12 predetermined criteria.

BNI UPG was the only state-owned bank that received a perfect score for this assessment.



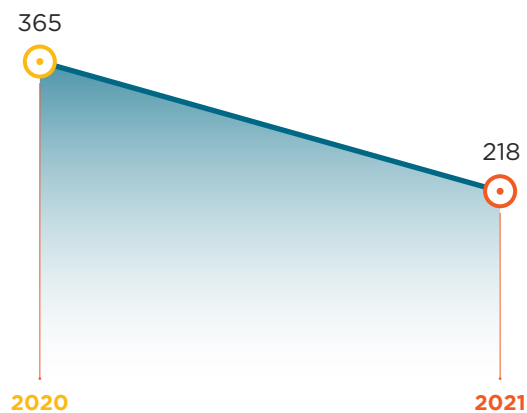
GRATUITY REPORT 2021

The acceptance/rejection of gratification report is submitted by the reporter (BNI employee) to the Compliance Division, and then forwarded to KPK through the Online Gratification (GOL) application. Reports of acceptance/rejection of gratification submitted by the Reporting Party have been forwarded to the KPK within an average reporting period of no later than 3.5 working days from the deadline of 30 working days.

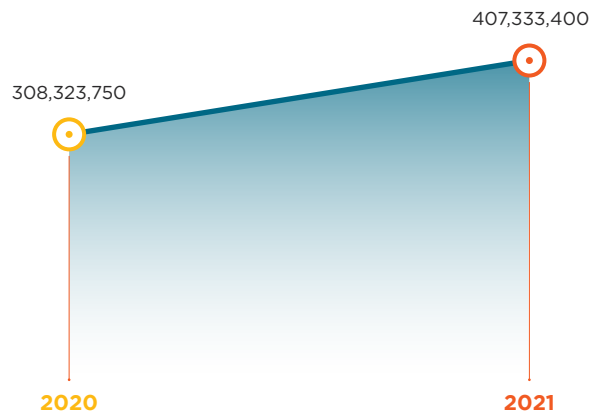
The following shows the trend of BNI gratification reporting in the last 2 (two) years:

BNI Gratification Reporting Trends for 2020-2021

Gratification Reporting Frequency



Gratification Reporting Amount



In 2021 the gratifications reported by UPG decreased by 40.3% from 365 reports in 2020 to 218 reports in 2021, while the reporting nominal increased by 32.1%, from Rp308,323,750 in 2020 to Rp407,333,400 in 2021.

Violation Reporting System

To implement the Good Corporate Governance and Code of Conduct principles by all Bank employees, the Company's management is committed to running the Company professionally based on Company behavior in accordance with the Code of Ethics and work culture, in order to realize good corporate governance. Therefore, the Company has developed a Whistleblowing System (WBS).

WHISTLEBLOWING SYSTEM PURPOSE

The Whistleblowing System (WBS) with the name of "WBS to CEO" is an early detection mechanism for any occurrence of a violation in BNI that can cause financial losses, including matters that can damage BNI's image. WBS management is carried out in collaboration with an external party, namely Deloitte. WBS is a commitment to create a clean and integrity work environment through the active participation of BNI Hi-Movers in reporting violations that occur within BNI.

WHISTLEBLOWING SYSTEM MANAGEMENT

The person in charge for WBS at BNI is the President Director, assisted by the Managing Director Compliance and Corporate Risk, carries out the duties as the person in charge of WBS, and the President Director has appointed the Compliance Division Head as the WBS Manager. The WBS Manager is the person in charge of WBS implementation at BNI and is responsible to the President Director through the Vice President Director. In carrying out these functions, the WBS Manager is assisted by BNI WBS Officers with the competence and integrity to carry out WBS daily activities. The BNI WBS Officer appointments are carried out by the President Director and/or the Company's Compliance and Risk Director upon the recommendation of the WBS Manager.

WBS Manager Duties and Authorities include:

WBS Manager Duties

1. Managing the implementation of the WBS;
2. Coordinating the handling of follow-up on reports received through the WBS;
3. Coordinating the provision of protection to Whistleblowers through related units both at the Head Office and outside the Head Office;
4. Monitoring the handling of report completion received in the WBS;
5. Conducting evaluations and corrective actions on the effectiveness of BNI's WBS.

WBS Manager Authorities

1. Providing recommendations to the WBS Person in Charge concerning follow-up report handling;
2. Determining follow-up on reports, especially reports where follow-up decisions are under the authority of the WBS Manager;
3. Providing proposals to the Person in Charge of WBS regarding requests for Whistleblower protection;
4. Taking other necessary actions for the implementation of the WBS.

SUBMISSION OF VIOLATION REPORTS

Reporting violations through WBS can be made by means of:

Telephone	:	021-57853377
E-mail	:	bni-transparan@tipoffs.com.sg
Surat	:	BNI Transparan PO BOX 2646/JKP 10026
Website	:	http://bni-transparan.tipoffs.com.sg
SMS/Whatsapp	:	081-1970-1946

COMPLAINT HANDLING

Handling complaint reports through WBS, involves:

- The WBS consultant team sends an e-mail to the BNI WBS Manager and/or the appointed BNI WBS Officers regarding any new disclosure reports entering the e-room.
- The timeframe for providing feedback on the follow-up to the disclosure report is as follows:
 - a. First response: no later than 15 (fifteen) working days after the disclosure report enters the e-room;
 - b. Subsequent responses: end of each month following the first response.
- To maintain independence, if there is a violation report that mentions the name or involves a member of the e-room, the e-room member cannot access the e-room.

PROTECTION FOR WHISTLEBLOWERS

The first protection for whistleblowers is the confidentiality of their identity and reports submitted by the whistleblower. The form of protection for whistleblowers is adjusted to the form of threats/actions received. Protection is provided with due observance of the principle of confidentiality and related provisions applicable to BNI.

TYPES OF REPORTABLE VIOLATIONS

Reports submitted through the WBS are reports of violations as follows:

Fraud

Fraud is dishonest or deceptive acts including, fraud, extortion, forgery, concealment or destruction of documents/ reports or using fake documents, committed by a person/group of people that causes potential loss or real loss to the company.

Violation Regulations/Laws

Violation acts subject to sanctions according to applicable internal and external legal provisions.

Conflict of Interest

A situation where members of the Board of Directors, members of the Board of Commissioners, committee members, permanent/non-permanent/ outsourcing employees (BNI Hi-Movers) due to their position, or authority at BNI have personal interests that can objectively influence the duties mandated by BNI, resulting in a conflict between personal and/or group and/or family interests and the economic interests of BNI.

Bribery/Gratification

Receiving something in any form, and regardless of the amount/value, from other parties related to their position/ authority/responsibility at BNI.

Unethical Conduct

Acts or actions taken by BNI Hi-Movers that cannot be justified ethically, such as violations of the BNI Code of Conduct.

WHISTLEBLOWING SYSTEM SOCIALIZATION

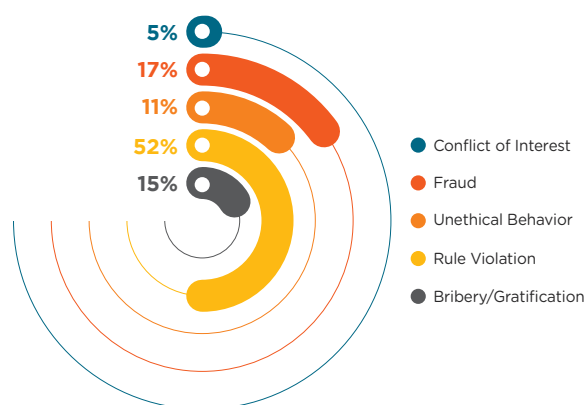
WBS socialization is carried out both online and offline on an ongoing basis to Branch/Region/Division employees, new employees, Worker's Union. In addition, WBS socialization is carried out through videos, posters and other BNI internal media (e-synergy, bulletins, Instagram) to increase employee understanding and concern for reporting violations through WBS so as to create a clean and integrity work environment.

NUMBER OF COMPLAINTS

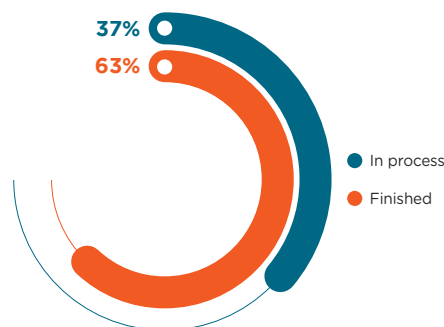
As of December 31, 2021, 54 (fifty four) reports of alleged violations were received through WBS with most complaints via email. Violation reports are followed up using a research process conducted by the Internal Control (KI) and/or by the Internal Audit Unit (IAU).

SANCTIONS/FOLLOW-UP ON COMPLAINTS IN 2021

Type of Violation



Report Status



Complaints reported through WBS are always followed up by BNI management. Reports that are proven to be true based on an examination are followed up with administrative sanctions in the form of giving warning letters up to and including termination of Employment (PHK) and other management actions including transfers and counseling.

63% of complaints received during 2021 were completed by Internal Control or the Internal Audit Unit, and for reports completed and proven to be violations, BNI gave strict sanctions according to the weight of the error, including laying off 8 employees who were proven to have acted fraudulently.

WBS reports still in the process of being examined are conveyed to the complainant through the WBS system.

Internal Fraud

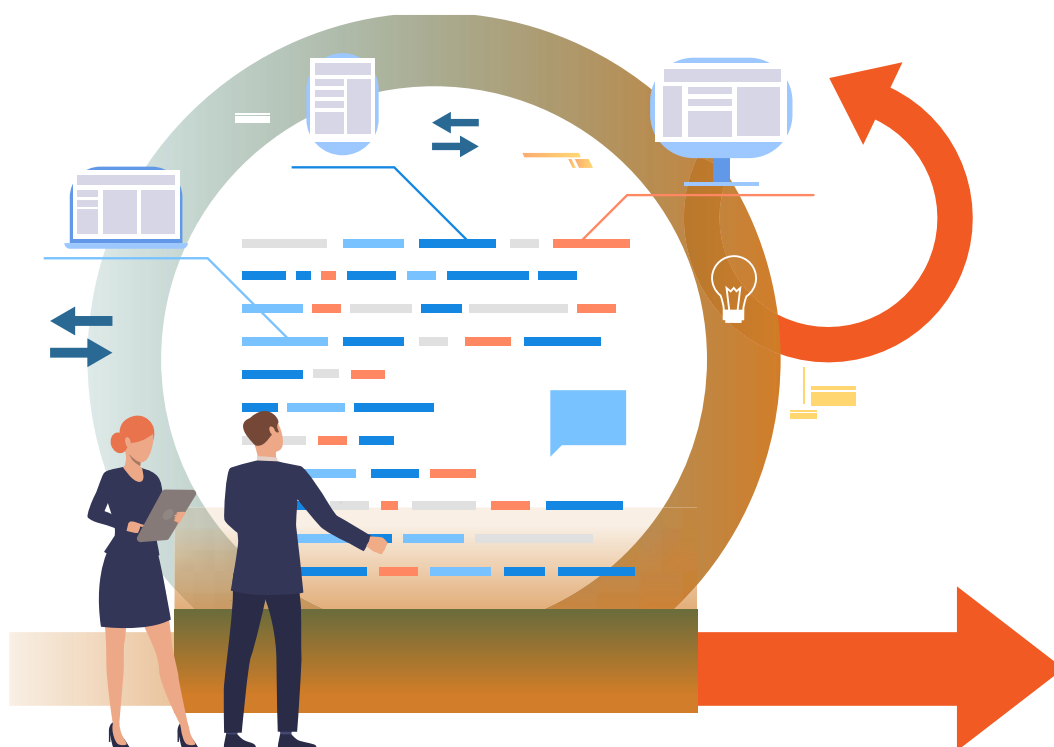
Internal Fraud is a deviation/fraud committed by the Management, permanent and non-permanent employees (honorary and outsourcing) related to the Bank's work processes and operational activities that affect the financial condition of the Bank.

Information on the number of internal fraud cases in 2021 can be seen in the table as follows:

INTERNAL FRAUD WITHIN 1 YEAR	NUMBER OF CASES COMMITTED BY					
	MEMBERS OF BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS		PERMANENT EMPLOYEES		NON -PERMANENT OFFICERS AND MOBILE WORKFORCE	
	2021	2020	2021	2020	2021	2020
Total Fraud	0	0	9 Fraud	6 Fraud	3 Fraud	2 Fraud
Resolved	0	0	9 Fraud	6 Fraud	3 Fraud	2 Fraud
In progress of internal resolution	0	0	0	0	0	0
Resolution not started	0	0	0	0	0	0
Processed through legal channel	0	0	4 Fraud	3 Fraud	1 Fraud	1 Fraud

Remark:

Internal fraud cases with more than Rp100 million loss



Provision of Funds to Related Parties and Large Exposure

BNI already has policies and procedures regarding the Legal Lending Limit (LLL), lending to Related Parties and also policies that govern credit limits per industry sector, together with monitoring and settlement. BNI periodically conducts Credit Procedure Committee and Credit Policy Committee meetings as well as Board of Directors Meetings to discuss matters related to credit policies, procedures and operational activities.

To ensure that the provision of funds to related parties and large exposures is in accordance with the principle of prudence, BNI has an internal control system as follows:

1. Established policies and procedures in the process of granting credit;
2. Conducting Ex-ante reviews in the process of providing new and additional loans with a nominal >Rp5 billion in the form of Credit Compliance Review (C2R) on the proposed Credit Application Tool (PAK) submitted by the Compliance Work Unit and in the process of procuring goods and services with a nominal value of Rp1billion in the form of Procurement Compliance Review (PCR);
3. Ex-post reviews are carried out by the Compliance Work Unit and the Internal Audit Work Unit;
4. Provision of funds to related parties need approval from the Board of Commissioners;
5. Provision of large funds needs approval from the management and for certain amounts must be consulted with the Board of Commissioners;
6. IAU conducts assessment of credit centers based on risk assessment to ensure the adequacy of risk management and internal control, including in the credit granting process.

In applying the provision of funds by the Bank to related parties or for large exposures:

1. Management pays attention to the provision of large credit amounts, through the provision of funds to debtors through the Internal Rating System (corporate, commercial, and small business), Loan Portfolio Management, Loan Exposure Limits (per segment, per economic sector and per regional), LLL (for internal BNI through Internal House Limit), and Country Exposure Limit;
2. Total capital and CAR ratios are always reported to Management and all units in order to have guidelines in carrying out bank business activities, especially those concerning the provision of funds.

Submission of reports to BI has been carried out in accordance with applicable regulations. The amount of funds available to related parties can be seen in the table below:

FUNDS AVAILABLE	TOTAL	
	DEBTORS	NOMINAL (RP-MILLION)
To Related Parties	364	5.151
To Individual and Group Debtors	20	176.552

Providing Loans to Related Parties

In accordance with the Republic of Indonesia Financial Services Authority Regulation No. 32/POJK.03/2018 dated December 27, 2018 concerning the Maximum Limit for Loans and Provision of Large Funds for Commercial Banks, as amended by POJK No. 38/POJK.03/2019 dated December 19, 2019, Article 5 states, that the entire portfolio of Provision of Funds to Related Parties with Banks is set at a maximum of 10% (ten percent) of the Bank's Capital. The definition of Provision of Funds is the investment of Bank funds in the form of, loans, securities, placements, claims for securities purchased with agreements to resell (reverse repo) and others.

BNI's policy concerning the provision of loans to related parties at is stated in the Company's Guidelines No. IN/551/PGV/002 dated July 22, 2021, which stipulates that the Bank is prohibited from providing Provision of Funds (hereinafter referred to as "Lending") to Related Parties without the Board of Commissioners' approval.

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 19 December 2019, includes:

- a. Individuals or companies controlling the Bank;
- b. Legal entities in the event that the Bank is the controller;
- c. Companies in the case relate to individuals or Companies as referred to in letter a as a controller;
- d. Members of the Board of Directors, Board of Commissioners, and Executive Officers of the Bank; An Executive Officer is an official directly responsible to the Board of Directors or has a significant influence on the Bank's policies and/or operations, including the Division Heads, Regional Office Heads, Branch Office Heads, Functional Office Heads whose position is at least equal to the Branch Office Heads, Risk Management work unit Heads, Compliance work unit Heads, and Internal Audit work unit Heads and/or other equivalent officials;
- e. Parties who have familial relationships horizontally and vertically:
 1. From an individual who is controlling 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. Familial relationships horizontally or vertically, include:
 - Biological/step/adoptive parents;
 - Step/adoptive Siblings;
 - Biological/step/adopted children;
 - Biological/step/adoptive grandparents;
 - Biological/step/adopted grandchildren;
 - Siblings/steps/adoptive from parents;
 - Husband or wife;
 - Parents in law;
 - Husband or wife of biological/step/adopted children.
- f. Members of the Board of Directors and/or Board of Commissioners, in the Companies referred to in letter a, b and/or c;
- g. Companies whose members of the Board of Directors and/or Board of Commissioners are members of the Bank's Board of Commissioners;
- h. Companies/entities with 50% (fifty percent) or more of the members of the Board of Directors and/or Board of Commissioners, are Directors and/or Commissioners in the Companies referred to in letter a, b and/or c;
- i. Companies/entities where:
 1. Members of the Board of Directors, Board of Commissioners, and/or Executive Officers of the Bank as referred to in letter d. act as controllers; and
 2. Members of the Board of Directors and/or Board of Commissioners in the parties as referred to in letter a, b and/or c act as controllers;
- j. Collective investment contracts where the Bank and or the parties referred to in letters a. to i. own 10% (ten percent) or more shares in the Investment Manager of the collective investment contract;
- k. Companies that have financial relationships with the Bank and/or parties as referred to in letter a. up to the letter i; Financial relationships include:



1. There is financial assistance from the Bank and/or Related Parties or financial assistance to the Bank and/or other Related Parties with requirements that cause parties providing financial assistance to be able to determine (controlling influence) the strategic policies of Companies receiving financial assistance;
 2. There is a significant business chain linkage in the business operations of the Bank or Related Parties with other Companies so there is dependence between one party and another which can result in:
 - One party being 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 disruptions making it difficult to meet obligations; and/or
 3. There is a transfer of loan risk through a guarantee where the guarantee party will take over part or all of the financial risk from the guaranteed party.
- l. The borrower is an individual or a non-bank company with financial relationships through the provision of guarantees to parties as referred to in letters a to k;
 - m. The borrower has financial relationships through guarantees provided by the parties as referred to in letters a to k;
 - n. Other Banks have financial relationships through providing guarantees to parties as referred to in letters a to letter k in the event that there is a counter guarantee from the Bank and/or parties as referred to in letters a to letter k to the other Bank; and
 - o. Other companies where there is an interest in the form of share ownership of 10% (ten percent) or more individually or jointly, from the parties as referred to in letter e.

Provision of Loans to debtors who are not Related Parties that are channeled and/or used for the benefit of the Related Party are classified as Providing Loans to Related Parties.

Provision of Funds for Social and Political Activities

BNI has a policy that prohibits BNI employees from becoming members and/or donors of political parties. During 2021, there was no funding for political activities. Sedangkan dana yang telah dikeluarkan dalam aktivitas sosial melalui Program Tanggung Jawab Sosial dan Lingkungan sepanjang tahun 2021 sebesar Rp93,23 miliar.

Procurement of Goods and/or Services

BASIC PRINCIPLES AND ETHICS OF PROCUREMENT OF GOODS AND/OR SERVICES

The Bank's procurement of goods and/or services basic principles are as follows:

- 1. Efficient:** goods and/or services procurement must be endeavored to obtain optimal and best results in the shortest amount of time by spending minimum funds and capability in a reasonable manner and not solely aimed at getting the lowest price.
- 2. Effective:** goods and/or services procurement must be in accordance with the predetermined requirements and provides the maximum benefit in accordance with the targets set.
- 3. Competitive:** goods and/or services procurement must be open to all Goods and/or Services Providers that meet the qualifications, and is performed through fair competition between equal Providers of goods and/or services that meet certain conditions/criteria based on clear and transparent rules and procedures.
- 4. Transparent:** goods and/or services procurement provisions and information regarding, including procurement administrative technical requirements, evaluation procedures, evaluation results, determination of prospective suppliers of goods and/or services, are open to all qualified goods and/or services providers.
- 5. Just and Fair:** all prospective Goods and/or Service Providers who meet the requirements must receive an equal treatment.
- 6. Open:** goods and/or services procurement can be pursued by all prospective goods and/or services providers that meet the requirements.
- 7. Accountable:** must achieve the target and can be accounted for so as to stay away from potential misuse and irregularities.

Ethics in implementing the Procurement of Goods and/or Services at BNI are as follows:

1. Carrying out tasks in an orderly manner, with a sense of responsibility to achieve the Procurement of Goods and/or Services goals, smoothness, and accuracy of objectives;
2. Working professionally, independently, and maintaining information confidentiality which by its nature must be kept confidential to prevent irregularities in the Goods and/or Services Procurement;
3. Not influencing each other, either directly or indirectly, resulting in unfair business competition;
4. Accepting and being responsible for all decisions made in accordance with the written agreement of the parties concerned;
5. Avoiding and preventing conflicts of interest with related parties, either directly or indirectly, which may result in unfair business competition in the Goods and/or Services Procurement;
6. Avoiding and preventing wastage and leakage of state/company finances;
7. Avoiding and preventing abuse of authority and/or collusion; and/or
8. Not accepting, not offering, and not promising the giving or receiving of gifts, rewards, commissions, rebates, and anything from or to anyone who is known or reasonably suspected to be related to the Goods and/or Services Procurement.

METHODS OF PROCUREMENT OF GOODS AND/OR SERVICES

The procurement of goods and/or services at BNI is carried out through the Tender, Limited Tender, Direct Appointment, Direct Procurement and Self-Management methods.

The criteria for the procurement method are as follows:

Tender	<ol style="list-style-type: none"> 1. Procurement of goods and/or services announced widely and openly must have at least 2 vendors of goods and/or services. 2. If necessary, the following can be done: <ol style="list-style-type: none"> a. Written notification to the association of providers of goods/services/principals; b. Sending Tender invitations to partners who potentially meet the requirements. 3. Followed by at least 3 (three) vendors who register and fulfill the requirements in the tender announcement. 4. The price negotiation process is carried out using the e-auction module unless it is not possible to do so. 5. For certain needs, more than 1 (one) vendor of goods and/or services may be appointed.
Limited Tender	<ol style="list-style-type: none"> 1. Procurement of goods/services offered to several parties is limited to a value determined by the Company. 2. If needed, it is possible to invite potential participants by way of announcements. 3. At least 2 (two) candidates who meet the requirements.
Direct Appointment	<ul style="list-style-type: none"> • Goods and services needed for BNI's main performance and cannot be delayed (business critical assets). • There is only one Provider who can carry out work according to user requirements, or in accordance with the provisions of prevailing laws and regulations. • Goods and services that are knowledge intensive in which to use and maintain these products requires continuity of knowledge from the Provider. • If the Procurement using a Tender or Limited Tender method has been carried out 2 (two) times and does not find a Provider, or there is no party meeting the criteria, or no parties participating in the Tender. • Goods and services owned by holders of Intellectual Property Rights (IPR) or who have warranties from Original Equipment Manufacturers. • Emergency management for security, community safety, and company strategic assets. • Procurement of goods and/or services that constitute a purchase or re-procurement (repeat order). • Emergency management due to local and national natural disasters (force majeure). • Additional or continuing work that cannot be avoided in the context of completing the procurement of goods and/or services. • Providers of goods and/or services are BUMN, BUMN Subsidiaries or BUMN Affiliated Companies as long as the goods and/or services referred to are products or services from BUMN, BUMN Subsidiaries, BUMN Affiliated Companies and/or small and micro businesses and as long as they are of quality, prices, and purpose, and can be justified. • Consultants not planned in advance to deal with certain problems where the work must be carried out immediately and cannot be delayed. • Procurement of goods and or services with a defined value determined by the Company.
Direct Procurement	<ol style="list-style-type: none"> 1. By way of Direct Procurement of the Provider or direct seller. 2. Can be done without a Work Order (SPK) or Contract. 3. Procurement of goods and/or services with a certain value can be carried out using the Direct Procurement Method if it fulfills one of the following conditions: <ol style="list-style-type: none"> a. Items are specially designed/created/made by a certain party or have artistic value/art work, including sculptures, paintings, handicrafts; or b. Subscription goods (subscription/membership) based on the results of studies that can be accounted for, including gardner, forrester; or c. Procurement is carried out based on widely published public tariffs, including electricity, telephone/communication, clean water, fuel oil, gas fuel; or d. Procurement is carried out in accordance with established business practices, including: hotel fees, transportation tickets.
Self-management	<ol style="list-style-type: none"> 1. Renovation work of buildings/offices, repairs/maintenance of equipment/furniture. 2. Swakelola is implemented for work that is incidental and/or simple and easy to supervise/monitor. If the work is carried out by contract or daily workers, it must be by individuals. 3. Procurement by means of Swakelola must obtain prior approval from the Head of the implementing unit. 4. Type of Self-Management: <ol style="list-style-type: none"> a. All activities carried out by BNI employees; or b. Some work can be done through piece rate, daily/weekly; or c. Some work can be assisted by individual experts (consultants). 5. To meet the needs of materials, tools, and/or experts who are not available at BNI, the Procurement process still refers to the Procurement method in accordance with the provisions stipulated in points 1, 2, 3 and 4. 6. Self-management procurement is carried out with a certain value.

GENERAL PROCUREMENT OF GOODS & SERVICES



PROCUREMENT THROUGH ELECTRONIC PROCUREMENT (E-PROC) APPLICATION

As one means to support BNI's digital banking transformation strategy in the context of facing business competition, increasing stakeholder satisfaction and GCG principles. Since 2017 BNI has used the Electronic Procurement (e-Proc) Application to procure goods and services, in the form of Procurement Management, Vendor Management, Contract Management and Payment Management modules.

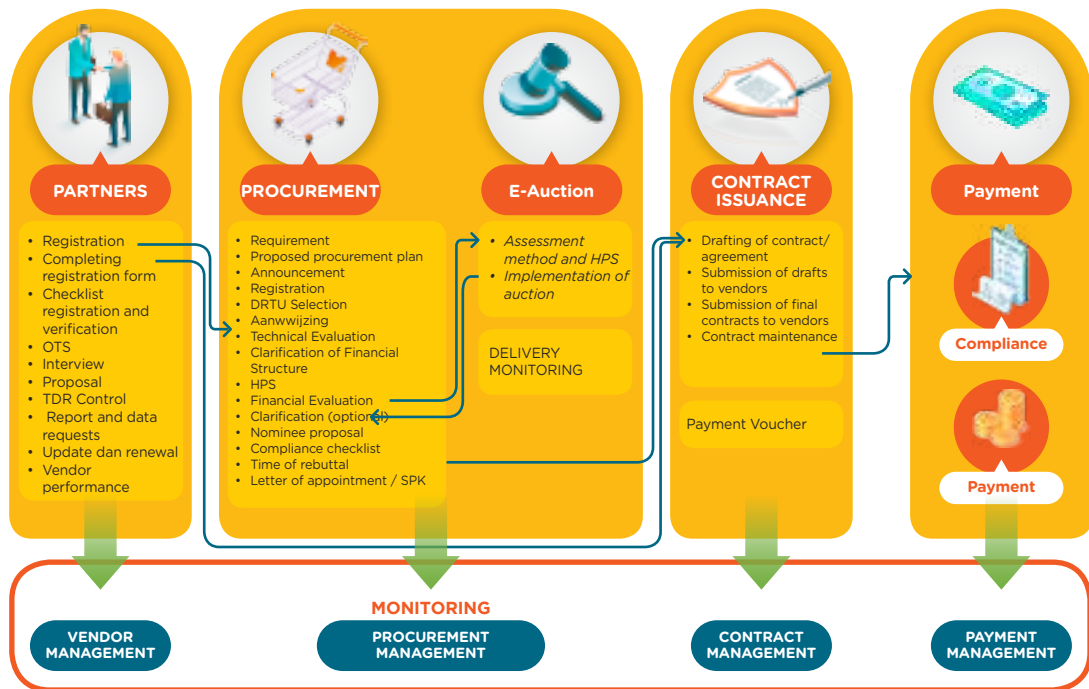
The e-Proc Application (<https://e-proc.bni.co.id>) ensures that the procurement process can be carried out through a digital process. Using e-procurement modules, both Participants, Committees and Administrative Officers who process procurement are digitally connected in an end-to-end platform, starting from partner registration, procurement process recipients to contracts and payments. The e-Proc Application, guarantees an efficient, accountable, effective, competitive, transparent, open procurement process with maintained governance.

Procurement through the Electronic Procurement (E-Proc) application



PROCUREMENT PROCESS THROUGH ELECTRONIC PROCUREMENT (E-PROC) APPLICATION

BNI E-Procurement



ISO 37001:2016 ANTI-BRIBERY MANAGEMENT SYSTEM



SNI ISO 37001:2016 (Anti-Bribery Management System within the scope of Goods and Services Procurement in the Asset Management and Procurement Division) Anti- Bribery Management System (Procurement of Good and Services at Procurement and Fixed Asset Division), obtained by BNI on August 11, 2020.

PT Bank Negara Indonesia (Persero), Tbk in carrying out all of its activities, carries out its duties and work properly, correctly and responsibly and applies AKHLAK as the main BUMN value, Prinsip 46, BNI Code of Ethics, and complies with internal company regulations, laws and regulations. and prevailing laws and regulations as well as the Good Corporate Governance principles and is committed to:

1. Carrying out Honest Willing and Sincere Behavior as well as being disciplined, consistent and responsible and implementing laws and regulations and internal regulations related to the Anti-Bribery Management System in every action and decision making;
2. Being firm against all forms of bribery to realize good corporate governance and being free from all forms of corruption, collusion and nepotism (KKN);
3. Playing an active role in ensuring the implementation of the Anti-Bribery Management System, including reporting suspected anti-bribery policy violations in accordance with the applicable mechanism at PT Bank Negara Indonesia (Persero), Tbk.;
4. Willing to accept sanctions set by the Company if proven to have violated the anti-bribery policy.

To support this commitment, the Company has established the anti-bribery compliance function as an independent function, to develop, oversee the implementation and encourage continuous improvement of the Anti-Bribery Management System, as well as to take firm action in accordance with its authority for violations of the Anti-Bribery Management System.

This Anti-Bribery management system policy is communicated and socialized to PT Bank Negara Indonesia (Persero) Tbk and other stakeholders to ensure Good Corporate Governance, free from Corruption, Collusion and Nepotism (KKN), and periodic reviews carried out in accordance with the Company's commitments.

ISO 30301: 2019 RECORDS MANAGEMENT SYSTEM



In an effort to improve the quality of archive management according to international standards and support operations in terms of the Archives Management System, BNI initiated the ISO 30301:2019 Archives Management System certification with the scope of BNI Record Center (BRC) Cikupa - Main Building. With the acquisition of the ISO 30301:2019 BNI Records Management System Certification on October 21, 2020, the Archives Management System policies are as follows:

1. Responsible for providing Records Management Targets in accordance with BNI's vision and mission;
2. Responsive in providing excellent service and making continuous improvements to improve the implementation of the ISO 30301:2019 Archives Management System effectively and efficiently;
3. Careful in complying with all laws and regulations related to archive management at the BNI Record Center.

In 2021, the first year of Surveillance Audit was carried out and BNI managed to maintain the ISO 30301:2019 Archive Management Certification.

BNI RECORD CENTER (BRC) CIKUPA

The BNI Archives Unit has a Record Center in the Cikupa area, Tangerang which is one of the largest Record Centers owned by BNI, with an area of 3.4 hectares and a total building area of 1.3 hectares and has a storage capacity of 337,200 boxes.

BRC Cikupa BNI's achievements in archive management:

4. Is a BUMN in the banking category that was the first to get Archival Accreditation with an "A" (Special) Grade from the National Archives of the Republic of Indonesia (ANRI);
5. Received the 2nd place title in the Best National Archives Unit Competition for the BUMN category organized by ANRI;
6. Become a study destination for imitating institutions/institutions both from government and private, including: BRI, Bank Mandiri, BTN, Bank DKI, BJB, Police Headquarters, Pelindo III, Pertamina, Ministry of Energy and Mineral Resources, Bank Panin, Bank Danamon, Bank Bukopin, Bank Muamalat, Sinar Mas Bank.

ISO 9001: 2015 QUALITY MANAGEMENT SYSTEM AT HPS SECTION (SELF ESTIMATED PRICE)



In order to improve the quality in managing the Self Estimated Price (HPS), BNI has initiated the implementation of international service standardization through ISO 9001:2015 (Quality Management System) certification. By obtaining the said certification on November 2, 2020 then Self-Estimated Price Management Quality Policy, to be a reliable service provider by customers by providing reasonable prices, on time, complying with applicable laws and regulations and striving to make continuous improvements to improve service quality.

In 2021, in the first year a Surveillance Audit was carried out, BNI managed to maintain the ISO 9001:2015 (Quality Management System) Certification.

ISO 9001: 2015 QUALITY MANAGEMENT SYSTEM FOR VENDOR MANAGEMENT



In order to improve the quality of management vendor management according to international standards, BNI initiated the ISO 9001:2015 Quality Management System certification for Vendor Management. By obtaining the certification referred to on November 12, 2020, BNI is committed to becoming a reliable vendor service provider in supporting the procurement process for goods and/or services by providing recommendations for quality and best vendors in their fields and continuously making continuous improvements to improve the quality of services.

In 2021, the first year of Surveillance Audit was carried out and BNI managed to maintain the ISO 9001:2015 (Quality Management System) Certification.

OFFICE BUILDING MANAGEMENT

BNI's office buildings are managed by prioritizing Occupational Health and Safety (OHS) and prioritizes the Health and safety of all employees/guests/customers as well as shutting down building safety, resilience and readiness.

During the pandemic and adaptation to new habits (New Normal), 3 (three) aspects were carried out, namely:

1. Building Entrance Areas

- Checking body temperatures;
- Spraying disinfectant on the car door handles;
- Recommendations to vendors before doing work inside the building.

2. Building Facilities

- Several BNI buildings have been equipped with Face Recognition for security and prevention of the spread of the Covid 19 virus, and are equipped with a sophisticated Thermal Scanner for accurate body temperature measurement as a substitute for a Thermo Gun;
- Regularly cleaning and disinfecting work areas and public areas (disinfecting public facilities that are frequently touched by the public every 4 hours);
- Providing adequate and easily accessible hand washing facilities;
- Installing information media to remind employees/guests to follow the provisions on physical distancing and washing hands with soap with running water/handsanitizer and discipline using masks;
- Installing Signage to keep a distance of at least 1 meter in public places;
- Limiting physical distances to at least 1 meter by placing a special sign on the floor of congested

areas such as elevators, and other areas as a distance barrier between employees, setting the number of employees entering, to facilitate the implementation of maintaining distance and setting work desks, seating at a minimum distance apart of 1 meter;

- Making efforts to minimize contact with customers: by using barriers/partitions (eg flexy glass) on the tables as additional protection for employees;
- Preventing crowds by implementing a queuing system at the entrance and maintaining a minimum distance of 1 meter;
- Installing the PeduliLindung application as an effort to minimize the spread of the COVID-19 pandemic.

3. Building System

- Plumbing system, including inspection/cleaning of roof tanks and groundwater tanks to maintain water quality, and condition of GWT and RWT rooms that must always be locked, housekeeping and engineering (plumbing) teams flush toilets (sinks and urinals) on H-3, including opening faucets in the janitor and pantry, especially on the Owner/Tenant floors who previously applied WFH, inspection of sump pits, transfer pumps, booster pumps and cleaning of water features (ponds/fountains/swimming pools);
- HPAC system (Heating, ventilation, and air conditioning) including cleaning FCU/AHU filters and other indoor units, cleaning ducting and increasing the volume of clean air intake inside the building, including the basement.

Bank's Strategic Plan

REVISION OF BNI 2019-2023 CORPORATE PLAN

Covid-19 spread widely throughout most of the world in 2020 and the outbreak was categorized as a "Pandemic". The Covid-19 pandemic has created extraordinary conditions that have impacted all industrial sectors. These impacts include:

1. Economic downturn

When the Covid-19 Pandemic hit most of the world's regions, several world institutions such as the World Bank, IMF, S&P, Fitch, revised their global economic growth projections negatively in 2020. The Indonesian economy also experienced a negative correction, with the decline in economy resulting from the impact of an imbalance in economic demand and supply due to the lockdown policies in many regions of the world.

The economy has been improving since early 2021, supported by the mass vaccination program. With the vaccination program, it is hoped that the public will gain herd immunity against Covid-19, so their mobility will return to normal.

2. Banking industry conditions

The economic downturn impacted the banking industry. One of the significant impacts was the increase in banking risk, especially credit risk (NPL). This increase in credit risk was followed by a decrease in the demand for bank credit. This was the result of businesses experiencing difficulties due to decreased demand, as well as cash flow difficulties in paying loan installments due to non-current business ventures or even business closures.

The decline in credit demand was inversely proportional to Third Party Funds (DPK) that increased due to a downward trend in public consumption. This resulted in a decrease in the banking system Loan to Deposit Ratio (LDR), and a higher cost of funds (CoF) for Banks. The increasing CoF followed by a decrease in credit demand resulted in the banking NIM being under pressure. The decline in NIM was also stimulated by a gradual reduction in interest rates and is projected to remain stable at around 3%.

Pressure on banking NIMs, followed by an increase in credit risk, resulted in an increase in reserves for banking losses, resulted in a significant decline in banking profits in 2020.

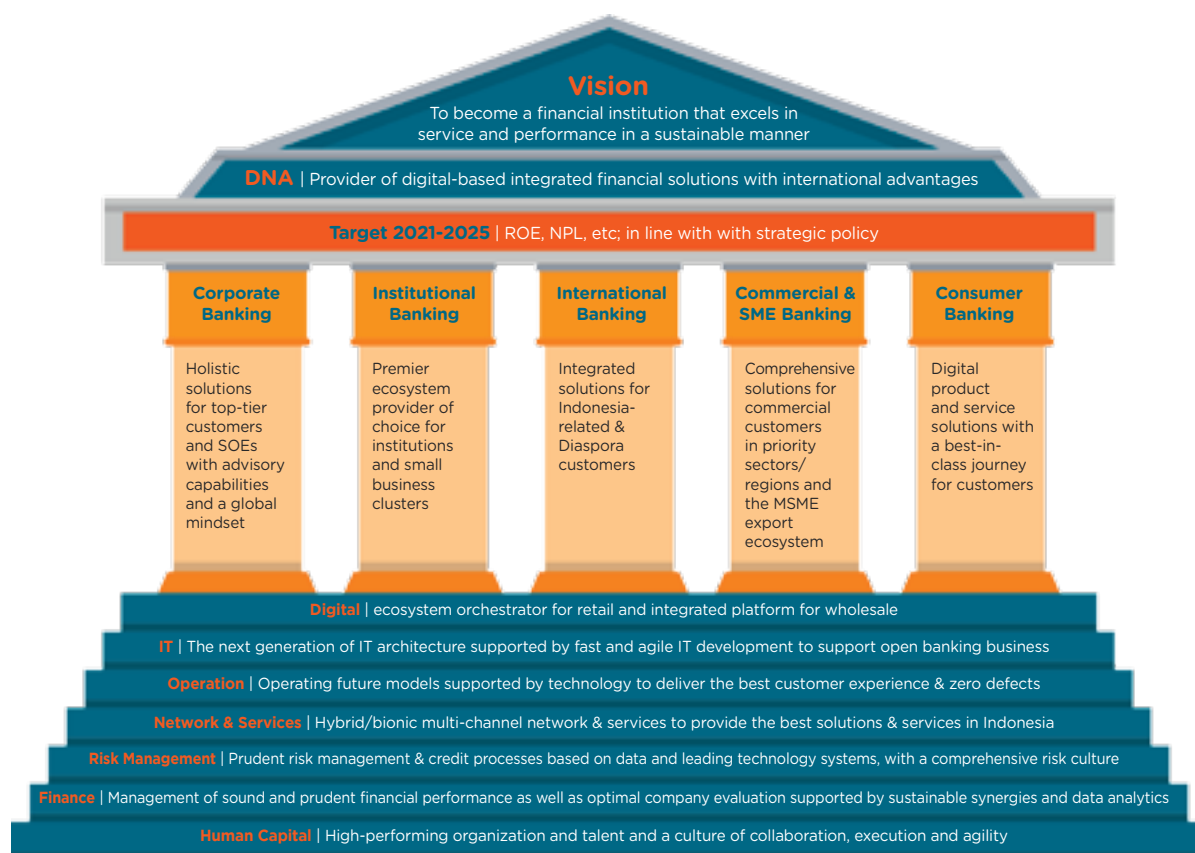
3. Changes in people's behavior

Restrictions on community mobility, especially in Indonesia in the form of PSBB and PPKM to suppress the spread of Covid-19, caused community business activities to decline. People started to make behavioral changes, with one most fundamental changes being the transaction behavior that changed from cash to cashless.

Through the "stay at home" policy, people were encouraged to transact their business through digital channels. The increasing number of people using digital channels saw an increase in digital attackers offering cashless transaction needs and solutions. In addition, the consumer loan business trend saw increased disbursements of Peer to Peer (P2P) lending.

Many companies responded to the impact of the Covid-19 pandemic by adjusting or fine tuning their strategic directions, including BNI. BNI reviewed its Corporate Plan and determined that the strategic direction and financial targets for 2021-2023 were no longer relevant to BNI's future business, so BNI needed to adjust to the changing external conditions.

During the Corporate Plan review, BNI also considered the fundamental conditions affecting the direction of its future strategies and targets, such as changes in the Indonesian banking landscape, the direction of the Ministry of SOEs, and changes in digital trends. BNI also paid attention to several internal conditions such as concerns for future improvements and improvements. Taking into account these conditions, BNI prepared a Revised Corporate Plan 2019-2023 (until 2025) with the following strategic directions:



To achieve its vision, BNI has set a value proposition to be achieved by 2025, as a provider of digital-based integrated financial solutions with international advantages, with targets set until 2025 in line with the annual Strategic Policy. To achieve this target, a strategy has been prepared for 5 (five) business pillars supported by 7 (seven) enablers. Each business pillar and enabler has an initiative strategy that will be developed and implemented starting in 2021 to support each pillar and enabler strategy achievement.

2021 STRATEGIC POLICY

Taking into account the external and internal conditions that occurred in 2020, and aligned with BNI's future strategic direction and targets as stated in the Revised BNI 2019-2023 Corporate Plan, BNI's 7 (seven) strategic policies in 2021 were::

1. Improve credit quality through improved risk management
Improving risk culture for all BNI employees through end-to-end transformation of the credit process, credit restructuring, optimizing the Remedial & Recovery process, and increasing employee capabilities.
2. Improve digital capability to meet customer needs
Developing digital-based innovations and solutions supported by increased data capabilities, partnerships through the use of API Management, blockchain platforms, and business process re-engineering.
3. Increase business expansion in a sustainable manner
Increasing credit expansion in the Top Tier industry, being selective in priority economic sectors, supply chain, and strengthening MSMEs.
4. Boost FBI and CASA through increased transactions
Strengthening CASA by offering total solutions and account optimization, and increasing business transactions through business ecosystem development, cross selling, and optimizing other channels.
5. Optimize network and international business by strengthening partnership cooperation
Increasing the Overseas Branch Offices (KCLN) role and productivity, and expanding partnerships to support international business development.

6. Optimize Subsidiary Contribution

Strengthening BNI Group synergy to support the position of Subsidiaries to become market leaders in each industry.

7. Optimize HC to support the Bank's business

Optimizing talent management and increasing employee capabilities related to credit processes, industry skills, global & digital mindset, and risk culture.

STRATEGIC POLICY AND TRANSFORMATION

In an effort to support the strategic direction of the 2019-2023 BNI Corporate Plan Revision and 2021 Strategic Policy during the Covid-19 Pandemic, BNI instigated improvements and business process innovations to answer several challenges faced in the banking industry through the BNI Corporate Transformation Program. Transformation initiatives developed by BNI in response to these conditions, included:

1. Credit quality improvement

The Covid-19 pandemic has indirectly seen debtors experience cash flow disruptions due to difficulties in paying obligations to banks, so the quality of bank loans has deteriorated. There needs to be policies and business processes for accelerating and improving loan quality. One of BNI's efforts to maintain debtor business resilience is through credit quality management, and BNI has made efforts to maintain credit quality by forming a LaR Optimization Management Team.

The LaR Optimization Management Team was formed with a focus on the management processes, decisions, action plans and monitoring of LaR debtors. The LaR Optimization Management Team is a liaison between Business as Usual (BaU), which focuses on managing and maintaining good debt, and Remedial Recovery (RR), which focuses on repairing non-performing loans or bad debt.

By implementing the LaR Optimization Management Team, BNI's loan quality was successfully maintained and improved. By December 2021, BNI's Gross NPL ratio has improved compared to the end of 2020, from 4.3% to 3.7% , an improvement of 0.5%. The same can be seen in the LaR ratio (incl. COVID-19) which improved by 5.4% (YoY) from 28.7% in December 2020 to 23.3% in December 2021. Following the improvement in loan quality, BNI's allowances for losses fell by 17.2%.

2. SME Exporter Hub (BNI Xpora)

To move the wheels of the Indonesian economy, the MSME businesses plays an important role in influencing and controlling the national economic condition. Almost all businesses in the Indonesian economy (>99%) are MSMEs who contribute 60.3% to state revenue, and who employ 97%.

On the other hand, BNI received directives from the Ministry of SOEs to support ean xpansion into international markets. To date, the MSME business has only contributed 14.4% of export transactions and has great potential for further development.

The SME Exporter Hub is BNI's effort to help MSMEs expand their market and gain access to global markets. This is in accordance with the Ministry of SOEs aspirations for BNI to focus on expanding the global market by helping local entrepreneurs penetrate into international markets.

Through BNI Xpora, BNI assists in providing integrated financial and non-financial solutions to MSMEs through 3 (three) stages, namely:

a. Go Productive

BNI provides solutions to increase MSME productivity by collaborating with start-ups and providing business management applications and digital financial reporting, collaborating with agencies and institutions in mentoring, training to increase MSME capabilities.

b. Go Digital

BNI facilitates MSME's use of digital technology through non-cash and advisory transaction solutions using a multi-channel approach with integrated digital platform support & digital activation in the form of telecommunication services and network connectivity.

c. Go Global

To penetrate the global market, BNI provides MSME assistance & development solutions, special advisory, access to international buyers by strengthening the role of Overseas Branch Offices (KCLN). One way is by partnering with global e-commerce, tradeclubs, and business matchmaking to bring together MSME customers with international buyers or suppliers by collaborating with partners who have a global reach.

To date, BNI has established 7 hubs in several cities, Jakarta, Bandung, Solo, Surabaya, Medan, Denpasar, and Makassar to capture the market potential of the MSME segment that has a business orientation towards the international market. The BNI Xpora ecosystem development has been enthusiastically received by businesses who are now recommending BNI Xpora services to other businesses. This positive signal has impacted the business performance and lending has increased by Rp2,485.71 million, with low-cost funds increasing by Rp2,239 million billion, and trade finance increasing by Rp2,328.56 million.

3. Capital Management - Additional Tier 1

Based on performance conditions in early 2021, BNI's capital (especially tier 1 capital) was less supportive in conducting business expansion. BNI's low core capital ratio was due to lower capital growth compared to RWA growth.

Several rating agencies were also concerned about the potential for lowering BNI's rating if BNI's capital was not strengthened. In general, the rating agencies stated that BNI's capital condition was at a limit that allowed the rating agencies to make corrections to BNI's rating.

The tier 1 capital strengthening strategy was carried out through Rights Issues and Additional Tier 1. Rights Issues will be carried out by BNI through the issuance of new shares in 2022. While Additional Tier 1 was carried out by BNI by issuing Tier 1 equivalent instruments, namely Perpetual bonds Additional Tier 1, in the 3rd quarter of 2021.

BNI became the first bank in Indonesia to carry out capital strengthening through Additional Tier 1 to strengthen BNI's capital structure. Investors are very enthusiastic about BNI's Additional Tier 1 product, as reflected by demand that exceeds supply (2.7x oversubscribed). In addition, BNI also managed to set a re-bid price with a yield of 4.3%. Additional Tier 1 BNI has upgraded BNI Tier 1 CAR of 140 bps to 17.8% in the third quarter of 2020. Until the fourth quarter of 2021, BNI was able to maintain its CAR at 19.7%.

Strategic initiatives in the BNI Corporate Transformation Program have implementation characteristics ranging from quick wins, mid term, long term, and enablers development. Strategic initiatives are possible to develop following changes in business direction and external conditions and to continue previous strategic initiatives to achieve BNI's future goals, so the strategic initiatives are multi-year and continuous.



Reporting Transparency

To fulfill the information disclosure principle that has important meaning for the public as a material consideration when making investment decisions, the Company submits and reports disclosure of information or material facts to the Financial Services Authority and announces the disclosure of such material information or facts to the public.

The Company conveys information to the public through the Company's website, the Integrated Electronic Reporting Facility for Issuers and Public Companies IDX and OJK, as well as the mass media.

REPORT	REPORT SUBMISSION DATE	REPORT SUBMISSION				REFERENCE
		OJK	IDX	WEBSITE	MASS MEDIA	
Changes in Audit Committee Members	January 7, 2021	✓	✓			OJK Regulation No. 55/POJK.04/2015 concerning Audit Committee Establishment and Work Guidelines
Monthly Securities Registration Position Report December 31, 2020	January 7, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Audit Committee Changes	January 26, 2021	✓	✓			OJK Regulation No. 55/POJK.04/2015 concerning Audit Committee Establishment and Work Guidelines
Consolidated Financial Statements Position December 31, 2020	January 30, 2021	✓	✓			<ul style="list-style-type: none"> OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Report OJK Circular Letter No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports jo. Regulation No. X.K.2 Attachment to Chairman of Bapepam and LK Decision No. Kep-346/BLJ2011 concerning Submission of Periodic Financial Statements of Issuers or Public Companies
Published Financial Report Position December 31, 2020	January 30, 2021	✓	✓			<ul style="list-style-type: none"> OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Report OJK Circular Letter No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports jo. Regulation No. X.K.2 Attachment to Chairman of Bapepam and LK Decision No. Kep-346/BLJ2011 concerning Submission of Periodic Financial Statements of Issuers or Public Companies
Submission of Annual Financial Report	February 3, 2021	✓	✓	✓		

REPORT	REPORT SUBMISSION DATE	REPORT SUBMISSION				REFERENCE
		OJK	IDX	WEBSITE	MASS MEDIA	
Affiliated Transactions	February 3, 2021	✓	✓	✓		<ul style="list-style-type: none"> OJK Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies
Announcement of Annual GMS for Fiscal Year 2020	February 9, 2021	✓	✓	✓	✓	OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Publication of Annual GMS for Fiscal Year 2020 Announcement	February 9, 2021	✓	✓	✓	✓	<ul style="list-style-type: none"> Article 23 paragraph (5) of the Company's Articles of Association OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Monthly Report of Securities Holder Registration Position January 31, 2021	February 10, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Summons to Annual GMS for Fiscal Year 2020	February 24, 2021	✓	✓	✓	✓	<ul style="list-style-type: none"> Article 21 of the Company's Articles of Association OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Submission Proof of Advertisement for Summons to Annual GMS for Fiscal Year 2020	February 24, 2021	✓	✓	✓	✓	<ul style="list-style-type: none"> Article 23 paragraph (7) of the Company's Articles of Association Article 17 paragraph (1) OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
BNI Sustainability Report for Fiscal Year 2020	February 24, 2021	✓	✓			OJK Regulation No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Service Institutions, Issuers and Public Companies
Annual Report Fiscal Year 2020	February 24, 2021	✓	✓			OJK Regulation No. 29/POJK.04/2016 concerning Annual Report of Issuers or Public Companies juncto OJK Regulation 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports.
Error on the invitation to the Annual GMS	February 26, 2021	✓	✓	✓	✓	Article 17 paragraph (1) POJK No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Re-submission Proof of Announcement of the Annual GMS for Fiscal Year 2020	March 5, 2021	✓	✓	✓	✓	Article 19 paragraph (2) POJK No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Submission Proof of Announcement for Annual GMS for Fiscal Year 2020	March 5, 2021	✓	✓			<ul style="list-style-type: none"> Article 23 paragraph (7) of the Company's Articles of Association Article 17 paragraph (1) OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders



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Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



**Good Corporate
Governance**



Social & Environmental
Responsibility



ESG
Commitment



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REPORT	REPORT SUBMISSION DATE	REPORT SUBMISSION				REFERENCE
		OJK	IDX	WEBSITE	MASS MEDIA	
Monthly Report of Securities Holder Registration (Correction)	April 7, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Monthly Report of Securities Holder Registration Position March 31, 2021	April 8, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Consolidated Financial Statements March 2021 Position (unaudited)	April 27, 2021	✓	✓			Regulation No. X.K.2 Attachment to Chairman of Bapepam and LK Decision No. Kep-346/BLJ2011 concerning Submission of Periodic Financial Statements by Issuers or Public Companies
Submission Proof of Advertising Interim Financial Statement Information	April 28, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Articles of Association Amendment Report	April 29, 2021	✓				Article 63 OJK Regulation No. 15/POJK.04/2020 concerning Plan and Implementation of a Public Company General Meeting of Shareholders
Monthly Report of Securities Holder Registration Position April 30, 2021	May 5, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Explanation of the News in the Mass Media	May 18, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Report on Changes in Audit Committee Members	May 31, 2021	✓	✓			OJK Regulation No. 55/POJK.04/2015 concerning Audit Committee Establishment and Work Guidelines
Monthly Report of Securities Holder Registration Position May 31, 2021	June 8, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Request for Explanation on Reporting in Mass Media with the News Title "Suspected Deposit Lost Rp20.1 Billion, Bank BNI Takes Legal Path"	June 22, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Report on Changes in Audit Committee Members	July 6, 2021	✓	✓			OJK Regulation No. 55/POJK.04/2015 concerning Audit Committee Establishment and Work Guidelines
Asset Quality Review Third Survey – Portfolio Review Period 2Q21	July 6, 2021			✓		IDX Regulation No. I-E concerning Obligation to Submit Information

REPORT	REPORT SUBMISSION DATE	REPORT SUBMISSION				REFERENCE
		OJK	IDX	WEBSITE	MASS MEDIA	
Submission of Annual Rating Results for 2017 Shelf-Registered Bonds and 2018 Subordinated MTN for the Period July 5 until July 1, 2022	July 7, 2021	✓	✓			OJK Regulation No. 49/POJK.04/2020 concerning Debt Securities and/or Sukuk Rating
Monthly Report of Securities Holder Registration Position June 30, 2021	July 8, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Investor Updates on Digital Banking	July 9, 2021			✓		IDX Regulation No. I-E concerning Obligation to Submit Information
Information Disclosure for the Repurchase of Shares in Significantly Fluctuating Market Conditions PT Bank Negara Indonesia (Persero) Tbk	July 21, 2021	✓	✓	✓		<ul style="list-style-type: none"> OJK Regulation No. 2/POJK.04/2013 concerning Buyback of Shares Issued by Issuers or Public Companies in Significantly Fluctuating Market Conditions OJK Circular Letter No. 3/SEOJK.04/2020 concerning Other Conditions as Market Conditions Fluctuate Significantly in Shares Buyback by Issuers or Public Companies
Information on Audit of Consolidated Financial Statements dated June 30, 2021	July 23, 2021	✓	✓			<ul style="list-style-type: none"> Provisions 111.1.5.2. Regulation Number 1-E concerning Obligation to Submit Information Jakarta Stock Exchange Board of Directors Decree No. KEP-00015/BEI/01-2021
Monthly Report of Securities Holder Registration Position July 31, 2021	August 6, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Consolidated Financial Statements Position June 30, 2021 (Audited)	August 16, 2021	✓	✓			<ul style="list-style-type: none"> OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Report OJK Circular Letter No. 9/SEOJK.03/2019 concerning Transparency and Publication of Conventional Commercial Bank Reports Regulation No. X.K.2 Attachment to Chairman of Bapepam and LK Decision No. Kep-346/BLJ2011 concerning Submission of Periodic Financial Statements of Issuers or Public Companies Regulation No. I-E Attachment to IDX Board of Directors Decision No. Kep-00015/BEI/01-2021 concerning Obligation to Submit Information
Report of Material Information or Facts: Performance Presentation by the Listed Company to Certain Parties (Analyst Meeting)	August 16, 2021	✓	✓			<ul style="list-style-type: none"> OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Information or Material Facts by Issuers or Public Companies Regulation No. I-E Attachment to IDX Board of Directors Decision No. Kep-00015/BEI/01-2021 concerning Obligation to Submit Information

REPORT	REPORT SUBMISSION DATE	REPORT SUBMISSION				REFERENCE
		OJK	IDX	WEBSITE	MASS MEDIA	
Information on the 2021 Annual Public Expose Plan	August 23, 2021		✓			IDX Regulation No. I-E Terms 111.3 concerning Obligation to Submit Information
Submission of 2021 Annual Public Expose Material	September 1, 2021		✓			IDX Regulation No. I-E Regarding Obligation to Submit Information
Monthly Report of Securities Holder Registration Position August 31, 2021	September 8, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Submission of Explanation on Reporting in Pasardana Mass Media with the title News PSAB Subsidiary Reportedly Failed to Pay Debt to BBNI	September 9, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Submission of Explanation on Lawsuits at the Central Jakarta District Court and South Jakarta District Court	September 9, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Submission of the 2021 Annual Public Expose Results Report	September 9, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Information Report or Material Facts on Operational Information for BNI Securities Ptd. Ltd	September 10, 2021	✓				<ul style="list-style-type: none"> OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports
Explanation of News in the Mass Media	September 15, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Report of Material Information or Facts Plan for Issuance of Additional Tier-1 Perpetual Non-Cumulative Capital Securities	September 17, 2021	✓	✓	✓		<ul style="list-style-type: none"> OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies Regulation No. I-E Attachment to IDX Board of Directors Decision No. Kep-00015/BEI/01-2021 concerning Obligation to Submit Information OJK Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports
Affiliated Transactions Report	September 20, 2021	✓	✓			OJK Regulation No. 42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions



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Management Discussion and Analysis
on Company Performance



Capital & Risk
Management Practices



Good Corporate
Governance



Social & Environmental
Responsibility



ESG
Commitment



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		OJK	IDX	WEBSITE	MASS MEDIA	
Consolidated Financial Statements Position September 2021 (unaudited)	October 25, 2021	✓	✓			Regulation No. X.K.2 Attachment to Chairman of Bapepam and LK Decision No. Kep-346/BL/2011 concerning Submission of Periodic Financial Reports by Issuers or Public Companies
Performance Presentation by the Listed Company to Certain Parties (Analyst Meeting)	October 25, 2021	✓	✓			<ul style="list-style-type: none"> • OJK Regulation No. 31/POJK.04/2015 concerning Disclosure of Material Information or Facts by Issuers or Public Companies • Regulation No. I-E Attachment to IDX Board of Directors Decision No. Kep-00015/BEI/01-2021 concerning Obligation to Submit Information
Follow-up to Exchange Explanation Request	October 26, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Request for Explanation of the Lawsuit at the Surabaya District Court	November 8, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Monthly Report of Securities Holder Registration Position October 31, 2021	November 8, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Request for Explanation of News in the Mass Media	December 7, 2021		✓			IDX Regulation No. I-E concerning Obligation to Submit Information
Monthly Report of Securities Holder Registration Position November 31, 2021	December 7, 2021	✓	✓			IDX Regulation No. I-E concerning Obligation to Submit Information

Equal Treatment for All Shareholders

All Shareholders, including Minority Shareholders and Foreign Shareholders, must receive equal treatment and be given the same opportunity to obtain information about the Company. The Company is active in conducting timely and accurate disclosure of all material aspects of the Company, including the Company's financial situation, performance, ownership and governance. Shareholders' rights are protected as referred to in the Capital Market regulations. Stakeholders' rights are recognized in accordance with the prevailing laws and regulations, and active cooperation between the Company and its stakeholders must be developed in a joint effort to create wealth, jobs, and the Company's sustainability.

Conflict of Interest Policy (Including Insider Trading)

The Bank has implemented a Conflict of Interest policy and an Insider Trading Policy as stated in the Company Guidelines for Prohibited and Not Prohibited Securities Transactions for Insiders No. IN/500/KMP/001 dated September 23, 2019 and Company Guidelines on Conflict of Interest Handling Procedures No. IN/695/KMP/001 dated October 29, 2014.

The Policy Conflict of Interest establishes rules, identifies, reduces and manages potential conflicts of interest that may arise in the Bank as a result of activities by the Bank's business units that contain information about the Bank, Bank customers and the BNI Group.

The Bank confirms the prohibition of using Insider Trading in personal transactions by employees and management (in this case members of the Board of Directors and the Board of Commissioners). With this policy, the use of insider information for the personal benefit of employees and management (insiders) is mitigated.

In 2021, BNI instigated a corporate action for buying back BNI shares. To prevent insider trading from occurring, in accordance with prevailing regulations, the Company established a policy that the Board of Commissioners, Board of Directors, Employees, Major Shareholders, individuals who because of their position or profession or because of their business relationship with the Company allow that individual to obtain inside information or, parties who within the last 6 (six) months are no longer a party, were prohibited from conducting transactions on the Company's shares within the period of share buyback.

Shares and Bonds Buyback

During surge in positive Covid-19 cases (second wave) that occurred in July 2021, the IHSG fluctuated and BNI shares experienced a significant decline of -25.0% YtD to reach Rp4,630 as of June 30, 2021. The selling pressure in the market due to the Covid-19 sentiment resulted in BNI shares being undervalued with a Price to Book Value (PBV) of 0.75x as of June 30, 2021, or far below the 10-year average PBV of 1.60x. As a result, the Company planned to repurchase Company's shares issued and listed on the Indonesia Stock Exchange up to a maximum amount of Rp1,700,000,000,000 (one trillion seven hundred billion Rupiah). In accordance with SEOJK No. 3/SEOJK.04/2020, the number of shares to be repurchased should not exceed 20% (twenty percent) of the paid-up capital and at least 7.5% (seven point five percent) of the Company's paid-up capital. The Company believed the Shares Buyback would not affect the Company's financial condition as to date, the Company had sufficient capital to finance the Company's business activities. The Company's Shares Buyback was carried out over a period of 3 (three) months from July 22, 2021 to October 21, 2021. During that period, the Company purchased 24,682,600 shares, worth Rp128,026,122,396.

The Company's Shares Buyback was carried out over a period of 3 (three) months from July 22, 2021 to October 21, 2021. During that period, the Company purchased 24,682,600 shares, worth Rp128,026,122,396. The Share Buyback funds came from the Company's internal cash, so the impact on the Company's operational costs was immaterial, and the Profit and Loss was still in line with the Company's target. The Company's Share Buyback transaction did not have a material negative impact on the Company's business activities, as the Company has sufficient capital and cash flow to carry out transaction financing in conjunction with the Company's business activities. This corporate action further convinced investors that BNI has strong financial fundamentals.

Management of State Officials' Assets Reports (LHKPN)

LHKPN POLICY

The Company has a policy concerning the implementation of the State Officials Asset Report (LHKPN) based on:

1. Law Number 28 of 1999 concerning State Officials who are Clean and Free from Corruption, Collusion and Nepotism;
2. Law Number 30 of 2002 concerning the Corruption Eradication Commission. Law Number 10 of 2015 concerning Stipulation of Government Regulation in Lieu of Law Number 1 of 2015 concerning Amendments to Law No. 30 of 2002 concerning the Corruption Eradication Commission jo. Republic of Indonesia Law No. 19 of 2019 concerning the Second Amendment to Law No. 30 of 2002 concerning the Corruption Eradication Commission;
3. KPK Regulation No. 07 of 2016, as amended by KPK Regulation No. 2 of 2020 concerning Procedures for Registration, Announcement and Examination of State Officials' Assets;
4. Minister of Republic of Indonesia SOEs Circular No. SE-12/MBU/10/2021 concerning Obligations to Submit State Officials' Asset Reports (LHKPN) for Officials in State-Owned Enterprises.

These policies regulate the Position of BNI State Officials to report their assets, delivery procedures, LHKPN management and administrator work units, to the sanctions that can be imposed on employees who do not carry out their reporting obligations.

MANDATORY LHKPN REPORT

Based on the LHKPN Policy, LHKPN Mandatory Reporting applies to Structural Officials within the Bank, namely:

1. The Board of Commissioners;
2. The Board of Directors;
3. The Senior Executive Vice President;
4. Executive Officers who report to OJK, namely:
 - Division/Unit/Head or equivalent;
 - Head of Regional (HOR);
 - Head of Overseas Branch.
5. Active employees who are placed on the Board of Commissioners/Board of Directors in Subsidiaries.

LHKPN MANAGEMENT

The LHKPN reporting management includes the LHKPN Management Coordinator and e-LHKPN Management Admin with the following details:

1. The LHKPN Management Coordinator is the Group Head Corporate Secretary and Group Head Human Capital Services with the following duties:
 - a. Coordinating with KPK in monitoring, filling out, and submitting LHKPN as well as socializing LHKPN obligations;
 - b. Coordinating with the Ministry of SOEs and KPK regarding the management and administration of the Mandatory LHKPN Application.
2. e-LHKPN Management Admin is an official from the Corporate Secretary Group and Human Capital Services Group with the following duties:
 - a. Managing and updating data required to report LHKPN;
 - b. Managing and monitoring LHKPN reporting obligations.

2021 LHKPN REPORT

As of the end of the 2021, out of 99 persons required to report, 99 or 100% fulfilled their LHKPN reporting obligations.

Transparency of Financial and Non-Financial Conditions

BNI fulfills its obligations for transparency and publication of financial and non-financial conditions in accordance with prevailing regulations, through the submission and publication of information both in print media and the following websites:

1. Monthly Financial Reports to regulators, which are also published through the OJK reporting system and the BNI website;
2. Quarterly Financial Reports to regulators, which are also published through the OJK reporting system, BNI website, and newspapers or other electronic media;
3. Annual Financial Reports to regulators, which are also published through the OJK reporting system, BNI website, and reporting systems for issuers or public companies;
4. BNI Annual Report submitted to regulators, rating agencies, banking development institutions, research institutions and financial magazines and published through the BNI website;
5. Periodic and incidental reports in compliance with regulations in the Capital Market sector, published on the Company's and the Indonesia Stock Exchange websites, and reported to OJK, Indonesia Stock Exchange, Ministry of SOEs, and relevant regulators;
6. Information on Corporate Governance, including the Annual Report on Corporate Governance, Vision, Mission, Corporate Values, Code of Ethics, Board of Commissioners and Board of Directors Composition and Profiles, and internal regulations related to governance ranging from the Articles of Association to the Corporate Charter are also published on the BNI website;
7. Information on the Company's Products and Services including its office network is published through the Annual Report and the BNI website, so that customers, investors and the wider community can easily access information on BNI products and services;
8. Information on Complaint Submission Procedures, BNI Safe Tips for Customers to maintain data confidentiality when using banking services, are published through the BNI website to comply with consumer protection provisions;
9. Other information aimed at supporting information disclosure, financial education and services to the public.

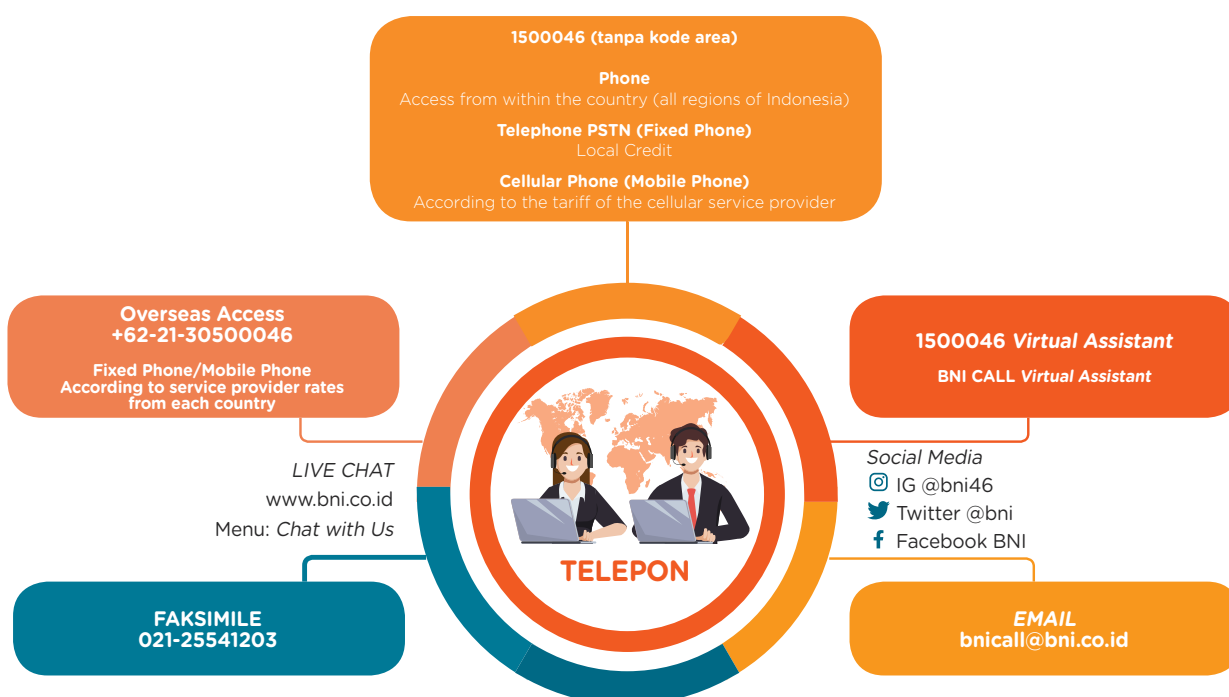
Transparency of Customer Complaints Procedures and Customer Dispute Settlement

EASE OF ACCESS SERVICES

BNI CONTACT CENTER AS BNI TOUCH POINT

In line with one of BNI's missions to provide excellent service and value-added digital solutions to all customers and as the partner of choice, BNI Call 1500046 continues to strive to provide the best service for BNI customers.

To prioritize easy, fast and cheap services for customers, BNI Contact Center continues to shift to digital. Customers can easily access the BNI Call 1500046 service, BNI's official social media service in Facebook, Instagram, and Twitter, Live Chat service on the BNI website and the BNI Call Virtual Assistant application that can be downloaded via Playstore and Appstore. In addition, customers can send written complaints to BNI via email and fax.

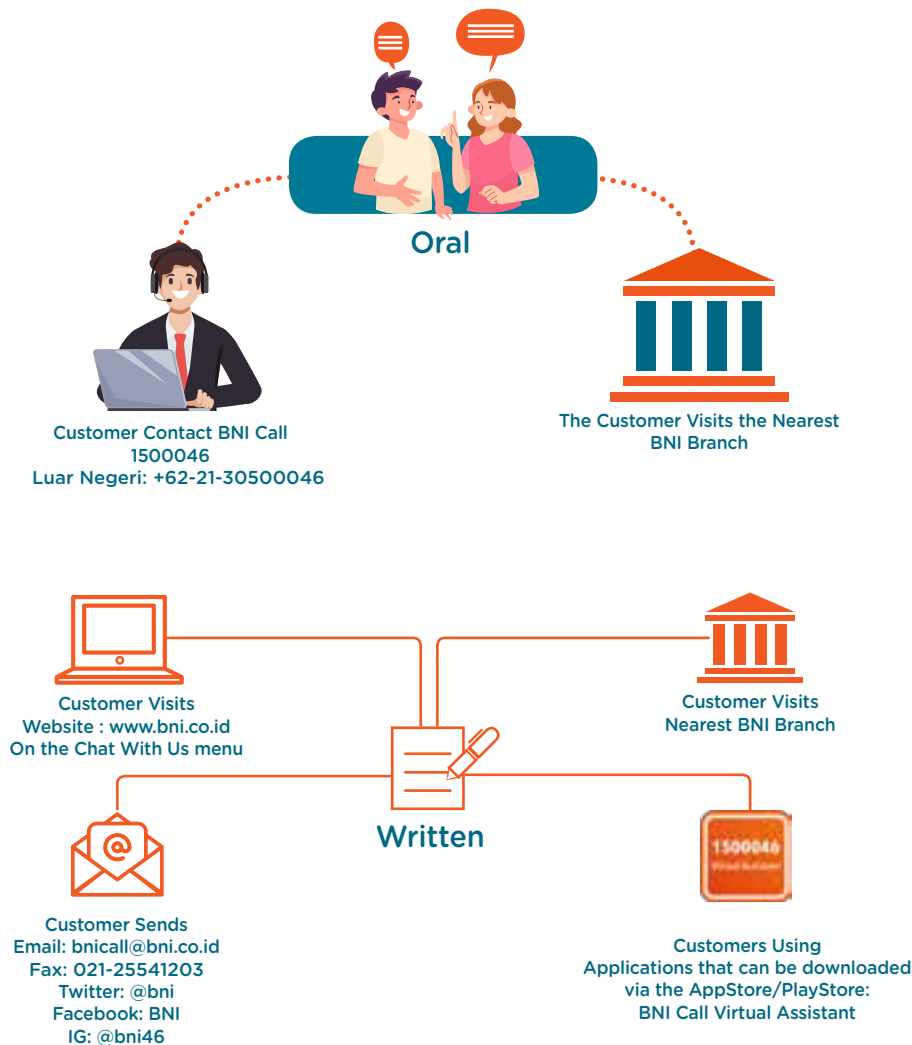


As a commitment to providing superior services, BNI Call 1500046 continues to improve service quality for customers by obtaining ISO 9001:2015 Certification in 2016 and updating it every year. In 2021, BNI Call 1500046 was ranked 1 (one) in 3 (three) categories: Best Performance Call Center, Phone Banking and Service Prima Contact Center based on the results of the Bank Service Excellent Monitor (BSEM) survey by Marketing Research Indonesia (MRI).

BNI CUSTOMER SERVICE AND COMPLAINT RESOLUTION PROCEDURES

BNI Contact Center, as one of BNI's frontlines, continues to strive to provide the best service, including the resolution of any customer complaints for banking services, credit cards, merchants, as well as Trade & Remittance. BNI customers can conveniently access the complaint services using a variety of media options, both verbally and in writing.

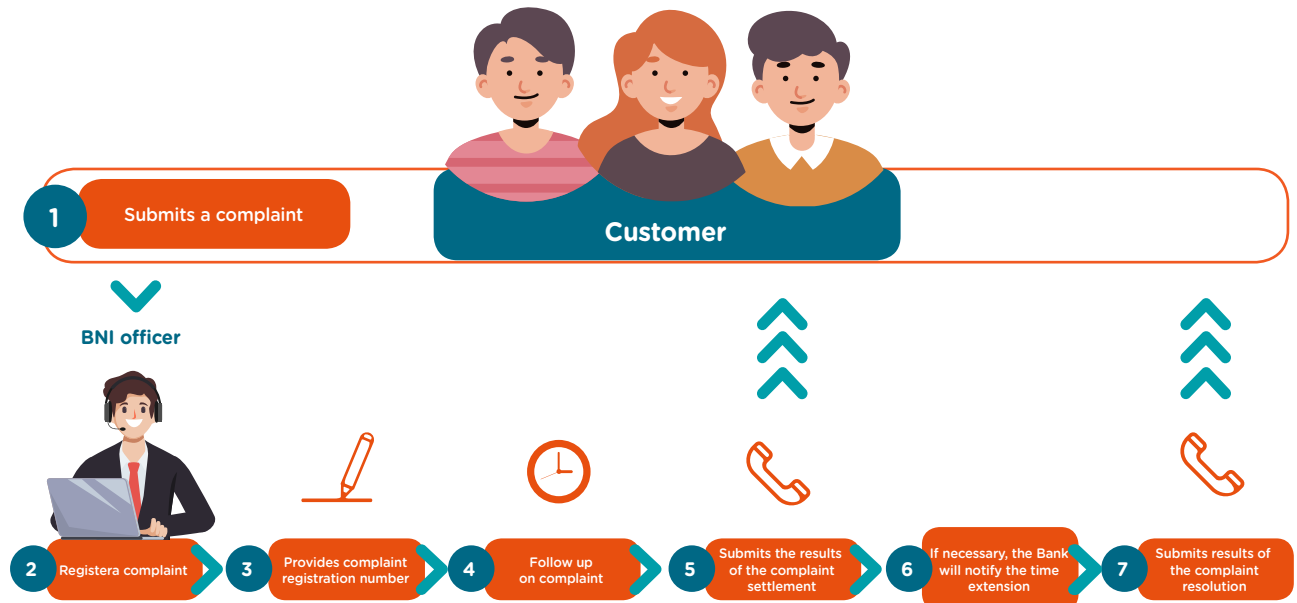
BNI Customer Complaints Submission Media



Solutions for resolving customer complaints submitted orally are carried out within a maximum of 5 (five) working days, while the settlement of written complaints is within a maximum of 20 (twenty) working days. If supporting documents are needed for customer complaints submitted orally, BNI will ask customers to submit written complaints. The customer can complete the documents for the complaint submitted within 20 (twenty) working days and this can be extended another 20 (twenty) working days.

Under certain conditions, the settlement of written complaints can be extended for a further 20 (twenty) working days in accordance with POJK No. 1/POJK.07/2013 and updated through POJK No. 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector. Information on the extension of the complaint settlement times is notified in writing to customers via telephone, e-mail, letter or short message service (SMS).

Complaint Submission and Resolution



If a customer feels that the settlement provided by BNI does not meet their expectations, then the customer can continue the complaint resolution process through an Alternative Dispute Resolution Agency listed in the List of Alternative Dispute Resolution Agencies set by the Financial Services Authority.

Bad Corporate Governance Practices

BNI is fully aware of the negative influence of Bad Corporate Governance practices that can interfere with the implementation of Good Corporate Governance (GCG), and during 2021 BNI was committed to not undertaking actions and policies related to the following practice:

NOTE	PRACTICE
There is a report as a company that pollutes the environment	Nil
Important cases currently being faced by the Bank, its subsidiaries, members of the Board of Directors and/or members of the Board of Commissioners who are currently serving are not disclosed in the Annual Report	Nil
Non-compliance in fulfilling tax obligations	Nil
The inconsistency of the presentation of the Annual Report and Financial Statements with the applicable regulations and Financial Accounting Standards	Nil
Cases related to labor and employees	Nil
There is no disclosure of operating segments in listed companies	Nil
There is a discrepancy between the hardcopy Annual Report and the softcopy Annual Report	Nil



Implementation of Integrated Governance

As a form of transparency in the implementation of Integrated Governance in the BNI Financial Conglomerate, as well as a follow-up to the provisions stipulated in OJK Regulation No. 18/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerate, and OJK Circular Letter No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance for Financial Conglomerates, the implementation of Integrated Governance of BNI's Financial Conglomerate in 2021 consisted of:

1. Self-Assessment Report on the Integrated Governance Implementation during 2021;
2. Structure of BNI Financial Conglomerate;
3. Structure of share ownership in BNI Financial Conglomerate as of December 2021;
4. Management Structure of BNI Financial Conglomerate;
5. Basic Principles of Integrated Governance of BNI Financial Conglomerate;
6. Intra-Group Transaction Policy at BNI Financial Conglomerate;
7. Report on the Implementation of BNI Good Corporate Governance as the Main Entity in the BNI Financial Conglomerate.

The following shows the Implementation of BNI Good Corporate Governance as the Main Entity in the BNI Financial Conglomerate.

SELF-ASSESSMENT REPORT ON IMPLEMENTATION OF INTEGRATED GOVERNANCE IN 2021

OJK Regulation No. 18/POJK.03/2014 dated November 18, 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates, and OJK Circular No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance For Financial Conglomerates, requires that the Financial Conglomerate compiles a Self-Assessment Report periodically (June and December) and submits to the Financial Services Authority no later than the 15th of the second month after the end of the relevant reporting month (August 15 and February 15).

The Self Assessment of the Integrated Governance principles implementation in the BNI Financial Conglomerate must at least be realized and focused on 7 (seven) evaluation factors for the Integrated Governance implementation consisting of:

Assessment Factors

NO.	ASSESSMENT FACTORS
1.	Board of Directors of Main Entity
2.	Board of Commissioners of Main Entity
3.	Integrated Governance Committee
4.	Integrated Compliance Work Unit
5.	Integrated Internal Audit Work Unit
6.	Implementation of Integrated Risk Management
7.	Integrated Governance Guidelines

The self-assessments are categorized into 5 (five) ratings with an explanation of each rating as follows:

RATING	DEFINITION
1	The Financial Conglomerate Integrated Governance implementation is generally very good. This is reflected in the very adequate fulfillment of the application of the principles of Integrated Governance. If there are weaknesses in the implementation of Integrated Governance, in general these weaknesses are not significant and can be corrected immediately by the Main Entity and/or LJK.
2	The Financial Conglomerate Integrated Governance implementation is generally very good. This is reflected in the adequate fulfillment of the application of the principles of Integrated Governance. If there are weaknesses in the implementation of Integrated Governance, in general these weaknesses are less significant and can be resolved with normal actions by the Main Entity and/or LJK.
3	Konglomerasi Keuangan dinilai telah melakukan penerapan Tata Kelola Terintegrasi yang secara umum cukup baik. Hal ini tercermin dari pemenuhan yang cukup memadai atas penerapan prinsip Tata Kelola Terintegrasi. Apabila terdapat kelemahan dalam penerapan prinsip Tata Kelola Terintegrasi, secara umum kelemahan tersebut cukup signifikan dan memerlukan perhatian yang cukup dari Entitas Utama dan/atau LJK.
4	The Financial Conglomerate Integrated Governance implementation is generally not good enough. This is reflected in the inadequate fulfillment of the application of the principles of Integrated Governance. There are weaknesses in the implementation of Integrated Governance, in general these weaknesses are significant and require comprehensive improvement by the Main Entity and/ or LJK.
5	The Financial Conglomerate Integrated Governance implementation is generally not good enough. This is reflected in the inadequate fulfillment of the application of the principles of Integrated Governance. There are weaknesses in the implementation of Integrated Governance, in general these weaknesses are very significant and difficult for the Main Entity and/or LJK to fix.

In the 2021 period, BNI prepared a self assessment regarding the implementation of Integrated Governance of the BNI Financial Conglomerate as follows:

Implementation of Integrated Governance Self-Assessment Results

RATING		DEFINISI PERINGKAT
JUNE 2021	DECEMBER 2021	
2	2	The Financial Conglomerate is considered to have implemented good Integrated Governance. This is reflected in adequate compliance with the Integrated Governance principles. If there are weaknesses in the Integrated Governance implementation, in general these weaknesses are less significant and can be resolved by normal actions by the Main Entity and/or FSI.

Based on the Integrated Governance Implementation Self Assessment using 7 (seven) assessment factors for the period

December 2020, we can conclude that:

1. Board of Directors of main entity
 - a. Dalam struktur Tata Kelola Terintegrasi seluruh In the Integrated Governance structure, all BNI Directors have met the qualifications stipulated by applicable laws;
 - b. The Integrated Governance processes have been carried out and followed up in accordance with the BNI Board of Commissioners directives;
 - c. The BNI Board of Directors has followed up on the BNI Board of Commissioners input on their evaluation of the Integrated Governance Guidelines, as well as ensured that internal and external audit findings have been properly followed up.
2. Board of Commissioners of main entity
 - a. In the Integrated Governance structure, all of BNI's Board of Commissioners have met the qualifications stipulated by the applicable legislation. All 10 (ten) members of the Board of Commissioners have passed the fit and proper test and have obtained a letter of approval from the Financial Services Authority (OJK);
 - b. In the Integrated Governance process, the BNI Board of Commissioners duties and responsibilities related to the Integrated Governance process includes providing input to the BNI Directors to improve the Integrated Governance Guidelines;
 - c. BNI's Board of Commissioners provided input and directives as well as evaluated the internal and external of audit findings to be followed up by the BNI Directors.



3. Integrated Governance Committee

- a. The Integrated Governance Committee was established in accordance with applicable regulations;
- b. During the January-December 2021 period, the Integrated Governance Committee held 6 (enam) meetings to provide input on the Governance implementation in the BNI Financial Conglomerate.

4. Integrated Compliance work unit

- a. The Compliance Division as an Integrated Compliance Unit is independent in accordance with applicable regulations;
- b. In order to improve the integrated compliance function, the Compliance Division carried out regular coordination and meetings with all work units in each FSI;
- c. The Compliance Division monitored, and evaluated the implementation of the compliance function in each FSI and provided suggestions and recommendations on the implementation of the compliance function in each FSI in order to develop and ensure the compliance function in each FSI is running well.

5. Integrated Internal audit work unit

- a. Internal Audit Unit is an independent Integrated Internal Audit Unit in accordance with applicable regulations;
- b. The Internal Audit Unit as the Integrated Internal Audit Unit monitors the internal audit including:
 - Conducting audits of each Subsidiary Company while taking into account the size, characteristics, and business complexity of the subsidiary, as well as coordinating between the FSI SKAI periodically (quarterly) through the Subsidiary Development Division (PPA);
 - Evaluating the implementation of the internal audit function (SKAI) in each FSI;

- Coordinating with the FSI SKAI periodically involves the Subsidiary Development Division (PPA) every quarter, with material discussed including the FSI Audit Work Plan, Main Audit Results of each LJK and Follow-up on Internal & External Audit Results of each FSI.

- c. The Internal Audit Unit as the Integrated Internal Audit Unit acts objectively in carrying out its duties and responsibilities, and submits a report on its duties and responsibilities to the President Director and the Board of Commissioners of the Main Entity with a copy to the Director in charge of the Main Entity Compliance Function.

6. Implementation of Integrated risk management

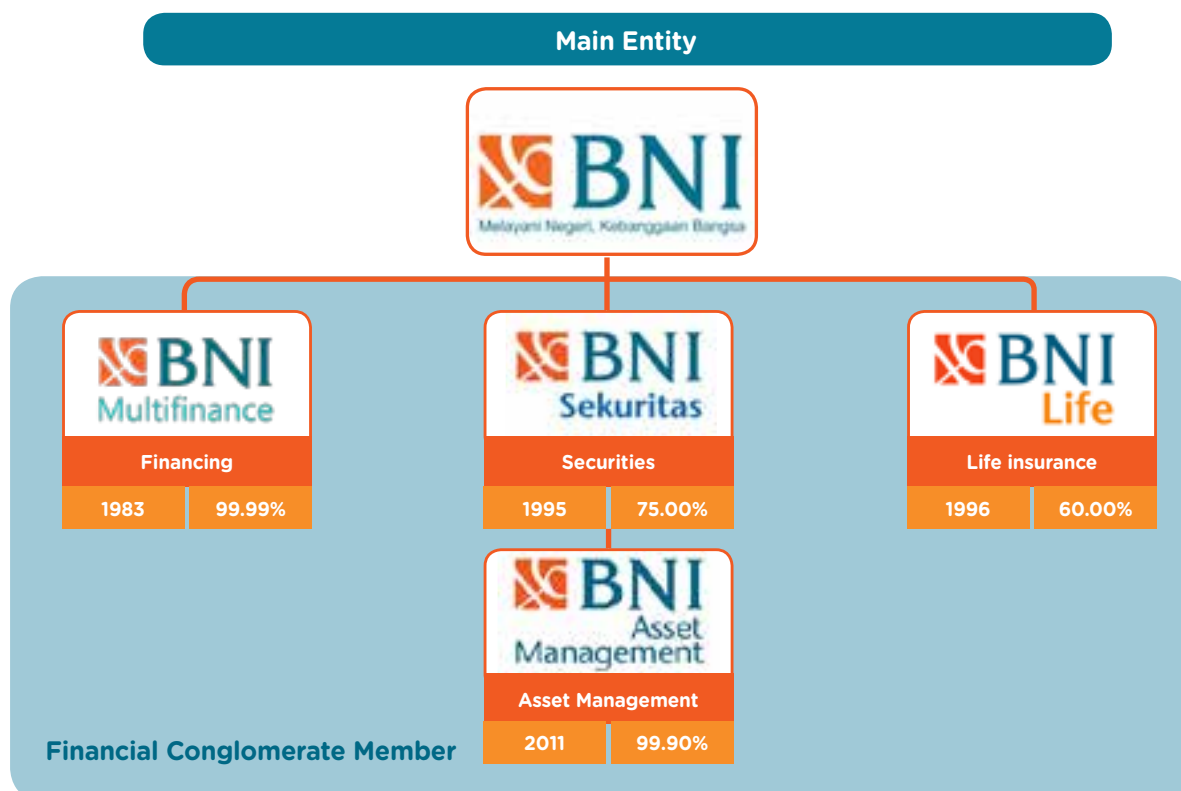
- a. The Bank's Risk Management Division is an independent Integrated Risk Management Unit in accordance with applicable regulations;
- b. The Bank's Risk Management Division has determined and updated the policies and risk limits that apply to all FSI;
- c. The implementation of Integrated Risk Management has accommodated the 4 (four) Risk Management pillars in accordance with the OJK Regulation.

7. Integrated Governance Guidelines

- a. BNI's Financial Conglomerate Integrated Governance Guidelines have been prepared, reviewed and implemented in accordance with OJK Regulation No.18/POJK/POJK.03/2014 as stipulated in the Board of Directors and Board of Commissioners letter No. DIR/946 dated December 1, 2021 and No. DK/22 dated December 8, 2021;
- b. BNI's Financial Conglomerate Integrated Governance Guidelines have been communicated to all FSIs in the BNI Financial Conglomerate and will continue to be evaluated in accordance with applicable regulations.

BNI FINANCIAL CONGLOMERATE STRUCTURE

Based on the Board of Directors' Letter No. DIR/128 dated March 13, 2015 BNI Financial Conglomerate has reported its structure of as follows:



BNI Financial Conglomerate has fulfilled the administrative requirements and has been recorded in the supervision administration of the Financial Services Authority in conformity with OJK Letter No. S-48/PB.313/2015 dated 15 April 2015 and OJK Letter No. S-26/PB.312/2021 dated February 25, 2021 (after BNI Syariah joined Bank Syariah Indonesia), and in addition the BNI Financial Conglomerate has an Integrated Governance Committee (TKT) as follows:

POSITION	NAME
Chairman	Agus Dermawan Wintarto Martowardojo (BNI)
Member	Askolani (BNI) Susyanto (BNI) Parikesit Suprpto (BNI Life) Utang Ranuwijaya (BNI Life) Rosa De Lima Dwi Mutiari (BNI Multifinance) Eddy Siswanto (BNI Asset Management) Boyke Wibowo Mukiyat (BNI Sekuritas) Bambang Setyogroho (Pihak Independen Komite TKT) Indrayeti (Pihak Independen Komite TKT)

BNI also has an Integrated Governance Manual, compiled and reviewed in accordance with the prevailing laws and regulations. The Integrated Governance Guidelines were last updated and reviewed through the Board of Commissioners Decree No. DK/22 dated December 8, 2021. BNI's Integrated Governance Guidelines can be accessed through www.bni.co.id.

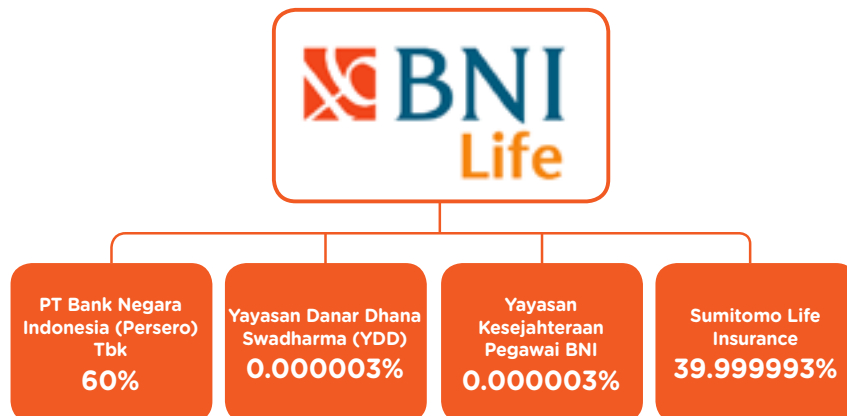
SHARE OWNERSHIP STRUCTURE IN THE BNI FINANCIAL CONGLOMERATE

PT Bank Negara Indonesia (Persero) Tbk as the Main Entity of the BNI Financial Conglomerate.



Share Ownership Structure of Financial Services Institutions in the BNI Financial Conglomerate, namely:

1. PT BNI Life Insurance



2. PT BNI Sekuritas



3. PT BNI Multifinance



4. PT BNI Asset Management



BNI FINANCIAL CONGLOMERATE MANAGEMENT STRUCTURE

Board of Commissioners' Structure

NAME	POSITION
Agus Dermawan Wintarto Martowardojo	President Commissioner/Independent
Pradjoto	Vice President Commissioner/Independent
Sigit Widyawan	Independent Commissioner
Septian Hario Seto	Independent Commissioner
Asmawi Syam	Independent Commissioner
Erwin Rijanto Slamet	Independent Commissioner
Iman Sugema	Independent Commissioner
Askolani	Commissioner
Susyanto	Commissioner
Ratih Nurdianti	Commissioner

Board of Directors' Structure

NAME	POSITION
Royke Tumilaar	President Director
Adi Sulistyowati	Vice President Director
Novita Widya Anggraini	Managing Director of Finance
David Pirzada	Managing Director Risk Management
Henry Panjaitan	Managing Director Treasury and International
Corina Leyla Karnelies	Managing Director Consumer Business
Muhammad Iqbal	Managing Director MSME
Y.B. Hariantono	Managing Director Information Technology and Operations
Bob Tyasika Ananta	Managing Director Compliance
Sis Apik Wijayanto	Managing Director Institutional Relations
Silvano Winston Rumantir	Managing Director Corporate Banking
Ronny Venir	Managing Director Services and Network

PT BNI LIFE INSURANCE

Board of Commissioners' Structure

NAME	POSITION
Parikesit Suprpto	President Commissioner/Independent
Kazuhiko Arai	Commissioner
Iwan Abdi	Commissioner
Henry Cratein Suryanaga	Independent Commissioner
Alwi Abdurrahman Shihab	Independent Commissioner

Board of Directors' Structure

NAMA	POSITION
Shadiq Akasya	President Director
Eben Eser Nainggolan	Managing Director Finance
Neny Asriany	Director
Naoto Oda	Director
Hiroshi Ono	Director

Shariah Supervisory Board Structure

NAME	POSITION
Ir. Agus Haryadi, AAAIJ, FIIS, ASAI	Chairman
Prof. Dr. H. Utang Ranuwijaya, MA	Member
Hj. Siti Haniatunnisa, LLB, MH	Member

PT BNI SEKURITAS

Board of Commissioners' Structure

NAME	POSITION
Boyke Wibowo Mukiyat	President Commissioner/Independent
Yoshihiro Ishiwata	Commissioner
I Made Sukajaya*	Commissioner

Note:

*waiting for OJK approval for fit & proper

Board of Directors' Structure

NAME	POSITION
Agung Prabowo	President Director
Reza Benito Zahar	Director
Putu Bagus Kresna	Director
Nieko Kusuma*	Director
Vera Ongyono*	Director
Yoga Mulia*	Director

Note:

*waiting for OJK approval for fit & proper

PT BNI MULTIFINANCE

Board of Commissioners' Structure

NAME	POSITION
Rosa De Lima Dwi Mutiari	President Commissioner/Independent
Wiwi Suprihatno	Commissioner

Board of Directors' Structure

NAME	POSITION
Hasan Gazali Pulungan	President Director
Antonius Anung Fajar Nugroho	Director
Linda Saragih	Director

PT BNI ASSET MANAGEMENT

Board of Commissioners' Structure

NAME	POSITION
Eko Priyo Pratomo*	President Commissioner/Independent Commissioner
Eddy Siswanto	Independent Commissioner
Teddy Erdius E. Saputra	Commissioner
Efrizal**	Commissioner

Keterangan:

* still waiting EGMS approval

** still waiting for fit & proper test

Board of Directors' Structure

NAME	POSITION
Putut Endro Andanawarih	President Director
Donny Susantio Adjie	Managing Director Business
Ade Yusransyah	Managing Director Operation

BASIC PRINCIPLES OF INTEGRATED GOVERNANCE IN BNI FINANCIAL CONGLOMERATE

To support the business and operations of the BNI Financial Conglomerate, BNI uses the GCG Roadmap issued by the Financial Services Authority and the ASEAN Corporate Governance Scorecard as the basic principles of implementing Integrated Governance.

In accordance with this, the basic principles of Integrated Governance of BNI Financial Conglomerate are as follows:

1. Implementation of Integrated Corporate Governance in BNI Financial Conglomerate to create superior performance and add economic value to shareholders and other stakeholders, and ensure that the BNI Financial Conglomerate operation is in accordance with applicable laws, business ethics, and principles of good corporate governance;
2. Referring to the applicable laws and regulations, subsidiaries are separate legal entities from BNI, so they have their own duties and responsibilities in managing the Company;
3. Subsidiaries are independent legal entities in accordance with applicable laws and regulations, in which BNI is the Controlling Shareholder in BNI's Financial Conglomerate;
4. These Good Corporate Governance Principles guidelines apply to Subsidiary Companies as long as they are not regulated differently, according to the prevailing laws and regulations. Articles of Association of Subsidiaries that are not in accordance with this Code must be adjusted.

INTRA-GROUP TRANSACTION POLICY IN BNI FINANCIAL CONGLOMERATE

UNDERSTANDING INTRA-GROUP TRANSACTION RISK

The relationship between ownership and control in various financial services sectors affects the business continuity of Financial Services Institutions (FSI) due to direct or indirect risk exposures arising from the business activities of entities incorporated in a Financial Conglomerate. Therefore, the

Financial Services Authority (OJK) has issued a number of regulations regarding the implementation of integrated Risk Management in conglomerates in the financial services industry, one of which is the obligation for the Financial Conglomerate to manage intra-group transaction risk.

Intra-group transaction risk is the risk arising from the dependency of an entity, directly or indirectly, on other entities within a Financial Conglomerate in the context of fulfilling the obligations of a written or unwritten agreement that is followed by a fund transfer and/or is not followed by a fund transfer.

PURPOSE OF INTRA-GROUP TRANSACTION RISK MANAGEMENT

The implementation of Intra-group transaction Risk Management in the BNI Financial Conglomerate aims to:

1. Manage and oversee the risk of intra-group financial conglomerate transactions based on the principle of prudence;
2. Ensure the integrated risk management process minimizes the possibility of negative impacts caused by the dependency of an FSI either directly or indirectly on another FSI in one Financial Conglomerate, as well as the negative impact on the overall business condition of the BNI Financial Conglomerate.

INTRA-GROUP TRANSACTION RISK MANAGEMENT PRINCIPLES

Matters that BNI as the main entity needs to address in Intra-group transaction Risk Management in the BNI Financial Conglomerate includes:

1. Having sufficient intra-group transaction risk management processes for the Financial Conglomerate as a whole;
2. Monitoring intra-group transactions in the Financial Conglomerate and preparing periodic reports;
3. Encouraging public disclosure related to intra-group transactions;
4. Considering the impact of intra-group transactions on the performance of FSI members of the Financial Conglomerate directly or on the BNI Financial Conglomerate as a whole.

TYPES OF TRANSACTIONS THAT MIGHT POSE INTRA-GROUP TRANSACTION RISKS

The types of transactions that may pose risks to intra-group transactions in the BNI Financial Conglomerate include the following, but not limited to:

1. Cross ownership between the FSIs in the Financial Conglomerate;
2. Centralized short-term liquidity management in the Financial Conglomerate;
3. Guarantees, loans, and commitments given or obtained by an FSI from another FSI in the Financial Conglomerate;
4. Exposures to controlling shareholders, including loan exposures and off-balance sheets such as guarantees and commitments;
5. Purchase or sale of assets from one FSI to another FSI in the Financial Conglomerate;
6. Transfer of Risk through reinsurance; and
7. Transactions to divert third party risk exposure between FSIs in the Financial Conglomerate.

ADEQUACY OF THE RISK IDENTIFICATION, MEASUREMENT, MONITORING AND CONTROL PROCESS AND THE INTRA-GROUP TRANSACTION RISK MANAGEMENT INFORMATION SYSTEM

In the intra-group transaction risk management, BNI as the Main Entity carries out the process of identifying, measuring, monitoring and controlling risks to all material risk factors in an integrated manner, and is supported by an adequate intra-group transaction risk management information system.

1. Identification of Intra-group Transaction Risk

Identification of intra-group transaction risk is carried out by analyzing types of products and/or transactions between the FSI in the BNI Financial Conglomerate that may pose an intra-group transaction risk in the BNI Financial Conglomerate.

2. Measurement of Intra-Group Transaction Risk

Measurement of intra-group transaction risk aims to rank the risk level of intra-group transactions in the Financial Conglomerate. The matters to be addressed by BNI as the main entity for measuring intra-group transaction risk is to compile an intra-group transaction risk measurement methodology and to evaluate the suitability of the assumptions, data sources, and procedures used to measure intra-group transaction risk.

3. Intra-group Transaction Risk Monitoring

Monitoring of intra-group transaction risk is carried out by evaluating the exposure of material Intra-group Transaction Risk or that could have an impact on the capital condition of the Financial Conglomerate; and to improve the process and scope of reporting if there are material changes in business activities, products, transactions, and risk factors.

The material financial relationships in an intra-group relationship between the FSI in the BNI Financial Conglomerate is measured based on the value of BNI's financial transactions with FSI members in the BNI Financial Conglomerate, and between fellow FSIs in the BNI Financial Conglomerate.

4. Intra-group Transaction Risk Control

For risk control, BNI as the Main Entity ensures that the BNI Financial Conglomerate has a method of controlling intra-group transaction risks that could endanger the business continuity of the Financial Conglomerate.

The control of intra-group transaction risk in the BNI Financial Conglomerate is carried out by taking into account:

- a. The composition of inherent risk parameters for intra-group transactions in the assessment of integrated risk profiles;
- b. Compliance with the principle of arm's length (fairness of transactions) related to intra-group transactions;
- c. Availability and completeness of intra-group transaction documentation; and
- d. Compliance with legal/regulatory provisions that apply to each intra-group transaction.

5. Intra-group Transaction Risk Management Information System

The intra-group transaction risk management information system includes:

- a. Intra-group transaction risk profile reports as a part of the integrated risk profile report;
- b. Intra-group transaction report, which contains:
 - Recapitulation of transactions with related parties;
 - Important agreements with related parties.

BNI as the Main Entity prepares and submits the intra-group transaction risk profile report as part of the integrated risk profile report and the intra-group transaction report to the Financial Services Authority on a semi-annual basis for reporting positions in June and December.

Throughout 2021, all intra-group transactions have been carried out fairly (fulfilling the arm's length principle).

BNI GOOD CORPORATE GOVERNANCE IMPLEMENTATION REPORT AS THE MAIN ENTITY IN THE BNI FINANCIAL CONGLOMERATE

Based on OJK Regulation No. 55/POJK.03/2016 concerning the Implementation of Governance for Commercial Banks, and OJK Regulation No. 4/POJK.03/2016 concerning Rating of Commercial Banks Soundness, each Bank is required to conduct a self-assessment of the Good Corporate Governance (GCG) principles implementation at least every semester for the position at the end of June and December.



Corporate Governance Aspects and Principles Implementation In Accordance With Financial Services Authority Regulations Otoritas Jasa Keuangan

BNI applies the principles of Good Corporate Governance in every aspect of its business by referring to the prevailing laws and regulations as stipulated in POJK No. 21/POJK.04/2015 concerning Implementation of Public Company Governance Guidelines, and SEOJK No. 32/ SEOJK.04/2015 concerning Guidelines for the Governance of Public Companies, where there are 5 (five) aspects, 8 (eight) principles and 25 (twenty five) recommendations for the implementation of good corporate governance aspects and principles. Recommendations for the application of good corporate governance aspects and principles in the Governance Guidelines are the standards that must be applied by the Bank when implementing the governance principles. BNI applied these aspects, principles and recommendations based on a “comply or explain” approach in 2021 as follows:

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
I	Aspect 1: Public Company Relationship with Shareholders in Ensuring Shareholders' Rights;			
	Principle 1 Increasing the Value of the GMS	The Public Company has technical voting methods or procedures, both openly and privately, that prioritize independence and the interests of shareholders.	Each share with voting rights issued has one vote (one share one vote). Shareholders can exercise their voting rights when making decisions, especially in making decisions by voting. However, the mechanism for making decisions by means of voting, either openly or in private, has not been regulated in detail. It is recommended that Public Companies have a voting procedure in making decisions on an agenda of the GMS. The voting procedure must maintain the independence or freedom of Shareholders. For example, open voting is carried out by raising one's hand in accordance with the optional instructions offered by the chairman of the GMS. Closed voting is carried out on decisions requiring confidentiality or at the request of Shareholders, by using a ballot card or by using electronic voting.	Voting Procedures in making decisions on an agenda at the BNI GMS are carried out by closed voting by using a ballot card or electronic voting. The procedure for calculating the quorum, question and answer and the mechanism for making meeting decisions has been outlined in the GMS Rules of Procedure which refer to the Financial Services Authority Regulation No. 32/ POJK.04/2014 as lastly amended by the Financial Services Authority Regulation No. 10/ POJK.04/2017. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		All members of the Board of Directors and the Board of Commissioners of a Public Company attend the Annual GMS.	The presence of all members of the Board of Directors and members of the Board of Commissioners of a Public Company is intended so that each member of the Board of Directors and members of the Board of Commissioners can pay attention, explain and directly answer problems that occur or questions raised by shareholders regarding the agenda of the GMS	Taking into account the health protocols, the 2021 BNI Annual GMS was attended by 11 (eleven) members of the Board of Directors and 7 (seven) members of the Board of Commissioners. Description: Explain
		A summary of the minutes of the GMS is available on the Public Company Website for at least 1 (one) year.	The Public Company must make a summary of the GMS minutes in Indonesian and foreign languages (at least in English), and announce it 2 (two) working days after the GMS is held to the public, one of which is through the Public Company Website. The availability of summary minutes of the GMS on the Public Company Website provides an opportunity for absent Shareholders to obtain important information in organizing the GMS easily and quickly. Therefore, the provisions regarding the minimum period of availability of the summary of the GMS minutes on the Website are intended to provide sufficient time for Shareholders to obtain such information.	The summary of the minutes of the Annual GMS has been announced within a maximum of 2 (two) working days after the GMS is held both on the Company's website and in print media as well as through the IDXnet electronic reporting system and the Financial Services Authority e-reporting Description: Comply
	Principle 2 Improving the Quality of Public Company Communication with Shareholders or Investors.	The Public Company has a communication policy with shareholders or investors.	The communication between a public company and shareholders or investors is intended so that shareholders or investors have a clearer understanding of the information that has been published to the public, such as periodic reports, information disclosure, business conditions or prospects and performance, and the implementation of public company governance. In addition, Shareholders or investors can also submit input and opinions to the management of the Public Company. The communication policy with shareholders or investors shows the commitment of the Public Company in communicating with shareholders or investors. The policy may include strategies, programs, and timing of communications, as well as guidelines that support shareholders or investors to participate in these communications.	The communication policy with shareholders or investors is contained in the Investor Relations company guidelines No. IN/41/KMP/001 dated 26 January 2015 which includes policies on investor relations activities such as analyst meetings, preparation of annual reports, investor meetings, public expose, and roadshow. The policy includes strategies, programs, and timing of communication, as well as guidelines that support shareholders or investors to participate in communications. The existence of a communication policy with shareholders or investors shows that BNI as a public company is committed to communicating with shareholders or investors. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		The Public Company discloses the communication policy of the Public Company with shareholders or investors on the Website.	The disclosure of the communication policy is a form of transparency on the commitment of the Public Company in providing equality to all shareholders or investors in the implementation of communication. The disclosure of information also aims to increase the participation and role of Shareholders or investors in implementing the communication program for Public Companies.	The disclosure of the communication policy as well as the communication agenda with the Shareholders or investors has been uploaded to the Website in the Investor Relations section. Description: Comply
II Aspect 2: Functions and Roles of the Board of Commissioners;				
	Principle 3 Strengthening the Membership and Composition of the Board of Commissioners	Determination of the number of members of the Board of Commissioners by considering the conditions of the Public Company.	The number of members of the Board of Commissioners can affect the effectiveness of the implementation of the duties of the Board of Commissioners. Determination of the number of members of the Board of Commissioners of a Public Company must refer to the provisions of the prevailing laws and regulations, consisting of at least 2 (two) persons based on the provisions of the Financial Services Authority regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies. In addition, it is also necessary to consider the conditions of the Public Company, which include among others the characteristics, capacity and size as well as the achievement of objectives and the fulfillment of different business needs among the Public Companies. However, the large number of members of the Board of Commissioners has the potential to interfere with the effectiveness of the implementation of the functions of the Board of Commissioners.	The number of members of the Board of Commissioners at BNI as of December 31, 2021 was 10 (ten) people with due observance of the diversity of composition, this number is deemed sufficient and in accordance with BNI conditions and adjusted to the provisions of the Financial Services Authority Regulation No. 33/ POJK.04/2014. Description: Comply
		Determining the composition of the members of the Board of Commissioners takes into account the diversity of expertise, knowledge and experience required.	The composition of the Board of Commissioners is a combination of characteristics, both in terms of the organs of the Board of Commissioners and members of the Board of Commissioners individually, according to the needs of the Public Company. These characteristics can be reflected in the determination of the expertise, knowledge and experience required in the implementation of supervisory duties and providing advice by the Board of Commissioners of a Public Company. Composition that has taken into account the needs of the Public Company is a positive thing, especially in relation to decision making in the context of implementing the supervisory function which is carried out by considering a wider variety of aspects	The current composition of the Board of Commissioners fulfills the element of diversity, namely a combination of independence, expertise/education, work experience, age and gender by taking into account the needs and complexities of BNI. This has been described in the Sub-Chapter on the Diversity of the Composition of the Board of Commissioners in this Governance Report. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
	Principle 4 Improving the Quality of Implementation of Duties and Responsibilities of the Board of Commissioners.	The Board of Commissioners has a self-assessment policy to assess the performance of the Board of Commissioners.	The Board of Commissioners' self- assessment policy is a guideline used as a form of accountability for collegially assessing the performance of the Board of Commissioners. Self-assessment is carried out by each member to assess the performance of the Board of Commissioners collegially, and not to assess the individual performance of each member of the Board of Commissioners. With this Self Assessment, it is expected that each member of the Board of Commissioners can contribute to improving the performance of the Board of Commissioners on an ongoing basis. This policy may include assessment activities carried out along with their aims and objectives, periodic implementation time, and benchmarks or assessment criteria used in accordance with the recommendations given by the nomination and remuneration function of the Public Company, where these functions are required in the Regulation of Financial Services Authority concerning the Nomination and Remuneration Committee of Issuers or Public Companies.	Self-assessment policy to assess the Board of Commissioners performance based on the realization of the work program of the Board of Commissioners in accordance with the Work Plan and Budget (RKA) of the Board of Commissioners and through the GCG Self Assessment in which there are indicators of the duties and responsibilities of the Board of Commissioners. The self-assessment policy (Self Assessment) to assess the performance of the Board of Commissioners based on the realization of the work program of the Board of Commissioners in accordance with the Work Plan and Budget (RKA) of the Board of Commissioners is described through advisory indicators on performance, strengthening of executive functions, and monitoring of compliance. Meanwhile, the assessment contained in the GCG Self Assessment is divided into 3 (three) benchmarks, namely the Governance Structure, Governance Process and Governance Outcome. Governance structure consists of 16 (sixteen) indicators, governance process consists of 17 (seventeen) indicators, while governance outcome consists of 6 (six) indicators. Description: Comply
		The self-assessment policy to assess the performance of the Board of Commissioners is disclosed in the Annual Report of the Public Company.	The disclosure of the Self- Assessment policy on the performance of the Board of Commissioners is carried out not only to fulfill the transparency aspect as a form of accountability for the implementation of its duties, but also to give confidence, especially to shareholders or investors, on the efforts that need to be made to improve the performance of the Board of Commissioners. With this disclosure, the Shareholders or investors will know the check and balance mechanism on the performance of the Board of Commissioners.	Disclosure of Self Assessment Policy on the Board of Commissioners performance. The self-assessment policy contained in the RKA is conveyed through the Annual Report of the Public Company, while the results of the GCG Self Assessment on the duties and responsibilities of the Board of Commissioners are submitted to regulators. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		The Board of Commissioners has a policy regarding the resignation of a member of the Board of Commissioners if the said person is involved in a financial crime.	The policy of resigning members of the Board of Commissioners who are involved in financial crimes is a policy that can increase the trust of stakeholders in the Public Company, so that the integrity of the company will be maintained. This policy is needed to assist the smooth running of the legal process and so that the legal process does not interfere with business activities. In addition, in terms of morality, this policy builds an ethical culture within the Public Company. This policy can be included in the Guidelines or Code of Ethics that apply to the Board of Commissioners. Furthermore, what is meant by being involved in a financial crime is the status of being convicted of a member of the Board of Commissioners from an authorized party. Financial crimes referred to include manipulation and various forms of embezzlement in financial service activities as well as the Criminal Act of Money Laundering as referred to in Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering.	The Board of Commissioners resignation policy is contained in the Articles of Association, namely Article 14 paragraph 16 c which states that the dismissal of a member of the Board of Commissioners, among others, is involved in an action that is detrimental to the Company and/or the State, Article 14 paragraph 18 which states that the decision to dismiss for that reason is taken after the person concerned is given the opportunity to defend himself in the GMS, as well as Article 14 paragraph 26 f which states that the position of a member of the Board of Commissioners automatically ends if he no longer meets the requirements as a member of the Board of Commissioners based on this Articles of Association and laws and regulations. Description: Comply
		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.	Based on the provisions of the Financial Services Authority Regulation concerning the Nomination and Remuneration Committee of Issuers or Public Companies, the committee that carries out the nomination function has the duty to formulate the policies and criteria required in the nomination process for candidate members of the Board of Directors. One of the policies that can support the Nomination process as referred to is the succession policy for members of the Board of Directors. The succession policy aims to maintain the continuity of the regeneration process or leadership regeneration at BNI in order to maintain business sustainability and BNI's long-term goals.	One of the Board of Commissioners organs is the Nomination and Remuneration Committee (currently all members of the Board of Commissioners) who carry out the nomination function, including assisting 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, with based on the BUMN Regulation Number Per-02/MBU/02/2015. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
III Aspect 3: Functions and Roles of the Board of Directors				
	Principle 5 Strengthening the Membership and Composition of the Board of Directors.	Determining the number of members of the Board of Directors considers the condition of the BNI Open and its effectiveness in decision making.	As a corporate organ authorized in the management of BNI, determining the number of Directors greatly affects the performance of the Public Company. Thus, the determination of the number of members of the Board of Directors must be carried out through careful consideration and must refer to the provisions of the prevailing laws and regulations, where based on the Financial Services Authority Regulation concerning the Board of Directors and the Board of Commissioners of an Issuer or Public Company consisting of at least 2 (two). In addition, determining the number of Directors must be based on the need to achieve the goals and objectives of the Public Company and adjusted to the conditions of the Public Company, including the characteristics, capacity and size of the Public Company as well as how to achieve the effectiveness of the Board of Directors decision making.	The number and capacity of the members of the Board of Directors are based on the provisions of the Financial Services Authority Regulation No. 33/POJK.04/2014. The number of members of the Board of Directors as of December 31, 2021 was 12 (twelve) people. Description: Comply
		Determining the composition of the members of the Board of Directors takes into account the diversity of expertise, knowledge and experience required.	Like the Board of Commissioners, the diversity of composition of the members of the Board of Directors is a combination of desired characteristics, both in terms of the organs of the Board of Directors and individual members of the Board of Directors, according to the needs of the Public Company. This combination is determined by taking into account the expertise, knowledge and experience appropriate to the division of duties and functions of the Board of Directors in achieving the objectives of the Public Company. Thus, consideration of the combination of characteristics referred to will have an impact on the accuracy of the nomination process and the appointment of individual members of the Board of Directors or the Board of Directors collegially.	The current composition of the BNI Board of Directors has fulfilled the diversity element, namely a combination of independence, expertise/ education, work experience, age and gender by taking into account the needs and complexities of BNI. This has been described in the Sub- Chapter on the Diversity of Directors in this Governance Report. Description: Comply
		Members of the Board of Directors in charge of accounting or finance have expertise and/ or knowledge in accounting.	Members of the Board of Directors in charge of accounting or finance have expertise and/ or knowledge in accounting.	The Managing Director Finance on behalf of Novita Widya Anggraini has an educational background in accounting economics and throughout 2021 improved competencies in finance and accounting as stated in the Board of Directors Education and/or Training in this Annual Report. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
	Principle 6 Improving the Quality of Implementation of Duties and Responsibilities of the Board of Directors.	The Board of Directors has a self-assessment policy to assess the performance of the Board of Directors.	As is the case with the Board of Commissioners, the Board of Directors 'self-assessment policy is a guideline used as a form of accountability for collegial evaluation of the Board of Directors' performance. Self-assessment is conducted by each member of the Board of Directors to assess the performance of the Board of Directors collegially, and not to assess the individual performance of each member of the Board of Directors. With this Self Assessment, it is hoped that each member of the Board of Directors can contribute to improving the performance of the Board of Directors on an ongoing basis. The policy may include the assessment activities carried out and their aims and objectives, periodic implementation time, and the benchmarks or assessment criteria used in accordance with the recommendations given by the nomination and remuneration function of the Public Company, where the formation of such functions has been mandatory in the Regulations of the Authority. Financial Services concerning the Nomination and Remuneration Committee of Issuers or Public Companies.	The performance appraisal policy for the Board of Directors is contained in the Guiding Principle Key Performance Indicator (KPI) BOD. The measurement of the performance of the Board of Directors consists of several KPIs which are measured collegially for all Directors and are quantitative and qualitative in nature. The policy includes assessments carried out on several factors, namely market capitalization, profits, market share and leadership. The Remuneration and Nomination Committee has evaluated and compiled and provided recommendations to the Board of Commissioners regarding the nomination and remuneration system/ policy for Commissioners, Directors, executive officers and employees as a whole. Description: Comply
		The self-assessment policy to assess the performance of the Board of Directors is disclosed in the annual report of the Public Company.	Disclosure of self-assessment policies on the performance of the Board of Directors is carried out not only to fulfill the transparency aspect as a form of accountability for the implementation of their duties, but also to provide important information on efforts to improve the management of the Public Company. This information is very useful to provide assurance to shareholders or investors that there is certainty that the company's management will continue to be in a better direction. With this disclosure, the Shareholders or investors know the check and balance mechanism on the performance of the Board of Directors.	Each year the Board of Directors Performance Assessment has been disclosed in the Annual Report which can be accessed by Shareholders/ investors and other stakeholders through the BNI website so that this information is very useful to provide assurance to Shareholders or investors that there is certainty that the company's management will continue to be in a better direction. Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		The Board of Directors has a policy regarding the resignation of a member of the Board of Directors if involved in a financial crime.	The policy of resigning members of the Board of Directors who are involved in financial crimes is a policy that can increase the trust of stakeholders in the Public Company, so that the integrity of the company will be maintained. This policy is needed to assist the smooth running of the legal process and so that the legal process does not interfere with business activities. In addition, in terms of morality, this policy will build an ethical culture within the Public Company. This policy can be included in the Guidelines or Code of Ethics that apply to the Board of Directors. Furthermore, what is meant by being involved in a financial crime is the status of being convicted of a member of the Board of Directors from an authorized party. These financial crimes include manipulation and various forms of embezzlement in financial service activities as well as the Criminal Act of Money Laundering as referred to in Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering.	The company will act actively in the event of a financial crime, as stated in the Articles of Association, namely Article 11 paragraph 13 in conjunction with Article 11 paragraph 14 d which states that members of the Board of Directors can be dismissed at any time for reasons, among others, if they are involved in actions that harm the Company and/or the State, Article 11 paragraph 15 which states that the decision to dismiss for that reason is taken after the person concerned is given the opportunity to defend himself in the GMS, and Article 11 paragraph 24 f which states that the position of a member of the Board of Directors automatically ends if no longer meets the requirements as a member of the Board of Directors based on this Articles of Association. and laws and regulations. In addition, the Articles of Association also state that members of the Board of Directors can be dismissed for the time being by the Board of Commissioners stating the reasons if the person concerned is acting contrary to the Articles of Association or there is an indication that the Company has committed losses or neglected its obligations or there is an urgent reason for the Company. The Company already has a BNI Anti- Money Laundering and Countering Financing of Terrorism (AML & CFT) Policy Statement in order to enforce Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering.
Description: Comply				
IV	Aspect 4: Stakeholder Participation			
	Principle 7 Improving Corporate Governance Aspects through Stakeholder Participation.	The Public Company has a policy to prevent insider trading.	A person who has inside information is prohibited from carrying out a Securities transaction using inside information as referred to in the Capital Market Law. Public Companies can minimize the occurrence of insider trading through preventive policies, for example by strictly separating data and/or information that is confidential and public in nature, as well as dividing the duties and responsibilities of managing the information in a proportional and efficient manner.	BNI has policies related to insider information to prevent insider trading. The policy is outlined in the Online Company Guidelines (e-PP). Description: Comply

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		Public companies have anti-corruption and anti-fraud policies.	The anti-corruption policy is useful to ensure that the business activities of the Public Company are carried out legally, prudently and in accordance with the principles of good governance. The policy can be part of a code of ethics, or in a separate form. This policy may include, among others, programs and procedures implemented in overcoming corrupt practices, kickbacks, fraud, bribery and/ or gratuities in public companies. The scope of the policy must describe the prevention of the Public Company against all corrupt practices, either giving or receiving from other parties.	To comply with OJK Regulation No. 39/POJK.03/2019 concerning the Implementation of Anti-Fraud Strategy in Commercial Banks to grow the Anti-Fraud Committee to foster anti-fraud culture and awareness at all levels of the organization. Policies and Principles no Fraud for the bank are implemented through the Implementation of Anti-Fraud Strategies. To measure the realization of a compliance culture, the Compliance Division has developed a tool called the Compliance index and the Whistleblowing System. BNI which can be accessed by all employees and stakeholders through the BNI website. Description: Comply
	The Public Company has a policy regarding the selection and capacity building of suppliers or vendors.	The policy on supplier or vendor selection is useful to ensure that the Public Company obtains the necessary goods or services at a competitive price and good quality. Meanwhile, the policy of increasing the ability of suppliers or vendors is useful to ensure that the supply chain runs efficiently and effectively. The ability of suppliers or vendors to supply/fulfill goods or services needed by the company will affect the quality of the company's output. The implementation of these policies can ensure continuity of supply, both in terms of quantity and quality required by the Public Company. The scope of this policy includes criteria in selecting suppliers or vendors, transparent procurement mechanisms, efforts to increase the ability of suppliers or vendors, and fulfillment of rights related to suppliers or vendors.		The company has a policy of selecting and increasing the ability of suppliers or vendors, which is outlined in the form of online procurement guidelines (e-PP). The policy also regulates the Procurement Procedure including the method and process flow. The implementation of this policy is always applied in the process of procuring goods and/or services and is guided by all employees. Providers of goods and/or services needed by BNI must be registered in the manual system or in the e-Procurement application system. The notification of the winner of the procurement of goods and/or services is carried out transparently. Description: Comply



NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		The Public Company has a policy regarding the fulfillment of creditors' rights.	Policies regarding the fulfillment of creditors' rights are used as guidelines in making loans to creditors. The purpose of this policy is to maintain the fulfillment of rights and maintain creditor trust in the Public Company. The policy includes considerations in entering into agreements, as well as follow-up actions in fulfilling Public Company obligations to creditors.	<p>Policies related to creditor rights have been stated in the agreement in the event that BNI enters into a loan agreement with creditors. The agreement has stated the rights and obligations of the parties, related to the rights of creditors, for example in the form of providing transparent, accurate and timely information at the time of request and use of loans, maintaining financial ratios (Current Ratio, DeR, Debt to Service Ratio) with the ratio agreed upon with the creditor, submitting an annual audited financial report at the period agreed with the creditor, and so on.</p> <p>Description: Comply</p>
		The Public Company has a whistleblowing system policy.	A well-developed whistleblowing system policy will provide assurance of protection to witnesses or reporters for indications of violations committed by employees or management of the Public Company. The application of this system policy will have an impact on the formation of a culture of good corporate governance. The whistleblowing system policy covers, among others, the types of violations that can be reported through the whistleblowing system, how to complain, protect and guarantee the confidentiality of the reporter, handling complaints, the party who manages the complaint, and the results of the handling and follow-up of complaints	<p>Management of the Whistleblowing System (WBS) at BNI under the name "WBS to CEO. WBS is a commitment to creating a clean and integrity work environment in the form of active participation of BNI Hi-Movers to report violations that occur within BNI. Violation reports via WBS can be made by telephone, email, letter SMS/Whatsapp, or website.</p> <p>Description: Comply</p>

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		Public Companies have a policy of providing long-term incentives to Directors and employees	Long-term incentives are incentives based on long-term performance achievement. Long-term incentive plans have the premise that the company's long-term performance is reflected by the growth in the value of its shares or other long-term targets. Long-term incentives are useful in order to maintain loyalty and provide motivation to Directors and employees to increase their performance or productivity which will have an impact on improving the company's performance in the long term. The existence of a long-term incentive policy is a real commitment of the Public Company to encourage the implementation of long-term incentives for Directors and Employees with terms, procedures and forms that are adjusted to the long-term goals of the Public Company. Such policies may include, among others: the aims and objectives of providing long-term incentives, the terms and procedures for providing incentives, as well as conditions and risks that must be considered by the Public Company in providing incentives. This policy can also be included in the remuneration policy of the existing Public Company.	<p>The policy for providing long-term incentives to Directors and employees has been outlined in a separate Long Term Incentive Guidelines. The provision of Long Term Incentives (LTI) for the Board of Directors and the Board of Commissioners totaling Rp39,549,600,000,- (thirty-nine billion five hundred forty-nine million six hundred thousand Rupiah) has been approved at the Board of Commissioners Meeting. This incentive policy is a BNI commitment that is adjusted to the Company's long-term goals and statutory provisions.</p> <p>Description: Comply</p>
V Aspect 5: Information Disclosure				
	Principle 8 Improving the Implementation of Information Disclosure.	Public Companies make wider use of information technology in addition to website sites as a medium for information disclosure.	The use of information technology can be useful as a medium for information disclosure. The disclosure of information that is carried out is not only disclosure of information that has been regulated in laws and regulations, but also other information related to the Public Company which is deemed useful to be known by Shareholders or investors. With the wider use of information technology in addition to the website, it is hoped that the company can increase the effectiveness of the company's information dissemination. Nonetheless, the use of information technology should still pay attention to the benefits and costs of the company.	<p>In addition to the website, BNI also uses other information technologies such as email, twitter and Instagram as a means of communication and media for information disclosure. Information disclosure carried out is not only disclosure of information regulated in laws and regulations but also other information related to a Public Company that is considered useful for shareholders/investors to know.</p> <p>Description: Comply</p>

NO.	PRINCIPLE	RECOMMENDATION	STATEMENT OF RECOMMENDATIONS FROM THE FINANCIAL SERVICES AUTHORITY	EXPLANATION OF IMPLEMENTATION AT BNI
		The Annual Report of the Public Company discloses the ultimate beneficial owner in the share ownership of the Public Company of at least 5% (five percent), in addition to the disclosure of the ultimate beneficial owner in the ownership of shares of the Public Company through the major and controlling shareholders.	The laws and regulations in the Capital Market sector that govern the submission of annual reports of Public Companies, have stipulated the obligation to disclose information regarding Shareholders who own 5% (five percent) or more shares of Public Companies and the obligation to disclose information regarding the main and controlling shareholders of the Public Company directly or indirectly up to the ultimate beneficial owner in ownership of the shares. In this Governance Guidelines it is recommended to disclose the ultimate beneficial owner of share ownership of a Public Company of at least 5% (five percent), in addition to disclosing the ultimate beneficial owner of share ownership by the major and controlling shareholders.	The ultimate beneficial owner of share ownership of a Public Company of at least 5% (five percent) has been disclosed in the Annual Report, Sub-Chapter List of Shareholders and Sub-Chapter Share Ownership of Directors and Board of Commissioners. Description: Comply

Implementation of the ASEAN Corporate Governance Scorecard

As explained in the Governance Assessment section through an independent party assessment based on the ASEAN Corporate Governance Scorecard parameters, BNI was awarded a “Very Good” predicate with a score of 97.33, which is an increase compared to the previous year’s score of 97.02. The assessment was carried out based on BNI’s information disclosure that can be accessed by all stakeholders based on the ASEAN Corporate Governance Scorecard parameters. The availability of information based on the ASEAN Corporate Governance Scorecard parameters are shown as follows:

ASEAN Corporate Governance

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
Principle A: Shareholder’s 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 annual general meeting (AGM) for final dividends	Yes	The company paid the final dividend on April 30, 2021 after the company’s public announcement on March 31, 2021
Do shareholders have the right to participate in:			
A.2.1	Amendments to the company’s constitution?	Yes	As stated in Article 28 of the Company’s Articles of Association
A.2.2	The authorization of additional shares?	Yes	Sebagaimana telah dimuat pada Pasal 4 ayat (6) Anggaran Dasar Perseroan, Ya sebagaimana telah dimuat
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	Yes	As stated in Article 4 Paragraph 6 of the Company’s Articles of Association
A.3.1	Do shareholders have the opportunity, evidenced by an agenda items, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non- executive Directors/Commissioners?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company’s website
A.3.2	Does the company provide minority shareholders a right to nominate candidates for Board of Directors/ Commissioners?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company’s website
A.3.3	Does the company allow shareholders to elect directors/ commissioners individually?	Yes	In accordance with the rules of the GMS published on the Company’s website 21 (twenty one) days before the GMS: https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pemanggilan_Ulang_RUPST_BNI-5_Maret_2021-Id.pdf

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
A.3.4	Does the company disclose voting? The procedure to be used before the start of the meeting?	Yes	In accordance with the rules of the GMS published on the Company's website 21 (twenty one) days before the GMS: https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pemanggilan_Ulang_RUPST_BNI-5_Maret_2021-Id.pdf
A.3.5	Do the minutes of the most recent AGMS record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.6	Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/ each agenda item for the most recent AGMS?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.7	Does the company disclose the list of board members who attended the most recent AGMS?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.8	Does the company disclose that all board members and the CEO (if not a board member) attended the most recent AGMS?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.9	Does the company allow for voting in absentia?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGMS?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGMS?	Yes	In accordance with the implementation of the Annual GMS held on March 29, 2021, as stated in the Summary of Minutes of the GMS published on the Company's website
A.3.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGMS/EGMS for all resolutions?	No	-
A.3.13	Does the company provide at least 21 days notice for all AGMS and EGMS?	Yes	The invitation for the 2021 Annual GMS was published on the Company's website
A.3.14	Does the company provide the rationale and explanation for each agenda which require shareholders' approval in the notice of AGMS/circulars and/or the accompanying statement?	Yes	The invitation for the 2021 Annual GMS was published on the Company's website
A.3.15	Does the company give the opportunity for shareholder to place item/s on the agenda of AGMS?	Yes	The invitation for the 2021 Annual GMS was published on the Company's website

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
A.4.1	In cases of mergers, acquisitions and/or takeovers, does the board of directors/commissioners of the offeree company appoint an independent party to evaluate the fairness of the transaction price?	Yes	-
A.5.1	Does the company publicly disclose policy/practice to encourage shareholders including institutional shareholders to attend the general meetings or engagement with the company?	Yes	The invitation for the 2021 Annual GMS was published on the Company's website
Principle B: Equal Treatment of Shareholders			
B.1.1	Do the company's ordinary or common shares have one vote for one share?	Yes	The invitation for the 2021 Annual GMS was published on the Company's website
B.1.2	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)?	Yes	As stated in the Company's Articles of Association:
B.2.1	Does each resolution in the most recent AGMS deal with only one item, i.e., there is no bundling of several items into the same resolution?	No	Explanation of the Company: As stated in the minutes of the AGMS, each agenda was decided for one matter only.
B.2.2	Are the company's notice of the most recent AGMS/circulars fully translated into English and published on the same date as the local-language version?	Yes	As published on the Company's website and IDX website: https://bni.co.id/id-id/company/tatakelola/rups
Does the notice of AGMS/circulars have the following details:			
B.2.3	Are the profiles of directors/commissioners (at least age, qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	No	Company Explanation: Minister of SOEs Regulation No. PER-02/MBU/02/2015 and No. PER-03/MBU/02/2015 concerning Requirements, Procedures for Appointment, and Dismissal of Members of the Board of Commissioners/ Board of Directors of State-Owned Enterprises stipulates that for Publicly listed SOEs, curriculum vitae of candidates for members of the Board of Commissioners/ Board of Directors to be proposed for appointment at the GMS, must be available and announced at the time of holding the GMS before making a decision regarding the appointment of the person concerned as a member of the Board of Commissioners/ Board of Directors. Since the Company is a Publicly listed SOE, the Company is subject to these provisions.
B.2.4	Are the auditors seeking appointment/re- appointment clearly identified?	No	-
B.2.5	Were the proxy documents made easily available?	Yes	In accordance with the implementation in the Annual GMS held on March 29, 2021 as follows: https://www.bni.co.id/id-id/perusahaan/tatakelola/rups
B.3.1	Does the company have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market?	Yes	As stated in the provisions of the Company's Prohibited and Non- Prohibited Transactions Guidelines reported in the 2021 Annual Report for concerning Governance Principles to Improve Corporate Governance Aspects through Stakeholder Participation
B.3.2	Are the directors and commissioners required to report their dealings in company shares within 3 business days?	No	Company explanation: The Company already has these provisions in the Company Guidelines provisions for Prohibited and Non-Prohibited Transactions as reported in the 2021 Annual Report concerning Governance Principles to Improve Aspects of Corporate Governance through Stakeholder Participation.

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
B.4.1	Are directors and commissioners required to disclose their interest in transactions and any other conflicts of interest?	Yes	As stated in the Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material/significant RPTs to determine whether they are in the best interests of the company and shareholders?	Yes	As stated in the Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures
B.4.3	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?	Yes	As stated in the Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures
B.4.4	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?	No	-
B.5.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	Yes	-
B.5.2	In case of related party transactions requiring shareholders approval, is the decision made by disinterested shareholders?	Yes	As stipulated in the Company's Articles of Association: http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf

Principle C: The Role of Stakeholders

Does the company disclose this policy?

C.1.1	The existence and scope of business of the company to fulfill the customer's welfare?	Yes	As stated in the 2020 Annual Report in the section Social Responsibility - Corporate Social Responsibility Related to Responsibility to Consumers.
C.1.2	Supplier/Contractor selection procedure?	Yes	As published in the Procurement Auction section on the Company's website http://bni.co.id/id-id/beranda/berita/lelangpengadaan
C.1.3	The company's efforts to ensure that its value chain is environmentally friendly or consistent with the promoting sustainable development?	Yes	As stated in the 2020 Annual Report in the Social Responsibility section and in the 2020 Sustainability Report
C.1.4	The company's efforts to interact with the communities in which the company operates?	Yes	As stated in the 2020 Annual Report in the Social Responsibility section and in the 2020 Sustainability Report
C.1.5	Company anti-corruption programs and procedures?	Yes	As stated in the 2020 Annual Report in the Corporate Social Responsibility section Related to Fair Operations
C.1.6	How are Creditor's rights protected?	Yes	As stated in several sections in the 2020 Annual Report, including the section on the Implementation of the Principles of Corporate Governance in accordance with the provisions of the Financial Services Authority.

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
C.1.7	Does the company have a separate report/section that describes the company's efforts on environmental/ economic and social issues?	Yes	The Company publishes the 2020 Sustainability Report that can be accessed through the Company's website: https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
C.2.1	Does the company provide contact details through the website or the company's Annual Report, so that Stakeholders (such as customers, suppliers, the public, etc.) can raise concerns and/or complaints regarding possible violations of their rights?	Yes	The Company announces the Company's contact details in the 2021 Annual Report and the Company's website: https://bni.co.id/id-id/kontak/kontakbni/hubungkami
C.3.1	Does the company explicitly disclose policies and practices for the health, safety and welfare of its employees?	Yes	As stated in the 2020 Annual Report in the Corporate Social Responsibility section Related to Employment, Health and Safety and the 2020 Sustainability Report.
C.3.2	Does the company disclose policies and practices regarding its employee training and development programs?	Yes	As stated in the 2020 Annual Report in the Employee Profile and Competency Development section.
C.3.3	Does the company have a remuneration/ compensation policy that does not only take into account the company's short-term performance?	No	-
C.4.1	Does the company have a whistleblowing policy that contains procedures for complaints by employees and other stakeholders regarding suspected illegal and unethical behavior and provides contact details through the website or the company's Annual Report?	Yes	As stated in the 2020 Annual Report in the Corporate Governance section – Whistleblowing System.
C.4.2	Does the company have policies or procedures to protect employees who disclose illegal or unethical behavior from retaliation?	Yes	As stated in the 2020 Annual Report in the Legal Aid Facilities section.
Principle D: Disclosure & Transparency			
D.1.1	Does the share ownership information reveal the identity of the beneficial owners, with 5% or more share ownership?	Yes	As stated in the 2020 Annual Report in the Majority and Controlling Shareholder Information section.
D.1.2	Does the company disclose the direct/ indirect ownership of the majority shareholder?	Yes	As stated in the 2020 Annual Report in the Majority and Controlling Shareholder Information section.
D.1.3	Does the company disclose share ownership by members of the Board of Directors and the Board of Commissioners, either directly/ indirectly?	Yes	As stated in the 2020 Annual Report in the Majority and Controlling Shareholder Information section.
D.1.4	Does the company disclose share ownership by Senior Management, either directly/indirectly?	Yes	As stated in the 2020 Annual Report in the Majority and Controlling Shareholder Information section.
D.1.5	Does the company disclose details of parent companies, subsidiaries, associations, joint ventures and special purpose enterprises?	Yes	As stated in the 2020 Annual Report in the Name and Address section of Subsidiaries, Associates.

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
Does the company's Annual Report disclose the following:			
D.2.1	Company objectives	Yes	As stated in the 2020 Annual Report in the Vision, Mission and Corporate Culture section.
D.2.2	Financial performance indicators	Yes	As stated in several sections in the 2020 Annual Report, including in the Financial Highlights and Management Reports section.
D.2.3	Non-financial performance indicators	Yes	As stated in several sections in the 2020 Annual Report, including the Operational Highlights and Management Reports section.
D.2.4	Dividend Policy	No	As stated in the 2020 Annual Report in the Dividend Policy section.
D.2.5	Biographical details (minimum age, educational qualification, date of first appointment, relevant experience and positions in other public companies) of all members of the Board of Directors and the Board of Commissioners.	Yes	As stated in the 2020 Annual Report in the Profiles of the Directors and Commissioners.
D.2.6	Attendance details of each member of the Board of Directors and the Board of Commissioners in the Board of Directors and/or Board of Commissioners Meetings	Yes	As stated in the 2021 Annual Report at the Board of Commissioners and Directors Meeting section.
D.2.7	Total remunerasi masing-masing anggota Direksi dan Dewan Komisaris.	No	-
D.2.8	Does the Annual Report contain a statement confirming the company's compliance with corporate governance and, if there is a violation, have been identified and explained the reasons for each problem?	Yes	As stated in the 2021 Annual Report in the section on Management Reports and Implementation of Corporate Governance Aspects and Principles in accordance with Financial Services Authority Regulations, as well as Bad Corporate Governance Practices.
D.3.1	Does the company disclose a policy regarding the review and approval of material related party transactions?	Yes	As stated in the 2021 Annual Report in the Transactions with Related Parties section and Significant Prohibitions, Limitations and/or Barriers to Transferring Funds between Banks and Other Entities in One Business Group.
D.3.2	Does the company disclose the name, relationship and nature and value of any material related party transactions?	Yes	As stated in the 2021 Annual Report in the Transactions with Related Parties section and Significant Prohibitions, Limitations and/or Barriers to Transfer Funds between Bank and Other Entities in One Business Group.
D.4.1	Does the company disclose insider trading of the company's stock?	Yes	As stated in the 2021 Annual Report in the Report on Ownership/Changes in Share Ownership for the Board of Commissioners and Directors.
D.5.1	Are audit and non-audit fees disclosed?	Yes	As stated in the 2021 Annual Report in the Independent External Auditor section.
D.5.2	Apakah biaya non-audit melebihi biaya audit?	No	-
Does the company use the following media to communicate?			
D.6.1	Quarterly Report	Yes	The Quarterly Report has been published on the Company's and IDX website https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentas
D.6.2	Company website	Yes	<i>The Company's website is bni.co.id</i>
D.6.3	Analyst meeting	Yes	The Quarterly Report on the Analyst Meeting is published on the Company's website and the IDX website. https://bni.co.id/id-id/company/relationsinvestor/reportpresentations

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
D.6.4	Media briefings	Yes	Press release published on the Company's website: http://bni.co.id/id-id/beranda/berita/siaranpers
D.7.1	Are audited Annual Financial Statements issued within 120 days of the end of the financial year?	Yes	The Annual Report accompanied for the 2020 Financial Statements will be published on the Company's website on February 24, 2021
D.7.2	Is the Annual Report issued within 120 days of the end of the financial year?	Yes	The Annual Report accompanied for the 2021 Financial Statements will be published on the Company's website on February 24, 2021
D.7.3	Is the statement that the Annual Financial Statements have been presented correctly and fairly confirmed by the Board of Commissioners or Directors and/or related officials of the company.	Yes	As stated in the 2021 Annual Report Ratification Form.
Does the company have a website that discloses up-to- date information on the following:			
D.8.1	Financial Report (last quarter)	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.2	The material presented in the briefing to analysts and the media	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.3	Downloadable Annual Report	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.4	Summons to the GMS and/or EGMS	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/rups
D.8.5	Minutes of the AGMS and/or EGMS	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/rups
D.8.6	Company constitution (Laws, company notes and articles of association)	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/anggarandasarbni
D.9.1	Does the company disclose contact details (eg telephone, fax and e-mail) of officers/institutions responsible for investor relations?	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/kontakinvestor/kontakinformasi Sebagaimana juga tertuang pada Laporan Tahunan 2021 pada bagian Identitas Perusahaan.
Principle E: Responsibilities of the Board of Directors and the Board of Commissioners			
The responsibilities of the Board of Commissioners and CG Policy should be clearly stated by the company:			
E.1.1	Does the company disclose its corporate governance policies/board of directors/board of commissioners charter?	Yes	The Board of Directors and the Board of Commissioners Charter are published on the Company's website. http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatertib As stated in the 2021 Annual Report in the section on the Implementation of Good Corporate Governance Principles, Guidelines and Work Procedures for the Board of Commissioners, as well as the Board of Directors Work Guidelines and Code of Conduct.
E.1.2	Are the types of decisions that require the approval of the Board of Directors/ Board of Commissioners to be disclosed?	Yes	Published in the Company's Articles of Association. http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/072018_resize_AD%20BNI%202018%20(dan%20AHU).pdf As stated in the 2021 Annual Report in the Board of Commissioners Decree and 2020 Directors Decree
E.1.3	Are the roles and responsibilities of the Board of Directors/Board of Commissioners clearly stated?	Yes	Published in the Board of Directors and the Board of Commissioners Charter and the Company's Articles of Association. http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatertib http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/072018_resize_AD%20BNI%202018%20(dan%20AHU).pdf As stated in the 2021 Annual Report in the Duties and Responsibilities section of the Board of Commissioners as well as the Duties and Responsibilities of the Board of Directors.

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
Vision and Mission of the Company:			
E.1.4	Does the company have an updated Vision and Mission statement	Yes	As stated in the 2020 Annual Report in the Vision, Mission and Corporate Culture Section
E.1.5	Does the Board of Directors play a major role in the process of developing and reviewing the company's strategy every year?	Yes	As stated in the 2020 Annual Report in the Management Report and Business Prospects section.
E.1.6	Does the Board of Directors have a process to review, monitor and supervise the implementation of company strategy?	Yes	As stated in the 2020 Annual Report in the Management Report and Business Development Strategy section.
Code of Ethics or Code of Conduct:			
E.2.1	Are details of the code of conduct or behavior disclosed?	Yes	Regulated in the Board of Directors and the Board of Commissioners Charter published on the Company's website http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatertib As stated in the 2020 Annual Report in the Company's Code of Ethics.
E.2.2	Are all Directors/Commissioners, Senior Management and employees required to comply with the code of conduct?	Yes	As stated in the 2020 Annual Report in the Code of Ethics Compliance section.
E.2.3	Does the company have a process for implementing and monitoring compliance with a code of conduct or behavior?	Yes	As stated in the 2020 Annual Report in the Efforts to Implement and Enforce the Code of Ethics.
Structure and Composition of the Board of Commissioners:			
E.2.4	Does the composition of the Independent Director/ Commissioner constitute at least 50% of the total members of the Board of Directors/ Board of Commissioners?	Yes	https://bni.co.id/id-id/perusahaan/tentangbni/komisaris
E.2.5	Does the company have a term limit of nine years or less or 2 terms of five years each for its Independent Director/ Commissioner?	Yes	Regulated in the Board of Directors/Board of Commissioners' Working Guidelines and Procedures in the term of office of the Board of Directors/Board of Commissioners http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatertib
E.2.6	Has the company set a limit of five seats for the Board of Directors and the Board of Commissioners that can be held simultaneously by an independent/ non- Executive Director/Commissioner?	Yes	Regulated in the Board of Directors/Board of Commissioners' Working Guidelines and Procedures in the term of office of the Board of Directors/Board of Commissioners http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatertib
E.2.7	Does the company have any executive directors/ commissioners who serve on more than two boards of listed companies outside of the group?	No	-
Nomination Committee:			
E.2.8	Does the company have a Nomination Committee?	Yes	The Company has a Nomination and Remuneration Committee http://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.9	Is the Nomination Committee comprise a majority of independent directors/ commissioners?	Yes	As stated in the 2020 Annual Report in the Nomination and Remuneration Committee section
E.2.10	Is the chairman of the Nomination Committee an independent director/ commissioner?	Yes	As in the 2020 Annual Report in the Nomination and Remuneration Committee section, the Nomination and Remuneration Committee Chair is held by Agus Dermawan Wintarto Martowardojo, President Commissioner/ Independent Commissioner.

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
E.2.11	Does the company disclose the terms of reference/ governance structure/ charter of the Nomination Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.12	Is the meeting attendance of the Nomination Committee disclosed and if so, did the Nomination Committee meet at least twice during the year?	Yes	As stated in the 2020 Annual Report, the Agenda for the Nomination and Remuneration Committee Meetings, as well as the Frequency and Attendance Level of the Nomination and Remuneration Committee Meetings.
Remuneration Committee/Compensation Committee:			
E.2.13	Does the company have a Remuneration Committee?	Yes	The Company has a Nomination and Remuneration Committee https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.14	Is the Remuneration Committee comprise of a majority of independent directors/commissioners?	Yes	As stated in the 2020 Annual Report in the Nomination and Remuneration Committee section
E.2.15	Is the chairman of the Remuneration Committee an independent director/ commissioner?	Yes	As in the 2020 Annual Report, the Nomination and Remuneration Committee Chair is held by Agus Dermawan Wintarto Martowardojo, President Commissioner/ Independent Commissioner.
E.2.16	Does the company disclose the terms of reference/ governance structure/charter of the Remuneration Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.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?	Yes	As stated in the 2020 Annual Report, the Agenda for the Nomination and Remuneration Committee Meetings, as well as the Frequency and Attendance Level of the Nomination and Remuneration Committee Meetings.
Audit Committee:			
E.2.18	Does the company have an Audit Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.19	Is the Audit Committee comprised entirely of non- executive directors/ commissioners with a majority of independent directors/commissioners?	Yes	As published on the Company's website https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris and the 2020 Annual Report in the Audit Committee section.
E.2.20	Is the chairman of the Audit Committee an independent director/commissioner?	Yes	As published on the Company's website https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris and the 2020 Annual Report in the Audit Committee section.
E.2.21	Does the company disclose the terms of reference/ governance structure/ charter of the Audit Committee?	Yes	https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/Piagam-Komite-Audit-2021.pdf
E.2.22	Does at least one of the independent directors/ commissioners of the committee have accounting expertise (accounting qualification or experience)?	Yes	As stated in the 2020 Annual Report on the Audit Committee Structure, Membership and Expertise.
E.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?	Yes	As stated in the 2020 Annual Report on the Frequency and Attendance of the Audit Committee Meetings.
E.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	No	-

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
Meetings and Attendance of the Board of Commissioners:			
E.3.1	Are the board of directors meetings scheduled before the start of fiscal year?	Yes	As stated in the 2020 Annual Report.
E.3.2	Does the board of directors/ commissioners meet at least six times per year?	Yes	As stated in the 2020 Annual Report.
E.3.3	Has each of the directors/ commissioners attended at least 75% of all the board meetings held during the year?	No	-
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	No	As stipulated in the Company's Articles of Association https://bni.co.id/id-id/perusahaan/tatakelola/anggarandasarbni
E.3.5	Did the non-executive directors/ commissioners of the company meet separately at least once during the year without any executives present?	Yes	As stated in the 2020 Annual Report.
Information Access			
E.3.6	Are the Board of Directors/ Commissioners meeting working papers given to the Boards at least five working days before the meeting?	No	-
E.3.7	Does the corporate secretary play an important role in supporting the Board of Directors in carrying out their responsibilities?	Yes	As stated in the 2020 Annual Report in the Corporate Secretary section
E.3.8	Is the corporate secretary trained in law, accounting or corporate secretarial practices and keeps abreast of relevant developments?	No	-
Appointment and Re-election of Board of Commissioners Members			
E.3.9	Does the company disclose the criteria used in the selection of new Directors/ Commissioners?	Yes	As stated in Article 11 and Article 14 of the Company's Articles of Association and in the 2020 Annual Report in the Criteria for Members of the Board of Commissioners, and the Criteria & Term of Office for the Board of Directors
E.3.10	Does the company disclose the process followed the appointment of a new Director/Commissioner?	Yes	As stated in the 2020 Annual Report in the Appointment Process for the Board of Commissioners and Board of Directors
E.3.11	Can all directors/commissioners be re-elected every 3 years; or 5 years for companies registered in countries where the law provides for 5 years each? A five-year period should be required by an existing law prior to the introduction of the ASEAN Corporate Governance Scorecard in 2011.	Yes	As stated in the 2020 Annual Report in the Criteria & Term of Office for the Board of Directors and the Term of Office for Members of the Board of Commissioners
Regarding Remuneration			
E.3.12	Does the company disclose remuneration policies/practices (salaries, allowances, benefits and others) (i.e. use of incentives and short-term and long-term performance measures) for the President Director and Directors?	Yes	As stated in the 2020 Annual Report in the Board of Directors' Remuneration Policy
E.3.13	Is there a fee structure disclosure for non-executive Directors/ Commissioners?	Yes	As stated in the 2020 Annual Report in the Remuneration Structure of Members of the Board of Directors

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
E.3.14	Do shareholders or the Board of Directors approve the remuneration of the executive directors and/or senior executives?	Yes	As a summary of the minutes of the Annual GMS on March 31, 2021, and as stated in the 2020 Annual Report
E.3.15	Does the company have measurable standards in place to align the performance-based remuneration of executive directors and senior executives with the company's long-term interests, such as reserves and deferred bonuses?	No	-
Internal Audit			
E.3.16	Does the company have a separate internal audit function?	Yes	As stated in the 2020 Annual Report on the Internal Audit Unit
E.3.17	Is the head of internal audit identified or, if outsourced, is the name of the external company disclosed?	Yes	As stated in the 2020 Annual Report on the Internal Audit Unit
E.3.18	Does the appointment and dismissal of internal auditors require the Audit Committee approval?	Yes	As stated in the 2020 Annual Report for the Internal Audit Unit and the Audit Committee
Risk Oversight			
E.3.19	Does the company establish sound internal control procedures/ risk management framework and periodically review the effectiveness of the framework?	Yes	As stated in the 2020 Annual Report for the Risk Management & Anti Fraud Committee – Risk Management Sub-Committee (KRA-RMC)
E.3.20	Does the Annual Report disclose the Board of Directors/Board of Commissioners review of the company's material controls (including operational, financial and compliance controls) and the risk management system?	Yes	As stated in the 2020 Annual Report for the Implementation of BNI Risk Management
E.3.21	Does the company disclose the major material risks facing the company (i.e. financial, operational including IT, environmental, social, economic)?	Yes	As stated in the 2020 Annual Report for Risk Management
E.3.22	Does the Annual Report/Annual Governance Report contain statements from the Board of Directors/Board of Commissioners or the Audit Committee on the adequacy of the company's internal control/risk management system?	Yes	As stated in the 2020 Annual Report
Company President Commissioner			
E.4.1	Are the President Commissioner and President Director positions held by different people?	Yes	As stated on the Company's website https://www.bni.co.id/id-id/company/aboutbni/director and https://www.bni.co.id/id-id/company/aboutbni/komisaris
E.4.2	Is the President Commissioner an Independent Director/Commissioner?	Yes	As stated in the Company's website https://www.bni.co.id/id-id/company/aboutbni/komisaris , and as stated in the 2020 Annual Report on changes in the Board of Commissioners membership composition
E.4.3	Is there a Director who previously served as the President Director of a company in the last 2 years?	No	As stated in the 2020 Annual Report in the Board of Directors Profiles

NO.	PARAMETER	AVAILABILITY	PRESENTATION DESCRIPTION
E.4.4	Are the roles and responsibilities of the President Commissioner disclosed?	Yes	As stated in the 2020 Annual Report in the division of supervisory responsibilities for each member of the Board of Commissioners
Senior Independent Commissioner			
E.4.5	If the President Commissioner is not independent, has the Board appointed a Senior Independent Leader/Director and has their role been defined?	N/A	
Board of Commissioners Expertise and Competency			
E.4.6	Does at least one non-executive Director/Commissioner have previous work experience in the main sector where the company operates?	Yes	As stated in the 2020 Annual Report in the Board of Directors and Board of Commissioners Profiles
Board of Commissioners Training/Development			
E.5.1	Does the company have an orientation program for new Directors or Commissioners?	Yes	As stated in the 2020 Annual Report on the Orientation and Introduction Program for New Commissioners/Directors
E.5.2	Does the company have a policy that encourages the Board of Directors/Board of Commissioners to take part in continuous or sustainable professional education programs?	Yes	As stated in the 2020 Annual Report on the Orientation and Introduction Program for New Commissioners/Directors
President Director Appointment and Performance Assessment			
E.5.3	Does the company disclose how the Board of Directors/Board of Commissioners plans for the succession of the President Director and main management?	Yes	As stated in the 2020 Annual Report in the Board of Directors Succession Policy
E.5.4	Does the Board of Directors/Board of Commissioners conduct annual performance appraisals of the President Director?	Yes	As stated in the 2020 Annual Report in the Board of Directors Performance Assessment
Board of Commissioners Performance Assessment			
E.5.5	Does the company conduct annual Board of Director/Board of Commissioners performance appraisals and disclose the criteria and processes followed for the assessments?	Yes	As stated in the 2020 Annual Report in the Board of Directors/Board of Commissioners Performance Assessments
E.5.6	Does the company conduct annual performance appraisal for each Director/ Commissioner and disclose the criteria and processes followed for the assessments?	No	-
E.5.7	Does the company conduct annual Board of Director/Board of Commissioners performance appraisals and disclose the criteria and processes followed for the assessments?	Yes	As stated in the 2020 Annual Report in Board of Directors/Board of Commissioners Performance Assessments



Our greatest glory is not in never failing, but in rising every time we fail

- Konfusius



Social and Environmental Responsibility

961	Social and Environmental Responsibility Governance
967	Corporate Social Responsibility Related to Fair Operations
973	Corporate Social Responsibility Related to Human Rights Implementation
977	Corporate Social Responsibility Related to The Environment
986	Corporate Social Responsibility Related To Employment, Occupational Health and Safety
993	Corporate Social Responsibility Related to Consumers/Customers
997	Corporate Social Responsibility Related to Social and Community Development

BASIS FOR IMPLEMENTATION OF CORPORATE SOCIAL RESPONSIBILITY

As one of the largest banks in Indonesia, BNI is strongly committed to developing a sustainable economy and always pays attention to its responsibility and the balancing of economic, social and environmental aspects. For this reason, BNI organizes a social and environmental responsibility (SER) program with the awareness that the Bank's success in maintaining sustainable performance is not only determined by its management and operational performance, but also by its support for the local communities in its operating areas.

For BNI, the development of business activities and advancing a sustainable domestic economy is always carried out with full integrity in line with the applicable laws and regulations, and by upholding business ethics. Therefore, BNI not only implements SER programs and activities to comply with regulations, but more than that, because SER has become the responsibility of the Bank to stakeholders.

For its implementation, SER programs and activities always refer to and are in line with the Bank's Mission and or Environmental, Social, and Governance (ESG) aspects and are also guided by the following regulations:

1. 2007 Law No. 40 concerning Limited Liability Companies.
2. 2012 Government Regulation No. 47 concerning Limited Corporate Social and Environmental Responsibility
3. Minister of State-Owned Enterprises of the Republic of Indonesia Regulation No. PER-05/MBU/04/2021 dated April 20, 2021 concerning Social and Environmental Responsibility Program for State-Owned Enterprises, revoking the Minister of State-Owned Enterprises of the Republic of Indonesia Regulation No. PER-09/MBU/07/2015 dated July 3, 2015 concerning the SOE Partnership Program and Community Development Program, which has been amended several times, most recently by the Minister of State-Owned Enterprises Regulation No. PER-02/MBU/04/2020 concerning the Third Amendment to the Minister of State-Owned Enterprises Regulation No. PER-09/MBU/07/2015 concerning the Partnership Programs and Community Development Programs for State-owned enterprises.
4. Financial Services Authority (OJK) Regulation No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.
5. Annual General Meeting of Shareholders for Fiscal Year 2018, held on May 13, 2019, where a Sustainable Financial Action Plan was reported to Shareholders in accordance with Financial Services Authority (OJK) Regulation No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.
6. Internal Company Guidelines.

POLICIES, STRATEGIES AND WORK PROGRAMS FOR THE IMPLEMENTATION OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY BASED ON THE SUSTAINABLE FINANCE CONCEPTS

BNI organizes its SER programs and activities with clear goals, which have a positive influence and advance the social conditions of the people connected to the Bank through the implementation of suitable programs and long-term impacts. The Bank's SER and work plan always respects and considers the stakeholders expectations and complies with applicable laws and is consistent with international norms. BNI avoids any SER that solely aims improve the Company's image in the eyes of the public and the business society. Understanding the objectives of the implemented SER program and the expected positive impacts are the Bank's main goal so it achieves the ideal, objective, targeted, and sustainable SER.

OJK (Financial Services Authority) issues provisions to encourage economic, social and ecological values in every policy or business decision. POJK (Financial Services Authority Regulation) No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers and Public Companies ("POJK Sustainable Finance") stipulates that the application of sustainable finance for Commercial Banks based on Business Activities/ Bank Category (BUKU) 3, BUKU 4 and Foreign Banks will take effect on January 1, 2019. The Sustainable Finance POJK was issued to support the Sustainable Finance Roadmap prepared by OJK, and included the health and welfare of the community, through the financial industry and financial institutions. This will have an impact on the Bank's efforts to encourage responsible behavior throughout the organization.

In this regard, BNI's management including the Board of Commissioners and the Board of Directors provide support in planning and direct supervision related to sustainable finance. The President Director instigated the implementation of sustainable finance and the division of functions related to sustainable finance through President Director Decree No. KMP/4/2602 dated June 21, 2019. Currently, BNI has established an ESG (Environmental, Social & Governance) Sub-Committee under the Risk Management & Anti-Fraud Committee through the Board of Directors Decree No. KP/484/DIR/R dated October 26, 2021.

In addition, the substance of the implementation of SER which is interpreted by the Bank in addition to leading to the fulfillment of the POJK on Sustainable Finance, but also leading to the BNI Sustainability Pillar to build harmonious and mutually beneficial relationships with the environment, community and stakeholders, both locally, nationally and globally, as well as providing positive impact on the mindset and life of the environment.

BNI Sustainability Pillars



These values have been translated into the following forms:

1. BNI for Indonesia

This pillar is on how BNI runs the Company's business by integrating Economic, Social and Environmental and Governance Concerns.

2. BNI for Customers

This pillar is on how BNI provides excellent service, digital solutions, and of security and privacy protection for all customers.

3. BNI for Employees

This pillar is on how BNI creates the best employee conditions as a place of pride to work and achieve.

4. BNI for the Community

This pillar is on how BNI increases community awareness and responsibility in line with business development

5. BNI for the Environment

This pillar is on how BNI improves the environment's quality in line with business development



The BNI Sustainability Pillars discussion is presented in detail in the 2021 Sustainability Report. In the Social and Environmental Responsibility Chapter of this Annual Report, the BNI pillar for the Communities and BNI for the Environment are discussed.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE ASPECTS SUSTAINABILITY STRATEGY AND IMPLEMENTATION

In the 4th and 5th Mission points, namely increasing awareness and responsibility for the environment and communities, and becoming an industry reference for implementing compliance and good corporate governance, BNI considers the ESG aspects (Environmental, Social and Governance) in its operations. The Company's operations are expected to support the achievement of the Sustainable Development Goals/SDGs.

BNI has an Environment, Social & Governance (ESG) Sub-Committee under the Risk Management & Anti-Fraud Committee based on the Board of Directors' Decree No. KP/484/DIR/R dated October 26, 2021. The ESG Sub-Committee is chaired by the Vice President Director as Chairman, Managing Director Risk Management as Deputy Chair, and the Bank's Risk Management Division Head as Secretary, and consists of Permanent Members at the Director & SEVP level, and Permanent Members at the Division/Unit level.

Social and Environmental Responsibility Governance



SOCIAL AND ENVIRONMENTAL RESPONSIBILITY IMPLEMENTATION COMMITMENT AND POLICIES

BNI is committed to implementing social and environmental responsibility programs and activities as stated in BNI's mission number 5 (five), namely Increasing Concern and Responsibility for the Environment and Communities, and mission number 6 (six), which is to become a reference for the implementation of compliance and good corporate governance for the industry. BNI has established policies that are used as the basis for implementing compliance with information disclosure on the impact of the Bank's business decisions and activities on society and the environment through transparent and ethical behavior.

BNI's social and environmental responsibility policies include:

1. Corporate Guidelines No. IN/924/KMP/001 dated November 23, 2021 concerning the Social and Environmental Responsibility (SER) program.
2. Corporate Guidelines on Business Banking Credit BUKU I Corporate Segment for customer credit risk analysis related to AMDAL or PROPER (Company Rating Assessment Program in Environmental Management) BPP No. IN/690/PGV/001 dated December 20, 2018.
3. Corporate Guidelines on Community Development Management No. IN/341/KMP/001 dated July 17, 2017.
4. Corporate Guidelines on Environmentally-friendly Lifestyle No. IN/418/KMP/001 dated September 12, 2017.

BNI has also prepared a Sustainable Financial Action Plan (RAKB) as BNI's commitment to implementing sustainable finance, which was submitted to OJK through Letter No. DIR/591 dated November 30, 2020. The RAKB is the basis for policy for the Bank in implementing sustainable finance in 2021.

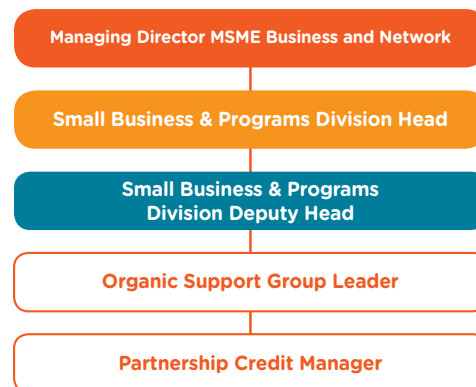
SOCIAL AND ENVIRONMENTAL RESPONSIBILITY MANAGEMENT STRUCTURE

The working organization that coordinates the SER implementation and is responsible for the implementation for social and environmental responsibility is currently within the Corporate Communication and Secretariat (KMP) Division. The Bank's SER management structure was established based on Board of Directors' Decree No. KP/089/DIR/R dated February 19, 2020. This division reports directly responsible to the President Director. While the implementation of the Partnership Program or Micro and Small Business Funding Program (PUMK) since 2017 has become the task of the Small Business & Program Division which was formed based on the Decree of the Board of Directors No. KP/127/DIR/R dated 27 March 2018.

Social and Environmental Responsibility Management Structure



Micro and Small Business Funding Program Management Structure (PUMK)



METHODS AND SCOPE OF DUE DILIGENCE ON THE SOCIAL, ECONOMIC AND ENVIRONMENTAL IMPACT OF BANK ACTIVITIES

BNI understands that the scope of social and environmental responsibility is the full impact of its business activities on all stakeholders. Therefore, BNI has a due diligence method that maps the social, economic and environmental impacts of the company's activities by implementing several mechanisms including:

1. Employee and customer satisfaction survey.
2. Analysis of the effectiveness of the social responsibility activities on the community.
3. Assisted by field expert consultants.
4. Application of the Corporate Guidelines on Business Banking Credit BUKU I Corporate Segment for customer credit risk analysis.
5. The KMP Division continuously evaluating the effectiveness of the eco-friendly lifestyles.

IMPORTANT SOCIAL, ECONOMIC AND ENVIRONMENTAL ISSUES RELATED TO THE IMPACT OF THE BANK'S ACTIVITIES

BNI strives to harmonize its business performance so it provide benefits that include the social, economic and environmental aspects. Important issues related to social, economic and environmental are prioritized by BNI when carrying out bank activities. To address these social, economic, and environmental issues, BNI has set performance achievement targets oriented towards the Sustainable Development Goals/SDGs.

As a company in the banking industry, the important and prioritized economic, social and environmental issues are shown below:

ASPECT	MATERIAL TOPIC	WHY THIS MATERIAL TOPIC
Economic	Company performance	Reflects BNI's performance achievement during the reporting year. Disclosure of economic performance leads to economic performance evaluation, which is beneficial for BNI and its stakeholders.
	Indirect economic impact	Reflects the commitment and benefits of BNI's existence and business activities for the community.
	Anti Corruption	Reflects BNI's commitment to conducting business activities in a clean, honest and transparent manner.
Social	Personnel	Reflects BNI's commitment to the importance of managing employees as an important asset in the Bank's business sustainability.
	Occupational Health and Safety	Reflects BNI's commitment to providing a safe and comfortable workplace for employees to be more productive and highly committed to their work.
	Training and Education	Reflects BNI's commitment to employee competency improvement as they are an important asset in the face of increasingly fierce competition.
	Diversity and Equal Opportunity	Reflects BNI's commitment to respecting the employees' diversity and equality to advance and develop regardless of ethnicity, religion, race.
	Customer Information Protection	Reflects BNI's commitment to maintaining customer data confidentiality to create customer trust and loyalty.
	Socio-Economic Compliance	Reflects BNI's commitment to complying with socio-economic regulations, such as employment, fair competition, and non-discrimination.
Environmental	Energy	Reflects BNI's concern for energy management where availability is becoming increasingly limited.
	Water	Reflects BNI's concern for water resources management where availability is becoming increasingly limited.
	Emissions	Reflects BNI's concern for greenhouse gas emissions that have a major impact on climate change.
	Effluent and Waste	Reflects BNI's concern for managing waste water so it does not pollute the environment.
	Environmental Compliance	Reflects the commitment to environmental regulations so BNI's operations does not have a negative impact on the environment.

STAKEHOLDERS IMPACTED BY OR INFLUENTIAL TO THE BANK'S ACTIVITIES

BNI has identified the stakeholders for decision-making and formulation of the Company's strategy. BNI maps stakeholders through identification and assessment by considering the principles of dependency, responsibility, tension, influence, diversity, perspectives and proximity.

ENGAGEMENT METHOD	SIGNIFICANT TOPICS/ ISSUES AND NEEDS	BNI RESPONSE
Customer: Economic relationship		
<ol style="list-style-type: none"> 1. Call center services, branch offices, phone banking, websites, social media (Facebook, Instagram, and Twitter) 2. Customer satisfaction survey 3. Information from Website & Frontliner 4. Agen46 Gathering Frequency: <ol style="list-style-type: none"> a. As needed b. Every two years c. Minimum once a year 	<ol style="list-style-type: none"> 1. Security of banking transactions 2. Small and Medium Business Loans 3. Banking facilities and easy access 4. Clear and transparent information on banking products and services 	<ol style="list-style-type: none"> 1. Innovating products and services according to needs and technological developments 2. Educating on banking financial related to banking products 3. Storing and protecting customer data based on regulations 4. Strengthening the data security system and striving for ISO 27001 certification 5. Reaching and nurturing SMEs, to provide financing
Investors/Shareholders: Economic, Ownership & Legal Relations		
<ol style="list-style-type: none"> 1. Quarterly Performance Report 2. Analyst Meetings 3. Reporting to the Indonesia Stock Exchange (IDX) 4. Holding Annual GMS (once a year) and Extraordinary GMS as needed 	<ol style="list-style-type: none"> 1. Financial and non-financial performance 2. Environmental, Social and Governance (ESG) Performance 3. Share Value that grows positively 4. Investments in environmentally friendly companies 	<ol style="list-style-type: none"> 1. Providing periodic information on BNI's performance 2. Communicating directly or through analysts, to ensure the delivery of material information 3. Executing strategies to achieve business targets 4. Disclosing more comprehensive information on ESG performance in the Sustainability Report 5. Strengthening the employees' capabilities, skills and expertise 6. Following up on Rating Agencies recommendations for ESG aspects 7. Conducting audits of the Financial Statements 8. Preparing Annual Report and Sustainability Report
Employees: Legal & stakeholders who help achieve company goals		
<ol style="list-style-type: none"> 1. Internal Media (eSinergi Digital Magazine, HCMS, Sinergi Magazine, BNI Forum), 2. Annual Employee Satisfaction Survey 	<ol style="list-style-type: none"> 1. Employee rights 2. Training and development 3. Equality of opportunity 4. Career development 5. Valuable and enjoyable work experience 6. Work life balance 	<ol style="list-style-type: none"> 1. Delivering In-class training and e-learning training 2. Performance Assessments and Promotion System 3. Easy Communication through HCT Info, Internal Communication (eSinergi, SMS Blast, BNI Forum) 4. Availability of whistleblowing system 5. A Workers Union 6. Availability of Facilities and Infrastructure to carry out activities 7. Providing welfare during employment and post-employment
Workers Union: Legal		
<ol style="list-style-type: none"> 1. Meetings and Discussions 2. Collective Labor Agreement (CLA) Discussion every two years 	Employee rights, remuneration and benefits	<ol style="list-style-type: none"> 1. Accommodating and identifying Workers Unions proposals and input 2. Conducting communications in the event of industrial relations disputes 3. Holding regular meetings in bipartite forums between BNI and employee unions 4. Ensuring employees' safety and rights through Collective Labor Agreements (PKB)

ENGAGEMENT METHOD	SIGNIFICANT TOPICS/ ISSUES AND NEEDS	BNI RESPONSE
Government/OJK: Legal/FSI		
<ol style="list-style-type: none"> 1. Submission of the Bank's Business Plan (RBB) and realization to Bank Indonesia and the Financial Services Authority (OJK) 2. Submission of RAKB to OJK 3. Other reports in accordance with applicable regulations to regulators 4. Frequency: 5. At least once a year 	<ol style="list-style-type: none"> 6. Laws and regulations Compliance 7. Environmental & social risk analysis in lending 8. Anti Bribery and Corruption (ABC), Anti Money Laundering (AML) and Anti Terrorism 9. Green Banking 10. Inclusive Banking 11. Sustainable finance 	<ol style="list-style-type: none"> 1. Complying with all applicable regulations 2. Paying taxes, levies and Non-Tax State Revenue (PNBP) in accordance with the laws and regulations 3. Developing a Sustainable Finance Action Plan (SFAP) 4. Establishing an ESG Sub Committee to monitor the SFAP implementation 5. Adjusting internal policies and regulations, based on Government regulations 6. Implementing GCG principles in all work units 7. Submitting performance and other activity reports: Sustainable Finance Action Plan Reports, Annual Reports, Sustainability Reports and other reports
Suppliers: Economic and Legal Relations		
Seminars and policy socialization as needed	Mutually beneficial relationships with suppliers, fair and transparent goods and services procurement processes	<ol style="list-style-type: none"> 1. Developing cooperation with partners for the Bank goods and services procurement 2. Fair and compliant partner selection processes 3. Payment systems based on work contracts 4. Socializing procurement procedure policies
Community: Social relations, social licenses & social responsibility and closeness to the company		
Strategic cooperation in BNI's social care through the SER program	<ol style="list-style-type: none"> 1. Environmental impact and performance 2. Implemented and planned SER programs 3. Opportunities to collaborate in the SER programs 4. Information on Company activities 5. Understanding Sustainable Finance 	<ol style="list-style-type: none"> 1. Implementing Financial Inclusion and Literacy 2. Organizing Community Development through the BNI Berbagi Program, BNI Kampoeng Program and BNI GoGreen Program 3. Organizing internships or contract programs for fresh graduates through the BNI BINA Program 4. Providing job opportunities as needed
Media: Social relations, social licenses		
Press releases when needed and media gatherings every three months	<ol style="list-style-type: none"> 1. Financial and non-financial performance 2. Environmental impact and performance 3. Implemented and planned SER programs 4. Opportunities to collaborate in SER programs 	<ol style="list-style-type: none"> 1. Updating information related to banking solutions or company performance through the www.bni.co.id website 2. Developing communication facilities such as press conferences 3. Including press release material on the www.bni.co.id website

SCOPE OF GOOD SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES THAT ARE MANDATORY OR BEYOND MANDATORY AND PROGRAMS THAT EXCEED THE MINIMUM RESPONSIBILITIES

BNI has always been committed to carrying out social and environmental responsibility both mandatory and those beyond mandatory. The details of the activities are as follows:

ACTIVITY	REGULATION
Partnerships and Community Development Program	<ul style="list-style-type: none"> Minister of State-Owned Enterprises of the Republic of Indonesia Regulation No. PER-05/MBU/04/2021 dated April 20, 2021 concerning the Social and Environmental Responsibility Program of State-Owned Enterprises Minister of SOEs Decree No. SK-03/D7.MBU/12/2018 dated December 10, 2018 concerning Implementation Guidelines for the Distribution of State-Owned Enterprise Partnership Program Funds through Special SOEs. Financial Services Authority Regulation No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.

ACTIVITY	REGULATION
Employment	<ul style="list-style-type: none"> 1997 Law No. 4 and 1998 PP No. 43 of concerning the obligation to employ persons with disabilities. Director General of Industrial Relations and Labor Social Security Decree No. KEP.023/PHIJSK-PK/PKB/II/2018 dated February 7, 2018 concerning the Collective Labor Agreement between PT Bank Negara Indonesia (Persero) Tbk. with the Workers Union of PT Bank Negara Indonesia (Persero) Tbk.
Occupational Safety	1970 Law No. 1 and 1992 No. 23 concerning Occupational Safety and Health.
Customer Protection	<ul style="list-style-type: none"> POJK No. 1/POJK.03/2013 concerning Consumer Protection in the Financial Services Sector. POJK No. 1/POJK.07/2013 concerning Transparency of Bank Product Information and Use of Customer Personal Data
Anti Corruption Programs	Law No. 20 of 2001 concerning Amendments to Law no. 31 of 1999 concerning the Eradication of Corruption Crimes
Anti Fraud Strategy	POJK No. 39/POJK.03/2019 dated December 19, 2019 concerning the Implementation of Anti-Fraud Strategy for Commercial Banks.

The Bank's social and environmental responsibility programs and activities that exceed the minimum obligations and responsibilities are as follows:

1. Environmentally-Friendly Lifestyle Policy.
2. "Ayo Menabung Dengan Sampah" Program
3. Business Banking Loan of Corporate Segment Buku I for customer credit risk analysis that regulates AMDAL requirements, and compliance with other environmental regulations.
4. Other employment activities include the provision of Day Care, Gym Center, Open Working Space Concept, and Lactation Rooms.
5. Other work safety programs include the use of eco-friendly and earthquake-resistant buildings.
6. Career opportunities for local residents through the Regional Officer Development Program (ODP).
7. Learning for BNI employees through digital learning (BNI smarter) accessed via a smartphone.
8. Use of solar cells at Plaza BNI BSD with a capacity of 2,200 watts
9. Becoming a member of the Indonesia Business Council for Sustainable Development (IBCSD), the Indonesian Credit Card Association (AKKI), the Indonesian Payment System Association (ASPI), the Association of Indonesian Bank Negara (HIMBARA), the Association of National Commercial Banks (PERBANAS), and the Banking Archives Communication Forum (FKKP).
10. Having a Company mission related to ESG aspects namely Mission No. 5 "Increasing Concern and Responsibility to the Environment and Communities" and No. 6 "Becoming the implementation reference for compliance and good Corporate Governance."
11. Having a BNI Sustainability Pillar (BNI for Indonesia, BNI for Customers, BNI for Employees, BNI for the Community, and BNI for the Environment)

12. Providing 3,184 ATM for people with disabilities throughout Indonesia.

13. Employing 31 employees with disabilities.

14. Making Sustainable Finance a mandatory eLearning module for Employees.

15. Using online facilities for employee education and training, one being the Youtube Channel of BNI Corporate University.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY FUNDING AND BUDGET

The social responsibility for funding and budget is embedded in every relevant Company operational activity, including employment costs, occupational health and safety, general costs, customer service costs and others. In addition, BNI also budgets for social responsibility activity costs in the Partnership and Community Development Program, through the Micro and Small Business Funding Program and the Social and Environmental Responsibility Development Program.

In 2021, BNI targeted the distribution of funds for the Micro and Small Business Funding Program of Rp150 billion, and for the Social and Environmental Development Program of Rp100 billion, with the funds distributed as of December 31, 2021 amounting to Rp30.32 billion for the Micro and Small Business Funding Program, and Rp93.23 billion for the Social and Environmental Responsibility Development Program.

Corporate Social Responsibility Related to Fair Operations



COMMITMENT AND POLICIES

The COVID-19 pandemic situation has affected many life sectors, from health, economy, to the employment sector. The COVID-19 pandemic has become a new problem faced by many countries as this virus has forced many countries to implement lockdown or work from home policies to reduce the spread of the virus. To ensure fair banking operations during the COVID-19 pandemic, BNI refers to several internal Bank policies including the anti-corruption policy, preventing conflicts of interest, gratification, and whistleblowing system implementation and code of conduct, Policy on Customer Protection and Provision of Information/Data/Documents to Outside Parties, and Policy on Fulfillment of Creditors' Rights.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO FAIR OPERATIONS FORMULATION AND SCOPE

The scope of social responsibility activities related to fair operations includes prevention of conflicts of interest, prohibition of giving or receiving gifts or souvenirs, prohibition of abuse of office and gratuities, implementation of a whistleblowing system, implementation of customer protection policies and the provision of information/data/documents to outside parties, fulfillment of creditor rights policy, anti-corruption and anti-fraud policies, relationships with other organizations, competent behavior, supplier/vendor selection policies, and general vendor management policies.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO FAIR OPERATIONS PLANNING

BNI always targets in its annual planning to ensure the implementation of all fair operating practice policies. Any violations that occur will be subject to strict sanctions in accordance with Bank policies and applicable regulations.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO FAIR OPERATIONS INITIATIVES IMPLEMENTATION

The implementation of social responsibility related to fair operating practices implemented by BNI includes the following:

PREVENTING CONFLICT OF INTEREST

A conflict of interest is a condition whereby the economic interests of companies clash with personal economic interests. BNI Hi-Movers are prohibited from carrying out actions that can cause conflicts of interest that can harm BNI's interests.

PROHIBITION OF GIVING, RECEIVING GIFTS OR SOUVENIRS

BNI Hi-Movers are prohibited from:

1. Receiving rewards directly or indirectly in any form from any party related to their duties and responsibilities.
2. Collecting illegal payments in any form when carrying out their duties for personal, group or other party gain.
3. Giving, promising or offering directly or indirectly gifts in any form to civil servants or state administrators personally with the aim of making those concerned conduct transactions with BNI.
4. Giving gifts, entertaining or other facilities to work partners, co-workers, and customers in accordance with the prohibitions stipulated in the applicable legal provisions.

ABUSE OF OFFICE AND GRATIFICATION

All BNI Hi-Movers are prohibited from abusing their authority and taking advantage, either directly or indirectly, of the knowledge obtained from the Bank's business activities for 1) Personal benefit, 2) Benefits for family members, 3) Benefits for other parties.

In executing the Bank's policies related to gratification, BNI has formed a Gratification Control Unit within the Compliance Division. BNI Hi-Movers sign an Employee

Integrity Pact every year, one of the points being: "Do not give, promise and/or receive rewards in any form to or from fund customers or customers of debtors, vendors, suppliers, partners and/or other parties both external and internal."

WHISTLEBLOWING SYSTEM

In order to realize good corporate governance, BNI has a Whistleblowing System (WBS). BNI is also committed to running the Company professionally based on corporate behavior that is in accordance with the code of ethics and work culture so that it can improve the effectiveness of the application of corporate governance.

The Compliance Division in collaboration with the Risk Management & Anti-Fraud Committee is committed to reducing the number of fraud incidents through corrective actions. These two functions also actively communicate with the relevant Divisions/Units to ensure that corrective actions have been implemented. Any violations related to gratification control and the implementation of anti-fraud strategies will be submitted in a Compliance Report to the Compliance Director every quarter and submitted to OJK every semester.

In addition, Bank has implemented an early detection mechanism for any violations that can cause financial loss, including those that can damage BNI's image within the WBS, called "WBS to CEO". WBS management is carried out in collaboration with an external party, namely Deloitte. WBS is a commitment to creating a clean and integrity work environment in the form of active participation of BNI Hi-Movers to report violations occurring within BNI.

POLICY ON CUSTOMER PROTECTION AND PROVISION OF INFORMATION/DATA/DOCUMENTS TO OUTSIDE PARTIES

BNI views customers as one of the most important stakeholders for improving the performance and sustainability of the Bank's business. Commitment to providing excellent service and protection for customers is a top priority. Therefore, BNI continues to strive to protect the interests of all customers and provides the best by fulfilling POJK No. 1/POJK.07/2013 concerning Consumer Protection for the Financial Services Sector, POJK No.18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector, as well as OJK Circular Letter No.17/SEOJK.07/2018 concerning Guidelines for Implementing Consumer Complaints Services in the Financial Services Sector.

POLICY ON FULFILLING CREDITOR RIGHTS

BNI applies an honest and transparent information disclosure system with equal treatment to all creditors without discrimination to protect the rights of creditors. This is in line with one of the Governance principles issued by OJK. BNI always ensures the fulfillment of rights and maintaining creditor trust in the Bank. The Bank guarantees the rights of creditors are properly executed, as outlined in agreements between both parties. As part of the implementation of creditor rights, the Bank carries out its obligations as promised in a timely manner and seeks to avoid delays or negligence that could potentially cause harm to both parties.

ANTI-CORRUPTION AND ANTI-FRAUD POLICY

A very important part of the corporate governance implementation to ensure the Bank's operations are reliable is the implementation of anti-corruption and anti-fraud. BNI provides knowledge and understanding to all employees, customers and business partners, including suppliers related to anti-corruption and fraud. Internally, the Bank has implemented anti-corruption and anti-fraud policies to prevent unethical practices between employees and all customers and business partners. Anti-corruption policies are listed in the code of conduct and must be obeyed by all levels of the organization. In addition, BNI has implemented anti-fraud policies and strategies and these form part of the Bank's strong commitment to upholding good and responsible corporate governance practices.

Through the Compliance Division, BNI continues to embody "no fraud for our bank" principle through anti-fraud strategies and WBS. The anti-fraud strategies are implemented through four pillars as stated in POJK No. 39/POJK.03/2019 dated December 19, 2019, concerning the Implementation of Anti-Fraud Strategies for Commercial Banks, namely prevention, detection, investigation, reporting, and sanctions. BNI determines corruption as part of the fraud.

With the signing of a gratification control commitment between the BNI President Director and the KPK (Corruption Eradication Committee) Chairperson on October 17, 2016, BNI committed to preventing corruption and gratification practices. The Compliance Division as the administrator of Gratification Control and Implementation of Anti Fraud Strategy released Government Regulations (PP) Gratification Control No IN/155/KPN/001 dated March 27, 2018 and Government Regulations Anti Fraud Strategy No. IN/283/ KPN/003 dated May 28, 2020.

Violation reports can be submitted through the Whistleblowing System (WBS) managed by the Compliance Division, by contacting:

1. Telephone: 021-57853377.
2. Email: bni-transparan@tipoffs.com.sg.
3. Letter: BNI Transparan PO BOX 2646/JKP 10026.
4. Website: <http://bni-transparan.tipoffs.com.sg>.
5. SMS & whatsapp: 081-1970-1946.

RELATIONSHIPS WITH OTHER ORGANIZATIONS

BNI Hi-Movers can establish business contacts with other organizations even though competitors, as long as they provide benefits for the Bank. However, BNI Hi-Movers must refrain from all forms of improper collaboration/alliances with other parties.

CONDUCT IN COMPETITION

BNI Hi-Movers are responsible for creating and maintaining a healthy competition in running the business. Therefore, BNI Hi-Movers always stay away from, avoid and prevent unhealthy competitive methods when developing their careers.

SUPPLIER/VENDOR SELECTION POLICY

In the supply chain, BNI involves local and international parties (especially Business Partners from Principals in Indonesia) to support the Indonesian economy. Suppliers/ Partners who cooperate with BNI are Construction Implementation Services, Construction Planning Services, Construction Supervision Services, Non-Construction Contractor Services, Non-Construction Consultancy, Suppliers of Goods and Other Services.

BNI uses an e-Procurement application (link: <https://e-proc.bni.co.id>) for managing vendors (new/existing) that includes registration, renewal, sanctions and evaluation of vendor performance assessments). The provisions governing vendor management refer to the Company Guidelines (PP) for the Management of Goods and or Services Procurement Partners, as published in the electronic Company Guidelines (BNI-e-PP).

The vendor management policy also includes Integrity, Anti-Bribery Management System (SMAP), Prohibition of Discrimination Against Vendors, and Compliance with the Code of Ethics. In 2021, BNI worked with 477 vendors (Local/Business Partner/Principal), with a procurement value of Rp3.33 trillion.

Procurement of Goods and Services 2021

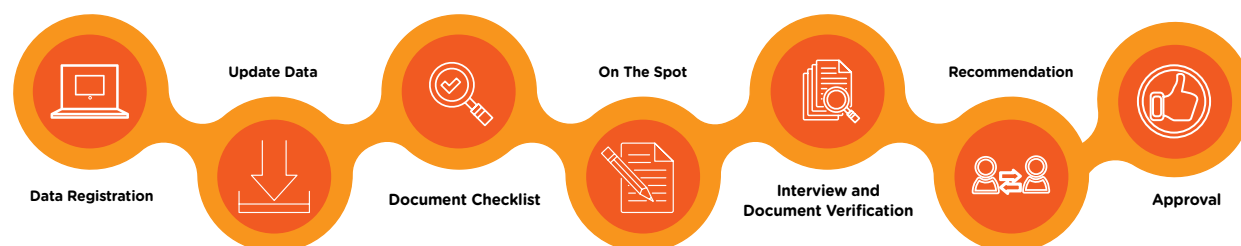
TYPE OF SUPPLIER/PARTNER	PROCUREMENT OF GOODS AND SERVICES 2021	
	NUMBER OF SUPPLIERS/PARTNERS	VALUE OF PROCUREMENT OF GOODS (RP TRILLION)
Local/BP/Principal	477	3,33
Total	477	3,33

Procurement of goods and/or services is carried out by means of tender, limited tender, or direct appointment; and must be routinely followed by providers of goods and/or services registered as BNI Partners.

Requirements to become a BNI Partner:

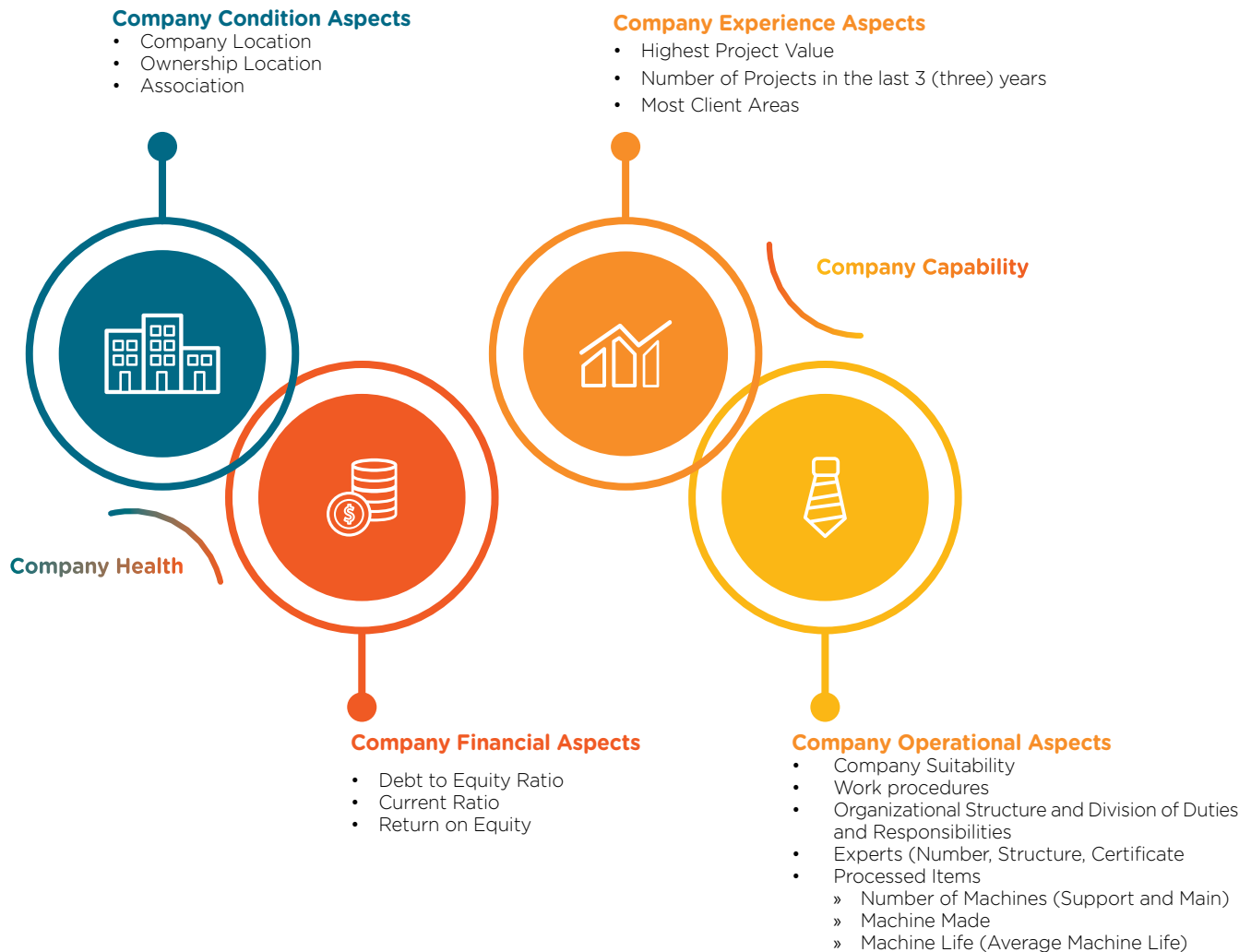
1. Business Entity or Individual. Individual requirements are intended for consultant/instructor services.
2. Business experience of 3 (three) years in accordance with the field.
3. Have an active account at BNI (not dormant).
4. Are not included in the BNI or other Government or private companies black lists.
5. Have not been involved in legal issues or legal proceedings in court, whether business entities or management/individuals, that may affect their business activities.
6. Are not in a state of bankruptcy, whether business entities or management/individuals.
7. Are not included in the customer black list (DHN), whether business entities or management/individuals.

e-Procurement system Flow





4 (four) aspects of Scoring



Vendor Management General Policy

The general policies for Vendor Management within BNI are as follows:

1. Vendor Management is used in an effort to support PT Bank Negara Indonesia (Persero), Tbk. Good Corporate Governance (GCG) implementation.
2. Increases transparency, fair and competitive business competition through Vendor Management.
3. Simplifies the Vendor Management procedures provisions to increase professionalism.
4. When implementing Vendor Management, it is necessary to establish guidelines as a reference within PT Bank Negara Indonesia (Persero) Tbk.
5. All Vendors and Units at PT. Bank Negara Indonesia (Persero) Tbk. involved in Vendor Management activities must follow the applicable guidelines.

The PT Bank Negara Indonesia (Persero) Tbk e-Procurement system was created with the aim of making the procurement process faster, more efficient, transparent, and integrated so that it can provide added value and increase the Company's competitiveness. The system can be accessed via the internet using the link <https://e-proc.bni.co.id>.

BNI is authorized to process the acceptance, recording and management of procurement partners at BNI. Goods and/or Service Providers registered as BNI Partners are proven by having a Partner Registration Certificate (TDR). The TDR applies to all Procurement at BNI according to the type of classification and qualifications of the Provider.

Management of Goods and/or Services Procurement Partners) where the documents of these aspects are obtained from the requirements that must be completed by the prospective vendor and the results of visits to the place of business/on the spot.

The category of providers that can be included in the list of BNI partners must have qualifications and classifications determined by:

1. Relevant agencies; or
2. Authorized associations; or
3. BNI, in the event that the relevant agencies or authorized associations does not determine qualifications or classifications.

The validity period as a BNI Partner is 2 (two) years and this can be extended for the same validity period, if they meet the requirements in accordance with the partner management provisions.

SOCIAL RESPONSIBILITY RELATED TO FAIR OPERATIONS INITIATIVES ACHIEVEMENTS AND AWARDS

In 2021, the achievements or impact of the Bank's social responsibility initiatives related to fair operations included the creation of healthy business activities, thereby maintaining the Bank's operational and financial performance during of a pandemic.

BNI categorizes fraud as corruption. The number of proven fraud incidents in 2021 with their resolutions and their comparison with the previous year are as follows:

DESCRIPTION	NUMBER OF CASES CONDUCTED					
	MANAGEMENT		PERMANENT EMPLOYEE		NON PERMANENT EMPLOYEE	
	2021	2020	2021	2020	2021	2020
Total incidents of fraud	0	0	9 Fraud	6 Fraud	3 Fraud	2 Fraud
Have been resolved	0	0	9 Fraud	6 Fraud	3 Fraud	2 Fraud
In the settlement process at BNI Internally	0	0	0	0	0	0
Resolution has not been attempted yet	0	0	0	0	0	0
Has been followed up through a legal process	0	0	4 Fraud	3 Fraud	1 Fraud	1 Fraud

Notes: Deviation/fraud cases with a loss of more than Rp100 million

In addition, BNI's commitment to implementing social responsibility related to fair operating practices has increased stakeholders' trust in BNI. Therefore, in 2021 BNI received various awards related to the implementation of social responsibility in the field of fair operations. These awards included:

1. Indonesia Most Trusted Company Award 2021 for 2020 GCG Implementation Assessment by The Indonesian Institute for Corporate Governance (IICG)
2. Financial Integrity Rating on Money Laundering and Terrorist Financing in 2021 by the Financial Transaction Reports and Analysis Center (PPATK)
3. Bank Indonesia Appreciation "There were no findings of over and under variance in rupiah currency processing in 2021"
4. Bank Indonesia's Appreciation "There were no findings of counterfeit money in the handling of rupiah currency in 2021"

Corporate Social Responsibility Related to Human Rights Implementation



COMMITMENT AND POLICIES

Human Rights (HAM) is a significant matter to uphold in many aspects of life, including work and labor. The right to good health is also one of the human rights, based on the 1966 International Covenant on Economic, Social, and Cultural Rights. During the COVID-19 pandemic condition, the fulfillment of human rights at work became a material thing.

In the context of human rights, BNI must respect, protect and fulfill human rights. Therefore, during this pandemic, the Bank followed the World Health Organization (WHO) guidelines with its best efforts. BNI committed to complying with all legal provisions and human rights principles, as stated in the Collective Labor Agreement (PKB) between BNI and BNI employees. The scope of social responsibility related to human rights includes guaranteeing freedom of association, freedom to worship, and other matters. In addition, BNI also has a complaint mechanism for receiving employee complaints in the Human Capital Division (HCT).

CORPORATE SOCIAL RESPONSIBILITY RELATED TO HUMAN RIGHTS SCOPE

The scope of corporate social responsibility related to human rights includes working time arrangements for employees, leave policies for employees, freedom for employees to fulfill/carry out religious obligations, policies for absent from work permission for employees, fulfillment of human rights for people with disabilities, both employees and BNI customers.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO HUMAN RIGHTS PLANNING

Mutually agreed Human Rights principles become the targets for BNI to be implemented properly, even during the COVID-19 pandemic. By so doing, a safe and comfortable work environment will be created for all BNI employees.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO HUMAN RIGHTS INITIATIVES IMPLEMENTATION

Corporate social responsibility related to human rights activities included:

Working Time

Working hours for BNI employees are regulated in the Personnel Guidelines. Activities carried out outside of working hours are counted as overtime and are required to pay attention to the Work-Life Balance that is further regulated in the Personnel Guidelines.

Annual Leave

Annual leave is provided as follows:

1. Employees are granted annual leave with the following conditions:
 - a. Managers and above have the right to 18 working days leave.
 - b. Assistant Managers and below:
 - i) After working for more than 10 (ten) years, 18 (eighteen) working days leave.
 - ii) After working between 5 (five) years up to 10 (ten) years, 15 (fifteen) working days leave.
 - iii) Up to 5 (five) years working, 12 (twelve) working days leave.
2. Newly appointed employees as permanent employees, the first annual leave given is after a period of at least 6 (six) months from the date of appointment and is

given proportionally.

3. Employees who stop working, are given proportionate days off and travel expenses for annual leave.
4. Officers who undergo Annual Leave are given an Annual Leave Travel Fee of 1 (one) time the Total Cash.
5. Taking into account the interests of employers or employees, annual leave can be taken in several parts, one part of which must be at least 5 (five) working days.
6. If the holidays determined by the Government and holidays recognized by the Company fall during the employee's leave period, then those days are not counted as part of the employee's leave.
7. The right to annual leave must be exercised in the year in question, and if deemed necessary, can be deferred for a maximum of 6 (six) months after the end of the leave period.
8. For Employees stationed outside their Home Base or hometown, they will receive additional time/days outside their leave entitlement if the person concerned takes leave and used it to return to their Home Base or hometown, with the following provisions:
 - a. Additional time/days is calculated based on the length of the trip taken at most 6 (six) calendar days to go and return to the place of duty.
 - b. Given 1 (one) time each year.
 - c. For AVP position and below.
 - d. Travel time is more than 24 (twenty four) hours by land or sea travel.
 - e. Provisions for implementing annual leave are further regulated in the Staffing Guidelines.

Menstrual, Childbirth and Miscarriage Leave

BNI highly respects the human rights of its female employees, and has implemented the following menstruation, childbirth and miscarriage leave policies:

1. Female employees who suffer from pain during menstruation are not required to work on the first and second day of menstruation, and the employee concerned can take menstruation leave that must be proven by a doctor's certificate.
2. Female employees during childbirth are entitled to for 3 (three) calendar months maternity leave while still receiving their Wages/Salaries. This is taken 1^{1/2} (one and a half) months before and 1^{1/2} (one and a half) months after childbirth in accordance with an obstetrician/midwife certificate filed by the employee.

3. Maternity leave does not reduce the right to annual leave and major leave.
4. Female employees who are pregnant and experience an accidental miscarriage and/or abortion for medical reasons, will receive leave in accordance with a certificate from the obstetrician/midwife who treats them, for 1^{1/2} (one and a half) calendar months after experiencing a miscarriage/abortion, in accordance with an obstetrician/midwife letter who treats them, whilst still receiving their Wage/Salary.

Religious Observance Leave

Fulfilling religious activities is a very basic human right. Therefore, BNI has policies to cover these rights as follows:

1. BNI always allows sufficient time for employees to perform their worship as required by their respective religions or beliefs.
2. At the request of the Employees, BNI gives permission to carry out the holy journey of the religious people required by the teachings of their religion 1 (one) time while working at BNI at the required time without reducing the rights of the Employee.
3. Provisions for the implementation of the holy journey of the religious people are further regulated in the Personnel Guidelines.

Unpaid Leave

Employees have the right to be absent and still receive wages/salaries without reducing their leave allowance, by submitting a written application letter to their direct supervisor and as far as possible attaching valid proof documents.

BNI also gives the right to permit other leave for:

1. Employee marriages for 3 (three) working days;
2. Children registered with the Company marriages, where the employee is granted 2 (two) working days;

3. The birth of a child from a wife registered with the Company or a wife experiencing a miscarriage where the employee is granted 2 (two) working days;
4. Baptism of children registered with the Company where the employee is granted 2 (two) working days;
5. Circumcision of children registered with the Company where the employee is granted 2 (two) working days;
6. Nyambutin ceremony for children who are registered with the Company for Hindu employees who are granted 1 (one) working day;
7. Death of a member of the Immediate Family where the employee is granted 2 (two) working days;
8. Death of a household relative where the employee is granted 1 (one) working day;
9. Death of a sibling where the employee is granted 1 (one) working day.

For disasters or incidents, such as fire, flood, natural disasters that cause serious damage to dwelling places, and the employee cannot reach their place of work, they may be granted a permit for a maximum of 3 (three) working days, except for force majeure regional or national disasters that are regulated separately.

Fulfilling the Rights for People with Disabilities

To ensure equal implementation of human rights, BNI has implemented disability-friendly services based on Financial Authority Regulation No.1/POJK.07/2013 concerning Consumer Protection in the Financial Services Sector, which requires financial service industry players to provide facilities for people with disabilities. BNI has 3,184 ATMs used by persons with disabilities.

Also, as of December 31, 2021, the Bank has 31 employees with disabilities serving in BNI call centers and back offices to ensure the available facilities and infrastructure supporting the work for employees with disabilities.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO HUMAN RIGHTS INITIATIVES ACHIEVEMENTS AND AWARDS

The Bank's CSR activities related to human rights affects the employee engagement level in terms of providing a safe and comfortable work environment. The employee engagement rate in 2021 was 96%, an increase of 1% from the previous year's 95%. Furthermore, the activities also affected a decrease in the employee turnover rate of 1.6% or lower than 2020, which was 1.96%.

BNI's commitment to implementing social responsibility related to human rights has also received appreciation, with several awards related to the implementation of social responsibility related to human rights being awarded. These awards included:

1. The Best Learning and Development Strategy (International Trade & Corporate Banking) 2021 in the Human Capital & Performance Award 2021.
2. Diamond Grade in the Regular Banking Category as a Bank that in 2021 always provided the Best Customer Service fromby the Carre Center for Customer Satisfaction and Loyalty (CCSL).



Corporate Social Responsibility Related to The Environment



COMMITMENT AND POLICIES

Financial Services Authority Regulation No. 51/ POJK.03/2017 encourages national banks together with issuers and public companies to participate in accomplishing Sustainable Finance that promotes the alignment of the interests of Profit, People and Planet. In the banking industry, the expected role is a project financing policy that pays attention to social and environmental aspects. BNI is also committed to carrying out its commitments that focus on the environmental field in accordance with the sustainability principle.

In an effort to achieve good management and environmental protection, BNI has compiled Environmentally-Friendly Company Guidelines for all BNI people. The legal basis for establishing this company guideline was the 2009 Law No. 32 concerning Environmental Protection and Management, which regulates the obligation for industries to protect nature and the environment. In addition, our guidelines are based on the 2011 Republic of Indonesia Presidential Regulation No. 61 concerning the National Action Plan for Reducing Greenhouse Gas Emissions (Ran GRK).

BNI also has SER Guidelines, as stipulated in BNI Instruction No. IN/924/ KMP/001 dated November 23, 2021 and No: IN/576/KMP/001, on October 17, 2018, as an update to the Temporary Company Guidelines No. IN/134/KMP/001 dated March 23, 2018, with these guidelines it is expected whereby good environmental management and protection has become the Company's commitment when conducting its business.

This is being realized by making the Environment one of the main pillars in the Company's SER activities. For the Company, carrying out environmental SER activities is a non-negotiable obligation. This is based on the Company's awareness that the Environment is the main source of life.

These guidelines provide a direction for changing lifestyles towards environmentally friendly, covering all attitudes, thoughts, actions within the scope of daily work by upholding behavior patterns oriented towards maintaining environmental sustainability and the social environment at BNI, both internally and externally.

BNI divides eco-friendly lifestyles into 4 (four) main categories, namely:

1. Natural resource efficiency, being the behavior related to the use of resources efficiently and responsibly.
2. Environmental pollution prevention, being the mindset and behavior that prioritizes environmental sustainability.
3. Non-carbon behavior, being the habit of preventing the release of carbon emissions into the atmosphere, aimed at reducing global warming and climate change. This behavior includes prioritizing the use of digital technology, especially with regard to supporting paper waste reductions and energy savings.
4. Environment-friendly collegial relationships, being the orientation of friendship activities in the work environment to support environmental sustainability efforts.

SIGNIFICANT ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED DIRECTLY OR INDIRECTLY WITH THE COMPANY

As a corporation engaged in banking, BNI has identified the main risks it faces, especially if lending is given to institutions that have environmental problems. Therefore, in terms of providing loans, BNI always adheres to the applicable internal regulations and always tries to avoid granting loans to projects or businesses that can seriously damage the environment. To fulfill this commitment, currently BNI has the Buku I Corporate Banking Segment Business Banking Credit Guidelines for customer credit risk analysis as a reference for the implementation of sustainable finance. The guidelines regulate loan requirements, one being that BNI requires the existence of Environmental Management Efforts (UKL/UPL) documents and/or Environmental Impact Analysis (AMDAL) and compliance with other environmental regulations.

As well as its loan provisions, BNI has submitted a 2022 RAKB report to the OJK containing the realization of the 2021 RAKB, and the 2022 RAKB action plan. The 2021 RAKB realization includes the establishment of a green asset portfolio strategy showing the increase in distribution of funds for renewable energy and oil palm, as well as the support for the implementation of government programs (social forestry). Identification of the criteria for Sustainable Business Activities (KKUB) for the corporate and medium-sized sectors and periodic monitoring carried out. BNI received the Innovative Commercial Bank award for implementing the Simple/Simple IB Program, BNI has also implemented sustainable Finance training, tree planting with the theme One Tree One Employee Series 1, adjusted its organizational functions, company regulations, risk rating and portfolio strategy planning to accommodate environmental and social aspects. Adjusted its policy on monitoring the implementation of RAKB, adjusted its information technology system, and established business criteria of debtors with an environmental and social perspective.

TARGET/ACTIVITY PLAN FOR 2021

In 2021, BNI targeted environmental SER activities including implementing the Company Guidelines for Environmentally-Friendly Lifestyle, Environmental Development and SER as well as Corporate Guideline on Business Banking Credit BUKU I Corporate Segment effectively. The Company also targeted the preparation for implementing the BNI 2021 Sustainable Finance Action Plan (RAKB).

IMPLEMENTATION OF ENVIRONMENTAL PROGRAMS RELATED TO COMPANY OPERATIONAL ACTIVITIES

Energy and Water Saving Activity

BNI is committed to always making savings and managing energy and water. BNI already has an Eco-Friendly Lifestyle Standard Operation Procedure containing policies for electricity and water savings, using technology to reduce carbon emissions, green lifestyle (use of public transportation, shuttle cars between BNI Buildings and cycling to the Office), and campaigns to reduce the plastic waste usage.

BNI has instigated several water and energy saving efforts in all work units in Indonesia as follows:

Energy Savings

Energy Efficiency Implementation

BNI encourages the involvement of all employees in the environmental care movement as BNI realizes that the success of environmentally friendly programs needs the employees' full participation.

1. Energy Efficiency in BNI Outlets

BNI continues to strive to continue the efficiency program to reduce operational costs. The program has been in place since 2016 until now. The Network Management Division has given an appeal to every BNI outlet to do (a) Save Water, (b) Save on Lights, (c) Save on Paper, (d) Save on Air Conditioning. Energy Efficiency in BNI Head Office

BNI continues its efforts to achieve energy efficiency, especially when using electricity at the Head Office, and has established a policy for turning off lights for 1 hour (12.00 to 13.00), and reducing the use of lamps at Grha BNI, Menara BNI, Plaza BNI, and Gedoeng BNI, and using energy-saving lamps.

2. Air Conditioning

a. BNI has started making energy efficiency efforts using coolers with magnetic bearing technology. This technology uses a magnetic field as the main driving component, thus allowing minimal friction between the driving components when working (frictionless);

b. Setting AC temperatures in a range of 23°C-25°C at Grha BNI, Menara BNI, Plaza BNI, and Gedoeng BNI;

c. Reducing the use of chillers on Saturdays and Sundays by purchasing Chiller Variable Refrigerant Volume/VRV to support the bank's operational activities.

3. Use of Solar Energy

BNI has started using solar energy for lighting at Plaza BNI BSD with a capacity of 2,200 watts. The use of solar energy is expected to improve energy efficiencies in the BNI building.

4. Teleconference

At present, BNI has limited business trips and replaced them with video conferencing and teleconferences as a means of communication between branch offices, regional offices and head offices throughout Indonesia.

5. Fuel Efficiency

a. BNI also applies a vehicle-sharing system between office locations, namely shuttle and car-pooling. This initiative has reduced fuel consumption

b. BNI also cooperates with Online Taxi service

providers as one of the savings strategies for vehicle management costs.

Water Saving

BNI uses water from the Regional Water Company (PDAM) and wells to support its banking activities. Based on the location of the Company's office areas, most of the water consumed is sourced from PDAM water. In addition, Plaza BNI uses wastewater treatment technology with a capacity of 125 m³/day. The processed water is reused for toilet flushing, watering plants and cooling towers.

Paperless Banking Activities through E-Office

In its operational activities, BNI does not produce B3 waste (hazardous and toxic materials) or effluent. The waste generated is mostly paper that is then recycled to be reused or managed as upcycled value-added products. Other waste is domestic waste that is managed by the building manager or licensed third parties.

BNI's strategy to reduce its paper use is by adopting a paperless office concept. This concept minimizes the use of paper by converting printed documents and correspondence into a digital format through correspondence applications, attendance, BNI e-PP, and e-billing.

The paperless office concept application has been adopted through the use of the BNI Forum as the Bank's operational communication media, ePP as a digital repository of Company regulations, as well as an e-office platform innovation that includes BNI internal mailing applications and employee attendance. With the increasingly digital era, BNI has applied correspondence applications, documents such as internal notes, memos, attachments, and disposition messages that are distributed digitally to recipients. All Divisions/Units/Units and all regions in BNI, starting from the Directors to all employees, have applied the use of these correspondence applications. At present, the number of documents circulating through mailing applications has reached 152,689 documents and 497,479 dispositions. Likewise, the development of the electronic attendance application has replaced printed documents such as filing for leave, permits, lateness, employee attendance reports, etc., and has also reduced the need for paper in all BNI operations.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO THE ENVIRONMENT IMPLEMENTATION OF INITIATIVES

Social and Environmentally Informed Loan Disbursement Activities

One form of BNI's concern for environmental preservation is to become a bank that plays a role in providing loans that are socially and environmentally sound. BNI encourages corporate, medium and small debtors engaged in the palm oil industry to implement environmentally friendly palm oil plantation management practices. This is done to show BNI's support for Indonesia's commitment to developing a sustainable palm oil industry, as well as preventing financial risks that will also have an impact on social and environmental aspects. In its lending activities, BNI has so far implemented the Sustainable Finance program. Sustainable Finance is a concept whereby financial institutions always prioritize environmental sustainability when carrying out its business practices.

Sustainable Business Category Loan Portfolio (Rp billion)

DESCRIPTION	2021	2020*
Renewable energy	9,528	4,920
Energy efficiency	17,746	156
Pollution prevention and control	5,098	214
Natural resource management and sustainable land use	14,004	21,261
Conservation of terrestrial and aquatic biodiversity	34	-
Eco-friendly transportation	-	-
Sustainable water and wastewater management	2,856	21
Climate change adaptation	-	-
Products that can reduce resources and produce less pollution (eco-efficient)	251	1,158
Environmentally friendly buildings that meet nationally, regionally or internationally recognized standards or certifications	5,278	528
Business activities and/or other environmentally sound activities	579	1,219
MSME Activities	117,011	113,789
Number of Financing Portfolios for Sustainable Business Activities (KKUB)	172,386	143,266

* reclassified

BNI's investment in Green and Sustainable Bonds amounting to USD54 million and the distribution of funds through the Social Forestry Program (PS) are part of the Land Objects Agrarian Reform (TORA) program which aims to equalize the economy and improve people's welfare. BNI, which is a member of HIMBARA, is involved in making the program a success by distributing Rp147 billion.

In 2021, BNI conducted a study of certain environmentally-related business segments, and the risks therein to mitigate the risks of financing oil palm plantations. In addition to paying attention to environmental requirements, BNI also pays attention to the social aspects of palm oil financing, including mapping plantation areas to avoid overlapping with surrounding communities and conservation areas. BNI also pays attention to the debtor's history regarding legal violations. If a violation is found, BNI will verify with related parties to minimize lending to debtors who have violated the applicable rules and regulations.

Let's Save with Waste Program Activities

To increase environmental awareness in the Bank's supply chain, BNI has implemented a financial inclusion program with a business model that synergizes financial literacy in its partnership business governance. One step taken is the synergy of community-based waste management with BNI Smart products, BNI Student Savings, and BNI Agen46 technology services.

The 'Let's Save With Waste' program invites people to use waste as a source of income, with their income entering into the banking system, in a consistent and sustainable manner. This program can provide many benefits, which can change the community paradigm to recognize that waste has economic value, they practice saving habits through the banking system, and they can realize the importance of clean living and waste management and sorting. Throughout 2021, BNI actively campaigned for healthy lifestyles by managing waste well while increasing financial literacy by introducing Agen46 functioning as waste banks.

BNI has also provided a waste bank administration system that is connected to the BNI Agen46's banking system, enabling the transactions previously recorded manually to now be recorded in the BNI banking system in real time. This system replaces the manual recording that was more susceptible to human error and also increases the accountability of the waste bank in front of all of its customers.

Residents who collect waste can bring it to the Waste Bank which has become BNI Agen46 to be weighed and then converted into a Rupiah value. The Rupiah value is then directly deposited into the accounts of each customer using BNI Smart products and BNI Student Savings. In addition to receiving transactions for saving money, BNI Agen46 can also provide other transaction services, such as purchasing electricity, telephone vouchers, and BPJS payments for their respective customers.

Implementation of Social and Environmental Responsibility

Rehabilitation of Organic Forest Land

Critical land is a sign that there has been a decline in soil quality, which will worsen land conditions and reduce the soil productivity level. Improving the quality of soil or land can be achieved by afforestation, reforestation, and agroforestry.

Realizing this, since 2018, BNI collaborating with the Organic Forest Group has consistently and sustainably improved the quality of the environment by rehabilitating 10 hectares of critical land in Blok S Cipendawa, Megamendung Village, Bogor Regency-West Java. The programs included nurseries and infrastructure construction (maintenance and watering equipment, tagging and geotagging, and irrigation system facilities).

In 2021, BNI again collaborated with the Organic Forest Group in planting trees to continue improving the quality of the environment. The programs included nurseries, plant maintenance, manufacture of water installation, training activities, and inventorizing the trees planted using a geotagging method.

10,000 seeds were planted that including African wood, white teak, cinnamon, resin, mahogany, nutmeg, and others. The planting method was still intercropping supported by environmentally-friendly organic fertilizers and irrigation channels, which are useful in restoring land fertility.

In 2021, BNI collaborated with the Organic Forest Group in infrastructure renovation in the Organic Forest, Megamendung, Bogor Regency, West Java. The renovated infrastructure facilities included multifunctional buildings that are useful for various activities, including educational facilities for the community or visitors wanting to conduct research in the Organic Forest area.

To ensure the success of the program, BNI uses monitoring procedures by making payments in stages following the applicable terms and conditions and direct visits to aid locations, which are then adjusted to the reports provided by the Organic Forest Group to BNI.

Support for Javanese Rhino Conservation

The Javanese rhino, part of Indonesia's biodiversity, has been threatened with extinction. To protect, restore, and conserve the Javanese rhino in Ujung Kulon National Park (TNUK), Banten, BNI collaborated with 7 (seven) other BUMNs, namely Bank Mandiri, BTN, Telkom, Pelindo 1, Pegadaian, Jasa Marga, and Angkasa Pura, who together with WWF and Ujung Kulon National Park agreed to work together. Efforts made included:

1. Controlling trap crops that caused a scarcity of rhino food,
2. Developing and empowering 5 (five) TNUK buffer villages to introduce sustainable agriculture and educate residents on the environment
3. Conducting rhino DNA mapping to build a healthy rhino lineage system with good reproductive abilities, and
4. Donating vehicles for patrols.

For this conservation, BNI carried out rhino species conservation activities and community development programs, recording a total of 75 Javanese Rhinos in 2021.

Integrated Waste Management

BNI participates in supporting and implementing integrated waste management education, control and waste management. In 2021, several assistance activities took place to control waste in 10 provinces in Indonesia, including Bangka Belitung, South Sulawesi, Bali, South Sumatra, South Kalimantan, DKI Jakarta, Banten, Central Sulawesi, West Sumatra and West Sulawesi. BNI's waste control assistance included providing motorbikes, bins and waste trucks. BNI was also active in organic and inorganic waste processing efforts. For managing organic waste, BNI helped in converting organic waste into organic fertilizer and compost, and for inorganic waste management, BNI provided support in the form of incinerators (environmentally friendly waste burners).

Environmentally friendly incinerators (waste burners) are used to burn waste that cannot be processed as an alternative method of reducing landfill waste. The incinerator advantages include:

1. They do not use fuel by using a self-burning combustion technology, where the waste is the fuel. The composition of waste is 75% dry: 25% wet where the waste is residual waste that ends up in the TPA;
2. They do not use electricity by using a natural airflow technology where the Sankyo incinerators do not use blowers so require no electrical energy or maintenance on the blowers unlike other incinerators;
3. They meet the emission standards by being smokeless and have pass the emission tests in the Indonesian Ministry of the Environment regulations;
4. They have been verified by KLHK as domestic waste incinerators with environmentally friendly technology through registration number: 110/TRL/Reg-1/KLHK;
5. They can handle large volumes of waste processing in a short time.

The residue from incinerator management can be used for making bricks, concrete and other construction materials

CORPORATE SOCIAL RESPONSIBILITY RELATED TO THE ENVIRONMENT ACTIVITIES QUANTITATIVE IMPACT ACHIEVEMENTS

Quantitative Impact of Energy and Water Conservation Activities

The impact of BNI's efforts to save water and energy in all work units in Indonesia are as follows:

Quantitative Impact of energy use

Table Impact of Energy Use 2019-2021

ENERGY SOURCES	PURPOSE	UNIT	2021	2020	2019
Energy Consumption in the Company (Head Office)					
Electricity	Building operations	kWh	38,243,699	41,806,992	37,674,580
PDAM Water	Building operations	m ³	268,008	193,833	180,047
Ground Water	Building operations	m ³	132	-	-
Fuel	Transportation	Rp	746,077,289	878,639,416	1,738,298,666

Note:

Calculation of electricity consumption is calculated from the total bill divided by the price per kWh of Rp1,115 for the B-3 category and Rp1,645 for the special service customer category. The calculation results are then converted to GJ, with the formula 1 kWh = 0.0036 GJ and 1 m³ = 0.038 GJ.

The calculation of fuel consumption is calculated from direct purchases.

BNI continues to save energy using various energy efficiency programs, including:

DESCRIPTION	TYPE
Setting the AC temperature in the range of 23° C-25° C at BNI Tower, Grha BNI, Gedoeng BNI, and Plaza BNI.	Electricity
Reducing the use of chillers on Saturdays and Sundays	Electricity
Turning off workspace lights during recess (12:00-13:00)	Electricity
Electricity efficiency by reducing the use of lights at Grha BNI, Plaza BNI, BNI Building, and BNI Tower	Electricity
Application of magnetic bearing technology for Plaza BNI coolers to allow minimal friction between driving components while working (frictionless).	Electricity
Installing solar panels with a capacity of 2,200 watts for garden lighting at Plaza BNI	Electricity
Limiting business travel and replacing it with direct long-distance communication (teleconference)	Fuel
Using energy-saving lamps	Electricity
Cooperating with Online Taxi service providers as a strategy to save on vehicle management costs	Fuel

Quantitative Impact of Using Online Taxis for Business

The use of Online Taxis for Business as operational vehicles can provide an Fuel efficiency of around 15.00%.

Quantitative Impact of Paperless Banking Activities through E-Office

Throughout 2021, BNI recorded savings on Paperless Banking activities through E-Office compared to the previous year. Through this system, employees could report attendance, applied for paid leave, and write other reports. Management also delivered SOPs, billing, and other correspondence through E-Office. Estimated use of this E-Office:

1. Electronic SOP/BNI e-PP: saving 1,583,880 sheets of paper in a year;
2. Digitalization of Letters/BNI e-Office: saving 1,977,862 sheets of paper in a year;
3. BNI e-Billing: saving 788,074 sheets of paper in a year; and
4. e-Billing Envelopes: saving 44,502 sheets of paper in a year.

BNI has also developed BNI e-PP to realize cost savings in printing and sending documents, as well as speeding up the updating process at the Bank. This technology develops systematic policies, guidelines for the preparation and updating of SOPs that are presented online in carrying out business activities and banking operations.

Number of Document Submissions 2019-2021

TYPE OF DOCUMENT	2021	2020	2019
Memo	55,297	89,123	108,389
Internal Memorandum	9,768	9,470	12,288
External Letter	41,896	54,094	62,975
Total Documents	106,961	152,689	183,654
Total Disposition	345,683	497,479	626,141

Quantitative Impact of Social and Environmental Lending Activities

The quantitative impact of the Bank's lending activities with a social and environmental perspective can be seen in the number of debtors certified with RSPO and/or ISPO in 2021 reaching 29 debtors.

Quantitative Impact of "Ayo Menabung Dengan Sampah" Program

'Ayo Menabung Dengan Sampah' Program aims to increase community awareness of the environment so that it can reduce waste. In addition, this activity also increased community knowledge and skills on the process of financial inclusion and can improve financial well-being. During 2021, the 'Ayo Menabung Dengan Sampah' program was implemented in several cities, including Kapuas Banjarmasin, Palu, Medan, West Lombok, Mataram, Surakarta, and Polewali.

Specifically for West Lombok, BNI also supported the success of the OJK KEJAR PRESTASI CHILDREN program with the theme "One Account for One Student, Realize the Dreams of Indonesian Children" and the implementation of MURI's record-breaking opening of the most SimPel accounts simultaneously with 11,046 accounts.

The Ayo Menabung Dengan Sampah program achievements for 2020-2021 were as follows:

DESCRIPTION	2021	2020	INCREASE (DECREASE)	
			NOMINAL	PERCENTAGE (%)
Number of accounts	288,697	272,850	15,847	5.8%
Savings	Rp1.2 billion	Rp1.6 billion	-Rp0.4 billion	-25%

In addition to the number of acquisitions above, the 'Ayo Menabung Dengan Sampah' Program is included in BNI's Sustainable Finance Action Plan (SFAP) and the program is a driving factor in achieving the title as the best SOE Bank for Implementation of SimPel/SimPel iB 2021 from the Financial Services Authority (OJK).

In the future, this program is expected to help Regional Offices and Branches conduct account acquisitions and maximize the function of Agen46 on a massive scale in all regions in Indonesia.

Impact of Social and Environmental Responsibility Implementation

1. Impact of Critical Land Rehabilitation Programs and Organic Forest Ecosystems

a. Impact on BNI Business:

Participating and improving BNI's positioning, as well as supporting sustainable development goals (SDG's) No. 13, namely Climate Action, in an effort to reduce the impact of climate change in Indonesia and No. 15, namely Life on Land, by paying attention to how to protect, restore, and maintain the sustainability of ecosystems on land, and manage forests in an effort to stop land degradation and stop the loss of biodiversity. .

b. Impact on Beneficiaries:

- i) Reducing the amount of critical land in Indonesia.
- ii) Creating a people's economic movement through organic farming.
- iii) Involving organic farming groups as the spearhead of greening or reforestation in the area of Tajur Halang Village, Cijeruk District, Kab. Bogor-Jawa Barat.
- iv) Improving public health and reducing unemployment in the surrounding Megamendung area, Bogor-West Java.

c. Impact of Java Rhino Conservation Support

The impact from Javan Rhino species conservation for to save one of Indonesia's original biodiversity from extinction, and improve food availability by limiting the growth of rare plants. Impact on the environment (1) Rhinos are browser animals that eat shrubs and leaf shoots. Growing leaf shoots absorbs more CO₂ than old leaves, (2) Rhinos help open pathways, allowing sunlight to reach the forest floor for the growth of new plant seeds, (3) Rhinos can also disperse plant seeds through their dung or bodies. (1) Gaining information and understanding about the Javan Rhino condition so as to prevent rhino poaching while preserving the environment, (2) Gaining empowerment, including training in making handicrafts.

Impact of Integrated Waste Management Support

1. Participating and improving BNI's position, as well as supporting sustainable development goal (SDG) No. 11, to create sustainable develop cities and communities so they become inclusive, safe, and resilient and reduce the adverse per capita urban environmental impact, which includes paying special attention to waste management.
2. Participating in reducing the amount of waste accumulating in the communities.
3. The waste processed can be beneficial for the communities and the environment.
4. Creating new waste processing business opportunities.

CERTIFICATION RELATED TO THE ENVIRONMENT

BNI already has a green building, which is designed to be environmentally friendly and energy efficient, namely Menara BNI which has received Gold Certification from the Green Building Council Indonesia (GBCI) while Plaza BNI is currently in the process of obtaining Platinum certification. In addition, BNI also included several employees in the Green Building Expert Certification organized by the Green Building Council Indonesia (GBCI), both for Greenship Associate (GA) and Greenship Professional (GP). This is BNI's effort in realizing a certified green building.

COMPLAINTS MECHANISM RELATED TO THE ENVIRONMENT

BNI operates a complaints mechanism through the Corporate Communication and Secretariat Division who manages Corporate complaints including if there are complaints related to the environment by the public. Until the end of 2021, no complaints or reports of violations of environmental problems.

Corporate Social Responsibility Related to Employment, Occupational Health And Safety



COMMITMENT AND POLICIES

Employees are a significant asset and a top priority for BNI in carrying out its business activities in the banking industry. Employees are at the forefront of providing services to customers and all Bank partners. BNI manages its human capital by increasing engagement on several aspects based on Human Capital Architecture (HC Architecture). Therefore, to support the Bank's performance, BNI continues to implement policies that comply with all applicable laws and regulations, including in the areas of employment, health and work safety to improve the Bank's productivity and quality of life of the employees.

Facing the COVID-19 pandemic condition in the labor sector, BNI took the initiative to instigate COVID-19 prevention to protect employee health and remain productive by adapting to new habits. Therefore, BNI pays attention and commits to providing a healthy, feasible, safe, and comfortable work environment and facilities and infrastructure for employees to actualize their potential.

BNI also plays an active role in improving its employees' performance and competence. BNI also follows employment-related governance aspects involving gender equality, job opportunities, and job training to increase employee professionalism. BNI also has a remuneration system that is commensurate with occupational health and safety for all employees.

Facing this pandemic, BNI continues to adapt to become an agile organization so that it can adapt well and continue to strive for maximum performance. BNI formed a Crisis Management Team with full involvement and supervision from a senior management team consisting of the Executive Management Team (EMT), Business Continuity Coordinator (BCCo), Support Team, Critical Business Unit/Work Unit and BCM Coordinator Function. It is hoped that this Crisis Management Team can mitigate quickly and anticipate developments even into the coming year.

BNI also has an Emergency Response Plan (ERP) as a structured plan mechanism to assist each work unit in dealing with emergency conditions. This mechanism includes compliance with security and safety standards, preventive measures, warnings, instructions and controls, termination of business processes, and evacuation.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO EMPLOYMENT, OCCUPATIONAL HEALTH AND SAFETY SCOPE AND FORMULATION

The scope for corporate social responsibility activities related to employment, occupational health and safety consists of employment programs including gender equality, through the creation of a work environment that is female-friendly, work equality, freedom of association, employment opportunities for people with disabilities, remuneration, pension programs, and employee welfare activities. In addition, BNI also has employee health facilities programs, and employee work safety programs, as part of the scope of corporate social responsibility activities related to employee health and safety.

TARGET/ACTIVITY PLAN FOR 2021

The Bank's targets for implementing employment, and occupational health and safety includes work programs that help employee's health by adapting to new habits and implementing strict health protocols. BNI has implemented work system adjustments to reduce the spread of COVID-19 and provides maximum protection to employees, their families, and even customers from the possibility of being exposed to the global COVID-19 pandemic.

BNI also strives to create a safe and comfortable work environment to support the optimal BNI performance. Therefore, BNI is determined to create a healthy and injury-free work environment and conducts operational

activities following applicable regulations. The Bank also provides several activities for employees to generate awareness and motivation in maintaining their health, so that each employee can increase their productivity and welfare.

EMPLOYMENT

Social Responsibility Related to Employment Activities

Friendly Working Environment for Women

As an important asset for the Bank in carrying out its business activities, BNI is committed to implementing good employment practices. BNI guarantees that all employees will always be treated equally irrespective of gender, and this is prioritized in its human capital management policy.

The majority of employees are women who make up 51.9% of the total workforce. Taking this composition into consideration, BNI provides facilities for female employees, including providing daycare to leave the child while the mother is working and breast-feeding areas for nursing mothers. The daycares are controlled to limit their use and to pay attention to health protocols.

Work Equality

BNI conducts employment activities with policies that guarantee all employees will be treated equally without considering gender. Human capital management in BNI is based on competence, so BNI guarantees that all employees receive equal opportunities in their career development.

Through BNI Corporate University, the Bank gives all employees the opportunity to learn and obtain applicable knowledge, as well as provides opportunities to grow through good performance and contribute significantly to the Bank's business performance achievement. The overall competency development program conducted by BNI Corporate University is determined by the needs of the Bank and employees by taking into account gender equality and equality of opportunity at all levels of the organization. During the COVID-19 pandemic, BNI held employee training and education, one being through the BNI Corporate University Youtube Channel.

Freedom of Association

It would be difficult for the Bank to progress without a harmonious working relationship between management, employees, and the workers unions. Therefore, the Bank is committed to building and maintaining harmonious Industrial Relations as a system of healthy and constructive

working relationships between employees, the Bank, and the Government.

BNI acknowledges that the Workers Union is the legal representative for members, both individually and collectively in employment. BNI always consults with the BNI Workers Union (SPBNI) when determining employment policies related to working conditions and the welfare of Workers/ Employees.

Management and Employees represented by the Workers Union agreed on a Collective Labor Agreement (CLA) in 2020. This demonstrated that the communication process developed jointly between Management and the Workers Union could produce positive products for the Company progress in the future. The CLA is expected

to create increasingly solid teamwork, provide the best contribution to the Bank, and support the improvement of the Indonesian economy, especially in the banking sector.

Remuneration

Remuneration is the compensation stipulated and given to members of the Board of Directors, members of the Board of Commissioners and/or Employees, whether permanent or variable in cash or non-cash in accordance with their duties, authorities and responsibilities. BNI always ensures that the remuneration system implemented is in accordance with applicable regulations and is competitive in accordance with the banking industry. The highest and lowest salary ratios during 2021 were as follows:

Highest and Lowest Salary Ratios 2021

DESCRIPTION	RATIO
Highest and lowest employee salaries	42.38:1
Highest and lowest Director salaries	1.18:1
Highest and lowest Commissioner salaries	1.11:1
Highest Director Salary and Highest Employee salaries	2.24:1

Work Opportunities for People with Disabilities

The Government has issued a number of regulations concerning disabilities, including the 1997 Law No. 4 concerning the obligation to employ people with disabilities, and the 1998 PP No. 43 concerning equal rights and employment opportunities for people with disabilities, and improving welfare for people with disabilities. In line with these regulations, BNI does not look at gender, age, ethnicity, religion, race or other discriminatory backgrounds. BNI contributes and plays a role by opening up employment opportunities for people with disabilities.

BNI opens up opportunities for the best candidates for people with disabilities to work. In 2021, there were 31 employees with disabilities. In the coming years, the Bank plans to increase opportunities for people with disabilities to join BNI in line with the preparation of work support infrastructure for employees with special needs.

Pension Programs

To maintain employee welfare in retirement, BNI includes employees in the Pension Program which is divided into:

1. Defined Benefit Pension Program (PPMP) provided for all employees who started working before September 1, 2005.
2. Defined Contribution Pension Program (PPIP) for all employees who started working after September 1, 2005.

Employee Welfare Activities

The welfare of all employees is a matter of great concern to create synergy between employees and the Bank in creating optimal work productivity. Under normal conditions, the Bank provides material and non-material employee welfare programs. The material program, a welfare program, is directly related to employee performance and compensation can be provided in the form of transportation allowance, food allowance, pension, holiday allowances, position allowances money, bonuses, education allowances, medical expenses, official clothes, leave allowances, and death allowances. Meanwhile, non-material programs are employee welfare programs through the provision of facilities and services to all Bank employees without discrimination.

As well as in these two areas, the Bank also routinely carries out activities to maintain employee engagement levels up to 96%. To create an atmosphere that makes employees productive, the Bank builds good communications and relationships among employees, both in daily work activities and other collective events. As more than half of the Bank's employees are of millennial age, the Bank provides more modern facilities and workspaces based on the tastes of millennials. Furthermore, the Bank provides a variety of training, and education in collaboration with the best national and international campuses to improve the employee's competencies. The Bank also provides various programs to appreciate their employees, including salaries, bonuses, other allowance facilities, and special appreciation programs.

The Bank provided extra food, transportation, etc., so employees can maintain their health, and productivity during the pandemic.

Employment Complaints Mechanism

As form of awareness towards the Bank's employment, BNI also has a mechanism for employee complaints through the Human Capital Services (HCE) division. The mechanism for handling employee complaints is as follows:

1. Employees submit complaints to their direct superior, to be settled by deliberation.
2. In the event that no resolution is reached, the problem can be escalated to a higher rank.

3. If it has not been resolved, the employee can submit the problem to the Workers Union Managers who subsequently jointly discuss it with the Chairperson in stages.
4. Employees, Leaders and Workers Unions seek resolution so that industrial disputes do not arise.

Impact of Employment Activities

Various Bank programs and activities in the field of employment throughout 2021 had a positive influence. This can be seen through the employee turnover and employee engagement levels as follows:

Employee Turnover Rate

The employee turnover rate in 2021 was 1.6% a decrease from 1.96% in 2019. This decrease in turnover was the result of the implementation of HC management policies implemented in 2021.

Employee Engagement

BNI regularly measures the level of employee engagement through an Employee Engagement Survey (EES). The survey results are used as feedback in the process of evaluating the human capital management system to establish policies that follow the employee's aspirations. In 2021, the employee engagement level was 96%, an increase of 1% compared to the 2020 results of 95%.

OCCUPATIONAL HEALTH AND SAFETY

Social Responsibility Activities Related to Occupational Health and Safety

Provision of Medical Facilities for Employees

BNI pays attention to employee health by providing a number of facilities, both to maintain health and for treatment. Every year, employees receive a medical checkup that can be arranged as needed through a flexible benefit application. Gym centers equipped with fitness equipment and classes with reliable instructors can be used by employees, which currently are used on a limited basis while taking into account the health protocol levels. For treatment, BNI provides insurance facilities

including BPJS Kesehatan, BPJS Ketenagakerjaan, and other private insurance.

BNI also has a Retirement Health Fund Program (DKMP) that is provided to employees entering retirement. The DKMP program is a form of the Bank's moral obligation to ensure that employees continue to receive health facilities after retirement by preparing them from now or when they are still active as employees. BNI also organizes training specifically aimed at employees entering the pre-retirement period. This training aims to prepare employees reaching retirement age by providing material on health, finance, and psychology.

Employee Health Facilities Related to COVID-19

The Bank adjusted its work systems to reduce the spread of COVID-19. The steps taken by BNI provided maximum protection to employees, families, and even customers from the possibility of being exposed to the global COVID-19 pandemic.

BNI set three adjustments to the work system, Split Operation, Shift Operations, and Work From Home (WFH). Split and Shift Operations were implemented for functions related to operations and banking services. Other positions were applied in the Work From Home system. This system was only applied to areas that had been designated as areas with high-risk conditions. For employees who work from the office, the Bank provided masks and vitamin supplements to maintain the body's resistance to the virus. This step is expected to help reduce the rate of spread of the COVID-19 in its distribution centers.

The decision to adjust the work system was a form of BNI's compliance with Government policies to prevent the spread of COVID-19. This Work From Home (WFH) policy is also in line with Government directives. This step is expected to optimize the efforts of employees to maintain the health of their closest people at home while providing maximum protection from the potential for contracting COVID-19 while interacting with the community while working or traveling to and from work.

Healthy Lifestyle BNI Hi-Mover Program

2021 continued as a very tough year for everyone. The COVID-19 outbreak turned into a global disaster, which then it hit the economy as everyone's productive activities were reduced to suppress the acceleration of the spread of the virus. The situation was very stressful and quite tough for the people, daily workers, such as motorcycle taxi drivers and online taxis, due to the decline in their income sources. This outbreak became a tough test for medical personnel who at all times needed protection from the virus.

BNI employees, also known as BNI Hi-Movers, jointly organized the #AntarkanSemangat program. Through the #AntarkanSemangat program, BNI Hi-Movers invited fellow employees and the community to show their enthusiasm for those in need by donating medical devices, basic necessities, or anything else for the delivery services.

BNI Hi-Movers shared their donation activities with the hashtag #AntarkanSemangat and invited at least two friends through social media. Apart from helping online taxi and motorcycle taxi drivers as a delivery service, donations could be channeled while still practicing Physical Distancing and adhering to health protocols for a healthier lifestyle.

Occupational Safety Activities for Employees

The work environment is an important factor for employees to carry out their work comfortably, and the safety of the work environment is a factor that is considered important by BNI. This has been realized through the construction of earthquake-resistant buildings, fire alarm systems such as Smoke Detectors, tools to anticipate fires such as APAR, Diesel Pumps and Emergency Stairs. BNI also has a fire situation/evacuation plan, laying out the fire safety operational procedures in the employees' room and every floor of the building so that all employees are well educated. All these facilities are regularly audited in the building safety audit process.

Implementation of OHS

Socialization of Building Emergency Implementation

BNI has Building Operational Technical Guidelines (PTO) for maintaining the safety and mental safety of all employees in the work environment. The PTO is BNI's effort to create a decent and safe work environment for all employees.

The PTO focused on the readiness for building safety equipment and facilities, the implementation of saving human lives, and training for employees and emergency response teams. In 2021, work safety activities carried out by the Bank were as follows:

1. Inspected/checked the building fire protection equipment regularly to ensure that the fire protection equipment functioned properly. Checks for Light Fire Extinguishers (APARs) were carried out by Security Officers every 1 (one) month, and inspections of Systematic Fire Extinguishers (APATs) and Fire Alarms were carried out by building managers in collaboration with the Fire Service carried out every 1 (one) once a year.
2. Standardized the specifications, placing building safety devices and evacuation routes in the building emergency response manual, and office building renovation standards, compiled with planning consultants reviewed every 1 (one) year or as needed.
3. Delivered emergency information to employees, guests, and the building emergency response team through the installation of signs for evacuation routes in a fire/earthquake emergency, video screening of emergency handling procedures on internal television media, safety briefings before conducting events, and socializing functions and the role of the emergency response teams every 1 (one) year by inviting speakers from the Fire Department.

The implementation of Employee Safety activities can be seen in the following table:

TYPE OF ACTIVITY	ACTIVITY TARGET	PARTICIPANTS
Emergency Socialization	Once a year	Appointed employees as emergency response team
Building Emergency Evacuation Simulation	Once a year	All employees/teams and the Building Management Team.
Fire Fighting Exercises	Once in 6 months	Appointed employees as the emergency response team and the Building Management Team.
Emergency Response Team Internal Training	Once in 6 months	Emergency Response Team

BNI's also routinely carried out the Socialization of Building Emergency both at the Head Office and at Regional, Area and Branch Offices. The implementation of the Building Emergency Socialization in 2021 can be seen in the following table:

OFFICE BUILDING LOCATION	SOCIALIZATION	TIME FRAME	PARTICIPANTS
BNI Record Center (BRC) Cikupa	Fire Fighting Simulation & Disaster Management	September 10, 2021	52 persons
Gedoeng BNI	Fire Evacuation	December 18, 2021	150 persons
Plaza BNI	Fire Evacuation	December 18, 2021	84 persons
Grha BNI	Fire Evacuation	April 26, 2021 & December 19, 2021	187 persons
Menara BNI	Fire Evacuation	December 26, 2021	130 persons

4. Conduct emergency response readiness training for Building Occupants together with the Building Emergency Response Team, including Fire Fighting Training, First Responder (Search and Rescue) training which is carried out at least once a year.

Details regarding the implementation of the Emergency Response Team Training activities in 2021 can be seen in the following table:

TYPE OF TRAINING	LOCATION/BUILDING	TIME FRAME	PARTICIPANTS
Fire Fighting Training	Plaza BNI 6	February 2021	61 people
First Responder Training and Building Evacuation	Grha BNI, BNI Tower, Plaza BNI and Gedoeng BNI	18, 19, 26 December 2021	340 people

5. Conducting a building fire emergency evacuation simulation for Building Occupants to measure the preparedness of the Emergency Response Team and measure the length of time to evacuate from the building location to the gathering point. This simulation is carried out every 1 (one) year together with the Fire Service. BNI's also routinely implements Building Fire Emergency Evacuation Simulations both at the Head Office and Regional Offices and Branch Offices.

Details of the implementation of the Building Fire Emergency Evacuation Simulation activities in 2021 can be seen in the following table:

LOCATION/BUILDING	TIME FRAME	PARTICIPANTS
BNI Record Center (BRC) Cikupa	September 10, 2021	52 persons
Gedoeng BNI	December 18, 2021	150 persons
Plaza BNI	December 18, 2021	84 persons
Grha BNI	April 26, 2021 & December 19, 2021	187 persons
Menara BNI	December 26, 2021	130 persons
BNI Record Center Cikupa	September 10, 2021	52 persons

Certification

For workforce safety learning, BNI has included employees in the training certification "Guidance and Certification of General Occupational Safety and Health Experts (AK3U)" organized by BPJS Health in collaboration with PT Surveyor Indonesia (Persero) and the Ministry of Manpower and Transmigration of the Republic of Indonesia.

Quantitative Impact of Employee Health Facility Activities

The quantitative impact of providing health facilities for employees can be seen in the employees' productivity level as measured by the Earning per Employee (EPE) indicator. In 2021, BNI maintained the employees' productivity level at Rp393 million per employee.

Impact of Employee Safety Activities

In 2021, the impact of the Bank's employee safety efforts was evident in the absence of work accident records (zero accidents) in BNI's operational activities at the Head Office and at Branch/Regional Offices. The implementation of work safety carried out by the Bank has been running effectively.

Corporate Social Responsibility Related to Consumers/Customers



COMMITMENT AND POLICY



Quality service is a key to success for a banking company. Therefore, BNI continues to strengthen its commitment to service excellence and customer satisfaction. Quality services in the banking sector are key to maintaining customer loyalty and the Bank's business sustainability. To understand its customer needs and deliver the best service, BNI pays attention to every internal policy to provide the best financial products and/or services in a professional manner for all customers.

During the COVID-19 pandemic, BNI consistently strived to understand customer needs by providing the best and professional service by always implementing health protocols. BNI immediately adjusted the conditions for COVID-19 by providing and conveying information to customers regarding banking products and/or services regarding adjustments to banking activities. BNI ensured that the information submitted to customers could be received accurately, honestly, clearly and not misleadingly. Then, BNI also provided a written summary of products and/or services information regarding descriptions, benefits, risks, costs of products and/or services, as well as terms and conditions.

TARGET/ACTIVITY PLAN 2021

BNI through its operational activities towards consumers/customers is committed to fulfilling customer satisfaction, one way is by handling grievances or complaints that can be resolved in accordance with the Standard Level Agreement. In addition, during the continuing COVID-19 condition in 2021, BNI strived to provide maximum service in the midst of COVID-19 by always implementing standard health protocols so that customers could comfortably transact at BNI.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO CONSUMERS/CUSTOMERS ACTIVITIES

ATM for People with Disabilities

By the end of 2021, BNI had 3,184 ATMs that can be used by people with disabilities. These ATMs have several facilities that are friendly to people with disabilities, including access ways to the ATM gallery that are convenient for wheelchair users, automatic entrances, non-slip iron floors under the ATM machines so it is when wheelchair users pass by, the ATM machines that are lower than other ATM machines. These specifications are used to facilitate wheelchair users.

ATM machines for people with disabilities are placed in hospitals, Branch Offices and Office Buildings. Features developed are "inquiry" and "withdrawal" with the "fast cash" menu. The provision of these special ATMs is part of BNI's effort to support people with disabilities in conducting banking transactions at ATMs.

Product Security

BNI has reviewed its products and evaluated their safety by conducting Post Implementation Reviews (PIR) by the Compliance Division, the Bank's Risk Management Division and the Technology Division. If the results of the PIR fulfills operational, technological and risk standards, the product description is conveyed to Bank Indonesia and the Financial Services Authority to obtain approval before being released to the general public.

SOCIAL RESPONSIBILITY RELATED TO CUSTOMERS ACTIVITIES IMPACT

BNI's social responsibility activities related to customers are going well, especially in the effective handling and resolution of customer complaints. This is shown by the number of Customer Satisfaction Surveys (CSS) which are conducted regularly, which are protected by independent survey consultants/vendors appointed by BNI by maintaining the confidentiality of customer data. Initially, CSS was implemented once a year and was changed to once every two years. In 2021, BNI again implemented CSS and got a score of 4.16 from a scale range of 1-5.

While the number of transactions at ATMs for people with disabilities over the last 3 (three) years were as follows:

DESCRIPTION	2021	2020	2019
Average number of transactions at ATMs for people with disabilities	16,675,097	17,431,100	6,399

PROCEDURE AND NUMBER OF CUSTOMER COMPLAINTS REPORTED AND RESOLVED

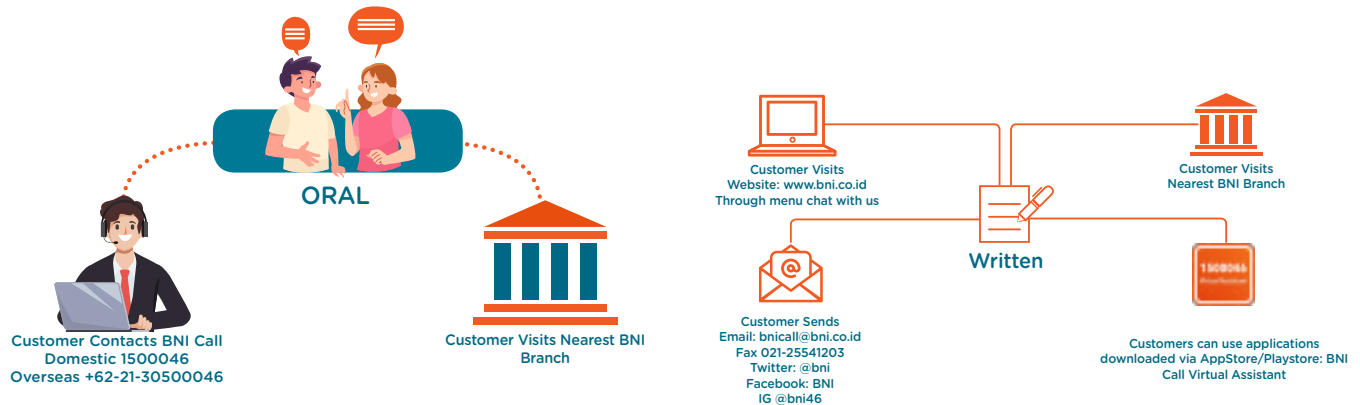
Submission Media

The Bank strives to provide the best services, including making it easier to submit customer complaints regarding the banking and credit cards services. Complaints can be submitted through the BNI Contact Center, which is one of BNI's front lines in providing services for BNI customers. BNI provides customers with convenient and comfortable access to complaints services through a variety of media choices, both verbally and in writing.

Verbal complaints can be made by contacting the BNI Call Center by contacting 1500046, or the customer can go to the nearest BNI branch. For written complaints, customers can submit via e-mail to bnical@bni.co.id, fax (021) 25541203, via live chat on the BNI website www.bni.co.id, and send complaints through BNI social media. As well as still visit the nearest BNI Branch.

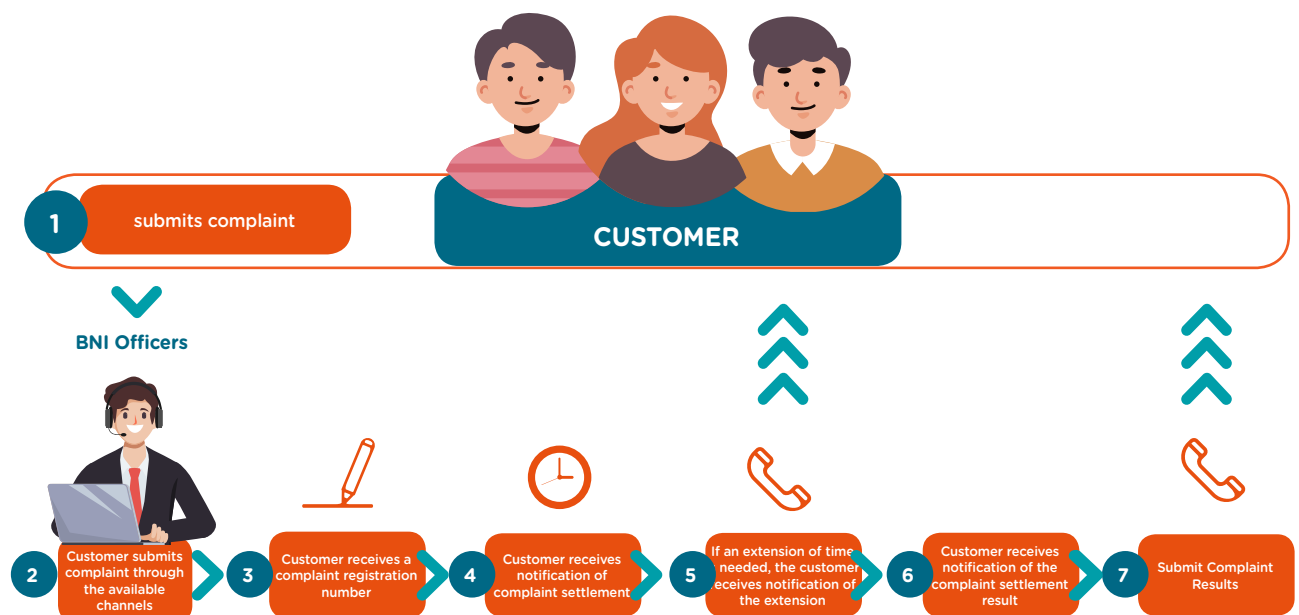
The BNI Contact Center is supported by an integrated Online Request Management complaint handling application so that receiving and resolving customer complaints can be carried out by the application, including sending notification of the complaint status to customers and facilitating monitoring of customer complaint settlement status. Through this application customers receive the same customer experience as complaints submitted through other available complaints media.

BNI Customer Complaint Submission Media



Customer Complaint Mechanisms and Facilities

Submission and Settlement Completion



BNI provides information on the resolution of customer complaints via telephone, email, letter or short message service (SMS). This is in accordance with the OJK Circular (SE OJK) No. 2/SEOJK.07/2014 and updated through OJK Circular (SE OJK) No. 17/SEOJK.07/2018, solutions for the resolution of customer complaints submitted orally are carried out within a maximum of 5 (five) working days and written complaints within a maximum of 20 (twenty) working days. If a supporting document is required for a customer complaint submitted orally, BNI will ask the customer to submit a written complaint. Customers can complete the documentation for complaints within 20 (twenty) working days and this can be extended for another 20 (twenty) working days.

In certain conditions, the fulfillment of document completeness and settlement of complaints can be extended for a further 20 (twenty) working days according to POJK Number 1/POJK.07/2013 and updated through POJK Number 18/POJK.07/2018 concerning Consumer Complaint Services in the Sector Financial Services. Information on the extension of the complaint settlement time is notified in writing to the customer.

If the customer feels that the settlement solution provided by BNI does not meet their expectations, then the customer can continue the complaint resolution process through an Alternative Dispute Resolution Agency listed in the List of Alternative Dispute Resolution Agencies set by the Financial Services Authority.

BNI Contact Center provides conveniences and comfort for customers in accessing information, requests and delivering complaints that can be accessed 24 hours both through BNI Call 1500046, email, social media and the BNI Call Virtual Assistant application, providing a new experience regarding the status of complaints previously submitted.

BNI Contact Center plays an active role as a point of contact for BNI customers in conveying voice of customer by providing insights to business units for improving superior products, features and services to customers, and provides feedback to business/product owners regarding customer complaints; monitoring the Service Level Agreement (SLA) for complaint resolution; adjustments to internal regulations if there are changes in legislation as well as improvements to online request management customer complaint handling applications.

Number of Customer Complaint Reports and Completion Level

To improve its customer service, BNI uses an online Request Management (ORM) application integrated with all touch points to make it easier for monitoring and maintaining the SLA completion of complaints in an effort to increase customer experience. In an effort to minimize customer complaints, BNI guarantees its products and services; provides easy and fast access to information; conducts customer education regarding data confidentiality and updates customer data.

In 2021, with business process improvements the number of complaints decreased by 10.86% compared to the previous year, from 687,375 complaints in 2020 to 612,713 in 2021, with a complaint settlement rate of 99.68%, considered good.

Corporate Social Responsibility Related to Social and Community Development



COMMITMENT AND POLICY

The corporate social responsibility related to social development describes one of the bank missions, namely increasing concern and responsibility to the environment and the community, as BNI's contribution to improving community welfare. The Social and Environmental Responsibility (SER) Program is the company's commitment to sustainable development and delivers economic, social, environmental and legal benefits and governance with more integrated, targeted, measurable and accountable principles, as part of the company's business approach. The Micro and Small Business Funding Program is referred to as the UMK Funding Program, a program to improve the ability of micro and small businesses to become stronger and more independent.

BNI's SER programs and activities commitment and policy for the Bank's social development references the applicable mechanisms and conditions including Republic of Indonesia Minister of State-Owned Enterprises Regulation No. PER-05/MBU/04/2021 dated April 20, 2021 concerning the Social and Environmental Programs of State-Owned Enterprises.

SOCIAL ISSUES RELEVANT TO THE COMPANY

As a BUMN, apart from being tasked with achieving the set profit target (commercial mission), BNI also carries out social function tasks to deliver added value to the communities around the company's operational areas through the Social and Environmental Responsibility (SER) Program. Through its role as one of the SOEs engaged in finance, Bank BNI's SER program is aligned with the corporate objectives and is carried out in a directed, structured and sustainable manner so as to maximize its corporate image and corporate business.

In addition to being strategic, the SER program also helps distribute social to the communities. Assistance is distributed for construction and rehabilitation of places of worship, free medical treatment, construction of public facilities and infrastructure, disaster response assistance, assistance for natural disasters and non-natural disasters including those caused by epidemics, and assistance during religious holidays (sharing basic necessities, donations to orphans and the poor).

BNI also contributed to the handling of the COVID-19 pandemic, which entered Indonesia in the first quarter of 2020. Up to December 31, 2021, the SER funds distributed for the handling of the COVID-19 outbreak was Rp52 billion. The assistance distributed included:

1. Medical and other supporting equipment including medical masks, cloth masks, personal protective equipment (PPE), hand sanitizers, portable sinks, sterile rooms, ambulances, thermo guns, vitamin packages and others,
2. Compensation for Health Workers,
3. Assistance with healthy food and fruit packages, food packages, and packaged rice packages to medical staff and communities affected by COVID-19.

CORPORATE SOCIAL RISK MANAGEMENT

As a corporation engaged in banking, BNI has identified the risks faced in SER activities including the risk of the assistance being misused, the risk of errors in distributing the assistance and the risk of invalidating the assistance proposal. To do so, BNI conducted a survey to assess the proposal feasibility, including monitoring the assistance objective and appropriateness to the amount of assistance provided, as well as monitored both before, during and after the assistance for the SER activities had been delivered.

BNI also faces social risks linked to loan disbursements if they are channeled to organizations/companies experiencing social problems. Therefore, BNI already has a credit disbursement policy that covers the prevention of these social risks.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO SOCIAL AND COMMUNITY DEVELOPMENT SCOPE AND FORMULATION

BNI aligns its attention and activities in the community, and is committed to continuing to run the community development and empowerment program to achieve the Sustainable Development Goals/SDGs. The superior and strategic social community sector program is carried out by BNI is called BNI Berbagi, a form of organizational responsibility for the impact of its decisions or activities on the community and the environment.

TARGET/ACTIVITY PLAN FOR 2021

As a BUMN company, BNI has a role to play and the responsibility for empowering and prospering the communities, and thereby encouraging people's economic growth, and this is carried out through the BNI SER program. The current COVID-19 pandemic has had an impact on people's lives, and this has become a challenge for BNI to play a more active role in community development as manifested in the SER programs. To support the SOE's program for small business development and community empowerment, BNI conducts the Partnership and Community Development Program activities in various regions of Indonesia based on the prevailing rules and regulations.

BNI's SER Program in 2021 was as follows:

1. Micro and Small Business Funding Program (PUMK)

To improve the capability of small businesses to become resilient and independent, the strategy undertaken in 2021 was to organize partnership programs aimed at improving the micro and small business entrepreneurs' capabilities. The 2021 work plans were as follows:

- a. Focusing on distribution in a clustering manner by establishing synergies with BUMN/BUMD/ Regional Governments to manage fostered partners in the form of MSMEs.

2. Social and Environmental Responsibility.

To support the BUMN empowerment program for community social conditions, the work programs for 2021 were as follows:

- Distributing SER development funds following the provisions.
- Cooperating with professional and competent partners to organize community empowerment programs.
- Cooperating in community development to improve the quality of the program.
- Increasing the SER capacity and capability of Foster Partners by providing education, training, apprenticeships, marketing, and other forms of assistance.

In addition, the Bank also distributed SER funds for handling COVID-19. The 2021 disbursement target for the Micro and Small Business Funding Program was Rp150 billion, and the disbursement target for the SER program in 2021 was Rp100 billion.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO SOCIAL AND COMMUNITY DEVELOPMENT ACTIVITIES

Micro and Small Business Funding Program (PUMK)

The BNI PUMK Program has been carried out by the Small Business & Programs Division since 2017. BNI channels the PUMK Program in the form of soft loans to fostered partners by currently only charging administrative services at 6% per year from the loan limit, and this was distributed in the form of:

- Loans to finance working capital and or purchase of fixed assets to increase production and sales;
- Special loans to finance the business activities for fostered partners in the form of additional and short-term loans, for the purpose of fulfilling orders from their customers;

3. Development Program Expenses:

- Expenses for education, training, apprenticeships, marketing, promotion, and other activities related to increase the productivity of the fostered partners and for conducting the assessments/research related to the Small Business and Micro Business Funding Program (PUMK);
- Development program expenses in the form of grants with a maximum amount of 20% of the Partnership Program funds disbursed in the current year;
- Development Program expenses can only be given to or for the benefit of the fostered partners.

BNI's fostered partners are micro entrepreneurs who technically are not familiar with banking due to their limited access to receive loans from banks. The micro business entrepreneurs operate in various formal and informal economic sectors, but have a strategic role to play in the real sector economy and it is proven that the micro segment is relatively more resistant to economic crises. BNI fostered partners are expected to increase their business activities, business capital, entrepreneurial spirit, access to banking, business administration, product quality and marketing reach.

Badan Usaha Milik Desa (BUMDES)

BNI performs coaching to Badan Usaha Milik Desa (Village-Owned Enterprises/BUMDes) in rural villages as a manifestation of serving the country throughout the archipelago. Coaching is provided in the form of stimulus for possible startup businesses in cooperation with BNI, such as BUMDes acting as referral agents and KUR collections and BUMDes can engage in providing banking products for the public through Agen46. To date, BNI have coached 3,062 MSMEs.

Millennial Smartfarming

Millennial Smartfarming is a follow-up program to the welcome to agriculture movement 4.0, which has been running since 2019 to date. Millennial Smartfarming's activities are a series of programs and social responsibility activities in the form of support from BNI, the Ministry of Agriculture (Ministry of Agriculture) and the Ministry of Communication and Information (Ministry of Communication and Information), and the Sejahtera Partner Startup Building a Nation in the Agriculture Sector, especially by applying the Internet of Things in the form of SER from BNI.

The Millennial Smartfarming activity objectives include:

1. Implementing smart agriculture through agricultural digitization using the Internet of Things (IoT);
2. Implementing through shaping the participation of creative and innovative millennial farmers;
3. Establishing an agricultural ecosystem by opening market access to farmers so their income is guaranteed, as well as optimizing banking financial inclusion in the Villages;
4. Financial inclusion means a condition where everyone has access to quality financial services at affordable costs and in a fun, uncomplicated and enjoyable way;
5. Strengthening millennial farmer institutions carried out through a number stakeholders.

As of December 31, 2021, 459 farmers had participated in this activity. BNI cooperated with the Ministry of Agriculture, Kemkominfo, Telkom, PIHC, OJK, and MSMB, and initiated continued activities from the welcome to agriculture movement (GMP) 4.0. This activity focuses on the establishment of Millennial Empowerment through Development & Expansion of Digital Agricultural Ecosystems (IOT) from upstream to downstream and increases village financial inclusion. In 2021, there were 4 (four) Millennial Smartfarming programs running that also provided CSR assistance as a form of BNI support in creating digital agricultural ecosystems.

NO	LOCATION	FORM OF ASSISTANCE
1	Cicalengka Bandung district	Weather and Land PH Sensor
2	Klaten district	Weather and Land PH Sensor
3	Gobleg Village Buleleng district	Water Dripping
4	Ngantang Village Malang district	Water Dripping

The essence of Millennial Smartfarming is to include young farmers as key players in the agricultural ecosystems. The hope is that in the hands of these young farmers national food security can be achieved to satisfy the President of the Republic of Indonesia's dream of making Indonesia the World Food Barn by 2045.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY (SER) PROGRAM

In 2021, BNI divided its SER activities into 3 (three) main programs, namely:

1. BNI Initiation, an activity based on BNI thematic initiatives related to the SDGs and BNI's vision and mission. BNI Initiation is also based on developing national issues that have a widespread impact on society.
2. Supporting the communities and other stakeholders in activities based on community and other stakeholder initiatives.
3. National Support, an activity based on the Government as the primary stakeholder and other stakeholders' initiative.

BNI SER PROGRAM ACTIVITIES

For its SER programs, BNI refers to the 4 (four) Pillars that support the Sustainable Development Goals.

BNI SER Initiative Achievements for Social Communities

Food Security

In the social sector, BNI focuses on Poverty Alleviation where COVID-19 in Indonesia has affected many people not only from the health side but also from the economic side. BNI has instigated 3 (three) major activities in all BNI work areas, and these include the Jumping Higher Program during Ramadan and Christmas, and Food Packages through institutions that coordinate with the local governments to collect data on poor and eligible people to receive food packages in the context of dealing with COVID-19.

The purpose of the three activities is to share happiness and help ease the burden on the poor or those who have been economically impacted by the COVID-19 pandemic, because of lower daily worker income, layoffs, and other conditions. The food package assistance included rice, instant noodles, sugar, oil, and others, and was distributed ahead of the month of Ramadan, Christmas Day, and for needy people dealing with COVID-19. During the distribution, BNI continued to prioritize health protocols through social distancing and physical distancing in an effort to prevent the spread of the virus.

Health

The current COVID-19 pandemic has impacted people's lives. BNI as a BUMN through its SER programs plays an active role in overcoming the current COVID-19 situation. The programs include:

1. COVID-19 Vaccination Acceleration Program Support
BNI participated in the vaccination program acceleration so that all Indonesians could immediately get vaccinated. There are still people who have difficulty receiving their vaccinations due to remote locations or quotas in some locations being insufficient. Realizing this, BNI together with several partners, including the National Task Force for the Acceleration of COVID-19 Vaccination, Interfaith Youth Organization, Indonesian Humanitas Insani Foundation, Universitas Indonesia Hospital, Universitas Indonesia Alumni Association, Universitas Kristen Indonesia, Trisakti Alumni Association, implemented a Vaccination Program in a number of regions in Indonesia, including Greater Jakarta, West Java, East Kalimantan, and East Nusa Tenggara.

2. COVID-19 Handling Health Facilities

The COVID-19 pandemic was showing a significant rise in positive cases, which has slowly declined thanks to the vaccination program. However, health agencies and medical personnel still need the health facilities and infrastructure to deal with COVID-19. Therefore, BNI together with BNI Life handed over assistance in the form of medical equipment, such as masks, personal protective equipment, and medical gloves to 25 government and private hospitals, including Pasar Minggu Hospital, Dr. Cipto Mangunkusumo National Hospital, Dr. Cipto Mangunkusumo National Hospital, St. Carolus, Primaya Evasari Hospital, Persahabatan Hospital, Kebayoran Baru Hospital, Harapan Kita Heart and Blood Vessel Hospital, Premier Jatinegara Hospital, Jakarta Hajj Hospital, and others.

3. Other Health Aid

BNI also supported the health agencies through assistance for ambulance vehicles, blood transfusion cars, hearse ambulances, blood donation unit infrastructure, patient beds, hand washing facilities, and others. The realization of the distribution includes DKI Jakarta, West Nusa Tenggara, East Nusa Tenggara, Central Kalimantan, Riau, Central Sulawesi, South Sumatra, Riau, Bengkulu, Banten, West Java, Central Java and Bali.

In 2021, Ambulances were distributed in several locations including:

1. Blood Transfusion Vehicles at Raja Ahmad Tabib Hospital, Tanjungpinang-Riau;
2. Ambulances at Kidang Rangka Main Clinic, Karawang-West Java;
3. Ambulances at Pratama Tanali Hospital, Ende District-East Nusa Tenggara;
4. Ambulances at KRMT Wongsonegoro Hospital, Kota Semarang-Central Java;
5. Ambulances at Fatimah Makale Hospital, Tana Toraja-South Sulawesi;
6. Ambulances at Bhayangkara Hospital Kupang - NTT;
7. Ambulances at Mataram City Hospital - NTB.

Ambulance are intended for people who can't afford them, so people needing them can get an ambulance quickly without being charged. Ambulances are used to accelerate the handling of COVID-19 or other diseases or health needs. BNI is also active in providing counseling on the processing of mask waste so it does not become an epicenter for disease transmission.

Education

To support the Education and Training programs, BNI carried out assistance activities including MSME training programs at SOE Homes, scholarships from Elementary School (SD) to Higher Education (PT) levels, construction or renovation of educational facilities, provision of school infrastructure to support education. For determining development/renovation and school infrastructure assistance, BNI first analyzes and considers the social, economic, and environmental conditions at the schools.

For scholarship assistance, in 2020 BNI as PIC together with BTN and Bukit Asam as Co-PIC provided scholarships to university students (PT) who are children of TNI and Polri in the DKI Jakarta Province. BNI's requirements for providing scholarships are a statement of the use of funds for education, a certificate of being active in college, a study result card issued by the university, they are not currently receiving educational assistance from other parties, and must be successful as evidenced by the transcript. For other scholarship activities, BNI requires that each prospective participant must come from a poor community as evidenced by a Certificate of Incapacity (SKTM) from the local government. The assistance provided is in the form of financial support every semester or in full.

During the COVID-19 pandemic, there was a shift in learning methods from face-to-face to Distance Learning (PJJ). Adapting to these new learning methods was not easy for both students and parents. Realizing this, BNI collaborated with an online learning provider startup, Ruang Guru, in an effort to provide education savings. This activity can be followed by students from elementary schools (SD) to high schools (SMA). The requirements for the participants are that they must attend online schools and Live Teaching carried out on the Ruang Guru online platform, then work on the quiz questions given. Appreciation is given to students with the best grades.

In addition, BNI together with the Pusat Indonesia dan Kemandirian Indonesia Raya Foundation (PIKIR) jointly provided internet access to support teaching and learning activities for students living in “blankspot” areas where there is no internet access. This assistance was carried out in the West Malalak District, Agam Regency-West Sumatra. Assistance was provided by coordinating with the local government in an effort to determine points based on location readiness.

In 2021, BNI expanded the areas by providing free internet access, in Kampar City, Kampar Regency, Riau. The assistance was for students, especially at the Elementary School and Satu Atap XIII Junior High School level in Kampar City, Kampar Regency, Riau. Before the installation of free internet, especially during Final Examinations, students had to ride as far as ± 70 Km to a school with internet access. These long distances from internet access impacted and delayed the communities and students from getting internet access. To monitor the assistance, BNI conducted monitoring during local BNI visits and requested a report from the implementers.

Tourism industry

Balkondes (Balai Ekonomi Desa)

Balkondes is a form of synergy between the Ministry of SOE and other BUMNs including BNI to help the village economy through empowerment programs and the development of tourism-based human resources. During the COVID-19 pandemic, BNI continued to assist the people in Wanurejo Village by providing excellent service development and training.

The training aimed at ensuring Balkondes administrators continued to provide the best service to visitors, which is expected to have an impact on the present economy of the community. During the COVID-19 pandemic, the people of Wanurejo village not only relied on tourism potential but also relied on the handicraft products so make an economic impact on the people. Providing training to the people of Wanurejo village through the Balkondes program provided many positive benefits.

The training was carried out in stages, and included:

1. Self Assessment, aimed at determining the advantages and disadvantages of Balkondes to be able to complete each other and repair.
2. Excellent service training, aimed at helping the Balkondes administrators gain an understanding of the importance of providing the best service to visitors, especially during the pandemic.
3. Study Appeal to one of the best tourist villages in Indonesia, namely the important tourist village of Sari, Yogyakarta. This was carried out so that the Balkondes management gained experience as a visitor and experienced the services provided by residents of the Important tourism village. The hope is a lot of lessons and positive things can be implemented at Balkondes Wanurejo.
4. Preparation of Standard Operational Procedures (SOP) and Job Descriptions. This is aimed at Balkondes delivering excellent service standards and each Balkondes management understanding each other's role so that visitors can feel good experience.

In 2021, BNI also provided training in Cleanliness, Health, Safety, & Environment Sustainability (CHSE) certification. The application of CHSE certification at Balkondes is to support an increase in the sense of security and comfort for tourists during the COVID-19 pandemic. The implementation of CHSE will support a growth in tourism business opportunities and increase tourists' confidence to visit Balkondes Wanurejo.

This certification was carried out in stages by applying CHSE, namely:

1. Cleanliness Procedures: carrying out continuous efforts and ensuring the cleanliness of people in the Wanurejo Balkondes area through signs, hygiene checklists, and soft copies available to all Balkondes staff;
2. Health Procedures: carrying out continuous efforts and ensuring the health of all people in the Wanurejo Balkondes area, through signs, banners, checking guest temperatures, recording visitors, and implementing health protocols;
3. Safety Procedures: carrying out continuous efforts and ensuring the safety of all people in the Wanurejo Balkondes area, through safety signs and safety devices in the Balkondes area;
4. Environment Sustainability Procedures: carrying out continuous efforts and ensuring environmental sustainability and comfort for everyone in the Wanurejo Balkondes area through water and electricity saving signs and procedures for using tools that may trigger hazards.

KAWAN (Local Tourism Area)

The tourism industry based on local community management is one of the solutions to equal distribution and an increase in community income. Therefore, BNI assists in the development of the tourism economy, especially potential tourist destination villages.

The “KAWAN” program provided by BNI involves community empowerment as a form of BNI’s support in developing Indonesia’s tourism potential. BNI assists tourism-conscious communities/groups (Pokdarwis) living in villages/tourist areas through 2 (two) programs, the Product Development Program, including the Homestay Renovation Program, tour packages, and other activities. As well as the Human Resources Assistance Program, including institutional formation.

The COVID-19 pandemic started in March 2020, and impacted all sectors, especially in the Tourism Sector. Various government policies forced people to stay at home and not carry out activities outside the home, resulting in a significant decline in the tourism service sector. However, people living in the tourism areas still depend on this industry and need to find solutions immediately.

BNI is committed to helping the community, especially through the “KAWAN” Program to provide quick solutions to the economic recovery of people in tourist areas by providing business equipment assistance. The assistance given included weaving and brick molding machines in the Mandalika Tourism Area, Mataram, NTB. The program aims to keep the wheels of the community’s economy continuously running during the pandemic. Considering the current conditions, BNI continues to strive to help tourism areas affected by COVID-19 to survive.

In 2021, BNI assistance including support to the Sembalun Tourism Area, Lombok, West Nusa Tenggara, to acquire a hand tracker to accelerate and facilitate the processing of agricultural land, to increase the community empowerment around the tourist area. Prior to the assistance provided by BNI, land preparation was carried out manually by using cows.

FOSTERED PARTNER DEVELOPMENT

Rumah BUMN (SOE House)

The number of MSMEs in Indonesia has reached 64 million, most of whom are micro-enterprises, showing the potential of MSMEs as one of the drivers of the Indonesian economy to increase the country’s prosperity. SOEs, as agents of development, have instigated several initiatives to improve the quality of MSMEs, through the SOE House.

The background for establishing the SOE House is to encourage the growth of national and global markets, where MSMEs play an important role in the prosperity of the country’s economy, by creating job opportunities, encouraging the improvement of people’s welfare, and creating new innovations.

In an effort to empower the communities' economy, especially for MSMEs, BNI has been involved in establishing 35 SOE houses throughout Indonesia since 2017. The BNI SOE houses are places for gathering, learning and fostering MSMEs actors to become quality Indonesian MSMEs. BNI SOE Houses actively assist and encourage MSMEs in responding to the main challenges of MSME business development in terms of increasing competence, increasing marketing access and facilitating access to capital.

BNI has fostered more than 10,000 MSMEs throughout Indonesia, from South Nias, Bantaeng, Pangandaran, Ngawi, Pontianak, Southeast Maluku to Jayapura. In addition to assistance, the SOE Houses have also helped the MSMEs:

1. Obtain 5,464 legal permits:
 - a. PIRT (Home Industry Licenses);
 - b. NIB (Business Registration Numbers);
 - c. Halal certificates from MUI;
 - d. BPOM permits; and
 - e. Other business licenses.
2. BNI SOE House provides MSME data to the Micro Business Productive Banpres (BPUM) for the Government, so the SOE Houses become one data source in each region contributing to the needs of the distributor.
3. Opening the way for MSMEs to enter National retail outlets in their respective regions including Alfamart, Indomaret and others.

SOE Houses also assisted in the distribution of People's Business Credit (KUR) in collaboration with the local BNI Branch with a total distribution of Rp5.4 billion.

As one of BNI's programs to help promote the sales of BNI's MSME products, BNI launched a Reseller program for the sale of SOE House Products in 10 SOE Houses, in Bekasi, Tegal, Tanjung Balai Karimun, Wonogiri, Ngawi, Ternate, Southwest Sumba, Bantaeng and Padang, with programs including:

1. Aku Saudagar Muda, recruiting regional students and youth to become resellers of MSME products
2. Sahabat Ibu preneur, an MSME community for MSME Women and resellers, including housewives and women who wish to earn additional income by selling BNI MSME products.

As part of its support for the Go Global MSME program, BNI also supports promotional activities for superior MSME products from BNI SOEs Overseas, including:

1. Tokyo Expo

Japan is one of the countries that highly values handicraft or craftsmanship products, as seen in the Tokyo residents requests for Indonesian MSME products, and BNI participated in an Indonesia Bazaar held for 1 (one) month in July 2021 at the Indonesian Embassy in Tokyo, where BNI presented Kriya dan Wastra from RB Katingan & RB West Manggarai.

2. Dubai Expo

BNI presented MSME products or selected products at international events produced by SOE-assisted MSME (Sleman, Katingan, Wonogiri, Banjarbaru and Bekasi) to visitors at the 2021 Dubai Expo held in Dubai City, UAE. from October 2021 until March 2022. The Dubai Expo is an exhibition that takes place every 5 years and runs for 6 months and is attended by tourists from all over the world, so this exhibition event is the most prestigious event for countries around the world to showcase their rich creations and culture to the International world.

3. UK Expo

A superior Indonesian products exhibition in collaboration with the British Diaspora and BI, called The Indonesian Merchant & Trade Expo (ISME UK EXPO) was held on November 28, 2021, with products from the SOE-assisted producers in Banjarbaru, Sleman, Katingan and products from Other KUR debtors. This exhibition aims to showcase diaspora to UK retailers.

4. Indonesian coffees are very popular overseas, and have become more global, BNI selected BNI MSME superior coffees together with the Ministry of Foreign Affairs to penetrate the German, Dutch and Australian markets.

Social Forestry

Social forestry assistance is intended to improve the community welfare in the form of providing certificates so that communities has access to cultivate the forest and forest conservation land. Social and Environmental Responsibility (SER) program assistance is provided in the form of agricultural machinery, irrigation, or renovation of educational facilities around forest land. By 2021, 5 Social Forestry Programs were active and CSR assistance was also being provided through BNI's support for the Social Forestry program.

National Forestry Program

NO	LOCATION	HELP FORM
1	East Java	Agricultural Equipment, Communal Cowshed and Biogas
2	West Java	Coffee Crusher and Agricultural Equipment
3	South Sumatera	Tractor Machine
4	Jambi	Tractor Machine
5	Riau	Tractor Machinery and Agricultural Equipment

KAMI Program

One of BNI's financial literacy programs for the priority community is "Kami Bersama BNI" program. KAMI (Indonesian Migrant Family) and BNI provide financial literacy education for Indonesian Migrant Workers (PMI) overseas. Through this financial literacy training, PMI are expected to manage their finances better and choose BNI as a trusted financial service institution.

Disaster Emergency Response

Indonesia covers a large area made up of many islands. Also, there are active mountains that surround Indonesia, and so Indonesia has huge potential for natural disasters.

Indonesia has a lot of potential natural disasters. The excessive exploitation of natural resources causes environmental damage and disasters such as land fires, floods, and landslides. To cope with those disasters and ease the burden on the affected communities, the programs instigated include:

1. Basic Needs Fulfillment Program

In disaster conditions, the basic needs fulfillment program is the earliest assistance provided by BNI to people affected by the disaster. In implementing this program, BNI collaborates with several parties, including the Regional Disaster Management Agency (BPBD), the Government, or the local BUMN Task Force (Satgas). This collaboration aims to determine the community needs and the locations that need targeted assistance. Aid is distributed directly to disaster command posts. The community assistance covers the daily necessities, including basic needs, fast food, medicines, sanitary napkins, pampers for children, blankets, and others.

2. Post-Disaster Program

Post-disaster assistance provided by BNI is in the form of post-disaster development. Post-disaster assistance posts are usually established if disaster conditions get worse after more than 3 (three) days with a large number of affected people. Selection of post-disaster locations is determined based on coordination with the Government and/or the BUMN Task Force based on the severity level and community needs. Activities carried out at the Disaster Command Post include the construction of public kitchens, meeting the basic needs of the community after a disaster, health checks for the community, etc.

Public Facilities and Infrastructure

For the development of public facilities and infrastructure sector activities carried out for the concreting of roads in Banten, West Java, and Central Java. Assistance for the construction of toilets/latrines in East Nusa Tenggara, West Sumatra, West Java, and South Kalimantan.

The construction of drainage and/or the provision of clean water facilities assistance are in Banten and West Sumatra. The assistance renovation of uninhabitable houses (RTLH) in Central Java, West Java, and West Nusa Tenggara. The bridge renovation assistance is in West Sumatra, Central Java, and Nanggroe Aceh Darussalam. The renewable energy assistance for micro-hydro power plants is in Malang, East Java.

Places of Worship Facilities

For assisting places of worship facilities, BNI also assists and supports either the construction or renovation of worship places for various religions in BNI work areas. The worship facilities assistance program is prioritized for places of worship located in the 3T (Disadvantaged, Remote, and Frontier) areas. BNI not only helps in the infrastructure facilities, but also in the supporting infrastructure at the places of worship.

CORPORATE SOCIAL RESPONSIBILITY RELATED TO SOCIAL DEVELOPMENT ACTIVITIES IMPACT

MSE FUNDING PROGRAM ACTIVITIES IMPACT

In 2021, the distribution for the MSE Funding was as follows:

Based on Economic Sector

BUSINESS SECTOR	DISTRIBUTION REALIZATION (RP)	NUMBER OF FOSTERED PARTNERS
Agriculture	12,738,226,000	142
Trade, Restaurant & Hotel	13,629,003,263	273
Services	8,312,485,000	96
Processing Industry	1,103,000,000	15
Construction	325,000,000	2
Grand Total	36,107,714,263	528

Based on the Distribution by BNI Regional Offices

REGION	2021 TARGET (RP)	DISTRIBUTION (RP)	DISTRIBUTION TO TARGET (%)
REGION 1. MEDAN	5,000,000,000	-	0.0%
REGION 2. PADANG	5,000,000,000	515,000,000	10.3%
REGION 3. PALEMBANG	18,000,000,000	50,000,000	0.3%
REGION 4. BANDUNG	10,000,000,000	1,318,500,000	13.2%
REGION 5. SEMARANG	10,000,000,000	1,720,000,000	17.2%
REGION 6. SURABAYA	20,000,000,000	4,175,000,000	20.9%
REGION 7. MAKASSAR	5,000,000,000	550,215,000	11.0%
REGION 8. DENPASAR	5,000,000,000	1,635,780,000	32.7%
REGION 9. BANJARMASIN	5,000,000,000	35,000,000	0.7%
REGION 10. JAKARTA SENAYAN	5,000,000,000	3,666,500,000	73.3%
REGION 11. MANADO	5,000,000,000	-	0.0%
REGION 12. JAKARTA KOTA	5,000,000,000	5,302,000,000	106.0%
REGION 14. JAKARTA BSD	5,000,000,000	543,000,000	10.9%
REGION 15. JAKARTA KEMAYORAN	5,000,000,000	3,592,493,263	71.8%
REGION 16. PAPUA	2,000,000,000	460,000,000	23.0%
REGION 17. YOGYAKARTA	10,000,000,000	1,385,075,000	13.9%
REGION 18. MALANG	35,000,000,000	11,159,151,000	31.9%
Total	155,000,000,000	36,107,714,263	23.30%

Impact of BNI SER Program Activities

Food security

During 2021, during the COVID-19 Pandemic, BNI focused on food package assistance to mitigate the impact of COVID-19 from an economic perspective. BNI's total funds amounted to Rp33.3 billion for several programs in BNI's work areas, including:

1. Jumping Higher Program during Ramadhan-Rp12.6 billion for 75,000 food packages;
2. Jumping Higher Program for Christmas-Rp7.06 billion for 35,000 food packages;
3. Other food package assistance-Rp13.64 billion for 125,157 food packages.

Health

The BNI SER Programs carried out in 2021, included efforts to break the spread of COVID-19, accelerate the support for COVID-19 vaccination activities, and support other health infrastructure for handling COVID-19 and Non-COVID 19.

1. COVID-19 Vaccination Acceleration Program Support
BNI support for the vaccination acceleration helped 32,121 people in Indonesia receive Dose 1 and Dose 2. This BNI vaccination support covered 12,300 people in Jabodetabek, 10,000 in West Java Province, 5,821 people in East Kalimantan Province, and 4,000 people in East Nusa Tenggara Province.
2. COVID-19 Handling Health Facilities
BNI medical equipment support for COVID-19 prevention in the form of medical equipment, such as masks, personal protective equipment, and medical gloves, to 25 government and private hospitals. BNI also assisted in health infrastructure facilities, by providing 5,500 medical masks, 2,000 Personal Protective Equipment, and 7,500 pairs of medical gloves.

3. OTHER Health Aid

In 2021, 52 (fifty two) ambulances were provided by BNI spread throughout Indonesia with an estimated assistance cost of Rp12.7 billion. Ambulances are used to accelerate the response to both COVID-19 and Non-COVID-19 prevention without charge, and are prioritized for poor people who need ambulance assistance. BNI has also helped build 40 hand washing points in collaboration with the COVID-19 Task Force for Medical Waste Handling and YP Unila High School-Bandar Lampung.

Education

During 2021 BNI played an active role in the education sector through several program activities including the provision of scholarships, school facilities and infrastructure, construction or renovation of school buildings, and others. Overall the total assistance amounted to Rp18.5 billion. These BNI programs included:

1. Scholarship assistance for elementary school to college students;
2. Assistance for the construction of educational infrastructure several parts of Indonesia;
3. Internet Education program assistance in "blankspot" areas;
4. Educational assistance to children with disabilities;
5. Training assistance for MSME businesses.

Tourism industry

Balkondes

The benefit of the activities carried out in Balkondes includes providing education to the people of Wanurejo Village on how to develop tourism potential in the local village. In addition, during the COVID-19 pandemic, the public became more aware of business potential that can be exploited and developed to improve the community's economy. BNI still provides free permits for MSMEs around the villages to sell in the Balkondes area, as a form of BNI's support for MSMEs around Balkondes Wanurejo.

KAWAN

By the end of 2021, BNI has realized homestay assistance and community empowerment in 8 (eight) locations, with the following details:

NO	HOMESTAY	LOCATION	NUMBER OF ROOMS	NUMBER OF HOUSE/ OWNER
1	Pramuka Island	Pramuka Island Tourism Area, Thousand Islands	10	10
2	Mandalika	Kuta Mandalika Village, Pujut District, East Lombok	10	10
3	Sembalun	Lendang Luar, Sembalun Village, East Lombok	7	7
4	Danau Toba	Kawasan Wisata Lumban Bul-Bul, Balige	9	9
5	Belitung	Terong Village, Sijuk District, Belitung Regency	10	10
6	Wakatobi	Waha Village, Wangi-Wangi District	7	7
7	Bromo	Ngadisari Village, Sukapura District	20	20
8	Ranupani	Senduro Village, Senduro District	10	10

Developing Fostered Partners

BUMN HOUSES

SOE Houses performance during 2021, can be seen in the table as follows:

DESCRIPTION	AMOUNT
Total UKM Online	10,520
Online Product	7,364
Online Transaction	1,368
Total Products	31,560
Online Transaction Value	Rp17,778,800,000

Coaching for SME in SOE HOUSES BNI

CATEGORY	NUMBER OF ACTIVITIES	PARTICIPANTS
Workshop/Training	281	5,750
Visits to MSME Locations	407	978
Exhibitions/Events	90	2,568

KAMI Program

In 2021, the Bank organized two training programs, namely Financial Education and Entrepreneurship Education. This training was held in 4 countries, namely Tokyo, Singapore, Seoul, and Dubai with a total of 280 participants.

Disaster Emergency Response

In 2021, there were 51 (fifty one) Disaster Emergency Responses and Post-Disaster assistance given for a total value of Rp2.8 billion in locations across Indonesia, including DKI Jakarta, West Java, Central Java, East Java, Bali, West Kalimantan, South Kalimantan, Central Kalimantan, NTB, NTT, West Sulawesi, South Sulawesi, Central Sulawesi, North Sulawesi and North Sumatra. The disasters included floods, landslides, land fires, earthquakes and volcanic eruptions.

General Facilities and Infrastructure

Through the development of public facilities and infrastructure, BNI has contributed to meeting the needs of communities in several regions in Indonesia. Overall, BNI funds distributed activities totaled Rp13 billion.

Places of Worship Facilities

For Places of Worship Facilities, BNI provided Rp13.7 billion in assistance in 140 places of worship for the construction and renovation of their religious facilities.

SOCIAL COMMUNITY DEVELOPMENT COMPLAINTS MECHANISM

Customer Complaints Mechanism and Means

BNI provided a one-stop complaint mechanism through BNI Call Center, for complaints, both business and environmental and social. The number of complaints related to BNI's environmental and social activities was insignificant, considering that BNI's activities did not have a direct impact on the social environment of the community.





The clearest path to success is always to try, at least one more time.

- Thomas A. Edison

The graphic features a large orange circle in the center, partially overlapping a dark blue shape on the left. A thin orange line with three dots forms a partial circle around the orange circle. The text 'ESG Commitment' is centered in the orange circle.

ESG Commitment

1.013 Environment, Social & Governance (ESG)

1.017 Index ESG (Environment, Social & Governance)
Based on Morgan Stanley Capital International (MSCI) Standards



Rating **A**

BNI's ESG rating (MSCI) has increased from BBB in December 2020 to A in November 2021.

Environment, Social & Governance (ESG)

Environment, Social & Governance (ESG) refers to POJK No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance in Financial Service Institutions, Issuers, and Public Companies. ESG has been implemented at BNI through loan disbursements using green portfolio criteria, fundraising, products & services and was monitored through a KPI ESG Assessment as the collegial KPI for the Board of Directors and all related Divisions in 2021.

BNI's ESG is carried out by following a policy for developing a sustainable financial products & services portfolio, internal capabilities, and organization to increase social value (people), economic value (profit), and ecological value (planet).

BNI's ESG rating (MSCI) increased from BBB in December 2020 to A in November 2021, mainly due to an increase in Social factors on all key issues, including Consumer Financial Protection, Human Capital Development, Access to Finance and Privacy & Data Security. These four key issues scored above the industry average. Meanwhile, other factors that also increased included Governance on key issues of Corporate Behavior with a score above the industry average. BNI is currently improving the Environmental factors on the key issues of Financing

Environmental Impact for comprehensive loan portfolio policies and gradual implementation of ESG.

Efforts to improve the Environmental Impact Financing carried out include the End-to-End Credit Process by adding ESG assessment factors. Emphasis on Pipeline Management starting with Lead Generation or prospecting for new debtors or existing debtors based on the industrial sector, are ranked based on factors that have a high, medium and low impact on the environment, social and governance. BNI has implemented a risk assessment tool that takes into account the ESG factors in determining the pipeline, called the Risk Acceptance Criteria (RAC) at the debtor level and the Industry Risk Appetite (IRA) at the industry level.

ESG-Based Pipeline Management process flow



Determination of industry sectors for portfolio enhancement was discussed at the start between business units, risk units, risk management and planning. The initiative for selecting the industrial sector at BNI used the Industry Risk Appetite (IRA) that takes into account the prospects for the leading industrial sector/regional advantage, Industry Risk Rating (IRR) and business and pipeline considerations. In addition, it is sharpened by the selection of businesses in the sector that have applied the principles of sustainable finance or who have considered ESG factors in the company's operations, although they are still gradually and continuously being improved. Based on these IRA factors, BNI categorizes the industrial sector into three groups: Appetite, Limited Appetite, and No Appetite.

To support pipeline management, BNI has Risk Acceptance Criteria (RAC) for the Corporate Segment in 11 industrial sectors, namely:



Palm Oil Plantations
(Upstream and Midstream)



Mining (Mine Operator, Smelter Refiner, Fabricator, Trader)



Construction
(Contractors, and Toll Road Contractors)



Electricity/
Energy



Real Estate



Telecommunications



Chemicals



Non-Metal Minerals Subsector
(Cement Industry)



FMCG
(Fast Moving Consumer Goods)



Hospitals



Pharmaceuticals

The industrial sector RAC is prepared with an emphasis on the application of ESG based on the characteristics of the industrial sector.

Risk Acceptance Criteria

SECTOR	ESG ASPECT CRITERIA
Palm Oil Plantations	<ul style="list-style-type: none"> Minimum ISPO or RSPO certification There have been no social/environmental disturbances in the last 5 years that impacted business continuity
Mining Operators	<ul style="list-style-type: none"> Minimum BLUE PROPER rating
Construction	<ul style="list-style-type: none"> Must have OHS certificate (Occupational Health and Safety) No social and environmental disturbances related to the project There have been no social/environmental disturbances in the last 5 years that have impacted business continuity
Electricity/Energy	<ul style="list-style-type: none"> Must have AMDAL and OHS certificate No social and environmental disturbances related to the project
Real Estate	<ul style="list-style-type: none"> Compliance with the regional spatial plan (RT & RW) Appropriate land use (suitability of land with its function based on the area/regional master plan, Basic Building Coefficient (KDB), Building Area Coefficient (KLB) There have been no social/environmental disturbances in the last 5 years that have impacted business continuity
Telecommunications	<ul style="list-style-type: none"> There have been no social/environmental disturbances in the last 3 years that have impacted business continuity
Chemicals	<ul style="list-style-type: none"> There have been no social/environmental disturbances in the last 5 years that have an impact on business continuity
Cement Industry	<ul style="list-style-type: none"> Minimum BLUE PROPER rating There have been no social/environmental disturbances in the last 3 years that have impacted business continuity
Fast Moving Consumer Goods (FMCG)	<ul style="list-style-type: none"> Have AMDAL and OHSE There have been no social/environmental disturbances in the last 3 years that have impacted business continuity
Hospitals	<ul style="list-style-type: none"> Minimum ISO 14001 certification There has been no malpractice news that have impacted business continuity Has a hospital waste management unit in accordance with Government regulations There have been no social/environmental disturbances in the last 3 years that have impacted business continuity
Pharmaceutical	<ul style="list-style-type: none"> There has never been any news of fatal side effects from the drugs produced There have been no social/environmental disturbances in the last 3 years that have impacted business continuity

BNI has mapped the fulfillment of ESG aspects in portfolios with a high impact on the environment, including:

- BNI's debtors in the palm oil sector who already have or are in the process of obtaining RSPO and/or ISPO certification make up 44% of the portfolio;
- Some debtors operating in the processing industry have obtained the BLUE PROPER Rating;
- Some debtors have also obtained ISO certification based on their industrial sector;

- In these cases, BNI continues to encourage debtors in the palm oil sector to obtain ISPO and RSPO certification, and fulfill certification in accordance with their respective industrial sectors.

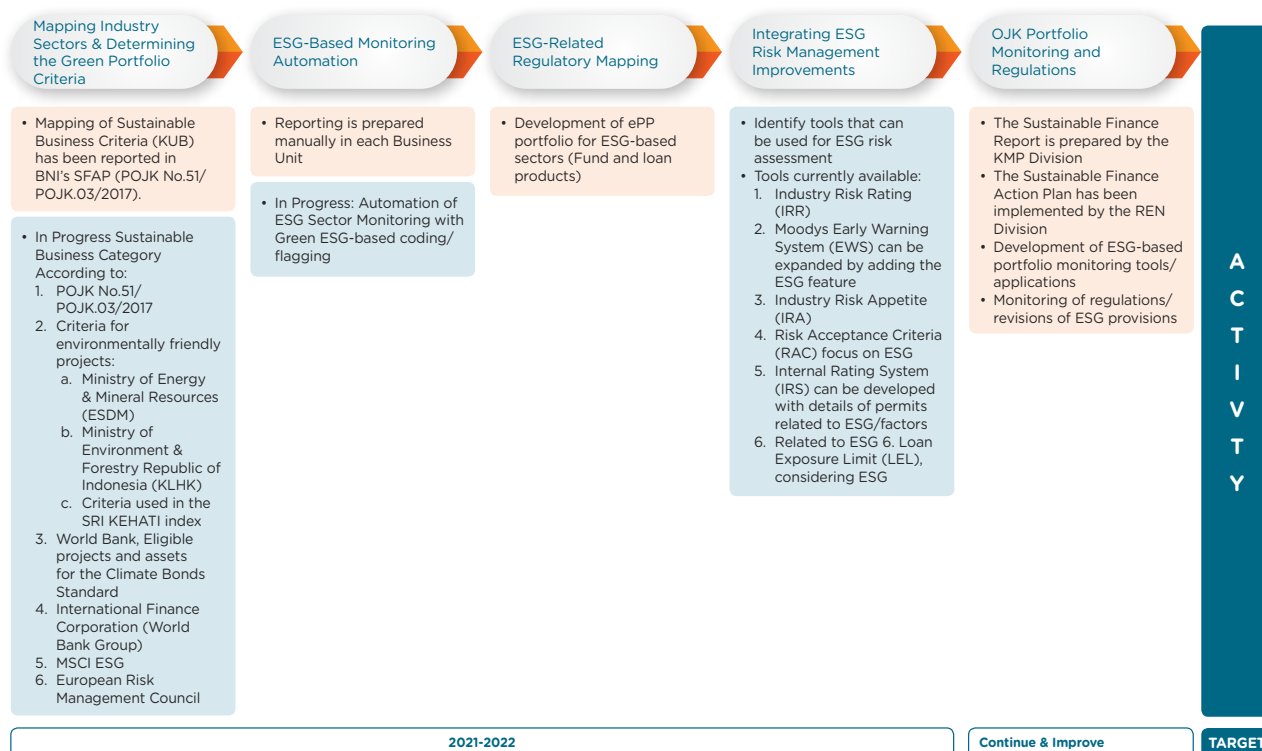
BNI has refined its loan policies and SOPs for lending by taking into account ESG factors, including:

- General analysis of lending to the palm oil sector that already has ISPO or RSPO certification;
- General social forest sector policies;
- Fulfillment of AMDAL for all sectors in the manufacturing industry.

BNI has developed a roadmap for improving ESG Risk Management as follows:

Road Map for ESG Risk Management Improvement

To improve the ESG support organization, BNI has appointed an ESG coordinator: the Bank Risk Management



(ERM) Division and the Divisions responsible for ESG development. BNI has also established an ESG Sub-Committee as part of the Risk Management and Anti-Fraud Committee to increase the focus and strengthen the ESG strategy, which is chaired by the Vice President Director and the Managing Director Risk Management as the deputy chairperson. In addition, an ESG performance assessment has been established using ESG KPI Ratings to provide a booster for the divisions responsible for ESG development.

Implementation of Sustainable Finance in Subsidiaries

The sustainable finance implementation in subsidiary companies has been carried out through the preparation and submission of the Sustainable Finance Action Plans (RAKB) to OJK:

- PT BNI Life Insurance
- PT BNI Multifinance
- PT BNI Sekuritas

Index ESG (Environment, Social & Governance) Based on Morgan Stanley Capital International (MSCI) Standards

ENVIRONMENTAL

COMPANY PRACTICE	PAGE
Environmental Impact Financing	
Scope of management system to assess ESG risk in financing activities	
<ul style="list-style-type: none"> BNI has implemented a management system to assess ESG risk in 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 2022. 	Sustainability Report page 124-125 Sustainability Report page 40 Annual Report page 227
Environmental loan policy	
<ul style="list-style-type: none"> BNI has developed binding environmental loan/investment policies related to agriculture, including palm oil. BNI has participated in the development of sustainable agricultural ecosystems through the Millennial Smart Farming program 	Sustainability Report page 18, 36 Sustainability Report page 95
BNI has developed an environmentally sound loan policy in the following sectors: <ul style="list-style-type: none"> Palm Oil plantations Mining (Mine Operator, Smelter Refiner, Fabricator, Trader) Construction (Toll Road Contractors and Contractors) Electricity/Energy Real Estate Telecommunications Chemicals Non-Metal Minerals (Cement Industry) Fast Moving Consumer Goods (FMCG) Hospitals Pharmaceuticals 	Annual Report pages 1.013- 1.014 Sustainability Report page 41
BNI participates in the development of social forestry programs aimed at economic equity, improving the welfare of communities living around the forests and preventing illegal logging through sustainable forest empowerment.	Sustainability Report page 96
BNI already has a loan policy to regulate the loan terms for industries related to agriculture; biodiversity; energy use; forestry; mining; oil and gas; transportation; and use of materials. The general loan policy is determined by the Credit and Business Policy Committee and environmental and social risk analysis is carried out by the Risk and Capital Management Committee, with evaluations carried out by the Audit Committee.	Sustainability Report page 38 Sustainability Report page 40
ESG Risk Management Integration	
To strengthen supervision in establishing the Environmental, Social & Governance (ESG) policies and management, BNI established an ESG sub-committee of the Risk Management & Anti-Fraud Committee, chaired by the Vice President Director with the Managing Director Risk Management as vice chairperson. The Bank Risk Management Division Leader is the secretary of the committee.	Annual Report page 804 Sustainability Report page 122-125
All BNI staff are trained on ESG risks and procedures, evidenced by the valid ESG training program provided.	Sustainability Report page 112-113
ESG Risk Management Supervision	
<ul style="list-style-type: none"> Active supervision by the Board of Commissioners and the Board of Directors in the application of risk management, including establishing a risk appetite and risk tolerance framework, risk control tools, as well as an integrated risk management framework and implementation. To strengthen supervision of the Environmental, Social & Governance (ESG) policies and management, BNI established an ESG sub-committee of the Risk Management & Anti-Fraud Committee, chaired by the Vice President Director with the Managing Director Risk Management as vice chairperson. 	Annual Report page 423 Annual Report page 804 Sustainability Report page 41, 42, 122, 123

COMPANY PRACTICE	PAGE
Through the ESG Sub-Committee, the Board of Directors is actively involved in managing ESG risk including:	Annual Report page 804
<ul style="list-style-type: none"> Developing policies and strategies for Environmental, Social, & Governance (ESG) management and their changes; Identifying potential ESG risks that impact both BNI and BNI stakeholders; Monitoring the application of Sustainability Finance strategies; Monitoring, evaluating and providing recommendations on BNI ESG assessment results; Evaluating the application of the ESG strategy in all BNI business lines. 	Sustainability Report page 122, 123
ESG Risk Management System	
BNI has developed a strong management system to assess ESG risk in financing activities outlined in the form of:	Annual Report page 1.013
<ul style="list-style-type: none"> Industry Risk Rating Prospective Sector Industry Risk Appetite Risk Acceptance Criteria 	
Environmental Financing Opportunities	
BNI is one of the recognized sustainability leaders and has received a number of ESG awards, and is entered the IDX ESG Senior Leader and SRI Kehati Index	Sustainability Report page 9
<ul style="list-style-type: none"> Gradually, BNI has taken an approach to identify and analyze climate-related risks, as well as steps to reduce emissions BNI has a significant investment in impact and target investments 	Sustainability Report page 68
BNI's total financing portfolio in the Sustainable Business Activities (KKUB) category amounts to Rp172.4 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

COMPANY PRACTICE	PAGE
Consumer Financial Protection	
Practice	
BNI provides annual training for all employees dealing with customers, including frontliners who serve customers directly. In 2021, 99.12% of the employees received training	Annual Report page 147
<p>BNI strives to ensure fair operating practice policies are applied, and are in accordance with the Bank's policies and prevailing regulations. In its operational practices, BNI guarantees the following:</p> <ol style="list-style-type: none"> Prevention of conflicts of interest Prohibition of giving, accepting gifts or souvenirs Provisions for prohibition of abuse of office and accepting gratification To realize good corporate governance, BNI has a Whistleblowing System (WBS). Customer protection policies and provision of Information/Data/Documents to external parties Policy on fulfillment of creditor rights Anti-corruption and anti-fraud policies 	Annual Report page 968
BNI has an independent debt collection policy with clear procedures, with regular training for related employees. 1,032 collection employees received training in 2021	Annual Report page 149
<p>The Board of Directors is high involved in product supervision through the Product Committee, whose duties and responsibilities include:</p> <ul style="list-style-type: none"> Determining the size and business development strategy through BNI products/activities; Conducting comprehensive testing and deciding on the "feasibility" of new products/activities, especially related to cross-sectoral/segmental alliances and strategic alliances with subsidiaries/other companies outside BNI by inviting the relevant Sector Director; Monitoring BNI products/activities and making decisions on the products/activities sustainability based on recommendations from the Supporting Staff Group/product owner; Acting as an arbitration institution in cross-sectoral issues related to new products/activities. 	Annual Report page 805

COMPANY PRACTICE	PAGE
BNI carries out marketing communications transparently based on OJK regulations and in accordance with company internal policies.	Sustainability Report page 59
BNI has an independent customer ombudsman & internal complaint review body with clear procedures and/or targets.	Annual Report pages 887- 889
BNI has an independent settlement system to provide protection for reporting parties and special training on internal and external protection programs	Annual Report pages 887- 889
In the Debt Collection Policy, BNI has well-defined loan modification options including income-based considerations and customer access to escalation options.	Annual Report page 400
BNI runs BNICorpu TV on its youtube channel to educate the public regarding financial literacy and the latest trends in society by presenting speakers from internal BNI and from professional institutions. Education is also carried out through social media and in collaboration with various government/private institutions	Annual Report page 383
The BNI Board-level committees supervise the complaints.	Annual Report page 887
Human Capital Development	
Practice	
<ul style="list-style-type: none"> BNI provides training and competency development on all aspects of the Company's operations in a planned and sustainable manner and provides equal opportunities, including gender) to all levels of the organization. In 2021, BNI delivered training and development programs organized by the Bank's internal and external parties to 27,583 employees or 99.12%, or 28.60 times each employee received training. BNI has a program that covers all employees (including part-timers and contractors). Since 2018, BNI has a mandatory learning program for all employees through Sustainable Finance e-learning to increase awareness and capability 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 adverse effects of climate change. 	Annual Report page 147 Sustainability Report pages 112-113
Strategy	
BNI has a Whistleblowing System (WBS) with the name "WBS to CEO", as an early detection mechanism for any violations to at BNI that can cause financial losses, including matters that can damage BNI's image. WBS management is carried out in collaboration with an external party, namely Deloitte	Annual Report page 887 Sustainability Report page 129
BNI carries out employee engagement surveys every year through a digital platform. In 2021, the employee engagement level was 96%.	Annual Report page 389
Talent path development strategy	
The workforce planning strategy is directed at ensuring the employee availability in functions in line with BNI's strategy. Recruitment is carried out through various programs including the Officer Development Program, Assistant Development Program and Experience Hire. In 2021, BNI strengthened its talent acquisition mechanism by improving the General ODP policy and opening new ODP channels, including ODP Information Technology, ODP Data Scientist, ODP Digital and the ODP Global Analyst Program.	Annual Report page 382
As well as the Bina internship program, BNI also has an internship program for students. In 2021 the number of internship were given to 566 people, through the BNI Digital Talent Internship program, Ministry of SOEs Certified Student Internship Program from FHCI, Digital Apprentice Program for 2020 Kemenkominfo Graduates Digital Talent Scholarship (DTS), Ministry of Education, Culture, Research, and Technology (Kemendikbudristek) Independent Campus Internship Program, BNI Digital Bootcamp Malang Internship Program, and Individual Internship Program.	Sustainability Report pages 111-112
BNI's Bina Apprenticeship Program is organized to provide training and work guidance to the inexperienced workforce by providing the knowledge, skills, and abilities needed to compete in the world of work. The number of Bina BNI apprentices in 2021 was 4,671 participants across all BNI operational areas.	Annual Report page 384
To provide learning solutions for its employees, BNI Corporate University provides learning facilities and infrastructure in-house and in partnership with other educational institutions.	Annual Report page 383
Programs & Initiatives	
BNI has a share ownership program for the Company's employees and management after receiving approval from the shareholders at the fiscal year 2020 annual GMS held on March 29, 2021. The Company management share ownership program commenced on December 30, 2021.	Annual Report pages 346, 653

COMPANY PRACTICE	PAGE
The remuneration strategy covers all employees, and is determined based on the principles of supply and demand, BNI's remuneration position compared to the market, and considers employees' talent classification. The employee remuneration consists of fixed remuneration that is calculated based on a position and person value weighting. Variable remuneration is based on performance based on the Bank's performance, unit performance, and individual employee performance.	Annual Report page 652 Sustainability Report page 115
BNI provides training and competency development at all Company levels, which are carried out in a planned and sustainable manner by upholding the provision of equal opportunities, adapted to the training and development needs at each level.	Annual Report page 148
The Education and Training Costs in 2021 amounted to Rp200.35 billion (1.60% of total personnel costs) with the total number of training participation increasing by 19.60% to 777,921 participants.	
Access to Finance	
Products and Strategies	
BNI is a direct provider or is directly involved in providing services in Micro services/Micro Insurance	Sustainability Report pages 77-81
Distribution and Reach	
To support customer convenience when conducting banking transactions, BNI offers a variety of e-Banking facilities that are constantly being refined through developments and innovations. The number of E-banking users in 2021 reached 25.2 million	Annual Report page 274
To expand its reach, BNI has more than 157,000 BNI Agen46 who are BNI partners in providing banking services to the public in the context of financial inclusion. Agen46 can facilitate many kinds of banking services to assist in the distribution of Government programs, such as distribution of social assistance and subsidies.	Annual Report page 274 Sustainability Report page 86
Advanced innovations in branchless alternative distribution channels targeting underserved demographics through Digital and Agen46 services.	Annual Report page 274
Privacy & Data Security	
Practice - Operations	
<ul style="list-style-type: none"> BNI guarantees that customers can update data, change, access and update data changes through BNI calls 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 follows Bank Indonesia Regulation (PBI) No. 22/20/PBI/2020 dated December 22, 2020 concerning Consumer Protection, and the Bank Indonesia Board of Governors Members Regulation No. 23/17/PADG/2021 dated September 9, 2021 concerning Procedures for Implementing Bank Indonesia Consumer Protection. 	Sustainability Report page 46, 61 Annual Report page 393 Sustainability Report page 47 Annual Report page 366
BNI launched innovations for credit card and other consumer loan applications through e-forms, including opening digital accounts through mobile banking to reduce the potential misuse of customer data, as data is directly stored in the system without any physical forms.	Annual Report page 242 Annual Report page 400
BNI has established a special organization (Information Security Division) combining several units with functions related to information security to maintain independence and focus more on evaluating, running, monitoring and improving cyber security.	Annual Report page 102
To ensure system reliability and information security, technology audits are conducted regularly by the internal audit unit. Assessments by external parties include the National Cyber and Crypto Agency (BSSN) through the Information Security Index (WE Index).	Annual Report page 394
The Technology Management Committee is a permanent committee at BNI authorized to provide recommendations to the Board of Directors on the formulation, determination of policies and strategies for BNI's information technology development. This committee was established to assist the Board of Commissioners and the Board of Directors in supervising Information Technology (IT) activities, including those related to cyber security.	Annual Report page 807
Practices - Employees	
BNI provides IT Work Unit employees with training to develop their soft skills and hard skills. The hard skills training includes project management, IT architecture, programming, CI/CD, secure coding, cloud security, and others, carried out in-house or through LinkedIn Learning, Google and AWS training, and other training media.	Annual Report page 394
For all employees, data security and/or privacy risks and procedures awareness is also carried out by increasing awareness through training and digital mindset development.	

COMPANY PRACTICE	PAGE
Governance	
Corporate Governance	
Salary Figures	Annual Report page 646
• Executive Officer Payment Disclosure	
Ownership Structure	Annual Report page 701
• Controlling Shareholders	
• Controlling Shareholders Requiring Attention	
One Share One Vote	Annual Report page 568
• Multiple Equity Classes with Different Voting	
• Government Intervention Requiring Attention	
Board of Directors	
BOARD OF DIRECTORS' INDEPENDENCE	Annual Report pages 699 and 670
• Executive Officers on the Board of Directors	
• Transactions with Related Parties	Annual Report page 891
BOARD OF DIRECTORS EXPERTISE & DIVERSITY	Annual Report page 630
• There are 30% female directors	
Salaries	
PAYMENT FIGURES	Annual Report page 646
• Executive Officer Payment Disclosure	
PAYMENT PERFORMANCE ALIGNMENT	Annual Report page 650
• CEO's Equity Policy	Annual Report page 649
• Clawback & Malus	
• Payments Related to Sustainability	
Share Ownership & Control	
DIRECTOR SELECTION	Annual Report page 587 and page 609
• Annual Director Selection	
• Proxy Access	Annual Report page 567
ONE SHARE ONE VOTE	Annual Report page 568
• Multiple Equity Classes with Different Voting	
SHAREHOLDERS' RIGHTS	Annual Report page 646
• Right to Talk about Payment Policy	Annual Report page 649
Accountancy	
ACCOUNTING RISK	Annual Report page 322
• Expenditure Recognition	
Business Ethics	
Business Ethics Policies and Practices	
BNI has a Board of Directors or C-suite level committee or executive committee that oversees ethical issues.	Annual Report page 793
BNI has a detailed formal policy on bribery and anti-corruption	Annual Report page 883
BNI audits all operations at least once every three years.	Annual Report page 780
BNI has a formal anonymous reporting system with legal protection for whistleblowers through the Whistle Blowing System (WBS) that is managed by an external party, Deloitte.	Annual Report Page 887-889
BNI has an ethical standard training program covering all employees (including part-time employees) and contractors	Annual Report page 880
All BNI suppliers are required to have a mandatory anti-corruption policy and program for compliance verification.	Annual Report page 879
	Annual Report page 894
BNI already has an Anti-Money Laundering Policy. The policy and implementation strategy is explained	Annual Report page 876
Tax Transparency	

Jonatan Christie



Optimism is a belief that leads to achievement. Nothing can be done without hope and belief.

- Hellen Keller



Financial Statements

1.024 Financial Statements

1.298 Attachment of Republic of
Indonesia Financial Services
Authority Circular Letter No. 9/
SEOJK.03/2020 Concerning
Transparency and Publication of
Conventional Commercial Bank
Reports

1.303 Cross-Reference No. 16/
SEOJK.04/2021: Format and
Completing the Annual Report of
Issuers or Public Companies

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES***

**LAPORAN KEUANGAN KONSOLIDASIAN/
*CONSOLIDATED FINANCIAL STATEMENTS***

**31 DESEMBER 2021 DAN 2020/
*31 DECEMBER 2021 AND 2020***

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK**

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
AND SUBSIDIARIES**

**SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
PADA TANGGAL 31 DESEMBER 2021 DAN 2020
SERTA UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**

**BOARD OF DIRECTORS' STATEMENT
REGARDING THE RESPONSIBILITY FOR
THE CONSOLIDATED FINANCIAL STATEMENTS
AS OF 31 DECEMBER 2021 AND 2020 AND
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**

No. DIR/55

No. DIR/ 55

Kami yang bertanda tangan di bawah ini:

We, the undersigned:

- 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
- 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 Keuangan

- 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
- 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

menyatakan bahwa:

declare that:

- Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak;
- Laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;
- Semua informasi dalam laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah dimuat secara lengkap dan benar;
 - 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;
- Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak.

- We are responsible for the preparation and the presentation of PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements;
- PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards;
- All information in the PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been disclosed in a complete and truthful manner;
 - 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;
- We are responsible for PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' internal control system.

Demikian pernyataan ini dibuat dengan sebenarnya.

Thus this statement is made truthfully.

 Atas nama dan mewakili Direksi/For and on behalf of the Directors 

Jakarta, 21 JAN 2022


Royke Tumilaar
 Direktur Utama/
 President Director




Novita Widya Anggraini
 Direktur Keuangan/
 Managing Director – Finance



LAPORAN AUDITOR INDEPENDEN KEPADA PARA PEMEGANG SAHAM

INDEPENDENT AUDITORS' REPORT TO THE SHAREHOLDERS OF

PT BANK NEGARA INDONESIA (PERSERO) Tbk

Kami telah mengaudit laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan entitas anaknya terlampir, yang terdiri dari laporan posisi keuangan konsolidasian tanggal 31 Desember 2021, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas dan laporan arus kas konsolidasian untuk tahun yang berakhir pada tanggal tersebut, dan suatu ikhtisar kebijakan akuntansi signifikan dan informasi penjelasan lainnya.

Tanggung jawab manajemen atas laporan keuangan konsolidasian

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan konsolidasian ini 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.

Tanggung jawab auditor

Tanggung jawab kami adalah untuk menyatakan suatu opini atas laporan keuangan konsolidasian ini berdasarkan audit kami. Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia. Standar tersebut mengharuskan kami untuk mematuhi ketentuan etika serta merencanakan dan melaksanakan audit untuk memperoleh keyakinan memadai tentang apakah laporan keuangan konsolidasian bebas dari kesalahan penyajian material.

We have audited the accompanying consolidated financial statements of PT Bank Negara Indonesia (Persero) Tbk and its subsidiaries, which comprise the consolidated statement of financial position as of 31 December 2021, and the consolidated statement of profit or loss and other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's responsibility for the consolidated financial statements

Management is responsible for the preparation and fair presentation of these 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.

Auditors' responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audit. We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan

WTC 3, Jl. Jend. Sudirman Kav. 29-31, Jakarta 12920 – Indonesia

T: +62 21 50992901 / 31192901, F: +62 21 52905255 / 52905030, www.pwc.com/id

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00026/2.1025/AU.1/07/0222-1/11/2022



Suatu audit melibatkan pelaksanaan prosedur untuk memperoleh bukti audit tentang angka-angka dan pengungkapan dalam laporan keuangan konsolidasian. Prosedur yang dipilih bergantung pada pertimbangan auditor, termasuk penilaian atas risiko kesalahan penyajian material dalam laporan keuangan konsolidasian, baik yang disebabkan oleh kecurangan maupun kesalahan. Dalam melakukan penilaian risiko tersebut, auditor mempertimbangkan pengendalian internal yang relevan dengan penyusunan dan penyajian wajar laporan keuangan konsolidasian entitas untuk merancang prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektifitasan pengendalian internal entitas. Suatu audit juga mencakup pengevaluasian atas ketepatan kebijakan akuntansi yang digunakan dan kewajaran estimasi akuntansi yang dibuat oleh manajemen, serta pengevaluasian atas penyajian laporan keuangan konsolidasian secara keseluruhan.

Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini audit kami.

Opini

Menurut opini kami, laporan keuangan konsolidasian terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan entitas anaknya pada tanggal 31 Desember 2021, serta kinerja keuangan dan arus kas konsolidasiannya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditors consider internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements 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 entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of PT Bank Negara Indonesia (Persero) Tbk and its subsidiaries as of 31 December 2021, and their consolidated financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

JAKARTA,
21 Januari/January 2022

Drs. M. Jusuf Wibisono, M.Ec., CPA
Izin Akuntan Publik/License of Public Accountant No. AP. 0222

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN KEUANGAN KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020
DAN UNTUK TAHUN-TAHUN YANG BERAKHIR PADA
31 DESEMBER 2021 DAN 2020**

**CONSOLIDATED FINANCIAL STATEMENTS
31 DECEMBER 2021 AND 2020
AND FOR THE YEARS THEN ENDED
31 DECEMBER 2021 AND 2020**

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Catatan atas Laporan Keuangan Konsolidasian.....	13 - 259	<i>Notes to the Consolidated Financial Statements</i>
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**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN POSISI KEUANGAN
KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
FINANCIAL POSITION
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
ASET				ASSETS
Kas	4	13,683,598	17,324,047	Cash
Giro pada Bank Indonesia	5	48,682,431	35,065,701	Current accounts with Bank Indonesia
Giro pada bank lain	6,46b			Current accounts with other banks
- Pihak berelasi		1,559,874	473,708	Related parties -
- Pihak ketiga		18,010,023	15,640,158	Third parties -
Total giro pada bank lain		19,569,897	16,113,866	Total current accounts with other banks
Dikurangi: Cadangan kerugian penurunan nilai		(6)	(6,078)	Less: Allowance for impairment losses
		19,569,891	16,107,788	
Penempatan pada bank lain dan Bank Indonesia	7,46c			Placements with other banks and Bank Indonesia
- Pihak berelasi		694,323	694,833	Related parties -
- Pihak ketiga		91,595,907	60,634,599	Third parties -
Total penempatan pada bank lain dan Bank Indonesia		92,290,230	61,329,432	Total placements with other banks and Bank Indonesia
Dikurangi: Cadangan kerugian penurunan nilai		(110)	(173)	Less: Allowance for impairment losses
		92,290,120	61,329,259	
Efek-efek	8,46d			Marketable securities
- Pihak berelasi		5,915,976	7,458,258	Related parties -
- Pihak ketiga		20,137,034	22,488,558	Third parties -
Total efek-efek		26,053,010	29,946,816	Total marketable securities
Dikurangi: Cadangan kerugian penurunan nilai		(250,048)	(260,219)	Less: Allowance for impairment losses
		25,802,962	29,686,597	
Efek-efek yang dibeli dengan janji dijual kembali	14,46e	22,010,968	8,666,091	Securities purchased under agreements to resell
Wesel ekspor dan tagihan lainnya	9,46g			Bills and other receivables
- Pihak berelasi		10,095,576	10,653,247	Related parties -
- Pihak ketiga		9,870,360	7,363,188	Third parties -
Total wesel ekspor dan tagihan lainnya		19,965,936	18,016,435	Total bills and other receivables
Dikurangi: Cadangan kerugian penurunan nilai		(402,618)	(122,901)	Less: Allowance for impairment losses
		19,563,318	17,893,534	

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN POSISI KEUANGAN
KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
FINANCIAL POSITION
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
ASET (lanjutan)				ASSETS (continued)
Tagihan akseptasi	10,46h			Acceptance receivables
- Pihak berelasi		6,482,887	7,655,982	Related parties -
- Pihak ketiga		15,074,553	14,119,058	Third parties -
Total tagihan akseptasi		21,557,440	21,775,040	Total acceptance receivables
Dikurangi: Cadangan kerugian penurunan nilai		(1,014,673)	(1,199,374)	Less: Allowance for impairment losses
		20,542,767	20,575,666	
Tagihan derivatif	11,46i			Derivative receivables
- Pihak berelasi		29,948	139,757	Related parties -
- Pihak ketiga		464,235	1,320,857	Third parties -
Total tagihan derivatif		494,183	1,460,614	Total derivatives receivables
Pinjaman yang diberikan	12,46j			Loans
- Pihak berelasi		97,554,050	112,907,440	Related parties -
- Pihak ketiga		484,882,180	473,299,347	Third parties -
Total pinjaman yang diberikan		582,436,230	586,206,787	Total loans
Dikurangi: Cadangan kerugian penurunan nilai		(50,294,886)	(44,227,986)	Less: Allowance for impairment losses
		532,141,344	541,978,801	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	13,46f			Government Bonds adjusted for amortization of discount and premium
Dikurangi: Cadangan kerugian penurunan nilai		111,429,979	90,661,121	Less: Allowance for impairment losses
		(1,649)	(1,803)	
		111,428,330	90,659,318	
Pajak dibayar dimuka	28a	1,051,189	1,049,787	Prepaid taxes
Beban dibayar dimuka	15	3,095,927	2,807,092	Prepaid expenses
Investasi pada entitas asosiasi	16,46k	8,688,406	-	Investment in associates
Penyertaan saham - bersih	17,46k	829,763	813,087	Equity investments - net
Aset lain-lain - bersih	18	11,849,220	13,757,811	Other assets - net
Aset tetap dan aset hak guna	19	39,834,564	38,958,245	Fixed assets and right of use
Dikurangi: Akumulasi penyusutan		(12,951,582)	(11,595,845)	Less: Accumulated depreciation
		26,882,982	27,362,400	
Aset pajak tangguhan - bersih	28d	6,230,293	4,799,832	Deferred tax assets - net
TOTAL ASET		964,837,692	891,337,425	TOTAL ASSETS

Catatan atas laporan keuangan konsolidasian tertampil merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN POSISI KEUANGAN
KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
FINANCIAL POSITION
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS				LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY
LIABILITAS				LIABILITIES
Liabilitas segera	20	4,553,735	5,560,702	Obligations due immediately
Simpanan nasabah	21,46l			Deposits from customers
- Pihak berelasi		152,257,041	110,385,839	Related parties -
- Pihak ketiga		576,911,570	537,185,905	Third parties -
Total simpanan nasabah		729,168,611	647,571,744	Total deposits from customers
Simpanan dari bank lain	22,46m			Deposits from other banks
- Pihak berelasi		1,269,116	1,083,744	Related parties -
- Pihak ketiga		13,107,893	7,939,287	Third parties -
Total simpanan dari bank lain		14,377,009	9,023,031	Total deposits from other banks
Liabilitas derivatif	11,46q			Derivative payables
- Pihak berelasi		12,277	55,108	Related parties -
- Pihak ketiga		97,671	359,172	Third parties -
Total liabilitas derivatif		109,948	414,280	Total derivative payables
Efek-efek yang dijual dengan janji dibeli kembali	23	1,828,652	2,590,268	Securities sold under agreements to repurchase
Liabilitas akseptasi	24,46r			Acceptance payables
- Pihak berelasi		244,229	746,481	Related parties -
- Pihak ketiga		5,343,840	4,753,879	Third parties -
Total liabilitas akseptasi		5,588,069	5,500,360	Total acceptance payables
Beban yang masih harus dibayar	25	1,242,130	1,181,534	Accrued expenses
Utang pajak	28b			Taxes payable
- Pajak penghasilan badan		1,210,152	992,037	Corporate income tax -
- Pajak lainnya		74,100	155,740	Other taxes -
Total utang pajak		1,284,252	1,147,777	Total taxes payable
Imbalan kerja	43	6,137,763	6,344,268	Employee benefits
Penyisihan	26	2,276,397	1,421,914	Provisions
Liabilitas lain-lain	27	20,542,001	18,280,485	Other liabilities
Efek-efek yang diterbitkan	29,46n	2,986,530	2,985,011	Securities issued
Pinjaman yang diterima	30,46o	32,457,936	44,114,314	Borrowings
Efek-efek subordinasi	31,46p	15,764,682	99,975	Subordinated securities
TOTAL LIABILITAS		838,317,715	746,235,663	TOTAL LIABILITIES

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN POSISI KEUANGAN
KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
FINANCIAL POSITION
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020
DANA SYIRKAH TEMPORER			
Simpanan nasabah			
Giro <i>Mudharabah</i>	32,46s		
- Pihak berelasi		-	1,056,206
- Pihak ketiga		-	1,755,950
Total giro <i>Mudharabah</i>		-	2,812,156
Tabungan <i>Mudharabah</i>	33,46u		
- Pihak berelasi		-	13,950
- Pihak ketiga		-	12,996,325
Total tabungan <i>Mudharabah</i>		-	13,010,275
Deposito <i>Mudharabah</i>	34,46t		
- Pihak berelasi		-	2,010,466
- Pihak ketiga		-	14,047,804
Total deposito <i>Mudharabah</i>		-	16,058,270
Total simpanan nasabah		-	31,880,701
Simpanan dari bank lain			
Giro <i>Mudharabah</i>	32		
- Pihak ketiga		-	11,996
Tabungan <i>Mudharabah</i>	33		
- Pihak ketiga		-	185,479
Deposito <i>Mudharabah</i>	34		
- Pihak ketiga		-	151,387
Total simpanan dari bank lain		-	348,862
TOTAL DANA SYIRKAH TEMPORER		-	32,229,563

TEMPORARY SYIRKAH FUNDS	
Deposits from customers	
<i>Mudharabah</i> current accounts	
Related parties -	
Third parties -	
Total <i>Mudharabah</i> current accounts	
<i>Mudharabah</i> saving deposits	
Related parties -	
Third parties -	
Total <i>Mudharabah</i> saving deposits	
<i>Mudharabah</i> time deposits	
Related parties -	
Third parties -	
Total <i>Mudharabah</i> time deposits	
Total deposits from customers	
Deposits from other banks	
<i>Mudharabah</i> current accounts	
Third parties -	
<i>Mudharabah</i> saving deposits	
Third parties -	
<i>Mudharabah</i> time deposits	
Third parties -	
Total deposits from other banks	
TOTAL TEMPORARY SYIRKAH FUNDS	

Catatan atas laporan keuangan konsolidasian tertampir 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 POSISI KEUANGAN
KONSOLIDASIAN
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
FINANCIAL POSITION
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
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 Rp7.500 per saham (dalam Rupiah penuh)				Class A Dwiwarna - Rp7,500 par value per share (in full Rupiah amount)
- Seri B - nilai nominal Rp7.500 per saham (dalam Rupiah penuh)				Class B - Rp7,500 par value per share (in full Rupiah amount)
- Seri C - nilai nominal Rp375 per saham (dalam Rupiah penuh)				Class C - Rp375 par value per share (in full Rupiah amount)
Modal dasar:				Share capital - Authorized:
- Seri A Dwiwarna - 1 saham				Class A Dwiwarna - 1 share
- Seri B - 289.341.866 saham				Class B - 289,341,866 shares
- Seri C - 34.213.162.660 saham				Class C - 34,213,162,660 shares
Modal ditempatkan dan disetor penuh:				Issued and fully paid:
- Seri A Dwiwarna - 1 saham				Class A Dwiwarna - 1 share
- Seri B - 289.341.866 saham				Class B - 289,341,866 shares
- Seri C - 18.359.314.591 saham	35	9,054,807	9,054,807	Class C - 18,359,314,591 shares
Tambahan modal disetor	35	17,010,254	14,568,468	Additional paid-in capital
Transaksi dengan kepentingan nonpengendali	1i	2,256,999	2,256,999	Transactions with non-controlling interests
Cadangan revaluasi aset	19	15,442,025	14,962,961	Asset revaluation reserve
Keuntungan yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	8	1,948,658	2,424,779	Unrealized gain 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		(17,100)	23,254	Exchange difference on translation of foreign currency financial statements
Saldo laba				Retained earnings
Sudah ditentukan penggunaannya	37	2,778,412	2,778,412	Appropriated
Cadangan umum dan wajib	38	-	-	General and legal reserves
Cadangan khusus		75,471,792	64,202,289	Specific reserves
Tidak ditentukan penggunaannya				Unappropriated
Total saldo laba		78,250,204	66,980,701	Total retained earnings
Saham treasury	2ah,35	(207,475)	(79,449)	Treasury shares
Total ekuitas yang dapat diatribusikan kepada pemilik entitas induk		123,738,372	110,192,520	Total equity attributable to equity holders of the parent entity
Kepentingan nonpengendali		2,781,605	2,679,679	Non-controlling interests
TOTAL EKUITAS		126,519,977	112,872,199	TOTAL EQUITY
TOTAL LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS		964,837,692	891,337,425	TOTAL LIABILITIES, TEMPORARY SYIRKAH FUNDS AND EQUITY

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 LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF PROFIT OR LOSS
AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
PENDAPATAN BUNGA DAN PENDAPATAN SYARIAH	39			INTEREST INCOME AND SHARIA INCOME
Pendapatan bunga		49,692,623	52,144,058	Interest income
Pendapatan syariah		333,264	4,028,813	Sharia income
TOTAL PENDAPATAN BUNGA DAN PENDAPATAN SYARIAH		50,025,887	56,172,871	TOTAL INTEREST INCOME AND SHARIA INCOME
BEBAN BUNGA DAN BEBAN SYARIAH	40			INTEREST EXPENSE AND SHARIA EXPENSE
Beban bunga		(11,720,943)	(18,101,085)	Interest expense
Beban syariah		(58,213)	(919,820)	Sharia expense
TOTAL BEBAN BUNGA DAN BEBAN SYARIAH		(11,779,156)	(19,020,905)	TOTAL INTEREST EXPENSE AND SHARIA EXPENSE
PENDAPATAN BUNGA DAN PENDAPATAN SYARIAH - BERSIH		38,246,731	37,151,966	INTEREST INCOME AND SHARIA INCOME - NET
PENDAPATAN PREMI DAN HASIL INVESTASI BEBAN KLAIM		5,886,644 (4,487,687)	5,330,499 (3,859,411)	PREMIUM INCOME AND INVESTMENTS RETURN CLAIMS EXPENSE
PENDAPATAN PREMI DAN HASIL INVESTASI - BERSIH		1,398,957	1,471,088	PREMIUM INCOME AND INVESTMENTS RETURN - NET
PENDAPATAN OPERASIONAL LAINNYA				OTHER OPERATING INCOME
Provisi dan komisi lainnya		8,943,427	8,309,050	Other fee and commission
Laba dari entitas asosiasi		698,334	-	Income from investment in associates
Penerimaan kembali aset yang telah dihapusbukkan (Kerugian)/keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi		2,580,871	1,548,562	Recovery of assets written off
Keuntungan dari penjualan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi		1,719,534	1,423,890	Unrealized (loss)/gain on changes in fair value of financial assets at fair value through profit or loss
Laba selisih kurs - bersih		1,327,928	1,109,425	Gain on sale of financial assets at fair value through other comprehensive income and fair value through profit or loss
Lain-lain		953,683	1,010,898	Foreign exchange gains - net Others
TOTAL PENDAPATAN OPERASIONAL LAINNYA		16,219,699	13,412,581	TOTAL OTHER OPERATING INCOME
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI		(18,297,151)	(22,590,435)	ALLOWANCE FOR IMPAIRMENT LOSSES
BEBAN OPERASIONAL LAINNYA				OTHER OPERATING EXPENSES
Gaji dan tunjangan	41,43,46x	(11,195,268)	(9,750,781)	Salaries and employees' benefits
Umum dan administrasi	42	(8,764,956)	(9,062,677)	General and administrative
Premi penjaminan simpanan		(1,293,463)	(1,188,620)	Deposit guarantee premium
Beban promosi		(921,654)	(1,030,410)	Promotion expense
Lain-lain		(2,625,611)	(3,181,268)	Others
TOTAL BEBAN OPERASIONAL LAINNYA		(24,800,952)	(24,213,756)	TOTAL OTHER OPERATING EXPENSES
LABA OPERASIONAL		12,767,284	5,231,444	OPERATING INCOME

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 LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF PROFIT OR LOSS
AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
BEBAN BUKAN OPERASIONAL - BERSIH		(216,297)	(119,291)	NON-OPERATING EXPENSE - NET
LABA SEBELUM BEBAN PAJAK		12,550,987	5,112,153	INCOME BEFORE TAX EXPENSES
BEBAN PAJAK				TAX EXPENSES
Kini		(3,293,213)	(2,218,324)	Current
Tangguhan		1,719,277	427,613	Deferred
TOTAL BEBAN PAJAK	28c	(1,573,936)	(1,790,711)	TOTAL TAX EXPENSES
LABA BERSIH		10,977,051	3,321,442	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		439,994	-	Gain from revaluation of fixed assets
Pengukuran kembali liabilitas imbalan kerja		918,412	(2,394,394)	Remeasurement of post employment benefit
Keuntungan dari perubahan nilai aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain		-	126,201	Gain on changes in value of financial assets at fair value through other comprehensive income
Pajak penghasilan terkait		(156,130)	387,352	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		(40,354)	(23,945)	Translation adjustment of foreign currency financial statements
(Kerugian)/keuntungan dari perubahan nilai aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain		(501,852)	3,312,177	(Loss)/gain on changes in value of financial assets at fair value through other comprehensive income
Pajak penghasilan terkait		85,315	(536,111)	Related income tax
LABA KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK		745,385	871,280	OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAXES
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN		11,722,436	4,192,722	TOTAL COMPREHENSIVE INCOME FOR THE YEAR
LABA TAHUN BERJALAN DIATRIBUSIKAN KEPADA:				INCOME FOR THE YEAR ATTRIBUTABLE TO:
Pemilik entitas induk		10,898,518	3,280,403	Equity holders of the parent entity
Kepentingan nonpengendali		78,533	41,039	Non-controlling interest
TOTAL		10,977,051	3,321,442	TOTAL

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF PROFIT OR LOSS
AND OTHER COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
LABA KOMPREHENSIF TAHUN BERJALAN DIATRIBUSIKAN KEPADA:				TOTAL COMPREHENSIVE INCOME FOR THE YEAR ATTRIBUTABLE TO:
Pemilik entitas induk		11,620,510	4,001,412	Equity holders of the parent entity
Kepentingan nonpengendali		101,926	191,310	Non-controlling interest
TOTAL		11,722,436	4,192,722	TOTAL
 LABA PER SAHAM DASAR DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK (DALAM RUPIAH PENUH)	 44	 585	 176	 BASIC EARNINGS PER SHARE ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY (IN FULL RUPIAH AMOUNT)

Catatan atas laporan keuangan konsolidasian tertampil 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 2021 DAN 2020 (Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)													
Catatan/ Notes	Modal ditempatkan dan disetor penuh/ Issued and fully paid-up capital	Tambahkan modal disetor/ Additional paid-in capital	Transaksi dengan kepentingan non-pengendali/ Transactions with non-controlling interest	Keuntungan/(kerugian) yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang dimiliki pada nilai penghasil komprehensif lainnya/ Unrealized Gains/(losses) on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax	Selisih kurs karena pengaliran laporan keuangan dalam mata uang asing/ Exchange difference on translation of foreign currency financial statements	Cadangan revaluasi aset/ Asset revaluation reserve	Cadangan umum dan legal/ General and legal reserves	Tidak dicadangkan/ Unappropriated ¹⁾	Saham treasury/ Treasury shares	Total ekuitas pemilik entitas/ equity owners of parent	Kepentingan non-pengendali/ Non-controlling interest	Total ekuitas/ Total equity	

*) 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 PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah, unless otherwise stated)

Catatan/ Notes	Modal ditambah dan disorot perulu/ Issued and fully paid-up capital	Tambahan modal disorot/ Additional paid-up capital	Transaksi dengan kepenganting/ nonpenganting/ Transactions with non-controlling interest	Keuntungan/ (Kerugian) yang belum direalisasi dari transaksi dengan pihak terkait/ and Obligasi Pemerintah yang diukur pada nilai wajar/ Fair value measurement/ penghasilan komprehensif lain setelah pagai/ Issued Gains/(losses) on marketable securities and government obligations/ Exchange difference dalam mata uang asing/ Transition of foreign currency financial statements	Cadangan revaluasi aset/ Asset valuation reserve	Cadangan dan wajib/ General and legal reserves	Tidak dicadangkan/ Unappropriated	Saham treasury/ Treasury shares	Total ekuitas pemilik/Total equity owners of parent	Kepenganting/ Non-controlling interest	Total ekuitas/ Total equity	Balance as of 31 December 2019	Impact of transitional adjustment on the implementation of Statement of Financial Accounting Standards (SFAS) 71	Balance as of 1 January 2020 after the implementation of SFAS 71	Comprehensive income for the year Treasury shares Distribution of dividends	Balance as of 31 December 2020
	9,054,807	14,568,468	2,256,999	(822,278)	47,199	14,946,679	2,778,412	79,665,093	122,515,579	2,488,369	125,003,948					
	-	-	-	541,412	-	-	-	(12,940,315)	(12,398,903)	-	(12,398,903)					
	9,054,807	14,568,468	2,256,999	(280,866)	47,199	14,946,679	2,778,412	66,744,778	110,116,676	2,488,369	112,605,045					
8.13	-	-	-	2,705,645	(23,945)	16,082	-	1,303,630	4,001,412	191,310	4,192,722					
34	-	-	-	-	-	-	-	-	(79,449)	-	(79,449)					
35	-	-	-	-	-	-	-	(3,845,119)	(3,845,119)	-	(3,845,119)					
	9,054,807	14,568,468	2,256,999	2,424,779	23,254	14,962,861	2,778,412	64,202,289	110,192,520	2,679,679	112,872,199					

*) 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 ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
CASH FLOWS FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
ARUS KAS DARI AKTIVITAS OPERASI				CASH FLOWS FROM OPERATING ACTIVITIES
Penerimaan pendapatan bunga		49,017,156	52,333,016	Receipts from interest income
Penerimaan pendapatan syariah		333,264	4,028,813	Receipts from sharia income
Pembayaran beban bunga		(11,603,250)	(18,478,792)	Payments of interest expense
Pembayaran beban syariah		(58,213)	(919,820)	Payment of sharia expense
Pendapatan premi dan hasil investasi		5,886,644	5,330,499	Premium and investment income
Beban klaim		(4,487,687)	(3,859,411)	Claims expense
Pendapatan operasional lainnya		17,340,344	11,267,818	Other operating income
Beban operasional lainnya		(23,518,575)	(22,826,335)	Other operating expenses
Beban bukan operasional - bersih		(216,297)	(119,292)	Non-operating expenses - net
Pembayaran pajak penghasilan		(3,075,099)	(1,544,212)	Payment of income tax
Arus kas sebelum perubahan dalam aset dan liabilitas operasi		29,618,287	25,212,284	Cash flows before changes in operating assets and liabilities
Perubahan dalam aset dan liabilitas operasi:				Changes in operating assets and liabilities:
Penurunan/(kenaikan) aset operasi:				Decrease/(increase) in operating assets:
Penempatan pada Bank Indonesia dan bank lain		2,039,585	31,097,354	Placements with Bank Indonesia and other banks
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laba rugi		(3,449,230)	1,738,086	Marketable securities and Government Bonds at fair value through profit or loss
Efek-efek yang dibeli dengan janji dijual kembali	14	(13,344,877)	(8,254,649)	Securities purchased under agreements to resell
Wesel ekspor dan tagihan lainnya		(1,949,501)	1,333,246	Bills and other receivables
Pinjaman yang diberikan		(5,735,124)	(39,682,400)	Loans
Tagihan akseptasi		217,600	(2,656,765)	Acceptance receivables
Beban dibayar dimuka	15	(288,835)	(197,833)	Prepaid expenses
Aset lain-lain		2,265,680	(2,145,641)	Other assets
Kenaikan/(penurunan) liabilitas operasi:				Increase/(decrease) in operating liabilities:
Liabilitas segera	20	(1,006,967)	287,897	Obligations due immediately
Simpanan nasabah	21	81,596,867	65,031,119	Deposits from customers
Simpanan dari bank lain	22	5,353,978	(2,561,245)	Deposits from other banks
Beban yang masih harus dibayar	25	60,596	184,275	Accrued expenses
Imbalan kerja	43	(1,300,303)	2,899,943	Employee benefits
Liabilitas akseptasi	24	87,709	158,920	Acceptance payables
Utang pajak		(81,640)	(94,144)	Taxes payable
Liabilitas lain-lain	27	3,395,200	1,785,732	Other liabilities
Penurunan dana <i>syirkah</i> temporer		-	117,745	Decrease in deposits from temporary <i>syirkah</i> funds
Kas bersih diperoleh dari aktivitas operasi		97,479,025	74,253,924	Net cash 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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**PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/AND SUBSIDIARIES**

**LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020**
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)

**CONSOLIDATED STATEMENTS OF
CASH FLOWS FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020**
(Expressed in millions of Rupiah,
unless otherwise stated)

	Catatan/ Notes	2021	2020	
ARUS KAS DARI AKTIVITAS INVESTASI				CASH FLOWS FROM INVESTING ACTIVITIES
Penjualan/(pembelian) dari efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi - bersih		6,266,545	(3,834,695)	Proceed/(placement) from marketable securities measured at fair value through other comprehensive income and amortized cost - net
Pembelian dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi - bersih		(20,399,175)	(6,909,989)	Placement of Government Bonds at fair value through other comprehensive income and amortized cost - net
Pembelian aset tetap	19	(1,850,402)	(1,273,440)	Acquisition of fixed assets
Hasil penjualan aset tetap		326,725	26,008	Proceeds from sale of fixed assets
Kas bersih digunakan untuk aktivitas investasi		(15,656,307)	(11,992,116)	Net cash used in investing activities
ARUS KAS DARI AKTIVITAS PENDANAAN				CASH FLOWS FROM FINANCING ACTIVITIES
Pembayaran pinjaman yang diterima	30	(12,102,103)	(13,530,558)	Proceed from borrowings (Proceed)/placement in securities sold
(Pembayaran)/penerimaan efek-efek yang dijual dengan janji dibeli kembali	23	(541,791)	507,305	under agreements to repurchase
Saham treasuri		(128,026)	(79,449)	Treasury shares
Penerimaan surat berharga subordinasi		15,664,702	-	Receipt from subordinated securities
Pembayaran liabilitas sewa		(353,980)	(190,348)	Payment of lease liability
Pembayaran dividen		(820,101)	(3,846,119)	Payment of dividends
Kas bersih diperoleh dari/ (digunakan untuk) aktivitas pendanaan		1,718,701	(17,139,169)	Net cash provided from/(used in) financing activities
PENINGKATAN BERSIH KAS DAN SETARA KAS		83,541,419	45,122,639	NET INCREASE IN CASH AND CASH EQUIVALENTS
Dampak kehilangan pengendalian		(37,613,983)	-	Impact of loss of control
KAS DAN SETARA KAS PADA AWAL TAHUN		126,907,599	81,184,598	CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR
Pengaruh perubahan kurs mata uang asing		505,258	600,362	Effect of foreign currency exchange rate changes
KAS DAN SETARA KAS PADA AKHIR TAHUN		173,340,293	126,907,599	CASH AND CASH EQUIVALENTS AT THE END OF THE YEAR
KAS DAN SETARA KAS TERDIRI DARI:				CASH AND CASH EQUIVALENTS CONSIST OF:
Kas	4	13,683,598	17,324,047	Cash
Giro pada Bank Indonesia	5	48,682,431	35,065,701	Current accounts with Bank Indonesia
Giro pada bank lain	6	19,569,897	16,113,867	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan		91,404,367	58,403,984	Placements with Bank Indonesia and other banks - maturing within three months of acquisition date
Total kas dan setara kas		173,340,293	126,907,599	Total cash and cash equivalents

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

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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 September 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.

Perubahan terakhir Anggaran Dasar BNI dilakukan antara lain tentang penyusunan kembali seluruh Anggaran Dasar sesuai dengan Akta No. 23 tanggal 20 April 2021 Notaris Fathiah Helmi, S.H. telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan surat keputusan No. AHU-0076627.AH.01.11 Tahun 2021 tanggal 26 April 2021.

Berdasarkan pasal 3 Anggaran Dasar BNI, ruang lingkup kegiatan BNI adalah melakukan usaha di bidang perbankan umum.

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 September 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 latest amendment of BNI's Articles of Association was made regarding, among other matters, realignment of the entire Articles of Association based on Notarial Deed No. 23 dated 20 April 2021 of Fathiah Helmi, 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-0076627.AH.01.11 Tahun 2021 dated 26 April 2021.

According to Article 3 of BNI's Articles of Association, BNI's scope of activity is to engage in general banking services.

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1. INFORMASI UMUM (lanjutan)

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)

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.

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1. INFORMASI UMUM (lanjutan)

d. Rekapisalisasi (lanjutan)

Pada tanggal 20 Juli 2001, modal saham BNI berkurang sebanyak 1.965.701.500 saham Seri C sehubungan dengan pengembalian kelebihan dana rekapisalisasi 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)
Cadangan umum dan wajib	432,952
Cadangan khusus	382,541
Selisih penilaian kembali aktiva tetap	1,190,598
Laba yang belum direalisasi atas efek-efek dalam kelompok tersedia untuk dijual	58,660
Kenaikan penilaian kembali nilai wajar aktiva bersih	2,472,634
Tambahan modal disetor	54,367,847
	-

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:

Accumulated losses
General and legal reserve
Specific reserve
Fixed assets revaluation reserve
Unrealize gain on available for sale securities
Revaluation uplift in the fair value of net assets
Additional paid in capital

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 Ministry 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).

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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. Organisasi dan Struktur Manajemen

Susunan Dewan Komisaris dan Direksi BNI pada tanggal 31 Desember 2021 dan 2020 yang ditetapkan berdasarkan RUPS tahunan BNI tanggal 29 Maret 2021 yang dinyatakan dengan Akta Notaris No. 14 tanggal 29 Maret 2021 dan berdasarkan RUPS Luar Biasa BNI tanggal 2 September 2020 yang dinyatakan dengan Akta Notaris No. 1 tanggal 2 September 2020 dan RUPS tahunan BNI tanggal 20 Februari 2020 yang dinyatakan dengan Akta Notaris No. 21 tanggal 20 Februari 2020 adalah sebagai berikut:

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 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 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. Organizational and Management Structure

The composition of the Boards of Commissioners and Directors of BNI as of 31 December 2021 and 2020 based on BNI's Annual Shareholders' General Meeting held on 29 March 2021 as stated under the Notarial Deed No. 14 dated 29 March 2021 and BNI's Extraordinary Shareholders' General Meeting held on 2 September 2020, as stated under the Notarial Deed No. 1 dated 2 September 2020 and BNI's Annual Shareholders' General Meeting held on 20 February 2020 as stated under the Notarial Deed No. 21 dated 20 February 2020 are as follows:

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1. INFORMASI UMUM (lanjutan)

1. GENERAL INFORMATION (continued)

**h. Organisasi dan Struktur Manajemen
(lanjutan)**

**h. Organizational and Management Structure
(continued)**

Dewan Komisaris

Komisaris Utama/
Komisaris Independen
Wakil Komisaris Utama
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris
Komisaris
Komisaris

2021

Agus Dermawan Wintarto Martowardojo

Pradjoto
Sigit Widyawan
Asmawi Syam
Septian Hario Seto
Iman Sugema
Erwin Rijanto Slamet⁵⁾
Ratih Nurdianti
Askolani
Susyanto

Board of Commissioners

President Commissioner/
Independent Commissioner/
Vice President Commissioner/
Independent Commissioner/
Independent Commissioner/
Independent Commissioner/
Independent Commissioner/
Independent Commissioner/
Commissioner
Commissioner
Commissioner

Dewan Komisaris

Komisaris Utama/
Komisaris Independen
Wakil Komisaris Utama
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris Independen
Komisaris
Komisaris
Komisaris
Komisaris

2020

Agus Dermawan Wintarto Martowardojo

Pradjoto
Sigit Widyawan
Asmawi Syam
Septian Hario Seto
Iman Sugema
Ratih Nurdianti
Joni Swastanto⁶⁾
Askolani
Susyanto

Board of Commissioners

President Commissioner/
Independent Commissioner/
Vice President Commissioner/
Independent Commissioner/
Independent Commissioner/
Independent Commissioner/
Independent Commissioner/
Commissioner
Commissioner
Commissioner
Commissioner

Direksi

Direktur Utama
Wakil Direktur Utama
Direktur Keuangan
Direktur Corporate
Banking
Direktur Treasury
& International
Direktur Hubungan
Kelembagaan
Direktur Manajemen Risiko
Direktur Bisnis Usaha Mikro,
Kecil, dan Menengah
(UMKM)
Direktur Layanan &
Jaringan
Direktur Bisnis
Konsumer
Direktur IT & Operasi
Direktur Human Capital &
Kepatuhan

2021 dan/and 2020

Royke Tumilaar
Adi Sulistyowati
Novita Widya Anggraini
Silvano Rumantrir
Henry Panjaitan
Sis Apik Wijayanto
David Pirzada
Muhammad Iqbal
Ronny Venir
Corina Leyla Kamalies
Hariantono
Bob Tyasika Ananta

Board of Directors

President Director (CEO)
Vice President Director
Managing Director - Finance (CFO)
Managing Director - Corporate
Banking
Managing Director - Treasury &
International Banking
Managing Director -
Institutional Relation
Managing Director - Risk Management
Managing Director - Micro, Small, and
Medium Enterprise (MSME)
Managing Director - Services &
Network
Managing Director - Consumer
Banking
Managing Director - IT & Operation
Managing Director - Human Capital &
Compliance

Komite Audit)**

Ketua
Anggota
Anggota
Anggota
Anggota
Anggota

Asmawi Syam
Sigit Widyawan
Iman Sugema
Human Brilianto¹⁾
Suhendi Muharam⁴⁾
-

2021

2020

Asmawi Syam
Sigit Widyawan
Iman Sugema
Donnaria Silalahi³⁾
-
Lungguk Gultom²⁾

Audit Committee)**

Chairman
Member
Member
Member
Member
Member

1. Efektif bergabung sejak 25 Januari 2021
2. Efektif berakhir masa jabatan sampai dengan 2 Januari 2021
3. Efektif berakhir masa jabatan sampai dengan 31 Mei 2021
4. Efektif bergabung sejak 5 Juli 2021
5. Efektif menjabat sejak 6 Agustus 2021 setelah mendapatkan persetujuan dari OJK
6. Efektif berakhir masa jabatan sampai dengan 29 Maret 2021

**) Pembentukan Komite Audit Bank telah dilakukan sesuai dengan peraturan OJK No. 55/POJK.04/2015 tanggal 29 Desember 2015.

1. Effective joined since 25 January 2021
2. Effective end term of office until 2 January 2021
3. Effective end term of office until 31 May 2021
4. Effective joined since 5 July 2021
5. Effective joined since 6 August 2021 after obtaining approval from FSA
6. Effective end term of office until 29 March 2021

**) The formation of Audit Committee is in accordance with Financial Service Authority rule No. 55/POJK.04/2015 dated 29 December 2015.

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1. INFORMASI UMUM (lanjutan)

**h. Organisasi dan Struktur Manajemen
(lanjutan)**

Pada tanggal 31 Desember 2021 dan 2020, Sekretaris Perusahaan BNI adalah Mucharom.

Jumlah pegawai BNI adalah sebagai berikut (tidak diaudit):

	Tetap/ Permanent	Tidak tetap/ Non-permanent
2021	25,082	2,095
2020	25,036	2,166

Kantor pusat BNI berlokasi di Jl. Jend. Sudirman Kav. 1, Jakarta. Pada tanggal 31 Desember 2021, BNI memiliki 195 kantor cabang, 1,097 kantor layanan serta 874 outlet lainnya (31 Desember 2020: 201 kantor cabang, 1,093 kantor layanan serta 925 outlet lainnya) (tidak diaudit). Selain itu, jaringan BNI juga meliputi 5 kantor cabang luar negeri yaitu Singapura, Hong Kong, Tokyo, London dan Seoul serta 1 kantor perwakilan di New York.

i. Entitas Anak

BNI mempunyai kepemilikan langsung pada Entitas Anak berikut:

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	
			2021	2020	2021	2020
PT BNI Life Insurance	Asuransi jiwa/ Life insurance	1997	60.00%	60.00%	22,769,205	20,571,078
PT BNI Multifinance	Pembiayaan/ Financing	1983	99.99%	99.99%	1,241,245	1,615,766
PT BNI Sekuritas dan Entitas Anak/and Subsidiary	Sekuritas/Securities	1995	75.00%	75.00%	1,655,831	1,506,429
BNI Remittance Ltd.	Jasa keuangan/ Financial services	1998	100.00%	100.00%	20,071	11,804
PT Bank BNI Syariah*	Perbankan/Banking	2010	-	99.95%	-	55,010,342

*) Entitas Anak sampai dengan 31 Januari 2021

Subsidiary until 31 January 2021 *)

Semua Entitas Anak BNI berkedudukan di Jakarta, kecuali BNI Remittance Ltd. berkedudukan di 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.

1. GENERAL INFORMATION (continued)

**h. Organizational and Management Structure
(continued)**

As of 31 December 2021 and 2020, BNI's Corporate Secretary is Mucharom.

The number of employees of BNI is as follows (unaudited):

	Total
2021	27,177
2020	27,202

BNI's head office is located at Jl. Jend. Sudirman Kav. 1, Jakarta. As of 31 December 2021, BNI has 195 domestic branches, 1,097 sub-branches and 874 other outlets (31 December 2020: 201 domestic branches, 1,093 sub-branches and 925 other outlets) (unaudited). In addition, BNI's network also includes 5 overseas branches located in Singapore, Hong Kong, Tokyo, London and Seoul and 1 representative office in New York.

i. Subsidiaries

BNI has direct ownership in the following Subsidiaries:

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 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.

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1. INFORMASI UMUM (lanjutan)

i. 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 2021 dan 2020, BNI Life memiliki 12 kantor pemasaran dan 10 kantor pemasaran mandiri yang tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki karyawan sebanyak 771 orang pada tanggal 31 Desember 2021 (31 Desember 2020: 838 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.

Perubahan terakhir Anggaran Dasar BNI Multifinance dilakukan antara lain tentang penyusunan kembali Anggaran Dasar dan penambahan modal ditempatkan dan disetor Perusahaan sebesar Rp203.000.000.000 dan seluruhnya sejumlah penerbitan 4.060.000.000 saham Perusahaan oleh BNI sesuai dengan Akta Notaris No. 90 tanggal 23 Juni 2016 Notaris I Gede Buda Gunamanta, S.H. telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.03-0060863 tanggal 24 Juni 2016.

Kantor pusat BNI Multifinance berlokasi di Gedung BNI Life Insurance, lantai 5, Jl. Aipda KS. Tubun No. 67, Jakarta 10260. Pada tanggal 31 Desember 2021 dan 2020, BNI Multifinance memiliki 9 outlet cabang tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki 131 karyawan masing-masing pada tanggal 31 Desember 2021 dan 2020 (tidak diaudit).

1. GENERAL INFORMATION (continued)

i. 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 Ministry 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 2021 and 2020, BNI Life has 12 marketing offices and 10 personal marketing offices located in various cities in Indonesia (unaudited) and has 771 employees as of 31 December 2021 (31 December 2020: 838 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.

The latest amendment of BNI Multifinance's Articles of Association was made regarding, among other matters, the increase in issued and fully paid capital amounting to Rp203,000,000,000 and issuance of 4,060,000,000 shares contributed by BNI, based on Notarial Deed No.90 dated 23 June 2016 of I Gede Buda Gunamanta, S.H. and has been approved by the Ministry of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-AH.01.03-0060863 dated 24 June 2016.

BNI Multifinance head office is located in Gedung BNI Life Insurance, 5th floor, Jl. Aipda KS. Tubun No. 67, Jakarta 10260. As of 31 December 2021 and 2020, BNI Multifinance has 9 counters located in various cities in Indonesia (unaudited) and had 131 employees as of 31 December 2021 and 2020, respectively (unaudited).

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i. 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 didalamnya 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.

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 2021 dan 2020, BNI Sekuritas memiliki 45 outlet cabang yang tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki karyawan sebanyak 371 orang dan 195 orang masing-masing pada tanggal 31 Desember 2021 dan 2020 (tidak diaudit).

BNI Remittance Ltd. (dahulu BNI Nakertrans)

BNI 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 7 dan 8 orang pada tanggal 31 Desember 2021 dan 2020 (tidak diaudit).

1. GENERAL INFORMATION (continued)

i. 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 Ministry 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' head office is located in Sudirman Plaza Indofood Tower, 16th floor, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia. As of 31 December 2021 and 2020, BNI Sekuritas has 45 counters located in various cities in Indonesia (unaudited) and has 371 employees and 195 employees as of 31 December 2021 and 2020 (unaudited).

BNI Remittance Ltd. (formerly BNI Nakertrans)

On 11 June 2009, BNI 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 7 and 8 employees as of 31 December 2021 and 2020, respectively (unaudited).

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1. INFORMASI UMUM (lanjutan)

i. Entitas Anak (lanjutan)

PT Bank BNI Syariah ("BNI Syariah")

BNI Syariah didirikan dengan Akta Pendirian Nomor 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.

BNI Syariah adalah bank umum syariah yang merupakan hasil pemekaran usaha (*spin-off*) Unit Usaha Syariah BNI ("UUS BNI"). Proses pendiriannya telah disetujui oleh Rapat Umum Pemegang Saham Luar Biasa BNI tanggal 5 Oktober 2009 sesuai Akta No. 37 Notaris Fathiah Helmi, S.H. Pemekaran usaha dilakukan dengan mengacu kepada PBI No. 11/10/PBI/2009 tentang Unit Usaha Syariah dengan cara mendirikan bank umum syariah baru.

Pemberitahuan atas rancangan *spin-off* kepada karyawan, nasabah dan pihak ketiga telah diumumkan di surat kabar nasional pada tanggal 12 Agustus 2009 sedangkan pemberitahuan atas rencana pengalihan hak dan liabilitas UUS BNI telah diumumkan di surat kabar nasional pada tanggal 15 Februari 2010. Pendirian tersebut dilakukan dengan izin Bank Indonesia melalui dua tahap yaitu persetujuan izin prinsip usaha dan izin usaha. Pada tanggal 8 Februari 2010 BNI Syariah telah mendapatkan izin prinsip dari Bank Indonesia untuk melaksanakan pemisahan UUS Bank BNI berdasarkan surat No. 12/2/DpG/Dpbs. Pemisahan UUS BNI dilakukan dengan Akta Pemisahan Nomor 159 tanggal 22 Maret 2010 yang dibuat di hadapan Aulia Taufani, S.H. sebagai pengganti Sutjipto, S.H., notaris di Jakarta.

Pada tanggal 21 Mei 2010, BNI Syariah memperoleh izin usaha dari Bank Indonesia, berdasarkan Keputusan Gubernur Bank Indonesia No. 12/41/KEP.GBI/2010. Selanjutnya pemisahan terjadi secara efektif pada tanggal 19 Juni 2010, yakni saat pertama kalinya BNI Syariah melakukan kegiatan usaha, sebagaimana yang dilaporkan kepada Bank Indonesia dengan surat No. Dir/1/03 tanggal 19 Juni 2010 perihal Laporan Pelaksanaan Pembukaan Bank Umum Syariah Hasil Pemisahan.

1. GENERAL INFORMATION (continued)

i. Subsidiaries (continued)

PT Bank BNI Syariah ("BNI Syariah")

BNI Syariah was established based on Establishment Deed No. 160 dated 22 March 2010 which was notarized 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.

BNI Syariah is a general sharia bank as a result of the spin-off of the Sharia Business Unit of BNI ("UUS BNI"). The establishment process was approved at the Shareholders' Extraordinary General Meeting of BNI held on 5 October 2009 in accordance with the Notarial Deed No. 37 of Notary Fathiah Helmi, S.H. The spin-off was conducted in accordance with PBI No. 11/10/PBI/2009 regarding Sharia Business Unit by establishing a new general sharia bank.

The announcement to the employees, customers and third parties regarding the planned spin-off was made through a national newspaper on 12 August 2009 while the announcement regarding the transfer of the rights and obligations of UUS BNI was made through a national newspaper on 15 February 2010. The establishment was approved by Bank Indonesia in two stages, which are the approval of the business license in principle and the business license. On 8 February 2010, BNI Syariah received its license in principle from Bank Indonesia to conduct the separation of UUS BNI based on Bank Indonesia letter No. 12/2/DpG/Dpbs. The separation of UUS BNI was made under Separation Deed No. 159 dated 22 March 2010 which was notarized by Aulia Taufani, S.H., as the substitute of Sutjipto, S.H., notary in Jakarta.

On 21 May 2010, BNI Syariah received its business license from Bank Indonesia, based on the Decision Letter No. 12/41/KEP.GBI/2010 of the Governor of Bank Indonesia. The separation became effective on 19 June 2010, in which BNI Syariah started its operational activity, as reported to Bank Indonesia under letter No. Dir/1/03 dated 19 June 2010 regarding the Report on the Implementation of the Opening of General Sharia Bank Resulting from the Spin-Off.

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1. INFORMASI UMUM (lanjutan)

i. Entitas Anak (lanjutan)

**PT Bank BNI Syariah ("BNI Syariah")
(lanjutan)**

BNI Syariah menjalankan operasional sebagai bank devisa sejak tanggal 9 Juli 2010 berdasarkan Salinan Surat Keputusan Deputi Gubernur Bank Indonesia No. 12/5/KEP.DpG/2010 tertanggal 9 Juli 2010.

Sehubungan dengan telah beroperasinya BNI Syariah, maka Bank Indonesia pada tanggal 27 Agustus 2010 mencabut izin usaha UUS Bank BNI melalui keputusan Deputi Gubernur Bank Indonesia No. 12/7/KEP.DpG/2010.

Berdasarkan Keputusan Para Pemegang Saham Sebagai Pengganti Rapat Umum Pemegang Saham Luar Biasa PT Bank BNI Syariah pada tanggal 24 Maret 2020, sesuai dengan Akta Notarial No. 4 dengan dari Notaris & PPAT Gamal Wahidin S.H tanggal 26 Maret dan 29 Juni 2020, di Jakarta, yang telah memperoleh pengesahan Menteri Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0059630.AH.01.11 dan AHU-0102042.AH.01.11 tahun 2020. PT Bank Negara Indonesia (Persero) Tbk menambah modal ditempatkan dan disetor penuh sebesar Rp419.835.000.000 (nilai penuh), berupa barang tidak bergerak (*inbreng*).

Kantor pusat BNI Syariah berlokasi di Gedung Tempo Pavillion 1, Jl. HR Rasuna Said Kav. 11, Kuningan, Jakarta 12950 - Indonesia. Pada tanggal 31 Desember 2020, BNI Syariah memiliki 68 kantor cabang, 241 kantor cabang pembantu dan 93 outlet lainnya) (tidak diaudit) dan memiliki karyawan sebanyak 5.738 karyawan (tidak diaudit).

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.

1. GENERAL INFORMATION (continued)

i. Subsidiaries (continued)

**PT Bank BNI Syariah ("BNI Syariah")
(continued)**

BNI Syariah started its operational activities as a foreign exchange bank on 9 July 2010 based on the Copy of the Decision Letter No. 12/5/KEP.DpG/2010 of the Deputy Governor of Bank Indonesia dated 9 July 2010.

As BNI Syariah has commenced its operations, UUS BNI's business license was revoked pursuant to the Decision Letter No. 12/7/KEP.DpG/2010 of the Deputy Governor of Bank Indonesia dated 27 August 2010.

Based on the Decision from Shareholders in replacement of the Shareholders' Extraordinary General Meeting of BNI Syariah on 24 March 2020, in accordance with Notarial Deed No. 4 of Notary Gamal Wahidin, S.H. dated 26 March and 29 June 2020, in Jakarta, which has been approved by the Minister of Law and Human Rights of the Republic of Indonesia No. AHU-0059630.AH.01.11 and AHU-0102042.AH.01.11 in 2020. PT Bank Negara Indonesia (Persero) Tbk had additional paid in capital amounting to Rp419,835,000,000 (full amount), in the form of *inbreng*.

BNI Syariah's head office is located in Gedung Tempo Pavillion 1, Jl. HR Rasuna Said Kav. 11, Kuningan, Jakarta 12950 - Indonesia. As of 31 December 2020, BNI Syariah has 68 branches, 241 sub-branches and 93 other outlets) (unaudited) and has 5,738 employees (unaudited).

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.

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1. INFORMASI UMUM (lanjutan)

i. Entitas Anak (lanjutan)

**PT Bank BNI Syariah ("BNI Syariah")
(lanjutan)**

Nilai buku dari saldo laba ditahan dan modal ditempatkan dan disetor BNI Syariah pada tanggal 31 Januari 2021 adalah sebesar Rp5.543.135 dengan nilai wajar sebesar Rp7.984.951. Selisih antara nilai buku dan nilai wajar sebesar Rp2.441.786 dicatat sebagai tambahan modal disetor.

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)

i. Subsidiaries (continued)

**PT Bank BNI Syariah ("BNI Syariah")
(continued)**

Carrying value of retained earning and capital stock of BNI Syariah as at 31 January 2021 is amounting to Rp5,543,135 with the fair value of Rp7,984,951. The difference between carrying value and fair value amounting Rp2,441,786 are recorded as additional paid-in-capital.

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. IKHTISAR KEBIJAKAN AKUNTANSI YANG PENTING

Laporan keuangan konsolidasian BNI dan Entitas Anak ("Grup") ini diselesaikan dan diotorisasi untuk terbit oleh Direksi pada tanggal 21 Januari 2022.

Kebijakan akuntansi utama yang diterapkan dalam penyusunan laporan keuangan konsolidasian BNI dan Entitas Anak ("Grup") adalah seperti dijabarkan dibawah ini:

a. Dasar penyusunan laporan keuangan konsolidasian

Berikut ini adalah ikhtisar kebijakan akuntansi penting 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. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The consolidated financial statements of BNI and its Subsidiaries ("Group") were completed and authorized for issuance by the Board of Directors on 21 January 2022.

The principal accounting policies adopted in preparing the 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 principal 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 ("PSAK") and Interpretation of Financial Accounting Standards ("ISAK") 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").

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**a. Dasar penyusunan laporan keuangan
konsolidasian (lanjutan)**

Laporan keuangan BNI Syariah disajikan sesuai dengan Standar Akuntansi Keuangan Syariah dan Standar Akuntansi Keuangan lainnya yang diterbitkan oleh Ikatan Akuntan Indonesia.

Laporan keuangan konsolidasian disusun sesuai dengan PSAK 1, "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 bagi hasil dari pembiayaan *mudharabah* dan *musyarakah* dan 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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**a. Basis of preparation of the consolidated
financial statements (continued)**

The financial statements of BNI Syariah have been presented in accordance with Sharia Financial Accounting Standards and other Financial Accounting Standards as issued by the Indonesian Institute of Accountants.

The consolidated financial statements are prepared in accordance with PSAK 1, "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 profit sharing for *mudharabah* and *musyarakah* financing and 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 others 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.



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**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 2021.

- Penyesuaian tahunan PSAK 1: "Penyajian laporan keuangan";
- Penyesuaian tahunan PSAK 13: "Properti Investasi";
- Penyesuaian tahunan PSAK 48: "Penurunan nilai aset";
- PSAK 112 "Akuntansi wakaf";
- Amendemen PSAK 22 "Kombinasi bisnis";
- Amendemen PSAK 71: "Instrumen keuangan";
- Amendemen PSAK 55: "Instrumen keuangan: Pengakuan dan pengukuran";
- PSAK 62: "Kontrak asuransi";
- Amendemen PSAK 60: "Instrumen keuangan: Pengungkapan";
- Amendemen PSAK 73: "Sewa";
- PSAK 110: "Akuntansi Sukuk"; dan
- PSAK 111: "Akuntansi Wa'd".

Implementasi dari standar-standar tersebut tidak menghasilkan perubahan substansial terhadap kebijakan akuntansi Grup dan tidak memiliki dampak yang material terhadap laporan keuangan konsolidasian di tahun berjalan atau tahun sebelumnya.

Bank saat ini memiliki sejumlah kontrak yang mengacu pada USD LIBOR dan berlaku hingga lebih dari tahun 2021. Bank telah menentukan suku bunga acuan alternatif pengganti LIBOR yang mengikuti rekomendasi *working group* setiap mata uang. Risiko yang timbul dari transisi terutama terkait dengan potensi dampak perbedaan suku bunga jika utang dan *swap* terkait tidak beralih ke suku bunga acuan baru pada saat yang sama dan/atau suku bunga bergerak dengan jumlah yang berbeda. Manajemen akan terus memonitor hal ini dan mengambil tindakan yang diperlukan untuk mengatasi risiko dan ketidakpastian terkait di masa mendatang.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**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 2021.

- Annual improvement SFAS 1: "Presentation of financial statements";
- Annual improvement SFAS 13: "Investment properties";
- Annual improvement PSAK 48: "Asset impairment"
- SFAS 112 "Accounting for endowments";
- Amendment of SFAS 22 "Business combination";
- Amendment of SFAS 71: "Financial instrument";
- Amendment of SFAS 55: "Financial instrument: Recognition and measurement";
- SFAS 62: "Insurance contract";
- Amendment of SFAS 60: "Financial instrument: Disclosure";
- Amendment of SFAS 73: "Lease";
- SFAS 110: "Sukuk Accounting"; and
- SFAS 111: "Wa'd Accounting"

The implementation of the above standards did not result in substantial changes to the Group's accounting policies and had no material impact to the consolidated financial statements for current or prior financial years.

Bank currently has a number of contracts which reference USD LIBOR and extend beyond 2021. The Bank already determined alternative benchmark referring to the recommendation of working group of each currency. Risks arising from the transition relate principally to the potential impact of rate differences if the debt and related swaps do not transition to the new benchmark interest rate at the same time and/or the rates move by different amounts. Management will continue to monitor this and take the necessary actions to address related risks and uncertainties going forward.

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**b. Perubahan Pernyataan Standar Akuntansi
Keuangan dan Interpretasi Standar
Akuntansi Keuangan (lanjutan)**

Tabel berikut berisi rincian semua instrumen keuangan yang dimiliki Bank pada tanggal 31 Desember 2021 yang mengacu pada USD LIBOR dan belum bertransisi ke acuan suku bunga alternatif:

	2021		
	Aset/ Assets	Liabilitas/ Liabilities	
Pinjaman Bank	32,310,313	28,429,747	Bank borrowings
Instrumen keuangan derivatif	3,335,272	3,335,272	Derivative financial instruments
Total aset dan liabilitas yang terekspose terhadap USD LIBOR	35,645,585	31,765,019	Total assets and liabilities exposed to USD LIBOR

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.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**b. Changes to Statements of Financial
Accounting Standards and Interpretations
of Statements of Financial Accounting
Standards (continued)**

The following table contains details of all of the financial instruments that Bank holds as at 31 December 2021 which reference USD LIBOR and have not yet transitioned to an alternative interest rate benchmark:

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 amortized cost.

Financial assets are measured at amortized 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 asset provide rights on a certain date for cash flow obtained solely from payment of principal and interest (SPPI) on the principal amount owed.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(i) Klasifikasi (lanjutan)

(i) Classification (continued)

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika memenuhi kondisi sebagai berikut:

Financial assets are measured at fair value through other comprehensive income if they meet the following conditions:

- 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.

- *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.*

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.

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.

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.

Other financial assets that do not meet the requirements to be classified as financial assets measured at amortized cost or fair value through other comprehensive income, are classified as measured at fair value through profit or loss.

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 (kadang disebut sebagai "accounting mismatch").

At initial recognition, the Group can make an irrevocable determination to measure assets that meet the requirements to be measured at amortized 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").

Penilaian model bisnis

Evaluation of business models

Model bisnis ditentukan pada level yang mencerminkan bagaimana kelompok aset keuangan dikelola bersama-sama untuk mencapai tujuan bisnis tertentu.

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve certain business objectives.

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PENTING (lanjutan)**

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Penilaian model bisnis (lanjutan)

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 mempengaruhi 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 pemjamin standar, dan juga margin laba.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
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c. Financial assets and liabilities (continued)

(i) Classification (continued)

**Evaluation of business models
(continued)**

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 categorized 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(i) Klasifikasi (lanjutan)

(i) Classification (continued)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga (lanjutan)

Evaluation of contractual cash flows obtained solely from payment of principal and interest (continued)

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:

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:

- Peristiwa kontinjensi yang akan mengubah waktu atau jumlah arus kas kontraktual;
- Fitur *leverage*;
- Persyaratan pembayaran dimuka 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.

- 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 the money element.

Liabilitas keuangan diklasifikasikan kedalam kategori sebagai berikut pada saat pengakuan awal:

Financial liabilities are classified into the following categories at initial recognition:

- 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.

- 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.

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c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Financial assets and liabilities (continued)

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 71/ Category as defined by SFAS 71		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 amortized 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	

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(i) Klasifikasi (lanjutan)

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 71/ <i>Category as defined by SFAS 71</i>		Golongan (ditentukan oleh Grup)/ <i>Class (as determined by the Group)</i>	Subgolongan/ <i>Subclasses</i>	
Liabilitas keuangan/ <i>Financial liabilities</i>	Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi/ <i>Financial liabilities at fair value through profit or loss</i>	Liabilitas derivatif - tidak terkait lindung nilai/ <i>Derivative payables - non hedging related</i>		
	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/ <i>Financial liabilities at amortized cost</i>	Liabilitas segera/ <i>Obligation due immediately</i>		
		Simpanan nasabah/ <i>Deposits from customers</i>		
		Simpanan dari bank lain/ <i>Deposits from other banks</i>		
		Efek-efek yang dijual dengan janji dibeli kembali/ <i>Securities sold under agreements to repurchase</i>		
		Liabilitas akseptasi/ <i>Acceptance payables</i>		
		Beban yang masih harus dibayar/ <i>Accrued expenses</i>		
		Liabilitas lain-lain/ <i>Other liabilities</i>	Setoran jaminan/ <i>Security deposit</i>	
			Utang bunga/ <i>Interest payable</i>	
			Utang nasabah/ <i>Payable to customers</i>	
			Utang ke pemegang polis/ <i>Obligation to policy holders</i>	
			Utang reasuransi dan komisi/ <i>Reinsurance payable and commission</i>	
			Lain-lain/ <i>Others</i>	
			Efek-efek yang diterbitkan/ <i>Securities issued</i>	
			Efek-efek subordinasi/ <i>Subordinated securities</i>	
			Pinjaman yang diterima/ <i>Borrowings</i>	
Komitmen pinjaman dan kontrak jaminan keuangan/ <i>Loan commitment and financial guarantee contract</i>	Fasilitas kredit yang belum digunakan/ <i>Unused loan facilities (committed)</i>			
	<i>Letters of credit</i> yang tidak dapat dibatalkan/ <i>Irrevocable letters of credit</i>			
	Garansi bank yang diberikan/ <i>Bank Guarantees issued</i>			
	<i>Standby letters of credit</i>			

(ii) Pengakuan awal

(ii) Initial recognition

- 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.

- 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 recognized 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 recognized 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.

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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 ketentuan sebagai opsi nilai wajar mengurangi atau mengeliminasi ketidak-konsistenan 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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (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 an 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 amortized cost and other financial liabilities measured at amortized cost using the effective interest rate method.

(iv) Derecognition

a. Financial assets are derecognized 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 recognized to the extent of the Group's continuing involvement in the asset.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(iv) Penghentian pengakuan (lanjutan)

(iv) Derecognition (continued)

**a. Aset keuangan dihentikan
pengakuannya jika: (lanjutan)**

**a. Financial assets are derecognized
when: (continued)**

Pinjaman yang diberikan dihapusbukkan ketika tidak terdapat prospek yang realistis mengenai pengembalian pinjaman atau hubungan normal antara Grup dan debitur telah berakhir. Pinjaman yang tidak dapat dilunasi tersebut dihapusbukkan dengan mendebit cadangan kerugian penurunan nilai.

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. Liabilitas keuangan dihentikan
pengakuannya jika liabilitas yang
ditetapkan dalam kontrak dilepaskan
atau dibatalkan atau kadaluarsa.**

**b. Financial liabilities are derecognized
when the obligation under the liability
is discharged or cancelled or has
expired.**

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.

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 recognized in the profit or loss.

(v) Pengakuan pendapatan dan beban

(v) Income and expense recognition

**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.**

**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
amortized cost are recognized in the
statement of profit or loss using the
effective interest rate method.**

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan penurunan nilai.

The gross carrying amount of a financial asset is the amortized cost of a financial asset before adjusting for allowance for impairment.

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.

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 amortized cost of a liability.

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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 komprehensif (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.

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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (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 fair value through other comprehensive income are recognized directly in other comprehensive income (as part of equity), until the financial asset is derecognized or impaired, except gain or loss arising from changes in exchange rate for debt instrument.

When a financial asset is derecognized or impaired, the cumulative gains or losses previously recognized in equity are recognized 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 amortized cost classifications to fair value through profit or loss are recorded at fair value. The difference between the recorded value and fair value is recognized in profit or loss on the statement of profit or loss and other comprehensive income.

Reclassifications of financial assets from amortized 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. Unrealized gains or losses are reclassified to profit or loss.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(vi) Reklasifikasi aset keuangan (lanjutan)

**(vi) Reclassification of financial assets
(continued)**

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.

Reclassification of financial assets from fair value through other comprehensive income to the amortized cost is recorded at fair value at the date of reclassification. Unrealized gains or losses is removed from equity and is adjusted against the fair value.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada nilai wajar.

Reclassifications on financial assets from fair value through profit or loss to fair value through other comprehensive income are recorded at fair value.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai wajar.

Reclassification of financial assets from fair value through profit or loss to amortized cost classification is recorded at fair value.

(vii) Saling hapus

(vii) Offsetting

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.

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 realize the asset and settle the liability simultaneously.

Hal yang berkekuatan hukum harus tidak kontingen atas peristiwa di masa depan dan harus dapat dipaksakan di dalam situasi bisnis yang normal, peristiwa kegagalan atau kebangkrutan dari entitas atas seluruh pihak lawan.

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 company or the counterparty.

Pendapatan dan beban disajikan dalam jumlah neto hanya jika diperkenankan oleh standar akuntansi.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

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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 dikuotasi 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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Financial assets and liabilities (continued)

(viii) Amortized cost measurement

The amortized 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 recognized 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 recognized 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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

(ix) Pengukuran nilai wajar (lanjutan)

(ix) Fair value measurement (continued)

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.

For more complex instruments, the Group uses internally developed models, which are usually based on valuation methods and techniques generally recognized 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 illiquid.

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.

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.

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 didalam prosedur pengukuran pada umumnya telah direview dan disesuaikan jika diperlukan, khususnya untuk perkembangan atas pasar terkini.

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.

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.

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.

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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 ekspektasian 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* yang dipahami secara global.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (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 liabilities based on unobservable inputs for the asset or liability.

(x) Allowance for impairment losses on financial assets

- *The Group recognizes 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 globally understood definition of investment grade.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

- (x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

- (x) Allowance for impairment losses on financial assets (continued)

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.

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.

Pengukuran Kerugian Kredit Ekspektasian

Measurement of Expected Credit Losses

Kerugian Kredit Ekspektasian adalah estimasi probabilitas tertimbang dari kerugian kredit yang diukur sebagai berikut:

Expected Credit Loss is an estimate of the weighted probability of a credit loss measured as follows:

- 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 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.

- 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.

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- (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:

- Jika restrukturisasi tidak mengakibatkan penghentian pengakuan aset yang ada, maka arus kas yang diperkirakan yang timbul dari aset keuangan yang dimodifikasi dimasukkan dalam perhitungan kekurangan kas dari aset yang ada.
- Jika restrukturisasi akan menghasilkan penghentian pengakuan aset yang ada, maka nilai wajar aset baru diperlakukan sebagai arus kas akhir dari aset keuangan yang ada pada saat penghentian pengakuannya. Jumlah ini dimasukkan dalam perhitungan kekurangan kas dari aset keuangan yang ada yang didiskontokan dari tanggal penghentian pengakuan ke tanggal pelaporan menggunakan suku bunga efektif yang baru dari aset keuangan tersebut.

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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
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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 derecognized and expected credit losses measured as follows:

- If the restructuring does not result in the termination of recognition of existing assets, then the estimated cash flows arising from the modified financial assets are included in the calculation of cash shortages of existing assets.
- If the restructuring will result in a derecognition of the existing assets, the fair value of the new asset is treated as the final cash flow of the existing financial assets at the time of derecognition. This amount is included in the calculation of cash shortages from existing financial assets which are discounted from the date of derecognition to the reporting date using the new effective interest rate of the financial assets.

Credit-impaired Financial Assets

At each reporting date, the Group assesses whether the financial assets recorded at amortized 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.



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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
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c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

- (x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

- (x) Allowance for impairment losses on financial assets (continued)

**Aset Keuangan Yang Memburuk
(lanjutan)**

**Credit-impaired Financial Assets
(continued)**

Bukti bahwa aset keuangan mengalami penurunan nilai kredit (memburuk) termasuk data yang dapat diobservasi mengenai peristiwa berikut ini:

Evidence that financial assets become credit impaired including observable data regarding the following events:

- kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
- pelanggaran kontrak, seperti peristiwa gagal bayar atau peristiwa tunggakan;
- pihak pemberi pinjaman, untuk alasan ekonomik 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; atau
- hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan.

- 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; or
- loss of an active market for financial assets due to financial difficulties.

Pembelian atau penerbitan aset keuangan dengan diskon sangat besar yang mencerminkan kerugian kredit yang terjadi.

Purchase or issuance of financial asset at significant discount which reflect the credit loss that occurs.

**Aset Keuangan yang dibeli atau yang berasal dari aset keuangan memburuk
(Purchased or originated credit-impaired financial assets - POCI)**

Purchased or originated credit-impaired financial assets - 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, perubahan kerugian kredit sepanjang umurnya, apakah positif atau negatif, diakui dalam laporan laba rugi konsolidasian sebagai bagian dari cadangan kerugian penurunan nilai.

Financial assets are categorized as POCI if there is objective evidence of impairment at initial recognition. At initial recognition, no allowance for credit losses is recognized because the purchase price or value has included lifetime estimated credit losses. Furthermore, changes in lifetime credit losses, whether positive or negative, are recognized in the consolidated statement of profit or loss as part of the allowance for impairment losses.

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c. Aset dan liabilitas keuangan (lanjutan)

- (x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

**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.

Perhitungan penurunan nilai secara individual

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara individual, jika memenuhi salah satu kriteria di bawah ini:

- Pinjaman yang diberikan yang secara individual memiliki nilai pinjaman diatas Rp15 miliar (nilai penuh); atau
- Pinjaman yang diberikan yang direstrukturisasi yang secara individual memiliki nilai pinjaman diatas Rp15 miliar (nilai penuh).

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c. Financial assets and liabilities (continued)

- (x) Allowance for impairment losses on financial assets (continued)

**Presentation of Allowance for
Expected Credit Losses in
Consolidated Statements of Financial
Position**

Allowance for expected credit losses is presented in the statement of consolidated financial positions as follows:

- for financial assets measured at amortized 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 recognized 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 recognized in other comprehensive income.

Individual impairment calculation

The Bank determines that loans should be evaluated for impairment through individual evaluation if one of the following criteria is met:

- Loans which individually have loan value more than Rp15 billion (full amount); or
- Restructured loans which individually loan value more than Rp15 billion (full amount).

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
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c. Aset dan liabilitas keuangan (lanjutan)

c. Financial assets and liabilities (continued)

- (x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

- (x) Allowance for impairment losses on financial assets (continued)

Perhitungan penurunan nilai secara kolektif

Collective impairment calculation

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara kolektif, jika memenuhi salah satu kriteria di bawah ini:

The Bank determines loans to be evaluated for impairment through collective evaluation if one of the following criteria is met:

- Pinjaman yang diberikan yang secara individual memiliki nilai tidak signifikan; atau
- Pinjaman yang diberikan yang direstrukturisasi yang secara individual memiliki nilai tidak signifikan.

- Loans which individually have insignificant value; or

- Restructured loans which individually have insignificant value.

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan

Recoveries of written-off financial assets

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.

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.

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 pada tahun sebelumnya dicatat sebagai pendapatan operasional selain pendapatan bunga.

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 from previous years are recorded as operational income other than interest income.

d. Prinsip konsolidasian

d. Principles of consolidation

Laporan keuangan konsolidasian meliputi laporan keuangan BNI beserta seluruh Entitas Anak yang berada di bawah pengendalian BNI.

The consolidated financial statements include the financial statements of BNI and all its Subsidiaries that are controlled by BNI.

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.

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.

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d. Prinsip konsolidasian (lanjutan)

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;
- c) kemampuan untuk menggunakan kekuasaannya atas Entitas Anak untuk mempengaruhi jumlah imbal hasil Entitas Anak.

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-Entitas Anak dimulai sejak Grup memperoleh 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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

d. Principles of consolidation (continued)

Control is acquired when BNI is exposed or has rights to variable returns from its involvement with a Subsidiaries and has the ability to affect those returns through its power over a 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.*

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 ceases obtain the control up to the date of the Group to control the Subsidiary.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

d. Prinsip konsolidasian (lanjutan)

d. Principles of consolidation (continued)

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.

All significant balances and transactions, including unrealized 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.

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.

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.

Kepentingan nonpengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham nonpengendali atas laba tahun berjalan dan ekuitas. Entitas Anak tersebut sesuai dengan persentase kepemilikan pemegang saham nonpengendali pada Entitas Anak tersebut.

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.

Entitas Asosiasi

Associates

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.

Associates are all entities over which the Group has significant influence but not control, generally accompanying a shareholding of 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.

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.

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 exchange, plus costs directly attributable to the acquisition.

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.

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.

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d. Prinsip konsolidasian (lanjutan)

Entitas Asosiasi (lanjutan)

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 akuntansi 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.

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POLICIES (continued)**

d. Principles of consolidation (continued)

Associates (continued)

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 have been 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**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 16:00 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.

Penjabaran aset dan liabilitas dalam mata
uang asing

Pada tanggal 31 Desember 2021 dan 2020, kurs mata uang asing yang digunakan untuk penjabaran mata uang asing terhadap Rupiah adalah sebagai berikut (dalam Rupiah penuh):

	2021
1 Pound Sterling Inggris	19,251
1 Euro Eropa	16,112
1 Dolar Amerika Serikat	14,253
1 Dolar Singapura	10,555
1 Dolar Australia	10,347
1 Dolar Hong Kong	1,828
1 Yen Jepang	124

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**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 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 16:00 Western Indonesian Time (WIB). The resulting gains or losses from the translation of monetary assets and liabilities in foreign currencies are recognized in the consolidated statement of profit or loss for the current year.

Translation of assets and liabilities
denominated in foreign currencies

As of 31 December 2021 and 2020, the foreign currency exchange rates used for translation of foreign currencies to Rupiah are as follows (amounts in full Rupiah):

	2021	2020	
1 Pound Sterling Inggris	19,251	19,012	Great Britain Pound Sterling 1
1 Euro Eropa	16,112	17,234	European Euro 1
1 Dolar Amerika Serikat	14,253	14,050	United States Dollar 1
1 Dolar Singapura	10,555	10,606	Singapore Dollar 1
1 Dolar Australia	10,347	10,752	Australian Dollar 1
1 Dolar Hong Kong	1,828	1,812	Hong Kong Dollar 1
1 Yen Jepang	124	136	Japanese Yen 1

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.

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PENTING (lanjutan)**

e. Transaksi dalam mata uang asing dan penjabaran (lanjutan)

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 16:00 WIB pada tanggal laporan posisi keuangan konsolidasian;
- Saldo akun-akun laba rugi setiap bulannya dijabarkan dengan menggunakan kurs *spot Reuters* jam 16:00 WIB rata-rata untuk bulan yang bersangkutan. Saldo untuk tahun berjalan merupakan jumlah dari penjabaran bulanan 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".

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.

Entitas Anak yang menjalankan kegiatan usaha dengan prinsip syariah, giro pada Bank Indonesia dan bank lain dinyatakan sebesar saldo giro dikurangi dengan cadangan kerugian penurunan nilai.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

e. Foreign currency transactions and translations (continued)

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 16:00 WIB at the consolidated statement of financial position date;
- Revenues and expenses accounts are translated using the average Reuters spot rate at 16:00 WIB for the respective month. The balances for the year represent the sum of those monthly 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".

f. Current accounts with other banks and Bank Indonesia

The current accounts with other banks and Bank Indonesia are classified as amortized cost. Current accounts with other banks and Bank Indonesia are stated at amortized 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.

Subsidiary that engages in sharia banking, presents current accounts with Bank Indonesia and other banks at their outstanding balance net of allowance for impairment losses.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**g. Penempatan pada bank lain dan Bank
Indonesia**

Penempatan pada bank lain dan Bank Indonesia terdiri dari *Deposit Facility* Bank Indonesia, *Term Deposit*, *Deposit Facility Syariah*, *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 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.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**g. Placements with other banks and Bank
Indonesia**

Placements with other banks and Bank Indonesia consist of Bank Indonesia Deposit Facility, Term Deposit, Sharia Deposit Facility, call money and time deposits.

Placements with other banks and Bank Indonesia are classified as amortized cost. Placements with other banks are stated at amortized 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 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 recapitalization 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., amortized 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.

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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

h. Efek-efek dan Obligasi Pemerintah (lanjutan)

Grup menentukan klasifikasi investasi pada surat berharga, khususnya sukuk, berdasarkan model usaha yang ditentukan berdasarkan klasifikasi sesuai PSAK 110 (Revisi 2015) tentang "Akuntansi Sukuk" sebagai berikut:

- Surat berharga diukur pada biaya perolehan disajikan sebesar biaya perolehan (termasuk biaya transaksi) 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.

Penyisihan kerugian wajib diakui sesuai dengan pedoman dari OJK dan disajikan sebagai pengurang saldo investasi pada surat berharga.

**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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**h. Marketable securities and Government
Bonds (continued)**

The Group defines the classification of investment in marketable securities, specifically sukuk, based on business model in accordance with SFAS 110 (Revised 2015) on "Accounting for Sukuk" as follows:

- At cost securities are stated at cost (including transaction costs), adjusted by unamortized premium and/or discount. Premium and discount are amortized over the period until maturity.
- At fair value securities are stated at fair values through profit or loss. Unrealized 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. Unrealized gains or losses from the increase or decrease in fair value are presented in other comprehensive income. Premium and discount are amortized over the period until maturity.

Allowance for possible losses are recognized in accordance with the guidelines of OJK and are stated as a deduction of investments in marketable securities.

**i. Securities purchased/sold under
agreements to resell/repurchase**

Securities purchased under agreements to resell are classified as amortized cost.

Securities purchased under agreements to resell are presented as assets in the consolidated statement of financial position, at the resale price net of unamortized interest income and allowance for impairment losses. The difference between the purchase price and the resale price is treated as unearned interest income, and recognized 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 amortized cost.

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PENTING (lanjutan)**

**i. Efek-efek yang dibeli/dijual dengan janji
dijual/dibeli kembali (lanjutan)**

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 dimuka yang belum diamortisasi. Selisih antara harga jual dan harga beli kembali diperlakukan sebagai bunga dibayar dimuka 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 dicatat pada biaya perolehan diamortisasi setelah dikurangi cadangan kerugian penurunan nilai.

Wesel ekspor dan tagihan lainnya diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**i. Securities purchased/sold under
agreements to resell/repurchase (continued)**

Securities sold under agreements to repurchase are presented as liabilities in the consolidated statement of financial position, at the repurchase price, net of unamortized prepaid interest. The difference between the selling price and the repurchase price is treated as prepaid interest and recognized 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 consist of receivables from Letters of Credit and Domestic Documentary Letters of Credit to exporters.

Bills and other receivables are stated at amortized cost less allowance for impairment losses.

Bills and other receivables are classified as amortized cost.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

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.

Derivatives financial instruments are recognized 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

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

k. Instrumen keuangan derivatif (lanjutan)

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.

Pinjaman yang diberikan pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung dan biaya tambahan 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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

k. Derivative financial instruments (continued)

Derivatives 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 recognized 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 amortized cost.

Loans are initially measured at fair value plus transaction costs that are directly attributable and additional costs to obtain financial assets, and after initial recognition are measured at amortized 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

I. Pinjaman yang diberikan (lanjutan)

I. Loans (continued)

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

Pembiayaan berdasarkan prinsip syariah

Sharia financing

Pembiayaan yang diberikan meliputi pembiayaan syariah yang terutama terdiri dari piutang syariah, pembiayaan *mudharabah* dan pembiayaan *musyarakah*.

Loans include sharia financing, which consists mainly of sharia receivables, *mudharabah* financing and *musyarakah* financing.

Piutang syariah adalah tagihan yang timbul dari transaksi berdasarkan akad-akad *ijarah*, *murabahah* dan *qardh*.

Sharia receivables arise from transactions based on *ijarah*, *murabahah*, and *qardh* agreements.

Ijarah adalah sewa menyewa atas suatu barang dan/atau jasa antara pemilik objek sewa termasuk kepemilikan hak pakai atas objek sewa dengan penyewa untuk mendapatkan imbalan atas objek sewa yang disewakan. *Ijarah muntahiyah bittamlik* adalah sewa menyewa antara pemilik objek sewa dan penyewa untuk mendapatkan imbalan atas objek sewa yang disewakan dengan opsi perpindahan hak milik objek sewa baik dengan jual beli atau pemberian (*hibah*) pada saat tertentu sesuai akad sewa.

Ijarah is a leasing arrangement of goods and/or services between the owner of a leased object (lessor) and lessee including the right to use the leased object, for the purpose of obtaining a return on the leased object. *Ijarah muntahiyah bittamlik* is a leasing arrangement between the lessor and lessee to obtain profit on the leased object being leased with an option to transfer ownership of the leased object through purchase/sale or giving (*hibah*) at certain time according to the lease agreement (akad).

Murabahah adalah transaksi penjualan barang dengan menyatakan harga perolehan dan keuntungan (margin) yang disepakati oleh penjual dan pembeli.

Murabahah is sales transaction for goods that provides the purchase price and margin agreed by both buyer and seller.

Piutang *murabahah* pada awalnya diukur pada nilai bersih yang dapat direalisasi ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung dan biaya tambahan untuk memperoleh aset keuangan tersebut, dan setelah pengakuan awal diukur pada biaya perolehan diamortisasi menggunakan metode tingkat imbal hasil efektif dikurangi cadangan kerugian penurunan nilai.

Murabahah receivables are initially measured at net realizable value plus transaction costs that are directly attributable and additional costs to obtain financial assets, and after initial recognition are measured at amortized cost based on effective rate of return method less allowance for impairment losses.

Sebelum tanggal efektif pelepasan BNI Syariah sebagai entitas anak pada tanggal 1 Februari 2021, pada setiap tanggal laporan posisi keuangan konsolidasian, BNI Syariah mengevaluasi apakah terdapat bukti obyektif bahwa piutang *murabahah* yang tidak dicatat pada nilai wajar melalui laba rugi telah mengalami penurunan nilai. Piutang *murabahah* mengalami penurunan nilai jika bukti obyektif menunjukkan bahwa peristiwa yang merugikan telah terjadi setelah pengakuan awal, dan peristiwa tersebut berdampak pada arus kas masa datang yang dapat diestimasi secara handal.

Before the effective date of BNI Syariah divestment on 1 February 2021, at each consolidated statement of financial position date, the BNI Syariah assessed whether there was objective evidence that *Murabahah* receivables not carried at fair value through profit or loss are impaired. *Murabahah* receivables are impaired when objective evidence demonstrates that loss event has occurred after the initial recognition, and the loss event has an impact on the future cash flows that can be estimated reliably.

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PENTING (lanjutan)**

I. Pinjaman yang diberikan (lanjutan)

Pembiayaan berdasarkan prinsip syariah
(lanjutan)

Kriteria yang digunakan oleh Entitas Anak untuk menentukan bukti obyektif dari penurunan nilai adalah sebagai berikut:

- a) kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
- b) pelanggaran kontrak, seperti terjadinya wanprestasi atau tunggakan pembayaran pokok atau margin;
- c) pihak pemberi pinjaman, dengan alasan ekonomi atau hukum sehubungan dengan kesulitan keuangan yang dialami pihak peminjam, memberikan keringanan (konsesi) pada pihak peminjam yang tidak mungkin diberikan jika pihak peminjam tidak mengalami kesulitan tersebut;
- d) terdapat kemungkinan bahwa pihak peminjam akan dinyatakan pailit atau melakukan reorganisasi keuangan lainnya;
- e) hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan; atau
- f) data yang dapat diobservasi mengindikasikan adanya penurunan yang dapat diukur atas estimasi arus kas masa datang dari kelompok aset keuangan sejak pengakuan awal aset dimaksud, meskipun penurunannya belum dapat diidentifikasi terhadap aset keuangan secara individual dalam kelompok aset tersebut, termasuk:
 - 1) memburuknya status pembayaran pihak peminjam dalam kelompok tersebut; dan
 - 2) kondisi ekonomi nasional atau lokal yang berkorelasi dengan wanprestasi atas aset dalam kelompok tersebut.

Estimasi periode antara terjadinya peristiwa dan teridentifikasinya kerugian ditentukan oleh manajemen untuk setiap portofolio yang diidentifikasi.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

I. Loans (continued)

Sharia financing (continued)

The criteria used by the Subsidiary to determine that there is objective evidence of impairment include:

- a) significant financial difficulty of the issuer or obligor;
- b) a breach of contract, such as a default or delinquency in principal or margin payments;
- c) the lender, for economic or legal reasons relating to the borrower's financial difficulty, grants the borrower a concession that the lender would not otherwise consider;
- d) it becomes probable that the borrower will enter into bankruptcy or other financial reorganization;
- e) the disappearance of an active market for that financial asset because of financial difficulties; or
- f) observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of financial assets since the initial recognition of those assets, although the decrease has not yet been identified individually in the portfolio, including:
 - 1) adverse changes in the payment status of borrowers in the portfolio; and
 - 2) national or local conditions that correlate with defaults on the assets in the portfolio.

The estimated period between the occurrence of the event and identification of loss is determined by management for each identified portfolio.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

I. Pinjaman yang diberikan (lanjutan)

Pembiayaan berdasarkan prinsip syariah
(lanjutan)

Entitas Anak pertama kali menentukan apakah piutang *murabahah* jumlahnya signifikan secara individual. Apabila piutang *murabahah* jumlahnya signifikan secara individual, maka Entitas Anak akan menentukan apakah terdapat bukti obyektif penurunan nilai secara individual atas piutang *murabahah*. Jika Entitas Anak menentukan tidak terdapat bukti obyektif mengenai penurunan nilai atas piutang *murabahah* yang dinilai secara individual, terlepas piutang *murabahah* tersebut signifikan atau tidak, maka Entitas Anak memasukkan aset tersebut ke dalam kelompok piutang *murabahah* yang memiliki karakteristik risiko kredit yang serupa dan menilai penurunan nilai kelompok tersebut secara kolektif. Piutang *murabahah* yang penurunan nilainya dilakukan secara individual, dan untuk itu kerugian penurunan nilai telah diakui atau tetap diakui, tidak termasuk dalam penilaian penurunan nilai secara kolektif.

Pinjaman *qardh* adalah pinjam meminjam dana tanpa imbalan yang diperjanjikan dengan kewajiban pihak peminjam mengembalikan pokok pinjaman secara sekaligus atau cicilan dalam jangka waktu tertentu. Pinjaman *qardh* meliputi *wakalah* dan *rahn*.

Wakalah merupakan akad pemindahan utang piutang nasabah kepada Bank dan atas transaksi ini bank mendapat *ujrah* (imbalan) dan diakui pada saat diterima.

Rahn merupakan transaksi menggadaikan barang atau harta dari nasabah kepada bank dimana nasabah meminjam uang dengan akad *qardh* menjaminkan aset-harta untuk pinjaman tersebut. Bank memperoleh *ujrah* karena menanggung beban penyimpanan jaminan dan risiko penyimpanan.

Pinjaman *qardh* diakui sebesar jumlah dana yang dipinjamkan pada saat terjadinya. Kelebihan penerimaan dari pinjaman atas *qardh* yang dilunasi diakui sebagai pendapatan pada saat terjadinya. Pinjaman *qardh* disajikan sebesar saldonya dikurangi penyisihan kerugian. Entitas Anak menetapkan penyisihan kerugian *qardh* berdasarkan penelaahan atas masing-masing saldo.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

I. Loans (continued)

Sharia financing (continued)

Subsidiary first assessed whether the Murabahah receivable is individually significant. If the Murabahah receivable is considered individually significant, the Subsidiary will determine that objective of evidence of impairment exist or not. If the Subsidiary determines that no objective evidence of impairment exists for an individually assessed Murabahah receivables, whether significant or not, it includes the asset in a group of Murabahah receivables with similar credit risk characteristics and collectively assesses them for impairment. Murabahah receivables that are individually assessed for impairment and for which an impairment loss is or continues to be recognized are not included in a collective assessment of impairment.

Funds of qardh is borrowing funds without an agreed commitment of benefits where the borrower is obligated to repay the principal simultaneously or in installments in certain periods. Funds of qardh consists of wakalah and rahn.

Wakalah is a transfer of debt from the indebted parties (customers) to the Bank and for this transaction the bank obtained an ujrah (fee) and is recognized upon receipt.

Rahn is the mortgage of goods or assets from customers to the Bank, at which that customers borrow money with qardh agreement and pledged their asset as collateral for the borrowings. The Bank obtains ujrah from bearing the collateral custody expense and custody risk.

Funds of qardh is recognized at the amount lent at the transaction date. Any excess amount paid by the borrower in repaying a qardh is recognized as revenue upon realization. Funds of qardh is stated at its outstanding balance less allowance for possible losses. The Subsidiary provides allowance for possible losses on qardh based on the review quality of the individual outstanding balances.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

I. Pinjaman yang diberikan (lanjutan)

Pembiayaan berdasarkan prinsip syariah
(lanjutan)

Pembiayaan *Mudharabah* adalah penanaman dana dari pemilik dana (*shahibul maal*) kepada pengelola dana (*mudharib*) untuk melakukan kegiatan usaha tertentu, dengan menggunakan bagi laba (*profit sharing*) atau metode bagi hasil usaha (*gross profit margin*) antara kedua belah pihak berdasarkan nisbah yang telah disepakati sebelumnya. Entitas Anak mengenakan bagi hasil berdasarkan metode bagi hasil usaha (*gross profit margin*).

Pembiayaan *Mudharabah* dinyatakan sebesar saldo pembiayaan dikurangi dengan penyisihan kerugian. Entitas Anak menetapkan penyisihan kerugian sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan. Apabila sebagian pembiayaan *Mudharabah* hilang sebelum dimulainya usaha karena adanya kerusakan atau sebab lainnya tanpa adanya kelalaian atau kesalahan pihak pengelola dana, maka rugi tersebut mengurangi saldo pembiayaan *Mudharabah* dan diakui sebagai kerugian bank. Apabila sebagian pembiayaan *Mudharabah* hilang setelah dimulainya usaha tanpa adanya kelalaian atau kesalahan pengelola dana, maka rugi tersebut diperhitungkan pada saat bagi hasil. Kerugian pembiayaan *mudharabah* akibat kelalaian atau kesalahan pengelola dana dibebankan pada pengelola dana dan tidak mengurangi saldo pembiayaan *mudharabah*.

Pembiayaan *musyarakah* adalah akad kerjasama antara dua pihak atau lebih untuk suatu usaha tertentu, dimana masing-masing pihak memberikan kontribusi dana dengan ketentuan bahwa keuntungan dibagi berdasarkan kesepakatan, sedangkan kerugian berdasarkan porsi kontribusi dana. Dana tersebut meliputi kas atau aset non-kas yang diperkenankan oleh syariah.

Pembiayaan *musyarakah* dinyatakan sebesar saldo pembiayaan dikurangi dengan saldo penyisihan kerugian. Entitas Anak menetapkan penyisihan kerugian sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

I. Loans (continued)

Sharia financing (continued)

Mudharabah financing is investment of funds from the owner of funds (shahibul maal) to the fund manager (mudharib) to conduct certain business activity, with profit sharing or net revenue sharing method between the two parties based on a mutually agreed predetermined ratio. The Subsidiary uses profit sharing scheme based on gross profit margin method.

Mudharabah financing is stated at the outstanding balance, net of allowance for possible losses. The Subsidiary provides allowance for possible losses based on the financing quality as determined by a review of each account. In the event that a portion of the mudharabah financing is lost prior to the start of operations due to damage or any other reasons without negligence or error on the part of the fund manager, the loss shall be deducted from mudharabah financing balance and shall be recognized as a loss by the Bank. If part of financing is lost after the commencement of business without negligence or fault of the fund manager, such loss is calculated during profit sharing. Loss on mudharabah financing due to negligence or error on the part of the fund manager is charged to the fund manager and not deducted from the mudharabah financing balance.

Musyarakah financing is an agreement between two or more parties for a particular business, in which each party contributes funds provided that the profits are divided according to the agreement, while losses are based on the portion of fund contributions. The fund consists of cash or non-cash assets allowed by sharia.

Musyarakah financing is stated at outstanding balance, net of allowance for possible losses. The Subsidiary provides allowance for possible losses based on the financing quality as determined by a review of each account.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

m. Kontrak jaminan keuangan

m. Financial guarantee contracts

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.

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.

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.

Financial guarantees are initially recognized at fair value on the date the guarantee was given. The fair value of a financial guarantee at inception is likely to equal the premium received because all guarantees are agreed on arm's length terms. The fee income earned is amortized over the period of guarantees using the straight line method.

Setelah pengakuan awal kontrak, jaminan keuangan dicatat pada nilai yang lebih tinggi antara nilai wajar amortisasi dengan nilai kerugian kredit ekspektasian sesuai PSAK 71 "Instrumen Keuangan".

After initial recognition of the contract, the financial guarantee is recorded at the higher of the amortized fair value and the expected credit loss value in accordance with PSAK 71 "Financial Instrument".

Cadangan kerugian penurunan nilai atas kontrak jaminan keuangan yang memiliki risiko kredit dihitung berdasarkan model kerugian ekspektasian.

Allowances for impairment on financial guarantee contracts with credit risk are calculated based on expected credit losses model.

n. Tagihan dan liabilitas akseptasi

n. Acceptance receivables and payables

Tagihan akseptasi diklasifikasikan sebagai aset keuangan dalam kelompok biaya perolehan diamortisasi. Liabilitas akseptasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Acceptance receivables are classified as financial assets measured at amortized cost. Acceptance liabilities are classified financial liabilities measured at amortized cost.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

o. Penyertaan saham

o. Equity investments

Penyertaan saham merupakan penanaman dana dalam bentuk saham pada perusahaan non-publik yang bergerak di bidang jasa keuangan untuk tujuan jangka panjang.

Equity investments represent investments in the form of shares of stock, in non-public companies engaged in financial services held for long-term purposes.

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PENTING (lanjutan)**

o. Penyertaan saham (lanjutan)

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 dan liabilitas sewa

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.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

o. Equity investments (continued)

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 recognized at fair value. Subsequently, the shares were recognized 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 and lease liabilities

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.

Land and buildings are shown at fair value, less subsequent 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**p. Aset tetap, aset hak guna dan liabilitas
sewa (lanjutan)**

Aset tetap (lanjutan)

Jika nilai wajar dari aset yang direvaluasi mengalami perubahan yang signifikan dan fluktuatif, maka perlu direvaluasi secara tahunan, sedangkan jika nilai wajar dari aset yang direvaluasi tidak mengalami perubahan yang signifikan dan fluktuatif, 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.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**p. Fixed assets, right-of-use assets and lease
liabilities (continued)**

Fixed assets (continued)

If the fair value of the revalued asset change significantly, it is necessary to revalue on an annual basis, whereas if the fair value of the revalued asset does not change significantly, it is necessary to revalue 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.

All maintenance and repair costs which do not fulfill the capitalization criteria, are recognized in profit or loss upon occurrence. At each financial year end, the assets' residual values, useful lives and methods of depreciation are reviewed, and adjusted prospectively as appropriate.

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PENTING (lanjutan)**

**p. Aset tetap, aset hak guna dan liabilitas
sewa (lanjutan)**

Aset tetap (lanjutan)

Semua aset tetap kecuali tanah, disusutkan berdasarkan metode garis lurus selama estimasi masa manfaat aset tersebut sebagai berikut:

	Tarif Penyusutan/ Depreciation Rate
Bangunan	6.67%
Perlengkapan kantor dan kendaraan bermotor	20.00%

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 73 "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Grup menerapkan PSAK 16 "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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

p. Fixed assets, right-of-use assets and lease liabilities (continued)

Fixed assets (continued)

All fixed assets, except land, are depreciated using the straight-line method over their expected useful lives as follows:

	Tahun/Years	
Bangunan	15	Buildings
Perlengkapan kantor dan kendaraan bermotor	5	Office equipment and motor vehicles

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 landrights 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 PSAK 73 "Leases", except if landrights substantially similar to land purchases, the Group applies PSAK 16 "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 derecognized from the accounts. Any resulting gain or loss is recognized in profit or loss.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
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**p. Aset tetap, aset hak guna dan liabilitas
sewa (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 identifikasi 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 identifikasi, Grup harus menilai apakah:

- Grup memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasi; dan
- Grup memiliki hak untuk mengarahkan penggunaan aset identifikasi. Grup memiliki hak ini ketika Grup memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya dan:
 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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**p. Fixed assets, right-of-use assets and lease
liabilities (continued)**

Fixed assets (continued)

The accumulated costs of construction of fixed assets are capitalized and recognized 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 asset 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**p. Aset tetap, aset hak guna dan liabilitas
sewa (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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**p. Fixed assets, right-of-use assets and lease
liabilities (continued)**

**Right-of-use assets and lease liabilities
(continued)**

The Group recognises a right-of-use asset and a leases liability at the leases commencement date. The right-of-use asset 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 asset is amortized 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 right 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 asset 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 asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the leases term.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**p. Aset tetap, aset hak guna dan liabilitas
sewa (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.

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.

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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**p. Fixed assets, right-of-use assets and lease
liabilities (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.

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.

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 recognize such permanent decline in value and any losses from such write-down is recognized in profit or loss.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
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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.

Termasuk di dalam simpanan adalah simpanan syariah yang terdiri dari giro *wadiah*. Giro *wadiah* merupakan giro *wadiah yad adh-dhamanah* yakni titipan dana pihak lain dimana pemilik dana mendapatkan bonus berdasarkan kebijakan BNI Syariah. Giro *wadiah* dicatat sebesar nilai titipan pemegang giro *wadiah*.

Simpanan nasabah diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi menggunakan metode suku bunga efektif kecuali simpanan syariah yang dinyatakan sebesar nilai liabilitas BNI Syariah kepada nasabah. 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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

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 amortized 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 include sharia deposits consist of wadiah deposit. Wadiah deposit is a wadiah yad adh-dhamanah deposits in which the depositor is entitled to receive bonus income based on the policy of BNI Syariah. Wadiah demand deposits are stated at the amount payable to customers.

Deposits from customers are classified as other financial liabilities which are measured at amortized cost using effective interest rate method except sharia deposits which is stated at the amount payable by BNI Syariah to customers. 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.

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PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

t. Simpanan dari bank lain

t. Deposits from other banks

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.

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.

Di dalam simpanan dari bank lain termasuk simpanan syariah dalam bentuk giro *wadiah* dan tabungan *wadiah*.

Deposits from other banks include sharia deposits in the form of wadiah demand deposits and wadiah saving deposits.

Simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif kecuali simpanan syariah yang dinyatakan sebesar nilai liabilitas BNI Syariah kepada nasabah. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan dari bank lain dikurangkan dari jumlah simpanan yang diterima.

Deposits from other banks are classified as other financial liabilities which are measured at amortized cost using effective interest rate method except sharia deposits which is stated at the amounts payable by BNI Syariah to the customers. Incremental costs directly attributable to the acquisition of deposits from other banks are deducted from the amount of deposits.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

u. Efek-efek yang diterbitkan

u. Securities issued

Efek-efek yang diterbitkan terdiri dari obligasi yang diterbitkan oleh Grup.

Securities issued consist of bonds issued by the Group.

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.

Securities issued are classified as other financial liabilities which are measured at amortized cost. Incremental costs directly attributable to the issuance of marketable securities are deducted from the amount of securities issued.

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.

Bonds issued are presented at nominal value net of unamortized discount. Costs incurred related to the bond issuance are presented as deduction from the proceeds of bonds issued and amortized over the term of the bonds using the effective interest rate method.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
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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.

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. Dana syirkah temporer

Dana syirkah temporer merupakan investasi dengan akad *mudharabah mutlaqah*, yaitu pemilik dana (*shahibul maal*) memberikan kebebasan kepada pengelola dana (*mudharib*/BNI Syariah) dalam pengelolaan investasinya dengan keuntungan dibagikan sesuai kesepakatan. Dana syirkah temporer terdiri dari giro *mudharabah*, tabungan *mudharabah*, deposito *mudharabah* dan sukuk *mudharabah* yang diterbitkan.

Giro dan tabungan *mudharabah* merupakan investasi yang bisa ditarik kapan saja (*on call*) atau sesuai dengan persyaratan tertentu yang disepakati. Giro dan tabungan *mudharabah* dinyatakan sebesar saldo tabungan nasabah di bank.

Deposito *mudharabah* merupakan investasi yang hanya bisa ditarik pada waktu tertentu sesuai dengan perjanjian antara pemegang deposito *mudharabah* dengan Bank. Deposito *mudharabah* dinyatakan sebesar nilai nominal sesuai dengan perjanjian antara pemegang deposito dengan bank.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

v. Borrowings

Borrowings are funds received from other bank, Bank Indonesia or other parties with payment obligation based on borrowings agreement.

Borrowings are initially recognized at fair value and subsequently measured at amortized cost using the effective interest rate method. Amortized 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. Temporary syirkah funds

Temporary syirkah funds represent investments from other parties conducted on the basis mudharabah mutlaqah contract in which the owners of the funds (shahibul maal) grant freedom to the fund manager (mudharib/BNI Syariah) in the management of their investments with profit distributed based on the contract. Temporary syirkah funds consist of mudharabah current accounts, mudharabah saving deposits, mudharabah time deposits and mudharabah sukuk issued.

Mudharabah current accounts and saving deposits represent investment which could be withdrawn anytime (on call) or can be withdrawn based on certain agreed terms. Mudharabah current accounts and savings deposits are stated based on the customer's savings deposit balance in bank.

Mudharabah time deposits represent investment that can only be withdrawn at a certain time based on the agreement between the customer and the Bank. Mudharabah time deposits are stated at nominal amount as agreed between the deposit holder and the bank.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

w. Dana syirkah temporer (lanjutan)

w. Temporary syirkah funds (continued)

Sukuk *mudharabah* yang diterbitkan merupakan sukuk yang menggunakan akad *mudharabah*. Sukuk *mudharabah* diakui pada saat entitas menjadi pihak yang terikat dengan ketentuan penerbitan sukuk *mudharabah*. Sukuk *mudharabah* diakui sebesar nilai nominal. Biaya transaksi diakui secara terpisah dari sukuk *mudharabah*. Biaya transaksi untuk penerbitan sukuk *mudharabah* disajikan dalam aset sebagai biaya yang ditangguhkan dan diamortisasi sepanjang jangka waktu sukuk menggunakan garis lurus. Penerbitan sukuk dan perdagangan sukuk berdasarkan akad syariah, termasuk adanya aset/aktivitas yang mendasari. Pemilik sertifikat sukuk *mudharabah* mendapatkan bagi hasil.

Mudharabah sukuk issued is a sukuk using the contract of mudharabah. Sukuk mudharabah is recognized when the entity becomes party of issuance contract mudharabah sukuk. Sukuk mudharabah is recognized at nominal value. Transaction costs are recognized separately from the sukuk mudharabah. Transaction costs for the issuance of sukuk mudharabah are presented in assets as deferred expenses and amortized over the term of sukuk using straight-line method. Sukuk issuance and trading of sukuk are based on the principles of sharia, including any underlying assets/activities. The holders of mudharabah sukuk certificate receive profit sharing.

Dana *syirkah* temporer tidak dapat digolongkan sebagai kewajiban. Hal ini karena BNI Syariah tidak berkewajiban untuk mengembalikan jumlah dana awal dari pemilik dana kecuali akibat kelalaian atau wanprestasi ketika mengalami kerugian. Di sisi lain dana *syirkah* temporer tidak dapat digolongkan sebagai ekuitas karena mempunyai waktu jatuh tempo dan pemilik dana tidak mempunyai hak kepemilikan yang sama dengan pemegang saham seperti hak *voting* dan hak atas realisasi keuntungan yang berasal dari aset lancar dan aset non-investasi (*current and other non-investment accounts*).

Temporary syirkah fund cannot be classified as liability. This was because BNI Syariah does not have any liability to return the initial fund to the owners, except for losses due to BNI Syariah management's negligence or when default of loss is incurred. On the other hand, temporary syirkah fund cannot be classified as shareholders' equity, because of the maturity period and the depositors do not have the same rights as the shareholders' such as voting rights and the rights of realised gain from current assets and other non-investment accounts.

Pemilik dana *syirkah* temporer mendapatkan imbalan bagi hasil sesuai dengan *nisbah* yang ditetapkan.

The owner of temporary syirkah funds receives a return from the profit sharing based on a predetermined ratio.

Hak nasabah atas bagi hasil dana *syirkah* temporer merupakan bagian bagi hasil milik nasabah yang didasarkan pada prinsip *mudharabah* atas hasil pengelolaan dana mereka oleh bank. Pendapatan yang dibagikan adalah yang telah diterima (*cash basis*).

Third parties' share on returns of temporary syirkah funds represents customer's share on the bank's income derived from the management of their funds by the bank under mudharabah principles. Income that will be distributed is the cash received (cash basis) from the share.

Pembagian hasil usaha dilakukan berdasarkan prinsip bagi hasil usaha yaitu dari pendapatan bank yang diterima berupa laba kotor (*gross profit margin*).

The distribution of revenue is based on profit sharing scheme on the bank's gross profit margin.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

w. Dana syirkah temporer (lanjutan)

Pendapatan margin dan bagi hasil atas pembiayaan yang diberikan dan atas aset produktif lainnya akan dibagikan kepada nasabah penyimpan dana dan bank sesuai dengan proporsi dana yang dipakai dalam pembiayaan yang diberikan dan aset produktif lainnya. Selanjutnya, pendapatan margin dan bagi hasil yang tersedia untuk nasabah tersebut kemudian dibagikan ke nasabah penabung dan deposan sebagai *shahibul maal* dan bank sebagai *mudharib* sesuai porsi *nisbah* bagi hasil yang telah disepakati bersama sebelumnya. Pendapatan margin dan bagi hasil dari pembiayaan dan aset produktif lainnya yang memakai dana bank, seluruhnya menjadi milik bank, termasuk pendapatan dari investasi bank berbasis imbalan.

x. Pendapatan bunga dan pendapatan syariah, beban bunga dan beban syariah

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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

w. Temporary syirkah funds (continued)

Margin income and profit sharing on financing facilities and other earning assets are distributed to fund owners and the bank based on proportion of fund used in the financing and other earning assets. Margin income and profit sharing income allocated to the fund owners are then distributed to fund owners and depositors as *shahibul maal* and the bank as *mudharib* based on a predetermined ratio (*nisbah*). Margin income and profit sharing from financing facilities and other earning assets using the bank's funds, are entirely shared for the bank, including income from the bank's fee-based transactions.

x. Interest income and sharia income, interest expense and sharia expense

Interest income and expense for all interest-bearing financial instruments are recognized 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

x. Pendapatan bunga dan pendapatan syariah, beban bunga dan beban syariah (lanjutan)

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui berdasarkan suku bunga efektif yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

Pendapatan dan beban bunga termasuk pendapatan dan beban syariah. Pendapatan syariah terdiri dari margin *murabahah*, pendapatan *ijarah* (sewa), bagi hasil pembiayaan *mudharabah* dan *musyarakah* serta pendapatan *qardh*. Beban syariah terdiri dari beban bagi hasil *mudharabah* dan beban bonus *wadiah*.

Margin *murabahah* dan pendapatan *ijarah* diakui selama periode akad berdasarkan konsep akrual. Pendapatan bagi hasil pembiayaan *mudharabah* dan *musyarakah* diakui pada saat diterima atau dalam periode terjadinya hak bagi hasil sesuai porsi bagi hasil (nisbah) yang disepakati. Pendapatan dari transaksi *qardh* diakui pada saat diterima.

Beban syariah merupakan bagi hasil untuk dana pihak ketiga dengan menggunakan prinsip bagi hasil berdasarkan porsi bagi hasil (nisbah) yang telah disepakati sebelumnya yang didasarkan pada prinsip *mudharabah mutlaqah*.

y. 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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

x. Interest income and sharia income, interest expense and sharia expense (continued)

If a financial asset or group of similar financial assets' value has diminished as a result of impairment losses, interest income subsequently obtained is recognized based on the effective interest rate used to discount future cash flows in calculating impairment losses.

*Interest income and expense include sharia income and expense. Sharia income represents profit from *murabahah* margin, lease income from *ijarah*, profit sharing from *mudharabah* and *musyarakah* financing and income from *qardh*. Sharia expenses consist of *mudharabah* profit sharing expenses and *wadiah* bonus expenses.*

*Murabahah margin and *ijarah* income are recognized over the period of the agreement based on accrual basis. Mudharabah and musyarakah income is recognized when cash is received or in a period where the right of revenue sharing is due based on agreed portion (nisbah). Qardh income is recognized upon receipt.*

*Sharia expense represents revenue sharing for third party fund using the revenue sharing principle based on pre-determined nisbah in accordance with *mudharabah mutlaqah* principle.*

y. Fees and commission income

Fees and commissions directly related to lending activities, or fee and commission income which relates to a specific period, is amortized 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 recognized as revenues on the transaction date as other operating income.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

z. 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.

BNI Life 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 diamandemen.

BNI Life 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 BNI Life dibagi berdasarkan kategori utama sebagai berikut:

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. 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.

BNI Life 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 is subsequently performed unless the terms of the agreement are later amended.

BNI Life issues insurance contracts for traditional insurance product and investment linked insurance product. Both of these products have significant insurance risk.

BNI Life's products may be divided into the following main categories:

Tipe polis/ Policy type	Deskripsi manfaat/ Description of benefits
1) Produk tradisional/ <i>Traditional products</i>	Produk yang memberikan perlindungan untuk menutupi risiko kematian, kecelakaan, penyakit kritis, dan kesehatan dari pemegang polis. Total uang pertanggungan akan dibayarkan pada saat terjadinya risiko yang ditanggung. <i>Products which provide protection to cover the risk of death, accident, critical illness, and health of the insured. The basic sum insured will be paid upon the occurrence of the risks covered.</i>

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. Kontrak asuransi (lanjutan)

z. Insurance contract (continued)

Tipe polis/ Policy type	Deskripsi manfaat/ Description of benefits
2) Produk asuransi unit link/ <i>Unit-linked insurance products</i>	<p>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.</p> <p>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.</p> <p>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.</p>

BNI Life memisahkan komponen deposit dari kontrak *unit link* seperti yang disyaratkan oleh PSAK 62 hanya jika kondisi-kondisi di bawah ini terpenuhi:

- BNI Life dapat mengukur komponen "deposit" secara terpisah (termasuk opsi penyerahan melekat, yaitu tanpa memperhitungkan komponen "asuransi"); dan
- Kebijakan akuntansi BNI Life tidak mensyaratkan untuk mengakui semua hak dan kewajiban yang timbul dari komponen "deposit".

Karena hanya kondisi pertama di atas terpenuhi, maka BNI Life tidak memisahkan komponen deposit dari kontrak *unit link*.

Pengujian kecukupan liabilitas

PSAK 62, "Kontrak Asuransi" mengharuskan setiap akhir periode pelaporan, BNI Life 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.

BNI Life unbundles the deposit component of unit-linked contract as required by SFAS. 62 only when both of the following conditions are met:

- BNI Life can measure separately the "deposit" component (including any embedded surrender option, i.e. without taking into account the "insurance" component); and
- BNI Life's accounting policies do not otherwise require to recognize all obligations and rights arising from the "deposit" component.

Since only the first condition above is met, BNI Life does not unbundle the deposit component of unit-linked contract.

Liability adequacy tests

SFAS 62, "Insurance Contracts" requires that at each end of reporting period, BNI Life 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.

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PENTING (lanjutan)**

z. Kontrak asuransi (lanjutan)

Pengujian kecukupan liabilitas (lanjutan)

Jika perbandingan tersebut menunjukkan bahwa nilai tercatat atas liabilitas kontrak asuransi (dikurangi dengan biaya akuisisi tangguhan dan aset tak berwujud 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.

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 aktuarial berdasarkan estimasi terbaik terkini yang ditetapkan oleh aktuaris Perusahaan, termasuk asumsi mortalitas/morbiditas, *lapse*, biaya, dan inflasi serta asumsi margin atas risiko pemburukan.

BNI Life menerapkan metode *Gross Premium Reserve* dalam perhitungan liabilitas kepada pemegang polis dengan menggunakan asumsi aktuarial berdasarkan asumsi estimasi terbaik dan margin atas risiko pemburukan.

Pengakuan pendapatan premi

Premi atau *ujrah/fee* kontrak jangka pendek diakui sebagai pendapatan dalam periode kontrak sesuai dengan proporsi total proteksi asuransi yang diberikan. Premi *ujrah/fee* kontrak jangka panjang diakui sebagai pendapatan pada saat jatuh tempo dari pemegang polis.

Premi reasuransi bruto diakui sebagai beban pada saat dibayarkan atau pada tanggal di mana polis tersebut efektif.

BNI Life 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.

Perubahan cadangan atas premi yang belum merupakan pendapatan diakui dalam laba rugi tahun berjalan.

Premi yang diterima sebelum diterbitkannya polis asuransi dicatat sebagai titipan premi pada laporan posisi keuangan konsolidasian.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. Insurance contract (continued)

Liability adequacy tests (continued)

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 liabilities are 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, include mortality/morbidity assumptions, lapse assumptions, expense assumptions and inflation assumptions as well as margin for adverse deviation assumptions.

BNI Life applies the Gross Premium Reserve method to calculate the policyholder liabilities based on actuarial assumptions which is based on best estimate assumptions and margin for adverse deviation.

Premium income recognition

Premiums or ujah/fee received from short-term insurance contracts are recognized as income within the contract period based on the insurance coverage provided. Premiums or ujah/fee received from long-term insurance contracts are recognized as income when these are due.

Gross reinsurance premiums are recognized as an expense when payable or on the date in which the policy becomes effective.

BNI Life calculates unearned premium reserves using daily amortization method.

Unearned premium reserves only apply for premiums that are short-term with less than one year insurance period which have risk component only (term life, personal accident and health insurance).

Changes in unearned premium reserves is recognized in the current year's profit or loss.

Premiums received prior to the issuance of insurance policies is recorded as policyholders' deposit in the consolidated statement of financial position.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. Kontrak asuransi (lanjutan)

z. Insurance contract (continued)

Reasuransi

Reinsurance

BNI Life 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.

BNI Life reinsures a portion of its risk with reinsurance companies. The amount of premium paid or portion of premium from prospective reinsurance transactions is recognized over the reinsurance contract in proportion with the protection received.

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.

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.

BNI Life menyajikan aset reasuransi secara terpisah sebagai aset atas liabilitas manfaat polis masa depan, premi yang belum merupakan pendapatan, dan estimasi liabilitas klaim.

BNI Life presents separately reinsurance assets of future policy benefit liabilities, unearned premium, and estimated claim liabilities.

Jika aset reasuransi mengalami penurunan nilai, Perusahaan 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 Perusahaan tidak dapat menerima seluruh total karena di bawah syarat-syarat kontrak, dan dampak pada total yang akan diterima dari reasuradur dapat diukur secara andal.

If a reinsurance asset is impaired, the Company 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 the Company may not receive all amounts due to it under the terms of the contract, and the impact of the amounts that the Company will receive from the reinsurer can be reliably measured.

Klaim dan manfaat polis

Claims and policy benefits

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 BNI Life reasuradur diakui dan dicatat sebagai pengurang klaim dan manfaat polis pada periode yang sama dengan periode pengakuan klaim dan manfaat polis.

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 recognized as expenses when the liabilities to cover claims are incurred. Reinsurance claims recoveries from reinsurance companies are recognized and recorded as deduction from claims and policy benefits consistent in the same period with the claims and policies benefits recognition.

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z. 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" dalam laporan posisi keuangan konsolidasian. 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.

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 BNI Life.

BNI Life 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.

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*.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. 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" in the consolidated statement of financial position. Changes in estimated claim liabilities as a result of further evaluation and the difference between estimated claims and paid claims are recognized as addition to or deduction from expenses in the period the changes occurred.

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 recognized consistently with the recognition of premium income. The liabilities for future policy benefits are determined and computed based on certain formula by BNI Life's actuary.

BNI Life 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 recognized in the current year's profit or loss.

For unit-linked products, the liabilities to unit-linked policyholders is recognized 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

z. Kontrak asuransi (lanjutan)

Liabilitas manfaat polis masa depan (lanjutan)

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 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 di laporan posisi keuangan sebesar total yang diterima setelah dikurangi *charges* atau *admin fee* lainnya dalam rangka mengelola pendapatan dari produk *unit link*.

Penerimaan dana dari peserta untuk produk Syariah diakui sebagai pendapatan kontribusi dari dana *tabarru'* sesuai dengan akad asuransinya dan bukan merupakan pendapatan entitas pengelola atau perusahaan, karena entitas pengelola sebagai wakil para peserta untuk mengelola dana *tabarru'*. Bagian kontribusi untuk *ujrah* entitas pengelola dalam rangka mengelola dana *tabarru'* diakui sebagai pendapatan *ujrah* pada laporan laba rugi. Bagian penerimaan dana dari peserta untuk investasi dari akad *mudharabah* diakui sebagai dana investasi *mudharabah* dan penerimaan dari peserta untuk investasi dari akad *wakalah* diakui sebagai dana investasi *wakalah* di laporan posisi keuangan Dana Peserta.

aa. 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. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

z. Insurance contract (continued)

Liabilities for future policy benefits (continued)

Funds received from customers for non-sharia products are recognized as gross premiums income in the consolidated statement of profit and loss and other comprehensive income. Liabilities to unit-linked policyholders are recognized in the consolidated statement of financial position 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 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.

Funds received from participant for Sharia unit products is recognized as contributions income from *tabarru fund'* in accordance with the insurance contract and not as income for operator/company, as the operator only act as a representative of the participants to manage the *tabarru' funds'*. The contribution portion for operator's *ujrah* in effort to manage the *tabarru' funds'* is recognized as *ujrah* income in profit or loss. Portion of fund received from participant for investment of *mudharabah* contract is recognized as *mudharabah* investment fund and receipt from *wakalah* contract is recognized as *wakalah* investment fund in the statement of financial position for Participant Funds.

aa. Taxation

The tax expense comprises of current and deferred tax. Tax are recognized in the profit or loss, except to the extent that it relates to items recognized in other comprehensive income or directly in equity. In this case, the tax is also recognized in other comprehensive income or directly in equity, respectively.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

aa. 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 atau pun berbeda dan adanya niat untuk melakukan penyelesaian saldo-saldo tersebut secara neto.

Koreksi terhadap kewajiban perpajakan diakui saat surat ketetapan pajak diterima atau jika mengajukan keberatan, pada saat keputusan atas keberatan tersebut telah ditetapkan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

aa. 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 recognized, 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 recognized 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 realized or the deferred income tax liability is settled.

Deferred tax assets are recognized only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilized.

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 on either the same taxable entity or different taxable entities where there is an intention to settle the balances on a net basis.

Corrections to taxation obligations are recorded when an assessment is received or, if appealed against, when the appeal has been decided.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

ab. Imbalan kerja

ab. Employee benefits

Imbalan kerja jangka pendek

Short-term employee benefits

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Short-term employee benefits are recognized when they accrued to the employees.

Imbalan pensiun dan imbalan pasca-kerja lainnya

Pension benefits and other post-employment

BNi memiliki program pensiun imbalan pasti dan iuran pasti.

BNi has defined benefit and defined contribution pension plans.

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").

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").

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").

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 diharuskan menyediakan imbalan pensiun minimum yang diatur dalam Undang-Undang Ketenagakerjaan No. 11 Tahun 2020, yang merupakan liabilitas imbalan pasti. Jika imbalan pensiun sesuai dengan Undang-Undang Ketenagakerjaan No. 11 Tahun 2020 lebih besar, selisih tersebut diakui sebagai bagian dari liabilitas imbalan pensiun.

BNi is required to provide minimum pension benefits as stipulated in the Labor Law No. 11 Tahun 2020 which represents an underlying defined benefit obligation. If the pension benefits based on Labor Law No. 11 Tahun 2020 are higher, the difference is recorded as part of the overall pension benefits obligation.

Karena Undang-Undang Ketenagakerjaan menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, pada dasarnya program pensiun berdasarkan Undang-Undang Ketenagakerjaan adalah program imbalan pasti.

Since the Labor Law sets the formula for determining the minimum amount of benefits, in substance pension plans under the Labor Law represent defined benefit plans.

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PENTING (lanjutan)**

ab. 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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

ab. Employee benefits (continued)

**Pension benefits and other post-
employment benefits (continued)**

The liability recognized 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 deep 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 recognized immediately in profit or loss.

Gains or losses on the curtailment or settlement of a defined benefit plan are recognized 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.

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PENTING (lanjutan)**

ab. 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.

ac. Laba per saham dasar

Laba per saham dasar dihitung dengan membagi laba tahun berjalan yang tersedia bagi pemegang saham biasa (laba *residual*) dengan jumlah rata-rata tertimbang lembar saham biasa yang beredar selama tahun berjalan.

ad. Transaksi dengan pihak-pihak berelasi

BNI dan Entitas Anak melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK 7 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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

ab. 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 charged and credited to profit or loss.

ac. Basic earnings per share

Basic earnings per share is computed by dividing income for the year available to shareholders of ordinary shares (*residual income*) by the weighted average number of ordinary shares outstanding during the current year.

ad. Transactions with related parties

BNI and Subsidiaries enter into transactions with parties which are defined as related parties in accordance with Statement of Financial Accounting Standards (SFAS) 7 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

**ad. Transaksi dengan pihak-pihak berelasi
(lanjutan)**

Semua transaksi signifikan dengan pihak-pihak berelasi, telah diungkapkan pada catatan atas laporan keuangan konsolidasian.

ae. Dividen

Pembagian dividen kepada para pemegang saham diakui sebagai liabilitas dalam laporan keuangan konsolidasian pada periode ketika dividen tersebut disetujui oleh para pemegang saham.

af. Pelaporan segmen

Grup mengidentifikasi 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.

Grup mengungkapkan segmen operasionalnya berdasarkan segmen usaha yang meliputi Korporasi, Menengah, Kecil, Konsumer dan Ritel, Tresuri dan Institusi Keuangan, Kantor Pusat dan Entitas Anak.

ag. 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.

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**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

**ad. Transactions with related parties
(continued)**

All significant transactions with related parties have been disclosed in notes to the consolidated financial statements.

ae. Dividends

Dividend distribution to the shareholders is recognized as a liability in the consolidated financial statements in the period in which the dividends are approved by the shareholders.

af. 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.

The Group discloses its operating segments based on operating segments that consist of Corporate, Middle, Small, Consumer and Retail, Treasury and Financial Institution, Head Office and Subsidiaries.

ag. 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.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG
PENTING (lanjutan)**

ah. 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.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING
POLICIES (continued)**

ah. 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.

**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.

**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.

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN
AKUNTANSI YANG PENTING (lanjutan)**

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. Dalam mengestimasi arus kas tersebut, manajemen membuat pertimbangan tentang situasi keuangan *counterparty* dan nilai realisasi bersih dari setiap agunan. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan manfaat yang ada, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

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, 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.

**3. USE OF CRITICAL ACCOUNTING ESTIMATES
AND JUDGMENTS (continued)**

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. In estimating these cash flows, management makes judgements about the counterparty's financial situation and the net realizable value of any underlying collateral. Each impaired asset is assessed on its merits, and the workout strategy and estimated cash flows considered recoverable.

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 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 estimate 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.

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Sumber utama ketidakpastian estimasi (lanjutan)

**b. Menentukan nilai wajar instrumen
keuangan (lanjutan)**

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.

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 akhir tahun. 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.

**3. USE OF CRITICAL ACCOUNTING ESTIMATES
AND JUDGMENTS (CONTINUED)**

Key sources of estimation uncertainty (continued)

**b. Determining fair values of financial
instruments (continued)**

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.

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 year. 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.

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN
AKUNTANSI YANG PENTING (lanjutan)**

Sumber utama ketidakpastian estimasi (lanjutan)

**e. Liabilitas asuransi untuk kontrak asuransi
dan reasuransi aset**

Aset yang timbul dari kontrak reasuransi juga dihitung dengan menggunakan metode di atas. 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.

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 Reserve* 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 Bank 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. Bank berkeyakinan bahwa asumsi tersebut adalah wajar dan sesuai, perbedaan signifikan dalam asumsi yang ditetapkan Bank dapat mempengaruhi secara material nilai aset tetap yang direvaluasi.

**3. USE OF CRITICAL ACCOUNTING ESTIMATES
AND JUDGMENTS (CONTINUED)**

Key sources of estimation uncertainty (continued)

**e. Insurance liabilities on insurance contracts
and reinsurance assets**

Assets arising from reinsurance contracts are also computed using the above methods. 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

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 Reserve* 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 Bank'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 Bank believes that its assumptions are reasonable and appropriate and significant differences in the Bank's assumptions may materially affect the valuation of its fixed assets.

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN
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Sumber utama ketidakpastian estimasi (lanjutan)

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.

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 apa pun 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;

**3. USE OF CRITICAL ACCOUNTING ESTIMATES
AND JUDGMENTS (CONTINUED)**

Key sources of estimation uncertainty (continued)

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.

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;*

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN
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**j. Penurunan nilai aset non-keuangan
(lanjutan)**

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: (lanjutan)

- b) perubahan yang signifikan dalam cara penggunaan aset atau strategi bisnis secara keseluruhan; dan
- c) industri atau tren ekonomi yang secara signifikan bernilai negatif.

Grup mengakui kerugian penurunan nilai apabila nilai tercatat aset melebihi nilai yang dapat dipulihkan. Jumlah terpulihkan adalah nilai yang lebih tinggi antara nilai wajar dikurangi 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.

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. 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)**

**j. Impairment of non-financial assets
(continued)**

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: (continued)

- 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.

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.

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. 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 AT1-1 has met the classification requirements as stated above.

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4. KAS

Kas terdiri dari:

	2021	2020
Rupiah	13,249,214	16,592,216
Mata uang asing		
Dolar Amerika Serikat	244,255	343,061
Dolar Singapura	90,851	166,853
Euro Eropa	31,972	56,511
Real Arab Saudi	16,325	37,434
Dolar Australia	13,866	71,522
Yen Jepang	11,049	19,414
Dolar Hong Kong	10,351	12,033
Pound Sterling Inggris	5,171	5,643
Ringgit Malaysia	3,580	6,001
Franc Swiss	1,988	4,513
Dirham Uni Emirat Arab	1,249	1,635
Won Korea Selatan	1,153	423
Yuan China	880	3,566
Dolar Brunei	682	1,051
Dolar Kanada	551	597
Dolar Taiwan	285	955
Baht Thailand	161	616
Dolar Selandia Baru	15	3
	434,384	731,831
	13,683,598	17,324,047

Saldo dalam mata uang Rupiah termasuk uang pada mesin ATM (Anjungan Tunai Mandiri) sejumlah Rp4.488.649 dan Rp5.870.004 masing-masing pada tanggal 31 Desember 2021 dan 2020.

4. CASH

Cash consists of the following:

Rupiah	
Foreign currencies	
United States Dollar	
Singapore Dollar	
European Euro	
Saudi Arabian Real	
Australian Dollar	
Japanese Yen	
Hong Kong Dollar	
Great Britain Pound Sterling	
Malaysian Ringgit	
Swiss Franc	
United Arab Emirates Dirham	
South Korean Won	
Chinese Yuan	
Brunei Dollar	
Canadian Dollar	
Taiwan Dollar	
Thailand Baht	
New Zealand Dollar	

The Rupiah balance includes cash in ATMs (Automatic Teller Machines) of Rp4,488,649 and Rp5,870,004 as of 31 December 2021 and 2020, respectively.

5. GIRO PADA BANK INDONESIA

	2021	2020
Rupiah	42,949,363	29,444,216
Dolar Amerika Serikat	5,733,068	5,621,485
	48,682,431	35,065,701

Bank BNI

Bank dipersyaratkan untuk memiliki Giro Wajib Minimum (GWM) dalam mata uang Rupiah dalam kegiatannya sebagai bank umum dan syariah, serta GWM dalam mata uang asing dalam kegiatannya melakukan transaksi mata uang asing.

5. CURRENT ACCOUNTS WITH BANK INDONESIA

Bank BNI

The Bank is required to maintain Minimum Statutory Reserves (GWM) in Rupiah for conventional and sharia banking and Minimum Statutory Reserves in foreign currencies for foreign exchange transactions.

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5. GIRO PADA BANK INDONESIA (lanjutan)

Bank BNI (lanjutan)

Pada tanggal 31 Desember 2021 dan 2020, Giro Wajib Minimum (GWM) Bank telah sesuai dengan Peraturan Bank Indonesia (PBI) No. 20/3/PBI/2018 tanggal 29 Maret 2018 tentang Giro Wajib Minimum Bank Umum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional dan Peraturan Anggota Dewan Gubernur (PADG) No. 22/19/PADG/2020 tanggal 29 Juli 2020 yang masing-masing sebesar:

	2021
Rupiah	
- GWM Primer	3.50%
- Harian*)	0.00%
- Rata-rata*)	3.00%
- PLM**)	6.00%
Mata uang asing***)	4.00%

*) Mulai berlaku per 1 Agustus 2020

**) Berdasarkan PADG Nomor 22/17/PBI/2020 tanggal 30 September 2020 tentang kewajiban pemenuhan Penyangga Likuiditas Makroprudensial (PLM) ditetapkan perubahan menjadi 6%.

***) Per 16 Maret 2020, berdasarkan PADG Nomor 22/2/PADG/2020 tanggal 13 Maret 2020, Penyesuaian kebijakan pengaturan GWM dengan menurunkan GWM Valuta Asing untuk Bank Umum Konvensional (BUK) sebesar 400 bps dari 8% (delapan persen) menjadi 4% (empat persen)

GWM Primer adalah simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. GWM Sekunder dan Penyangga Likuiditas Makroprudensial (PLM) adalah cadangan minimum yang wajib dipelihara oleh Bank berupa SBI, Surat Utang Negara (SUN), Surat Berharga Syariah Negara (SBSN) dan/atau excess reserve yang merupakan kelebihan saldo Rekening Giro Rupiah Bank dari GWM Primer, GWM LFR dan Rasio Intermediasi Makroprudensial (RIM). GWM LFR dan RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia, jika LFR dan RIM Bank dibawah minimum LFR dan RIM target Bank Indonesia (84%) atau jika di atas maksimum LFR dan RIM target BI (94%) dan Kewajiban Penyediaan Modal Minimum (KPMM) Bank lebih kecil dari KPMM Insentif BI sebesar 14%.

5. CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

Bank BNI (continued)

As of 31 December 2021 and 2020, the Bank's Minimum Statutory Reserve complied with Bank Indonesia (BI) Regulation PBI No. 20/3/PBI/2018 dated 29 March 2018 and Regulation of Members of The Board of Governors (PADG) No. 22/19/PADG/2020 dated 29 July 2020 concerning Minimum Statutory Reserve of Commercial Banks with BI in Rupiah and foreign currency, which are as follows:

	2020	
Rupiah		Rupiah
- Primary Minimum Statutory Reserve -	3.50%	
- Daily*)	0.50%	
- Average*)	3.00%	
- PLM***) -	6.00%	
Foreign Currencies***)	4.00%	

*) Effective on 1 August 2020

**) Based on PADG No. 22/17/PBI/2020 dated 30 September 2020 regarding fulfillment of Macroprudential Liquidity Buffer (PLM) with changes to 6%

***) As of 16 March 2020, based on PADG No. 22/2/PADG/2020 dated 13 March 2020, Adjusting the statutory reserve requirement policy by lowering the Foreign Exchange Reserve Requirement for Bank Umum Konvensional (BUK) by 400 bps from 8% (eight percent) to 4% (four percent)

Primary Minimum Statutory Reserve is a minimum reserve that should be maintained by the Bank in Current Accounts with Bank Indonesia. Secondary Minimum Statutory Reserve and Macroprudential Liquidity Buffer are the minimum reserves that should be maintained by the Bank which comprised of Certificates of Bank Indonesia (SBI), Government Debenture Debt (SUN), Sharia Government Securities (SBSN), and/or excess reserve which represent the excess reserve of the Bank's Current Accounts in Rupiah over the Primary Minimum Statutory Reserve, Minimum Statutory Reserve on LFR and Macroprudential Intermediation Ratio (RIM). Minimum Statutory Reserve on LFR and RIM is the additional reserve that should be maintained by the Bank in the form of Current Accounts with Bank Indonesia, if the Bank's LFR and RIM is below the minimum of LFR and RIM targeted by Bank Indonesia (84%) or if the Bank's LFR and RIM is above the maximum of LFR and RIM targeted by BI (94%) and the Capital Adequacy Ratio (CAR) is below BI requirement of 14%.

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5. GIRO PADA BANK INDONESIA (lanjutan)

Rasio Giro Wajib Minimum untuk rekening Rupiah dan mata uang asing pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar:

	2021	2020	
Rupiah			Rupiah
- GWM Primer	7.66%	5.43%	Primary Minimum Statutory Reserve -
- Harian	1.99%	0.50%	Daily
- Rata-rata	5.67%	4.93%	Average
- PLM	17.40%	12.09%	PLM -
Mata uang asing	4.02%	4.01%	Foreign currencies

BNI telah memenuhi ketentuan Bank Indonesia tentang GWM pada tanggal 31 Desember 2021 dan 2020.

BNI Syariah

Rasio Giro Wajib Minimum untuk rekening Rupiah dan mata uang asing pada tanggal 31 Desember 2020 adalah sebagai berikut:

	2020	
Rupiah	3.25%	Rupiah
Mata uang asing	1.36%	Foreign currencies

Sesuai dengan Peraturan Anggota Dewan Gubernur No. 22/10/PADG/2020 tentang Perubahan Kelima atas PADG No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah tanggal 30 April 2020, setiap Bank diwajibkan memelihara GWM dalam rupiah dan valuta asing yang besarnya ditetapkan masing-masing sebesar 3,5% (dengan pemenuhan GWM harian 0,5% dan GWM rata-rata 3%) dan Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah dan Unit Usaha Syariah tanggal 29 Maret 2018 serta 1% dari Dana Pihak Ketiga dalam Rupiah dan valuta asing.

Berdasarkan Peraturan Anggota Dewan Gubernur No. 22/4/PADG/2020 Tentang Pelaksanaan Peraturan Bank Indonesia No. 22/4/PBI/2020 Tentang Insentif Bagi Bank Yang Memberikan Penyediaan Dana Untuk Kegiatan Ekonomi Tertentu Guna Mendukung Penanganan Dampak Perekonomian Akibat Wabah Virus Corona tanggal 15 April 2020, besaran insentif kelonggaran atas kewajiban pemenuhan GWM dalam Rupiah yang wajib dipenuhi secara harian ditetapkan sebesar 0,5%.

Saldo giro pada Bank Indonesia disediakan untuk memenuhi persyaratan GWM dari Bank Indonesia.

BNI Syariah telah memenuhi ketentuan Bank Indonesia tentang GWM pada tanggal 31 Desember 2020.

**5. CURRENT ACCOUNTS WITH BANK INDONESIA
(continued)**

The ratio of the Minimum Statutory Reserve requirement for its Rupiah and foreign currencies accounts as of 31 December 2021 and 2020, are as follows:

BNI has complied with the Bank Indonesia regulations regarding the Minimum Statutory Reserve as of 31 December 2021 and 2020.

BNI Syariah

The ratio of Minimum Statutory Reserve requirement for its Rupiah and foreign currencies as of 31 December 2020, are as follows:

Based on Members of the Board of Governors Regulation No. 22/10/PADG/2020 regarding the Fifth Amendment to PADG No. 20/10/PADG/2018 regarding Minimum Statutory Reserve requirements in Rupiah and Foreign Currencies of Commercial Banks, Sharia Banks and Sharia Business Unit dated 30 April 2020, each Bank is required to maintain Minimum Statutory Reserve Requirements (GWM) in Rupiah and foreign currencies equivalent to 3.5% (with fulfillment of the daily Minimum Statutory Reserves Requirements of 0.5% and 3% at the average) and Bank Indonesia Regulation No. 20/3/PBI/2018 concerning Minimum Statutory Reserves in Rupiah and Foreign Currencies for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units dated 29 March 2018 and 1% of Third Party Funds in Rupiah and foreign currencies.

Based on Regulation of Members of the Board of Governors No. 22/4/PADG/2020 Regarding the Implementation of Bank Indonesia Regulation No. 22/4/PBI/2020 Regarding Incentives for Banks Providing Funds for Certain Economic Activities to Support the Handling of the Economic Impacts of the Corona Virus Outbreak dated 15 April 2020, the amount of allowance incentives for the fulfillment of Minimum Statutory Reserves in Rupiah which must be fulfilled daily is set at 0.5%.

The balance of current accounts with Bank Indonesia is provided to meet Minimum Statutory Reserve from Bank Indonesia.

BNI Syariah has complied with the Bank Indonesia regulations regarding the Minimum Statutory Reserve as of 31 December 2020.

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5. GIRO PADA BANK INDONESIA (lanjutan)

BNI Syariah (lanjutan)

BNI Syariah menempatkan dana pada Bank Indonesia dengan rata-rata tingkat bonus tahunan sebagai berikut:

	2021	2020
Deposit Facility Bank Indonesia Syariah	-	3.50%
Sertifikat Bank Indonesia Syariah	-	4.88%
Deposito Berjangka Syariah Bank Indonesia	-	0.57%

**5. CURRENT ACCOUNTS WITH BANK INDONESIA
(continued)**

BNI Syariah (continued)

BNI Syariah placed its fund with Bank Indonesia with average annual bonuses as follows:

Bank Indonesia Sharia Deposit Facilities
Bank Indonesia Sharia Certificate
Bank Indonesia Sharia Term Deposit

6. GIRO PADA BANK LAIN

a. Berdasarkan mata uang

	2021	2020
Rupiah	472,155	732,013
Mata uang asing		
Dolar Amerika Serikat	13,304,783	10,155,923
Yen Jepang	2,607,273	1,519,795
Dolar Singapura	1,257,222	936,638
Yuan China	1,047,381	808,980
Euro Eropa	313,946	603,234
Pound Sterling Inggris	169,733	289,716
Dolar Hong Kong	161,074	169,006
Dolar Kanada	69,816	18,727
Dolar Australia	68,000	606,117
Won Korea Selatan	58,363	30,617
Dolar Selandia Baru	12,428	-
Real Arab Saudi	11,121	194,906
Dirham Uni Emirat Arab	7,078	1,086
Franc Swiss	5,885	41,946
Ringgit Malaysia	1,869	2,818
Baht Thailand	1,770	2,344
	19,097,742	15,381,853
Total	19,569,897	16,113,866
Cadangan kerugian penurunan nilai	(6)	(6,078)
	19,569,891	16,107,788

6. CURRENT ACCOUNTS WITH OTHER BANKS

a. By currency

Rupiah
Foreign currencies
United States Dollar
Japanese Yen
Singapore Dollar
Chinese Yuan
European Euro
Great Britain Pound Sterling
Hong Kong Dollar
Canadian Dollar
Australian Dollar
South Korean Won
New Zealand Dollar
Saudi Arabian Real
United Arab Emirates Dirham
Swiss Franc
Malaysian Ringgit
Thailand Baht

b. Berdasarkan hubungan

	2021	2020
Pihak berelasi		
Rupiah	38,487	11,944
Mata uang asing	1,521,387	461,764
Total pihak berelasi	1,559,874	473,708
Pihak ketiga		
Rupiah	433,668	720,069
Mata uang asing	17,576,355	14,920,089
Total pihak ketiga	18,010,023	15,640,158
Total	19,569,897	16,113,866
Cadangan kerugian penurunan nilai	(6)	(6,078)
	19,569,891	16,107,788

b. By relationship

Related parties
Rupiah
Foreign currencies
Total related parties

Third parties
Rupiah
Foreign currencies
Total third parties

Total
Allowance for impairment losses

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6. GIRO PADA BANK LAIN (lanjutan)

**6. CURRENT ACCOUNTS WITH OTHER BANKS
(continued)**

c. Berdasarkan kolektibilitas Bank Indonesia

Seluruh giro pada bank lain pada tanggal-tanggal 31 Desember 2021 dan 2020 diklasifikasikan lancar.

c. By Bank Indonesia collectibility

All current accounts with other banks as of 31 December 2021 and 2020 are classified as current.

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
					Current accounts with other banks	
Giro pada bank lain					Beginning balance	
Saldo awal	15,507,040	-	606,826	16,113,866	Net remeasurement of loss allowance**)	
Pengukuran kembali bersih penyisihan kerugian**)	8,910,319	-	-	8,910,319	New financial assets originated or purchased	
Aset keuangan baru yang diterbitkan atau dibeli	913,923	-	-	913,923	Fully repayment	
Pembayaran penuh	(5,687,285)	-	-	(5,687,285)	Foreign exchange and other movements	
Valuta asing dan perubahan lain	(74,100)	-	-	(74,100)		
Dampak kehilangan pengendalian*)	-	-	(606,826)	(606,826)	Impact of loss of control*)	
	19,569,897	-	-	19,569,897		

*) Lihat Catatan 1

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian, adalah pembayaran kembali

Refer to Note 1*)

Including in the net remeasurement of loss allowance is repayment**)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Giro pada bank lain					Current accounts with other banks
Saldo awal	12,676,455	2,088,339	-	199,997	Beginning balance
Transfers from credit impaired financial assets	679,178	(679,178)	-	-	Transfers from credit impaired financial assets
Pengukuran kembali bersih penyisihan kerugian	9,567,965	(3,446)	-	406,829	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	16,232,856	-	-	-	New financial assets originated or purchased
Pembayaran kembali	(24,585,116)	-	-	-	Repayment
Valuta asing dan perubahan lain	935,702	(1,405,715)	-	-	Foreign exchange and other movements
	15,507,040	-	-	606,826	16,113,866

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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:

31 Desember/December 2021						
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	Syariah/ Sharia	Total/Total		
Giro pada bank lain						Current accounts with other banks
Saldo awal	9	-	-	6,069	6,078	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	2	-	-	-	2	Net remeasurement of loss allowance
Pembayaran penuh	(5)	-	-	-	(5)	Fully repayment
Dampak kehilangan pengendalian*)	-	-	-	(6,069)	(6,069)	Foreign exchange and Impact of loss of control*)
	6	-	-	-	6	

*) Lihat Catatan 1

Refer to Note 1*)

31 Desember/December 2020						
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	Syariah/ Sharia	Total/Total		
Giro pada bank lain						Current accounts with other banks
Saldo 1 Januari	508	-	-	2,000	2,508	Balance at 1 January
Pengalihan ke						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	1	(1)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya – tidak mengalami penurunan nilai	(1)	1	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya – mengalami penurunan nilai	6	-	-	-	6	Lifetime ECL credit-impaired -
Pengukuran kembali bersih penyisihan kerugian	(489)	-	-	4,069	3,580	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	22	-	-	-	22	New financial assets originated or purchased
Pembayaran kembali	(36)	-	-	-	(36)	Repayment
Valuta asing dan perubahan lain	(2)	-	-	-	(2)	Foreign exchange and other movements
	9	-	-	6,069	6,078	

Manajemen berpendapat bahwa jumlah
cadangan kerugian penurunan nilai telah
memadai.

Management believes that the allowance for
impairment losses is adequate.

e. Tingkat suku bunga per tahun

	Dolar Amerika Serikat/ United States Dollar %
2021	0.01 - 0.13
2020	0.01 - 0.15

Giro pada bank lain selain dalam mata uang
Dolar Amerika Serikat dan Yuan China tidak
mendapat bunga.

e. Annual interest rates

	Yuan China/ Chinese Yuan %	
2021	2.00	2021
2020	2.00	2020

Current accounts with other banks stated in
currency other than United States Dollar and
Chinese Yuan do not earn interest.



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**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

	2021	2020	
Rupiah			Rupiah
Bank Indonesia - <i>Deposit Facility</i>	48,988,439	29,041,929	Bank Indonesia - <i>Deposit Facility</i>
<i>Call Money</i>			<i>Call Money</i>
PT Bank Rakyat Indonesia (Persero) Tbk	158,400	106,000	PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mayapada Internasional Tbk	31,400	-	PT Bank Mayapada Internasional Tbk
PT Bank Mega Tbk	-	250,000	PT Bank Mega Tbk
Bank of America Jakarta	-	100,000	Bank of America Jakarta
PT Bank CTBC Indonesia	-	20,000	PT Bank CTBC Indonesia
Subtotal	189,800	476,000	Subtotal
<i>Negotiable Certificate of Deposit</i>			<i>Negotiable Certificate of Deposit</i>
PT Bank Maybank Indonesia Tbk	38,817	98,548	PT Bank Maybank Indonesia Tbk
PT Bank DKI	9,688	-	PT Bank DKI
PT Bank Rakyat Indonesia (Persero) Tbk	-	194,666	PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	-	89,816	PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk
PT Bank Commonwealth	-	69,692	PT Bank Commonwealth
Subtotal	48,505	452,722	Subtotal
Deposito berjangka	566,583	835,416	Time deposits
	49,793,327	30,806,067	
Mata uang asing			Foreign currencies
Bank Indonesia - <i>Deposit Facility</i>	41,332,924	28,522,164	Bank Indonesia - <i>Deposit Facility</i>
<i>Call Money</i>			<i>Call Money</i>
PT Bank Rakyat Indonesia (Persero) Tbk	285,050	-	PT Bank Rakyat Indonesia (Persero) Tbk
San In Godo Bank, Tokyo	171,030	126,450	San In Godo Bank, Tokyo
Wells Fargo Bank	50,596	-	Wells Fargo Bank
Bank of New York Mellon	17,103	-	Bank of New York Mellon
Lain-lain	-	572,538	Others
Subtotal	523,779	698,988	Subtotal
Deposito berjangka			Time deposits
The Chugoku Bank Limited, Hong Kong	427,575	210,750	The Chugoku Bank Limited, Hong Kong
Woori Bank Seoul	83,860	-	Woori Bank Seoul
Mizuho Bank Ltd., Hong Kong	57,010	63,225	Mizuho Bank Ltd. Hong Kong
KEB Hana Bank, Seoul	35,940	694,908	KEB Hana Bank, Seoul
Bank of Nova Scotia Hong Kong	-	281,000	Bank of Nova Scotia Hong Kong
BNP Paribas	-	-	BNP Paribas
Lain-lain	35,815	52,330	Others
Subtotal	640,200	1,302,213	Subtotal
	42,496,903	30,523,365	
Total	92,290,230	61,329,432	Total
Cadangan kerugian penurunan nilai	(110)	(173)	Allowance for impairment losses
	92,290,120	61,329,259	

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**7. PENEMPATAN PADA BANK LAIN DAN BANK
INDONESIA (lanjutan)**

a. Berdasarkan jenis dan mata uang (lanjutan)

Perincian penempatan pada bank lain dan Bank Indonesia berdasarkan mata uang adalah sebagai berikut:

	2021	2020
Rupiah	49,793,327	30,806,067
Mata uang asing		
Dolar Amerika Serikat	42,377,103	30,320,207
Won Korea Selatan	119,800	203,158
	42,496,903	30,523,365
Total	92,290,230	61,329,432
Cadangan kerugian penurunan nilai	(110)	(173)
	92,290,120	61,329,259

b. Berdasarkan hubungan

	2021	2020
Pihak berelasi		
Rupiah		
Deposito berjangka	395,004	486,062
Call Money	-	194,666
	395,004	680,728
Mata uang asing		
Call Money	285,050	-
Deposito berjangka	14,269	14,105
	299,319	14,105
Total pihak berelasi	694,323	694,833
Pihak ketiga		
Rupiah		
Bank Indonesia - Deposit Facility	48,988,439	29,041,929
Call Money	189,800	281,335
Deposito berjangka	171,579	349,352
Negotiable Certificate Deposit	48,505	452,723
	49,398,323	30,125,339
Mata uang asing		
Bank Indonesia - Deposit Facility	41,332,924	28,522,164
Deposito berjangka	625,931	1,288,108
Call Money	238,729	698,988
	42,197,584	30,509,260
Total pihak ketiga	91,595,907	60,634,599
Total	92,290,230	61,329,432
Cadangan kerugian penurunan nilai	(110)	(173)
	92,290,120	61,329,259

**7. PLACEMENTS WITH OTHER BANKS AND
BANK INDONESIA (continued)**

a. By type and currency (continued)

Placements with other banks and Bank Indonesia based on currencies are as follows:

Rupiah
Foreign currencies
United States Dollar
South Korean Won
Total
Allowance for impairment losses

b. By relationship

Related parties
Rupiah
Time deposits
Call Money
Foreign currencies
Call Money
Time deposits
Total related parties
Third parties
Rupiah
Bank Indonesia - Deposit Facility
Call Money
Time deposits
Negotiable Certificate Deposit
Foreign currencies
Bank Indonesia - Deposit Facility
Time deposits
Call Money
Total third parties
Total
Allowance for impairment losses

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**7. PENEMPATAN PADA BANK LAIN DAN BANK
INDONESIA (lanjutan)**

c. Berdasarkan kolektibilitas Bank Indonesia

Seluruh penempatan pada bank lain dan Bank Indonesia pada tanggal-tanggal 31 Desember 2021 dan 2020 diklasifikasikan sebagai lancar.

**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)**

c. By Bank Indonesia collectibility

All placements with other banks and Bank Indonesia as of 31 December 2021 and 2020 are classified as current.

**d. Gross carrying amount and allowance for
impairment losses**

Movements in the gross carrying amount are as follows:

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Penempatan pada bank lain dan Bank Indonesia					Placements with other banks and Bank Indonesia
Saldo awal	61,329,432	-	-	-	Beginning balance
Pengukuran kembali bersih penyisihan kerugian*)	(728,100,646)	-	-	-	Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	759,080,480	-	-	-	New financial assets originated or purchased
Valuta asing dan perubahan lain	(19,036)	-	-	-	Foreign exchange and other movements
	92,290,230	-	-	-	92,290,230

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali

Including in the net measurement of loss allowance, is repayment*)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Penempatan pada bank lain dan Bank Indonesia					Placements with other banks and Bank Indonesia
Saldo awal	47,776,813	-	-	-	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	(70,587,880)	-	-	-	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	531,634,606	-	-	-	New financial assets originated or purchased
Valuta asing dan perubahan lain	(447,494,107)	-	-	-	Foreign exchange and other movements
	61,329,432	-	-	-	61,329,432

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**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:

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Penempatan pada bank lain dan Bank Indonesia					Placement with other banks and Bank Indonesia
Saldo awal	173	-	-	173	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	(332)	-	-	(332)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	269	-	-	269	New financial assets originated or purchased
	110	-	-	110	
31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Penempatan pada bank lain dan Bank Indonesia					Placement with other bank and Bank Indonesia
Saldo awal	147	-	-	147	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	(731)	-	-	(731)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	831	-	-	831	New financial assets originated or purchased
Valuta asing dan perubahan lain	(74)	-	-	(74)	Foreign exchange and other movements
	173	-	-	173	

Manajemen berpendapat bahwa jumlah
cadangan kerugian penurunan nilai di atas
telah memadai.

Management believes that the allowance for
impairment losses is adequate.

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7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

e. Penempatan pada bank lain yang digunakan sebagai jaminan

Tidak terdapat penempatan pada bank lain yang digunakan sebagai jaminan pada tanggal 31 Desember 2021 dan 2020.

f. Tingkat suku bunga per tahun

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	Won Korea/ Korean Won %
2021	2.75 - 10.00	0.02 - 2.39	0.55 - 2.15
2020	3.00 - 10.00	0.05 - 1.80	0.50 - 0.80

Penempatan pada Bank Indonesia dan bank lain dalam mata uang selain Rupiah, Dolar Amerika Serikat, dan Won Korea Selatan, tidak mendapat bunga.

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

e. Placements with other banks pledged as collateral

There were no placements with other banks pledged as collateral as of 31 December 2021 and 2020.

f. Annual interest rates

Placements with Bank Indonesia and other banks stated in currency other than Rupiah, United States Dollar, and South Korean Won, do not earn interest.

8. EFEK-EFEK

a. Berdasarkan jenis dan mata uang

	2021		2020	
	Nilai nominal/ Nominal value	Nilai tercatat/ Carrying value	Nilai nominal/ Nominal value	Nilai tercatat/ Carrying value
Nilai wajar melalui laba rugi				
Rupiah				
Reksadana	7,646,834	8,660,074	6,389,251	6,391,232
Obligasi	22,050	23,116	523,025	524,673
Obligasi subordinasi	6,000	6,172	-	-
Efek lainnya	828,474	828,914	266,410	266,410
	8,503,358	9,518,276	7,178,686	7,182,315
Mata uang asing				
Reksadana	51,630	53,952	28,799	29,443
Total nilai wajar melalui laba rugi	8,554,988	9,572,228	7,207,485	7,211,758
Nilai wajar melalui penghasilan komprehensif lain				
Rupiah				
Obligasi	5,945,300	7,437,279	7,329,800	7,567,361
Reksadana	7,653,486	7,182,068	2,952,402	2,956,185
Obligasi subordinasi	578,800	601,467	605,300	625,219
Efek beragunan aset	70,580	71,969	158,380	161,430
	14,248,166	15,292,783	11,045,882	11,310,195
Mata uang asing				
Sertifikat Bank Indonesia	128,273	127,885	-	-
Obligasi	799,565	804,062	746,237	750,794
Reksadana	-	-	3,251,590	3,353,354
	927,838	931,947	3,997,827	4,104,148
Total nilai wajar melalui penghasilan komprehensif lain	15,176,004	16,224,730	15,043,709	15,414,343
Biaya perolehan diamortisasi				
Rupiah				
Obligasi	306,500	256,052	7,365,813	7,320,715
Total biaya perolehan diamortisasi	306,500	256,052	7,365,813	7,320,715
Total efek-efek		26,053,010		29,946,816
Cadangan kerugian penurunan nilai		(250,048)		(260,219)
		25,802,962		29,686,597

Fair value through profit or loss

Rupiah

Mutual funds

Bonds

Subordinated bonds

Other securities

Foreign currencies

Mutual funds

Total fair value through profit or loss

Fair value through other comprehensive income

Rupiah

Bonds

Mutual funds

Subordinated bonds

Asset backed security

Foreign currencies

Certificate of Bank Indonesia

Bonds

Mutual funds

Total fair value through other comprehensive income

Amortized cost

Rupiah

Bonds

Total amortized cost

Total marketable securities

Allowance for impairment losses

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8. EFEK-EFEK (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Perincian efek-efek berdasarkan mata uang adalah sebagai berikut:

	2021	2020
Rupiah	25,067,111	25,813,225
Mata uang asing		
Dolar Amerika Serikat	985,899	4,133,591
Total	26,053,010	29,946,816
Cadangan kerugian penurunan nilai	(250,048)	(260,219)
	25,802,962	29,686,597

b. Berdasarkan hubungan

	2021	2020
Pihak berelasi		
Rupiah	5,569,658	7,105,927
Mata uang asing	346,318	352,331
Total pihak berelasi	5,915,976	7,458,258
Pihak ketiga		
Rupiah	19,497,453	18,707,298
Mata uang asing	639,581	3,781,260
Total pihak ketiga	20,137,034	22,488,558
Total	26,053,010	29,946,816
Cadangan kerugian penurunan nilai	(250,048)	(260,219)
	25,802,962	29,686,597

c. Berdasarkan penerbit

	2021	2020
Korporasi	21,826,648	18,860,972
Bank	4,098,477	4,509,531
Bank Indonesia	127,885	6,576,313
Total	26,053,010	29,946,816
Cadangan kerugian penurunan nilai	(250,048)	(260,219)
	25,802,962	29,686,597

d. Berdasarkan peringkat

	31 Desember/December 2021		
	Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value
Nilai wajar melalui laba rugi			
Rupiah			
Reksadana	-	-	8,660,074
Obligasi	Pefindo	(AA-) - (AAA)	23,116
Obligasi subordinasi	Beragam/ various	Beragam/ various	6,172
Efek lainnya	Pefindo	(A+) - (AAA)	828,914
			9,518,276
Mata uang asing			
Reksadana	-	-	53,952
Total nilai wajar melalui laba rugi			9,572,228

8. MARKETABLE SECURITIES (continued)

a. By type and currency (continued)

Marketable securities based on currencies are as follow:

Rupiah
Foreign currencies
United States Dollar
Total
Allowance for impairment losses

b. By relationship

Related parties
Rupiah
Foreign currencies
Total related parties
Third parties
Rupiah
Foreign currencies
Total third parties
Total
Allowance for impairment losses

c. By issuer

Corporates
Banks
Bank Indonesia
Total
Allowance for impairment losses

d. By rating

Fair value through profit or loss
Rupiah
Mutual funds
Bonds
Subordinated bonds
Other securities

Foreign currencies
Mutual funds
Total fair value through profit or loss

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2021							
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value					
Nilai wajar melalui penghasilan komprehensif lain				Fair value through other comprehensive income			
Rupiah				Rupiah			
Reksadana	-	-	7,182,068				Mutual funds
Obligasi subordinasi	Pefindo	(A-) - (AA+)	601,467				Subordinated bonds
Efek beragunan aset	Pefindo	idAAA(sf)	71,969				Asset backed security
Obligasi							Bonds
Hutama Karya II 8.07 Utama2027	Pefindo	idA	407,083				Hutama Karya II 8.07/Hutama2027
Semen Indo II_Smgrij-2024	Pefindo	idAA+	321,591				Semen Indo II_Smgrij-2024
Bank Tabungan Negara Btn-8.7C/24	Pefindo	idAA+	282,457				Bank Tabungan Negara Btn-8.7C/24
Bank Tabungan Negara Btn-8.5B/22	Pefindo	idAA+	256,110				Bank Tabungan Negara Btn-8.5B/22
Bank CIMB Niaga II/I Bngaij-2022	Pefindo	idAAA	216,577				Bank CIMB Niaga II/I Bngaij-2022
PLN III 9.1 2024 Plinij-2024	Pefindo	idAAA	211,000				PLN III 9.1 2024 Plinij-2024
Pub III BRI Tahap I 2019 Seri C	Pefindo	idAAA	205,571				Pub III BRI Tahap I 2019 Seri C
Obl I Bank Mandiri I 2016 Seri C	Pefindo	AAA	204,366				Obl I Bank Mandiri I 2016 Seri C
Obl Adira V 2019 Seri C	Pefindo	AAA	131,201				Obl Adira V 2019 Seri C
PLN IV 8.5 01/08 Plinij-2026B	Pefindo	idAAA	109,272				PLN IV 8.5 01/08 Plinij-2026B
Obl Sarana Multi III 2019 Seri D	Pefindo	AAA	108,421				Obl Sarana Multi III 2019 Seri D
Bank Mandiri 8.00 15 Mandiri/8.00	Pefindo	idAAA	107,088				Bank Mandiri 8.00 15 Mandiri/8.00
Bank Mandiri Mandiri-8.5B	Pefindo	idAAA	106,488				Bank Mandiri Mandiri-8.5B
PLN II 8.2 2027C Plinij-2027C	Pefindo	idAAA	105,933				PLN II 8.2 2027C Plinij-2027C
Obl Berkljtn IV Adira III Seri E	Pefindo	AAA	105,448				Obl Berkljtn IV Adira III Seri E
PPGDIJ 4.85 Mat 16/0 Ppgdij-4.85A	Pefindo	idAAA	103,048				PPGDIJ 4.85 Mat 16/0 Ppgdij-4.85A
Bank Panin 7.60 27/0 Pnbni-7.60	Pefindo	idAA	102,796				Bank Panin 7.60 27/0 Pnbni-7.60
JSMR Pt Sukuk 9.00 1 Jsmr_PT_2024	Pefindo	idAA-	102,117				JSMR Pt Sukuk 9.00 1 Jsmr_PT_2024
PT. Bank Rakyat Indone Bri-6.65/23	Pefindo	idAAA	101,348				PT. Bank Rakyat Indone Bri-6.65/23
PLN I 2020 6.70 Plinij-6.7-25	Pefindo	idAAA	101,069				PLN I 2020 6.70 Plinij-6.7-25
PPGDIJ 6.45 Mat 22/0 Ppgdij-6.45B	Pefindo	idAAA	100,289				PPGDIJ 6.45 Mat 22/0 Ppgdij-6.45B
PPGDIJ 4.85 Mat 16/0	Pefindo	idAAA	79,678				PPGDIJ 4.85 Mat 16/0
Moratelindo Sukuk 9.9 09/07/2022	Pefindo	idA	74,194				Moratelindo Sukuk 9.9 09/07/2022
KAINIJ 7.75 Mat 13/1 KAINIJ-7.75	Pefindo	idAA+	74,011				KAINIJ 7.75 Mat 13/1 KAINIJ-7.75
Obl Berkljtn Bank Panin III 2018	Pefindo	AA	71,957				Obl Berkljtn Bank Panin III 2018
Obl Berkljtn Bank BTN I 2017 Seri B	Pefindo	AA+	71,711				Obl Berkljtn Bank BTN I 2017 Seri B
Bank Mandiri 8.50 2023 BMRIJ23	Pefindo	idAAA	69,178				Bank Mandiri 8.50 2023 BMRIJ23
Pt. Utama Karya Utama2022	Pefindo	idA	68,466				Pt. Utama Karya Utama2022
Sukuk Berkljtn PNM I 2021 Seri C	Pefindo	A+	61,942				Sukuk Berkljtn PNM I 2021 Seri C
Obl Berkljtn III PNM II 2019 Seri B	Pefindo	A+	58,352				Obl Berkljtn III PNM II 2019 Seri B
PLN II 7.2 2022 Plinij-2022A	Pefindo	idAAA	56,166				PLN II 7.2 2022 Plinij-2022A
Obl Berkljtn PLN I 2018 Seri B	Pefindo	AAA	54,259				Obl Berkljtn PLN I 2018 Seri B
Obl Berkljtn Maybank I 2019 Seri C	Pefindo	AAA	54,205				Obl Berkljtn Maybank I 2019 Seri C
Obl Berkljtn Maybank I 2017 Seri B	Pefindo	AAA	53,987				Obl Berkljtn Maybank I 2017 Seri B
Pub V SMF IV 8.1 Smfper-2025B	Pefindo	idAAA	53,863				Pub V SMF IV 8.1 Smfper-2025B
Sukuk Berkljtn PLN II 2017 Seri C	Pefindo	AAA	52,985				Sukuk Berkljtn PLN II 2017 Seri C
PLN VI 2020 7.2 Plinij-2025A	Pefindo	idAAA	52,481				PLN VI 2020 7.2 Plinij-2025A
PLN II 7.5 2024B Plinij-2024B	Pefindo	idAAA	52,283				PLN II 7.5 2024B Plinij-2024B
PT Pupindo II Pupi5.6A/24	Pefindo	idAA-	51,949				PT Pupindo II Pupi5.6A/24
Obl Berkljtn PNM II 2018 Seri B	Pefindo	A+	51,518				Obl Berkljtn PNM II 2018 Seri B
Pub V SMF II 7.8 Smfper-2022A	Pefindo	idAAA	51,415				Pub V SMF II 7.8 Smfper-2022A
Indo Eximbank 6.70 Bexi-14/2/23	Pefindo	idAAA	51,383				Indo Eximbank 6.70 Bexi-14/2/23
Smb I CIMB II 7. Bngasmb-2022	Pefindo	idAAA	51,304				Smb I CIMB II 7. Bngasmb-2022
Obl Berkljtn PNM I 2017 Seri B	Pefindo	A+	51,256				Obl Berkljtn PNM I 2017 Seri B
Obl Berkljtn PLN I 2017 Seri C	Pefindo	AAA	51,128				Obl Berkljtn PLN I 2017 Seri C
PT Pupindo Tahap I A Pupi-7.0A-23	Pefindo	idAA-	50,389				PT Pupindo Tahap I A Pupi-7.0A-23
Obligasi Berkljtn Astra I 2020 Seri B	Pefindo	AAA	47,185				Obligasi Berkljtn Astra I 2020 Seri B
Obl Berkljtn XL Axiata II 2019 Seri D	Pefindo	AAA	44,220				Obl Berkljtn XL Axiata II 2019 Seri D
Obl Berkljtn Maybank III 2018 Seri C	Pefindo	AAA	42,870				Obl Berkljtn Maybank III 2018 Seri C
Obl Berkljtn PLN IV 2019 Seri A	Pefindo	AAA	42,739				Obl Berkljtn PLN IV 2019 Seri A
Pt. Bank Rakyat Indone Bri-8.0/22	Pefindo	idAAA	42,673				Pt. Bank Rakyat Indone Bri-8.0/22
Maybank 7.15 15/03/23 Bniiij-2023	Pefindo	idAAA	41,402				Maybank 7.15 15/03/23 Bniiij-2023
Mtn Kimia Farma 8.75 Mtn-Kimia_F	Pefindo	idAA-	40,449				Mtn Kimia Farma 8.75 Mtn-Kimia_F
Sbk Pegadaian 26/05/ Ppgdij2022U	Pefindo	idAAA	39,166				Sbk Pegadaian 26/05/ Ppgdij2022U
Obl Berkljtn Indosat III 2018 Seri E	Pefindo	AAA	32,886				Obl Berkljtn Indosat III 2018 Seri E
Obl Berkljtn Sarana IV 2020 Seri C	Pefindo	AAA	32,223				Obl Berkljtn Sarana IV 2020 Seri C
Ppgdij 7.60 Mat 08/0 Ppgdij-7.60B	Pefindo	idAAA	31,380				Ppgdij 7.60 Mat 08/0 Ppgdij-7.60B
Obl Berkljtn Indosat IV 2016 Seri E	Pefindo	AAA	27,971				Obl Berkljtn Indosat IV 2016 Seri E
PT Pupindo II Pupi5.6A/24	Pefindo	idAA-	27,384				PT Pupindo II Pupi5.6A/24
Bank Tabungan Negara Btn-7.9/23	Pefindo	idAA+	27,060				Bank Tabungan Negara Btn-7.9/23
Moratelindo Suk 10.5 Mortel-2023	Pefindo	idA	26,745				Moratelindo Suk 10.5 Mortel-2023
Moratelindo Suk 11.2 Mortel-2025	Pefindo	idA	26,044				Moratelindo Suk 11.2 Mortel-2025

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2021							
Pemeringkat/ Agencies		Peringkat/ Rating	Nilai tercatat/ Carrying Value			Fair value through other comprehensive income (continued)	
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)							
Rupiah (lanjutan)							
Obligasi (lanjutan)							
PLN III 6.5 2023 Plnjj-2023A	Pefindo	idAAA	25,645			PLN III 6.5 2023 Plnjj-2023A	
Sukuk Berkinjtn PLN I 2018 Seri E	Pefindo	AAA	24,768			Sukuk Berkinjtn PLN I 2018 Seri E	
Obl Berkinjtn PLN III 2019 Seri C	Pefindo	AAA	22,829			Obl Berkinjtn PLN III 2019 Seri C	
Obl Berkinjtn Bank BRI II 2017 Seri D	Pefindo	AAA	22,119			Obl Berkinjtn Bank BRI II 2017 Seri D	
Obl Berkinjtn Bank BTN I 2017 Seri D	Pefindo	AA+	21,844			Obl Berkinjtn Bank BTN I 2017 Seri D	
Obl Berkinjtn Sarana IV 2020 Seri B	Pefindo	AAA	21,545			Obl Berkinjtn Sarana IV 2020 Seri B	
Pgddij 7.95 Mat 08/0 Pgddij-7.95C	Pefindo	idAAA	21,449			Pgddij 7.95 Mat 08/0 Pgddij-7.95C	
Mandiri Taspen Pos. Mantap24A	Pefindo	idAAA	21,198			Mandiri Taspen Pos. Mantap24A	
Obl Berkinjtn PLN II 2017 Seri D	Pefindo	AAA	20,785			Obl Berkinjtn PLN II 2017 Seri D	
Bank Cimb Niaga 8.15 Bngaij-8.15	Pefindo	idAAA	20,570			Bank Cimb Niaga 8.15 Bngaij-8.15	
Obl Berkinjtn Indosat I 2014 Seri D	Pefindo	AAA	17,170			Obl Berkinjtn Indosat I 2014 Seri D	
Obl Berkinjtn Mandiri II 2019 Seri B	Pefindo	AA+	16,926			Obl Berkinjtn Mandiri II 2019 Seri B	
Obl Berkinjtn Sarana III 2020 Seri B	Pefindo	AAA	15,873			Obl Berkinjtn Sarana III 2020 Seri B	
Obl PLN XII 2010 Seri B	Pefindo	AAA	15,521			Obl PLN XII 2010 Seri B	
Obl Berkinjtn Mandiri II 2017 Seri B	Pefindo	AA+	15,326			Obl Berkinjtn Mandiri II 2017 Seri B	
Obl Berkinjtn Mandiri II 2019 Seri A	Pefindo	AA+	14,413			Obl Berkinjtn Mandiri II 2019 Seri A	
Obl Berkinjtn Bank Maybank II 2018	Pefindo	AAA	14,047			Obl Berkinjtn Bank Maybank II 2018	
Obl Berkinjtn PLN V 2019 Seri B	Pefindo	AAA	13,987			Obl Berkinjtn PLN V 2019 Seri B	
Sukuk Berkinjtn PLN II 2017 Seri B	Pefindo	AAA	13,968			Sukuk Berkinjtn PLN II 2017 Seri B	
Sukuk Berkinjtn Axiata II 2019 Seri C	Pefindo	AAA	12,613			Sukuk Berkinjtn Axiata II 2019 Seri C	
Obl Berkinjtn Telkom I 2015 Seri B	Pefindo	AAA	12,590			Obl Berkinjtn Telkom I 2015 Seri B	
Sukuk Berkinjtn Axiata II 2019 Seri D	Pefindo	AAA	11,356			Sukuk Berkinjtn Axiata II 2019 Seri D	
Obl Berkinjtn Indosat I 2017 Seri E	Pefindo	AAA	11,236			Obl Berkinjtn Indosat I 2017 Seri E	
Obl Berkinjtn Indosat II 2017 Seri E	Pefindo	AAA	11,070			Obl Berkinjtn Indosat II 2017 Seri E	
Sukuk Berkinjtn PLN I 2017 Seri B	Pefindo	AAA	10,905			Sukuk Berkinjtn PLN I 2017 Seri B	
Obl Berkinjtn CIMB IV 2018 Seri C	Pefindo	AAA	10,691			Obl Berkinjtn CIMB IV 2018 Seri C	
Obl Berkinjtn CIMB I 2019 Seri C	Pefindo	idAAA	10,662			Obl Berkinjtn CIMB I 2019 Seri C	
Sukuk Berkinjtn Axiata II 2019 Seri C	Pefindo	AAA	10,656			Sukuk Berkinjtn Axiata II 2019 Seri C	
Obl Berkinjtn Mandiri I 2020 Seri A	Pefindo	AA+	10,484			Obl Berkinjtn Mandiri I 2020 Seri A	
Obl Berkinjtn Maybank IV 2017 Seri B	Pefindo	AA+	10,316			Obl Berkinjtn Maybank IV 2017 Seri B	
Bank Maybank 8.5 11/ Bniiij-2024	Pefindo	idAAA	10,258			Bank Maybank 8.5 11/ Bniiij-2024	
Bank Maybank 8.0 11/07/22 Bniiij-2022	Pefindo	idAAA	10,222			Bank Maybank 8.0 11/07/22 Bniiij-2022	
Sukuk Sub Bank Syariah 2016	Pefindo	AA	8,637			Sukuk Sub Bank Syariah 2016	
Sukuk Berkinjtn Axiata I 2015 Seri D	Pefindo	AAA	8,504			Sukuk Berkinjtn Axiata I 2015 Seri D	
Obl Berkinjtn BTN I 2015 Seri D	Pefindo	AA+	7,744			Obl Berkinjtn BTN I 2015 Seri D	
Obl Berkinjtn Axiata I 2018 Seri C	Pefindo	AAA	7,593			Obl Berkinjtn Axiata I 2018 Seri C	
Sukuk Pegadaian II 2019 Seri B	Pefindo	AAA	7,322			Sukuk Pegadaian II 2019 Seri B	
Sukuk Berkinjtn PLN I 2020 Seri A	Pefindo	AAA	7,219			Sukuk Berkinjtn PLN I 2020 Seri A	
Sukuk Pegadaian III 2020 Seri B	Pefindo	AAA	7,213			Sukuk Pegadaian III 2020 Seri B	
Sukuk Berkinjtn PLN III 2019 Seri C	Pefindo	AAA	5,616			Sukuk Berkinjtn PLN III 2019 Seri C	
Sukuk PLN II 2018 Seri B-KPK	Pefindo	AAA	5,540			Sukuk PLN II 2018 Seri B-KPK	
Sukuk PLN II 2018 Seri B-PNM	Pefindo	AAA	5,540			Sukuk PLN II 2018 Seri B-PNM	
Sukuk Berkinjtn PLN II 2018 Seri B	Pefindo	AAA	5,540			Sukuk Berkinjtn PLN II 2018 Seri B	
Sukuk Berkinjtn PLN I 2017 Seri B	Pefindo	AAA	5,452			Sukuk Berkinjtn PLN I 2017 Seri B	
Sukuk Berkinjtn Axiata II 2019 Seri C	Pefindo	AAA	5,437			Sukuk Berkinjtn Axiata II 2019 Seri C	
Sukuk Berkinjtn PLN III 2019 Seri B	Pefindo	AAA	5,426			Sukuk Berkinjtn PLN III 2019 Seri B	
Obl Berkinjtn Bank BRI I 2019 Seri C	Pefindo	AAA	5,334			Obl Berkinjtn Bank BRI I 2019 Seri C	
Obl Berkinjtn Telkom I 2015 Seri C	Pefindo	AAA	5,155			Obl Berkinjtn Telkom I 2015 Seri C	
Obl Indosat VIII Tahun 2012 Seri B	Pefindo	AAA	5,126			Obl Indosat VIII Tahun 2012 Seri B	
Obl Berkinjtn PLN III 2018 Seri C	Pefindo	AAA	5,124			Obl Berkinjtn PLN III 2018 Seri C	
Obl Berkinjtn PLN III 2018 Seri D	Pefindo	AAA	5,074			Obl Berkinjtn PLN III 2018 Seri D	
Obl Berkinjtn Sulselbar I 2021 Seri B	Pefindo	A+	5,002			Obl Berkinjtn Sulselbar I 2021 Seri B	
Sukuk Berkinjtn Axiata II 2019 Seri C	Pefindo	AAA	4,349			Sukuk Berkinjtn Axiata II 2019 Seri C	
Obl Berkinjtn Mandiri I 2020 Seri B	Pefindo	AAA	4,328			Obl Berkinjtn Mandiri I 2020 Seri B	
Sukuk Berkinjtn PLN I 2020 Seri B	Pefindo	AAA	4,123			Sukuk Berkinjtn PLN I 2020 Seri B	
Sukuk Berkinjtn CIMB II 2019 Seri B	Pefindo	AAA	4,104			Sukuk Berkinjtn CIMB II 2019 Seri B	
Sukuk Berkinjtn Timah I 2017 Seri B-B	Pefindo	A-	4,047			Sukuk Berkinjtn Timah I 2017 Seri B-B	
Sukuk Berkinjtn Timah I 2017 Seri B-F	Pefindo	A-	4,047			Sukuk Berkinjtn Timah I 2017 Seri B-F	
Sukuk Berkinjtn Adira III 2019 Seri B	Pefindo	AAA	4,015			Sukuk Berkinjtn Adira III 2019 Seri B	
Lainnya	Beragam/Various	Beragam/Various	1,249,896			Others	
Subtotal			7,437,279			Subtotal	
			15,292,783				

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2021				
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value		
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)			Fair value through other comprehensive income (continued)	
Mata uang asing			Foreign currencies	
Sertifikat Bank Indonesia	-	-	127,885	Certificate of Bank Indonesia
Obligasi				Bonds
PT Pelindo PLBIIJ-II/25	S&P	BBB-	138,987	PT Pelindo PLBIIJ-II/25
Bank Rakyat Indonesia BBRI-3.95	S&P	BBB	75,197	Bank Rakyat Indonesia BBRI-3.95
JP Morgan Chase USA	Moody's	Baa1	70,830	JP Morgan Chase USA
Huntington USA	Moody's	Baa2	70,221	Huntington USA
Suntrust USA	Moody's	Baa1	69,561	Suntrust USA
Bank of America	Moody's	Baa1	69,489	Bank of America
Pertamina PERTIJ31	-	-	68,045	Pertamina PERTIJ31
M&T Bank USA	Moody's	Baa2	67,851	M&T Bank USA
Corestates Cap III / Wells Fargo	Fitch	BBB	66,470	Corestates Cap III / Wells Fargo
PLN P.LISTRIK 5.375 PLNIIJ-2029	S&P	BBB-	64,090	PLN P.LISTRIK 5.375 PLNIIJ-2029
Pertamina 2023	S&P	BBB	43,321	Pertamina 2023
Subtotal			804,062	Subtotal
			931,947	
Total nilai wajar pada penghasilan komprehensif lain			16,224,730	Total fair value through other comprehensive income
Biaya perolehan diamortisasi			Amortized cost	
Rupiah			Rupiah	
Obligasi				Bonds
PT Intan Baruprana Finance IBFI-17	Pefindo	idBBB-	250,048	PT Intan Baruprana Finance IBFI-17
Lainnya	Beragam/Various	Beragam/Various	6,004	Others
Subtotal			256,052	Subtotal
Total biaya perolehan diamortisasi			256,052	Total amortized cost
Total efek-efek			26,053,010	Total marketable securities
Cadangan kerugian penurunan nilai			(250,048)	Allowance for impairment losses
Efek-efek - bersih			25,802,962	Marketable securities - net

31 Desember/December 2020				
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value		
Nilai wajar melalui laba rugi			Fair value through profit or loss	
Rupiah			Rupiah	
Reksadana	-	-	6,391,232	Mutual funds
Obligasi	Pefindo	(AA-) - (AAA)	524,673	Bonds
Efek lainnya	Pefindo	(A+) - (AAA)	266,410	Other securities
			7,182,315	
Mata uang asing			Foreign currencies	
Reksadana	-	-	29,443	Mutual funds
Total nilai wajar melalui laba rugi			7,211,758	Total fair value through profit or loss

31 Desember/December 2020				
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value		
Nilai wajar melalui penghasilan komprehensif lain			Fair value through other comprehensive income	
Rupiah			Rupiah	
Reksadana	-	-	2,956,185	Mutual funds
Obligasi subordinasi	Pefindo	(A-) - (AA+)	625,219	Subordinated bonds
Efek beragunan aset	Pefindo	idAAA(sf)	161,430	Asset backed security

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2020					
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value			
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)			Fair value through other comprehensive income (continued)		
Rupiah					Rupiah
Obligasi					Bonds
PT Utama Karya HUTAMA2027	Pefindo	idAAA	385,597	PT Utama Karya HUTAMA2027	
PT Utama Karya HUTAMA2022	Pefindo	idAAA	317,549	PT Utama Karya HUTAMA2022	
PT Semen Indonesia SMGRIJ-2024	Pefindo	idAA	313,119	PT Semen Indonesia SMGRIJ-2024	
Bank Tabungan Negara BTN-8.7C/24	Pefindo	idAA+	273,007	Bank Tabungan Negara BTN-8.7C/24	
Bank Tabungan Negara BTN-8.5B/22	Pefindo	idAA+	259,825	Bank Tabungan Negara BTN-8.5B/22	
Bank CIMB Niaga BNGAIJ-2022	Pefindo	idAAA	216,159	Bank CIMB Niaga BNGAIJ-2022	
PLN III THP III 9.1 2024 PLNIIJ-2024	Pefindo	idAAA	215,978	PLN III THP III 9.1 2024 PLNIIJ-2024	
Bank JABAR I Tahap I BJB-2021	Pefindo	idAA-	204,106	Bank JABAR I Tahap I BJB-2021	
Bank Mandiri Thp I th 2016 Seri C	Pefindo	AAA	196,196	Bank Mandiri Thp I th 2016 Seri C	
Bank Rakyat Indonesia BRI-8.0/22	Pefindo	idAAA	154,778	Bank Rakyat Indonesia BRI-8.0/22	
PT Utama Karya HUTAMA2026	Pefindo	idAAA	153,013	PT Utama Karya HUTAMA2026	
Bank OCBC NISP NISPIJ-2021	Pefindo	idAAA	150,590	Bank OCBC NISP NISPIJ-2021	
BRI Tahap I 2019 Seri C BBRIJ-7.85	Pefindo	idAAA	138,746	BRI Tahap I 2019 Seri C BBRIJ-7.85	
Adira Finance Tahap V Tahun 2019 Seri C	Pefindo	AAA	127,210	Adira Finance Tahap V 2019 Seri C	
Bank BTN Tahap I Tahun 2017 Seri B	Pefindo	AA+	124,376	Bank BTN Tahap I Tahun 2017 Sr B	
Bank Mandiri 8.00 15 Mandiri/8.00	Pefindo	idAAA	108,117	Bank Mandiri 8.00 15 Mandiri/8.00	
PLN Thp IV 8.5 01/08 Plnij-2026B	Pefindo	idAAA	105,394	PLN Thp IV 8.5 01/08 Plnij-2026B	
Bank Mandiri Mandiri-8.5B	Pefindo	idAAA	105,126	Bank Mandiri Mandiri-8.5B	
Adira Finance Tahap III 2018 Seri E	Pefindo	AAA	104,840	Adira Finance Tahap III 2018 Seri E	
Sarana Multi Infrastruktur III 2019 D	Pefindo	AAA	104,386	Sarana Multi Infrastruktur III 2019 D	
PLN THP II 8.2 2027C PLNIIJ-2027C	Pefindo	idAAA	103,625	PLN THP II 8.2 2027C PLNIIJ-2027C	
Bank Panin 7.60 27/0 Pnbni-7.60	Pefindo	AA	101,156	Bank Panin 7.60 27/0 Pnbni-7.60	
Jsmr Pt Sukuk 9.00 1 Jsmr_Pt 2024	Pefindo	idAA-	100,966	Jsmr Pt Sukuk 9.00 1 Jsmr_Pt 2024	
Ppgdij 6.45 Mat 22/0 Ppgdij-6.45B	Pefindo	idAAA	100,784	Ppgdij 6.45 Mat 22/0 Ppgdij-6.45B	
Keb Hana 7.75 18/05/2021	Pefindo	idAAA	100,710	Keb Hana 7.75 18/05/2021	
Bank Panin Tahap III Tahun 2018	Pefindo	AA	99,335	Bank Panin Tahap III Tahun 2018	
PLN THP I 2020 6.70 PLNIIJ-6.7-25	Pefindo	idAAA	97,886	PLN THP I 2020 6.70 PLNIIJ-6.7-25	
Bank Panin 8.75 27/10/21 Pnbni-2021	Pefindo	idAA	92,249	Bank Panin 8.75 27/10/21	
Bank Sulselbar Thp II Th 2016	Pefindo	A+	86,382	Bank Sulselbar Thp II Th 2016	
Sarana Multigriya Finansial Thp IV 2020 A	Pefindo	AAA	80,617	Sarana Multigriya Finansial IV 2020 A	
Moratelindo Sukuk 9.9 09/07/2022	Pefindo	idA	75,215	Moratelindo Sukuk 9.9 09/07/2022	
KAINIJ 7.75 MAT 13/1 KAINIJ-7.75	Pefindo	idAA+	70,634	KAINIJ 7.75 MAT 13/1 KAINIJ-7.75	
Bank Mandiri 8.50 21/9/2023 Bmri-2023	Pefindo	idAAA	67,761	Bank Mandiri 8.50 21/9/2023	
Adira Finance Tahap III Tahun 2016 Seri C	Pefindo	AAA	62,037	Adira Finance Tahap III 2016 Seri C	
PLN Thp II 7.2 2022 PLNIIJ-2022A	Pefindo	idAAA	56,288	PLN Thp II 7.2 2022 PLNIIJ-2022A	
PNM Tahap II Tahun 2019 Seri B	Pefindo	A+	54,652	PNM Tahap II Tahun 2019 Seri B	
Adira Finance Tahap IV Tahun 2019 Seri C	Pefindo	AAA	54,029	Adira Finance Tahap IV 2019 Seri C	
Bank Maybank Indonesia Thp I 2019 Seri C	Pefindo	AAA	53,050	Bank Maybank Indonesia I 2019 Sr C	
Bank Maybank Indonesia Thp I 2017 Seri B	Pefindo	AAA	52,742	Bank Maybank Indonesia I 2017 Sr B	
PT Bank Rakyat Indone BRI-25/05/21	Pefindo	idAAA	52,708	PT Bank Rakyat Indone BRI-25/05/21	
PLN Tahap I Tahun 2018 Seri B	Pefindo	AAA	52,501	PLN Tahap I Tahun 2018 Seri B	
PUB V SMF THP IV 8.1 SMFPER-2025B	Pefindo	idAAA	52,294	SMF THP IV 8.1 SMFPER-2025B	
PUB V SMF THP II 7.8 SMFPER-2022A	Pefindo	idAAA	51,625	SMF THP II 7.8 SMFPER-2022A	
SMB I CIMB THP II 7. BNGASMB-2022	Pefindo	idAAA	51,385	SMB I CIMB II 7. BNGASMB-2022	
PLN THP II 7.5 2024B PLNIIJ-2024B	Pefindo	idAAA	51,285	PLN THP II 7.5 2024B PLNIIJ-2024B	
PT Pupindo Tahap I A Pupi-7.0A-23	Pefindo	idAAA	50,691	PT Pupindo Tahap I A Pupi-7.0A-23	
Indo Eximbank 6.70 Bexi-14/2/23	Pefindo	idAAA	50,492	Indo Eximbank 6.70 Bexi-14/2/23	
PT Bank Rakyat Indone Bri-6.65/23	Pefindo	idAAA	50,454	PT Bank Rakyat Indone Bri-6.65/23	
Mtn Syariah Pegadaia Pgd-Mtn2021	Pefindo	idAAA	50,158	Mtn Syariah Pegadaia Pgd-Mtn2021	
Sbk Jsmr 14/10/20 - Jsmr_Sbk2021	Pefindo	idAA-	50,070	Sbk Jsmr 14/10/20 - Jsmr_Sbk2021	
Pln Thp Vi 2020 7.2 Plnij-2025A	Pefindo	idAAA	50,055	Pln Thp Vi 2020 7.2 Plnij-2025A	
Astra Sedaya Finance Tahap I 2020 Seri B	Pefindo	AAA	46,879	Astra Sedaya Finance I 2020 Seri B	
Maybank Finance Tahap II Th 2016 Seri B	Pefindo	AA+	44,507	Maybank Finance Tahap II 2016 Sr B	
XI Axiata Tahap II Tahun 2019 Seri D	Pefindo	AAA	43,121	XI Axiata Tahap II Tahun 2019 Seri D	
Bank Maybank Indonesia III 2018 Sr C	Pefindo	AAA	42,375	Bank Maybank Indonesia III 2018 Sr C	
Bank Maybank 7.15 15/03/23 Bnii-2023	Pefindo	idAAA	41,588	Bank Maybank 7.15 15/03/23	
XI Axiata Tahap I Tahun 2018 Seri B	Pefindo	AAA	41,231	XI Axiata Tahap I Tahun 2018 Seri B	
PLN Tahap IV Tahun 2019 Seri A	Pefindo	AAA	41,172	PLN Tahap IV Tahun 2019 Seri A	
Bank Panin Tahap II Tahun 2016	Pefindo	AA	41,000	Bank Panin Tahap II Tahun 2016	
Mtn Kimia Farma 8.75 Mtn-Kimia_F	Pefindo	idAA-	39,788	Mtn Kimia Farma 8.75 Mtn-Kimia_F	
PNM Thp II Th 2018 Seri B	Pefindo	A+	34,963	PNM Thp II Th 2018 Seri B	
Sarana Multi Infrastruktur IV 2020 Seri C	Pefindo	AAA	31,092	Sarana Multi Infrastruktur IV 2020 Sr C	
PPGDIJ 7.60 MAT 08/0 PPGDIJ-7.60B	Pefindo	idAAA	30,958	PPGDIJ 7.60 MAT 08/0 PPGDIJ-7.60B	
Bank BRI Tahap I Tahun 2019 Seri C	Pefindo	AAA	30,786	Bank BRI Tahap I Tahun 2019 Seri C	
PNM Tahap I Tahun 2017 Seri B	Pefindo	A+	30,731	PNM Tahap I Tahun 2017 Seri B	
Sarana Multi Infrastruktur IV 2020 Seri A	Pefindo	AAA	30,231	Sarana Multi Infrastruktur IV 2020 Sr A	
PNM Tahap II Tahun 2016 Seri B	Pefindo	A+	29,589	PNM Tahap II Tahun 2016 Seri B	

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2020					
	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)
Bank Tabungan Negara Btn-7.9/23	Pefindo	AA+	26,504	Bank Tabungan Negara Btn-7.9/23	
Moratelindo Suk 10.5 Mortel-2023	Pefindo	idA	26,378	Moratelindo Suk 10.5 Mortel-2023	
Moratelindo Suk 11.2 Mortel-2025	Pefindo	idA	25,734	Moratelindo Suk 11.2 Mortel-2025	
Maybank Finance Tahap III Th 2016 Seri B	Pefindo	AA+	25,659	Maybank Finance III 2016 Seri B	
Sarana Multigriya Finansial Thp VI 2016	Pefindo	AAA	25,600	Sarana Multigriya Finansial VI 2016	
PLN Thp III 6.5 2023 PLNIIJ-2023A	Pefindo	idAAA	25,152	PLN Thp III 6.5 2023 PLNIIJ-2023A	
Bank Tabungan Negara Btn-7.9/2022	Pefindo	AA+	24,463	Bank Tabungan Negara Btn-7.9/2022	
PLN Tahap III Th 2019 Seri D	Pefindo	AAA	22,217	PLN Tahap III Th 2019 Seri D	
Bank BRI Tahap II Tahun 2017 Seri D	Pefindo	AAA	21,337	Bank BRI Tahap II Tahun 2017 Sr D	
Obligasi Pln Xii Tahun 2010 Seri B	Pefindo	AAA	21,303	Obligasi Pln Xii Tahun 2010 Seri B	
Ppgdij 7.95 Mat 08/0 Ppgdij-7.95C	Pefindo	idAAA	21,028	Ppgdij 7.95 Mat 08/0 Ppgdij-7.95C	
Bank BTN Tahap I Tahun 2017 Seri D	Pefindo	AA+	21,008	Bank BTN Tahap I Tahun 2017 Sr D	
Sarana Multigriya Finansial IV 2020 Sr B	Pefindo	AAA	20,807	Sarana Multigriya Finansial IV 2020 B	
Bank Cimb Niaga 8.15 Bngaij-8.15	Pefindo	idAAA	20,683	Bank Cimb Niaga 8.15 Bngaij-8.15	
Astra Sedaya Finance Tahap III 2019 Sr C	Pefindo	AAA	20,584	Astra Sedaya Finance III 2019 Sr C	
PNM Thp I Th 2017 Seri B	Pefindo	A+	20,487	PNM Thp I Th 2017 Seri B	
Bank Maybank Indonesia Tahap II Tahun 2018	Pefindo	AAA	20,472	Bank Maybank Indonesia II 2018	
Bank Tabungan Negara Btn-8B/8/21N	Pefindo	AA+	20,416	Bank Tabungan Negara Btn-8B/8/21N	
Sarana Multigriya Finansial III 2020 Sr B	Pefindo	AAA	20,401	Sarana Multigriya Finansial III 2020 B	
Bank PANIN 9.15 28/0 PNBNIJ-9.15	Pefindo	idAA	20,330	Bank PANIN 9.15 28/0 PNBNIJ-9.15	
Obligasi Bank DKI 9.25 BDKIUI-2021	Pefindo	idAA-	20,315	Obligasi Bank DKI 9.25 BDKIUI-2021	
Gerbang Nusantara 2016 Seri B	Pefindo	AA-	20,278	Gerbang Nusantara 2016 Seri B	
Adira Finance Tahap I Tahun 2020	Pefindo	AAA	20,166	Adira Finance Tahap I Tahun 2020	
Pegadaian Tahap III Tahun 2020 Seri A	Pefindo	AAA	20,017	Pegadaian Tahap III 2020 Seri A	
MTN Syariah Ijarah I Telkom 2018 Seri C	Pefindo	AAA	19,000	MTN Syariah Ijarah I Telkom 2018 C	
Mandiri Tunas Finance Tahap II 2019 Sr B	Pefindo	AA+	16,608	Mandiri Tunas Finance II 2019 Sr B	
Indosat Tahap IV Th 2016 Seri E	Pefindo	AAA	16,255	Indosat Tahap IV Th 2016 Seri E	
PLN Tahap I Tahun 2013	Pefindo	AAA	15,966	PLN Tahap I Tahun 2013	
Mandiri Tunas Finance Thp II 2017 Seri B	Pefindo	AA+	15,575	Mandiri Tunas Finance II 2017 Seri B	
Maybank Finance Tahap III 2016 Seri B	Pefindo	AA+	15,396	Maybank Finance III 2016 Seri B	
Mandiri Tunas Finance Tahap II 2016 Sr B	Pefindo	AA+	15,240	Mandiri Tunas Finance II 2016 Sr B	
Indosat Tahap I Th 2014 Seri D	Pefindo	AAA	14,705	Indosat Tahap I Th 2014 Seri D	
Mandiri Tunas Finance Tahap II 2019 Sr A	Pefindo	AA+	14,459	Mandiri Tunas Finance II 2019 Sr A	
Sukuk Ijarah Bkijt II XI Axiata Tahap II 2019 Seri C	Pefindo	AAA(idn)	13,641	Sukuk Ijarah Bkijt II XI Axiata II Tahap II 2019 Seri C	
PLN Tahap V Tahun 2019 Seri B	Pefindo	AAA	13,604	PLN Tahap V Tahun 2019 Seri B	
Telkom Tahap I Tahun 2015 Seri B	Pefindo	AAA	12,348	Telkom Tahap I Tahun 2015 Seri B	
Sukuk Ijarah Berkelanjutan II XI Axiata Tahap II Tahun 2019 Seri D	Pefindo	AAA	11,059	Sukuk Ijarah Berkelanjutan II XI Axiata Tahap II 2019 Seri D	
Bank CIMB Niaga Tahap IV 2018 Seri C	Pefindo	AAA	10,585	Bank CIMB Niaga IV 2018 Seri C	
Sukuk Ijarah Berkelanjutan II XI Axiata Tahap II Tahun 2019 Seri C	Pefindo	AAA	10,526	Sukuk Ijarah Berkelanjutan II XI Axiata Tahap II 2019 Seri C	
PLN Tahap I Tahun 2017 Seri C	Pefindo	AAA	10,447	PLN Tahap I Tahun 2017 Seri C	
Maybank Finance Thp IV Th 2017 Seri B	Pefindo	AA+	10,282	Maybank Finance Thp IV 2017 Seri B	
Bank Maybank 8.0 11/07/22	Pefindo	idAAA	10,259	Bank Maybank 8.0 11/07/22	
Adira Finance Tahap IV Tahun 2016 Seri C	Pefindo	AAA	10,218	Adira Finance Tahap IV 2016 Seri C	
Obligasi XV Bank BTN Tahun 2011	Pefindo	AA+	10,198	Obligasi XV Bank BTN 2011	
Sukuk Mudharabah Berkelanjutan I Sarana Multigriya Finansial II 2020	Pefindo	AAA(sy)	10,062	Sukuk Mudharabah Berkelanjutan I Sarana Multigriya Finansial II 2020	
Mandiri Tunas Finance Tahap I 2020 Seri A	Pefindo	AA+	10,027	Mandiri Tunas Finance I 2020 Seri A	
Bank Maybank 8.5 11/ BNIIJ-2024	Pefindo	idAAA	10,021	Bank Maybank 8.5 11/ BNIIJ-2024	
Indo Eximbank 6.35 BEXI14/2/21N	Pefindo	idAAA	10,014	Indo Eximbank 6.35 BEXI14/2/21N	
Pengadaan Tahap III Tahun 2020 Seri A	Pefindo	AAA	10,004	Pengadaan Tahap III 2020 Seri A	
Bank Tabungan Negara BTN-28/06/21	Pefindo	idAA+	8,157	Bank Tabungan Negara BTN-28/06/21	
Lainnya	Beragam/Various	Beragam/Various	229,407	Others	
Subtotal			7,567,361	Subtotal	
			11,310,195		

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

d. Berdasarkan peringkat (lanjutan)

d. By rating (continued)

31 Desember/December 2020					
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value			
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)			Fair value through other comprehensive income (continued)		
Mata uang asing			Foreign currencies		
Reksadana	-	3,353,354	Mutual Funds		
Obligasi			Bonds		
PT Pelindo PLBIIJ-II/25	S&P	BBB-	139,628	PT Pelindo PLBIIJ-II/25	
Bank Rakyat Indonesia BBRI-3.95	S&P	BBB-	75,499	Bank Rakyat Indonesia BBRI-3.95	
Pertamina 2023	S&P	BBB	72,874	Pertamina 2023	
Bank of America	Moody's	A2	69,243	Bank of America	
M&T Bank USA	Moody's	A3	68,318	M&T Bank USA	
Suntrust USA	Moody's	A3	67,370	Suntrust USA	
Corestates Cap III / Wells Fargo	Fitch	A+	65,570	Corestates Cap III / Wells Fargo	
PLN P.LISTRIK 5.375 PLNII-2029	S&P	BBB	64,331	PLN P.LISTRIK 5.375 PLNII-2029	
JP Morgan Chase USA	Moody's	Aa1	63,940	JP Morgan Chase USA	
Huntington USA	Moody's	A3	63,837	Huntington USA	
Lainnya	Beragam/Various	Beragam/Various	184	Others	
Subtotal		750,794	Subtotal		
		4,104,148			
Total nilai wajar pada penghasilan komprehensif lain			Total fair value through other comprehensive income		
		15,414,343			

31 Desember/December 2020					
Pemeringkat/ Agencies	Peringkat/ Rating	Nilai tercatat/ Carrying Value			
Biaya perolehan diamortisasi			Amortized cost		
Rupiah			Rupiah		
Obligasi			Bonds		
Sukuk Bank Indonesia	-	6,576,313	Sukuk Bank Indonesia		
PT Intan Baruprana Finance IBFI-17	Pefindo	255,389	PT Intan Baruprana Finance IBFI-17		
MTN Syariah Mudharabah			MTN Syariah Mudharabah		
Pegadaian I Tahun 2018	Pefindo	idAAA(sy)	250,000	Pegadaian I Tahun 2018	
MTN Syariah Mudharabah			100,000	MTN Syariah Mudharabah	
Bio Farma Tahun 2018	Pefindo	idAAA(sy)		Bio Farma Tahun 2018	
Sukuk Mudharabah Berkelanjutan				Sukuk Mudharabah Berkelanjutan	
I Sarana Multi Infrastruktur Th I				I Sarana Multi Infrastruktur Th I	
Th 2018 Seri A	Pefindo	idAAA(sy)	50,000	Th 2018 Seri A	
MTN Syariah Mudharabah I				MTN Syariah Mudharabah I	
Kimia Farma Tahun 2019	Pefindo	idAAA(sy)	40,000	Kimia Farma Tahun 2019	
Sukuk Mudharabah Berkelanjutan				Sukuk Mudharabah Berkelanjutan	
I Indonesia Eximbank Tahap I				I Indonesia Eximbank Tahap I	
Tahun 2018 Seri B	Pefindo	idAAA(sy)	20,000	Tahun 2018 Seri B	
Sukuk Ijarah Berkelanjutan				Sukuk Ijarah Berkelanjutan	
II XL Axiata Tahap I				II XL Axiata Tahap I	
Tahun 2018 Seri B	Pefindo	idAA(sy)	18,000	Tahun 2018 Seri B	
Lainnya	Beragam/Various	Beragam/Various	11,013	Others	
Subtotal		7,320,715	Subtotal		
Total efek-efek			Total marketable securities		
Cadangan kerugian penurunan nilai			Allowance for impairment losses		
Efek-efek - bersih			Marketable securities - net		

Underlying aset utama dari reksa dana yang dimiliki oleh Grup adalah deposito berjangka dan Obligasi Pemerintah.

The main underlying assets of the Group's mutual funds consist of time deposits and Government Bonds.

e. Berdasarkan kolektibilitas Bank Indonesia

e. By Bank Indonesia collectibility

2021		2020			
Pokok/ Principal	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	Pokok/ Principal	Cadangan kerugian penurunan nilai/ Allowance for impairment losses		
Lancar	25,483,291	-	29,425,303	(4,830)	Current
Kurang lancar	319,671	-	266,124	-	Substandard
Macet	250,048	(250,048)	255,389	(255,389)	Loss
26,053,010	(250,048)	29,946,816	(260,219)		

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8. EFEK-EFEK (lanjutan)

8. MARKETABLE SECURITIES (continued)

**f. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai**

**f. Gross carrying amount and allowance for
impairment losses**

Perubahan nilai tercatat bruto adalah sebagai
berikut:

Movements in the gross carrying amount are
as follows:

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi					Marketable securities at amortized cost
Saldo awal	6,013	-	255,390	7,059,312	7,320,715
Pembayaran penuh	(9)	-	(5,342)	-	(5,351)
Valuta asing dan perubahan lain	-	-	-	-	-
Dampak kehilangan pengendalian*)	-	-	-	(7,059,312)	(7,059,312)
	6,004	-	250,048	-	256,052

*) Lihat Catatan 1

Refer to Note 1*)

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					Marketable securities at fair value through other comprehensive income
Saldo awal	15,133,011	281,332	-	-	15,414,343
Pengukuran kembali bersih penyisihan kerugian	561,102	(73)	-	-	561,029
Aset keuangan baru yang diterbitkan atau dibeli	539,965	-	-	-	539,965
Pembayaran penuh	(299,564)	-	-	-	(299,564)
Valuta asing dan perubahan lain	4,901	4,056	-	-	8,957
	15,939,415	285,315	-	-	16,224,730

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi					Marketable securities at amortized cost
Saldo awal	33,971	-	263,675	1,386,074	1,683,720
Pengukuran kembali bersih penyisihan kerugian	-	-	-	5,673,238	5,673,238
Pembayaran kembali	(27,958)	-	(8,285)	-	(36,243)
	6,013	-	255,390	7,059,312	7,320,715

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8. EFEK-EFEK (lanjutan)

**f. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai (lanjutan)**

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

8. MARKETABLE SECURITIES (continued)

**f. Gross carrying amount and allowance for
impairment losses (continued)**

Movements in the gross carrying amount are as follows: (continued)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					Marketable securities at fair value through other comprehensive income
Saldo awal	16,783,445	297,710	-	36,020	17,117,175
Pengalihan ke:					beginning balance
- Kerugian kredit ekspektasian 12 bulan	77,042	(77,042)	-	-	Transfer to:
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(57,748)	57,748	-	-	12-month ECL-
Pengukuran kembali bersih penyisihan kerugian	(2,389,532)	97	-	(2,389,435)	Lifetime ECL not credit - impaired
Aset keuangan baru yang diterbitkan atau dibeli	910,007	-	-	910,007	Net remeasurement of loss allowance
Pembayaran kembali	(210,931)	-	-	(246,951)	New financial assets originated or purchased
Valuta asing dan perubahan lain	20,728	2,819	-	23,547	Repayment
					Foreign exchange and other movements
	15,133,011	281,332	-	-	15,414,343

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

Movements in the allowance for impairment losses are as follows:

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Efek-efek yang diukur pada biaya perolehan diamortisasi					Marketable securities at amortized cost
Saldo awal	-	255,389	4,830	260,219	Beginning balance
Pembayaran penuh	-	(5,341)	-	(5,341)	Fully repayment
Valuta asing dan perubahan lain	-	-	-	-	Foreign exchange and other movements
Dampak kehilangan Pengendalian*)	-	-	(4,830)	(4,830)	Impact of loss of control*)
	-	250,048	-	250,048	

^{*)}Lihat Catatan 1

^{*)} Refer to Note 1

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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)

31 Desember/December 2021						
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	Syariah/ Sharia	Total/Total**)		Marketable securities at fair value through other comprehensive income
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain						Beginning balance
Saldo awal	10,247	5,165	-	-	15,412	Net remeasurement of loss allowance
Pengukuran kembali bersih penyisihan kerugian	(3,414)	(885)	-	-	(4,299)	New financial assets originated or purchased
Aset keuangan baru yang diterbitkan atau dibeli	225	-	-	-	225	Fully repayment
Pembayaran penuh	(193)	-	-	-	(193)	Foreign exchange and other movements
Valuta asing dan perubahan lain	5	77	-	-	82	
	6,870	4,357	-	-	11,227	

*) 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,
because the carrying value is presented at fair value.

31 Desember/December 2020						
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	Syariah/ Sharia	Total/Total		Marketable securities at amortized cost
Efek-efek yang diukur pada biaya perolehan diamortisasi						Beginning balance
Saldo awal	-	-	263,675	28,906	292,581	Net remeasurement of loss allowance
Pengukuran kembali bersih penyisihan kerugian	-	-	-	(24,592)	(24,592)	Repayment
Pembayaran kembali	-	-	(8,286)	-	(8,286)	Foreign exchange and other movements
Valuta asing dan perubahan lain	-	-	-	516	516	
	-	-	255,389	4,830	260,219	

31 Desember/December 2020						
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	Syariah/ Sharia	Total/Total*)		Marketable securities at fair value through other comprehensive income
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain						Beginning balance
Saldo awal	-	-	-	-	-	Transfer to:
Pengalihan ke:						12-month ECL-
- Kerugian kredit ekspektasian 12 bulan	64	(64)	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(126)	126	-	-	-	Net remeasurement of loss allowance
Pengukuran kembali bersih penyisihan kerugian	11,959	5,132	-	-	17,091	New financial assets originated or purchased
Aset keuangan baru yang diterbitkan atau dibeli	778	-	-	-	778	Repayment
Pembayaran kembali	(2,429)	(29)	-	-	(2,458)	Foreign exchange and other movements
Valuta asing dan perubahan lain	1	-	-	-	1	
	10,247	5,165	-	-	15,412	

*) 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,
because the carrying value is presented at fair value.

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f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

g. Tingkat suku bunga per tahun

8. MARKETABLE SECURITIES (continued)

f. Gross carrying amount and allowance for impairment losses (continued)

Management believes that the allowance for impairment losses is adequate.

g. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	Yen Jepang/ Japanese Yen %	
Suku Bunga :				Interest Rate:
2021	4.75 - 12.90	0.16 - 5.63	0.30 - 0.92	2021
2020	6.35 - 11.25	0.79 - 5.50	0.30 - 0.92	2020

9. WESEL EKSPOR DAN TAGIHAN LAINNYA

a. Berdasarkan jenis dan mata uang

	2021	2020
Rupiah		
Surat Keterangan Berdokumen		
Dalam Negeri (SKBDN)	722,713	640,999
Wesel Ekspor	602,116	756,807
Tagihan lainnya:		
- Open account financing dan		
Supply chain financing	11,217,690	11,819,775
	12,542,519	13,217,581
Mata uang asing		
Wesel Ekspor	4,654,824	2,694,789
Surat Keterangan Berdokumen		
Dalam Negeri (SKBDN)	251	18,473
Tagihan lainnya:		
- Open account financing dan		
Supply chain financing	2,261,766	1,666,195
- Tagihan transaksi L/C Sight	506,576	419,397
	7,423,417	4,798,854
Total	19,965,936	18,016,435
Cadangan kerugian		
penurunan nilai	(402,618)	(122,901)
	19,563,318	17,893,534

9. BILLS AND OTHER RECEIVABLES

a. By type and currency

Rupiah
Domestic Documentary
Letters of Credit
Export Bills
Other receivables:
Open account financing and -
Supply chain financing
Foreign currencies
Export Bills
Domestic Documentary
Letters of Credit
Other receivables:
Open account financing and -
Supply chain financing
L/C Sight receivables -
Total
Allowance for
impairment losses

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**9. WESEL EKSPOR DAN TAGIHAN LAINNYA
(lanjutan)**

9. BILLS AND OTHER RECEIVABLES (continued)

a. Berdasarkan jenis dan mata uang (lanjutan)

a. 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:

	2021	2020
Rupiah	12,542,519	13,217,581
Mata uang asing		
Dolar Amerika Serikat	7,300,820	4,798,854
Yuan China	119,710	-
Yen Jepang	2,887	-
	7,423,417	4,798,854
Total	19,965,936	18,016,435
Cadangan kerugian penurunan nilai	(402,618)	(122,901)
	19,563,318	17,893,534

Rupiah
Foreign currencies
United States Dollar
Chinese Yuan
Japanese Yen

Total
Allowance for
impairment losses

b. Berdasarkan hubungan

b. By relationship

	2021	2020
Pihak berelasi		
Rupiah	10,095,576	10,646,028
Mata uang asing	-	7,219
Total pihak berelasi	10,095,576	10,653,247
Pihak ketiga		
Rupiah	2,446,943	2,571,553
Mata uang asing	7,423,417	4,791,635
Total pihak ketiga	9,870,360	7,363,188
Total	19,965,936	18,016,435
Cadangan kerugian penurunan nilai	(402,618)	(122,901)
	19,563,318	17,893,534

Related parties
Rupiah
Foreign currencies
Total related parties

Third parties
Rupiah
Foreign currencies
Total third parties

Total
Allowance for
impairment losses

c. Berdasarkan kolektibilitas

c. By collectibility

	2021	2020
	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	Cadangan kerugian penurunan nilai/ Allowance for impairment losses
	Pokok/ Principal	Pokok/ Principal
Lancar	19,912,490	17,962,990
Macet	53,446	53,445
	19,965,936	18,016,435
	(349,172)	(100,430)
	(53,446)	(22,471)
	(402,618)	(122,901)

Current
Loss

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**9. WESEL EKSPOR DAN TAGIHAN LAINNYA
(lanjutan)**

9. BILLS AND OTHER RECEIVABLES (continued)

**d. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai**

Perubahan nilai tercatat bruto adalah sebagai berikut:

**d. Gross carrying amount and allowance for
impairment losses**

Movements in the gross carrying amount are as follows:

31 Desember/December 2021						
	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	Syariah/ Sharia	Total/Total	
Wesel ekspor dan tagihan lainnya						Bill and other receivables
Saldo awal	10,955,418	7,007,571	53,446	-	18,016,435	Beginning balance
Pengalihan dari						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(778,831)	778,831	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya – tidak mengalami penurunan nilai	971,376	(971,376)	-	-	-	Lifetime ECL not credit - impaired
Pengalihan ke kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	(215,366)	-	215,366	-	-	Transfer to lifetime ECL credit - impaired
Pengukuran kembali bersih penyisihan kerugian	13,829,128	2,790,644	(177,859)	-	16,441,913	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	2,990,975	232,250	39,671	-	3,262,896	New financial assets originated or purchased
Pembayaran penuh	(12,687,280)	(5,053,510)	(76,952)	-	(17,817,742)	Fully repayment
Valuta asing dan perubahan lain	54,995	7,665	(226)	-	62,434	Foreign exchange and other movements
	15,120,415	4,792,075	53,446	-	19,965,936	
31 Desember/December 2020						
	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	Syariah/ Sharia	Total/Total	
Wesel ekspor dan tagihan lainnya						Bill and other receivables
Saldo awal	15,635,815	3,660,192	53,674	-	19,349,681	Beginning balance
Pengalihan ke						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	(8,776,911)	8,776,911	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya – tidak mengalami penurunan nilai	5,482,192	(5,482,192)	-	-	-	Lifetime ECL not credit - impaired
Pengukuran kembali bersih penyisihan kerugian	12,486,541	610,198	-	-	13,096,739	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	933,273	-	-	-	933,273	New financial assets originated or purchased
Pembayaran kembali	(14,854,369)	(497,259)	(228)	-	(15,351,856)	Repayment
Valuta asing dan perubahan lain	48,877	(60,279)	-	-	(11,402)	Foreign exchange and other movements
	10,955,418	7,007,571	53,446	-	18,016,435	

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**9. WESEL EKSPOR DAN TAGIHAN LAINNYA
(lanjutan)**

9. BILLS AND OTHER 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:

Movements in the allowance for impairment
losses are as follows:

31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Wesel ekspor dan tagihan lainnya						Bill and other receivables
Saldo awal	58,930	69,736	(5,765)	-	122,901	Beginning balance
Pengalihan dari						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(4,914)	4,914	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	4,940	(4,940)	-	-	-	Lifetime ECL not credit - impaired
Pengalihan ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(74)	-	74	-	-	Transfer from/to lifetime Lifetime ECL credit - impaired - net
Pengukuran kembali bersih penyisihan kerugian	53,981	223,942	73,056	-	350,979	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	11,822	3,522	16,655	-	31,999	New financial assets originated or purchased
Pembayaran penuh	(20,704)	(52,089)	(31,790)	-	(104,583)	Fully repayment
Penghapusbukuan	-	-	-	-	-	Write-offs
Valuta asing dan perubahan lain	(158)	264	1,216	-	1,322	Foreign exchange and other movements
	103,823	245,349	53,446	-	402,618	
31 Desember/December 2020						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Wesel ekspor dan tagihan lainnya						Bill and other receivables
Saldo awal	50,987	17,579	28,970	-	97,536	Beginning balance
Pengalihan ke						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	44,799	(44,799)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(8,367)	8,367	-	-	-	Lifetime ECL not credit - impaired
Pengukuran kembali bersih penyisihan kerugian	13,582	92,018	(9,417)	-	96,183	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	5,285	-	-	-	5,285	New financial assets originated or purchased
Pembayaran kembali	(47,620)	(3,101)	(25,318)	-	(76,039)	Repayment
Valuta asing dan perubahan lain	264	(328)	-	-	(64)	Foreign exchange and other movements
	58,930	69,736	(5,765)	-	122,901	

Manajemen berpendapat bahwa jumlah
cadangan kerugian penurunan nilai telah
memadai.

Management believes that the above
allowance for impairment losses is adequate.

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**9. WESEL EKSPOR DAN TAGIHAN LAINNYA
(lanjutan)**

9. BILLS AND OTHER RECEIVABLES (continued)

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	Euro Eropa/ European Euro %	Yuan China/ Chinese Yuan %	
2021	4.00 - 7.71	0.68 - 5.15	-	-	2021
2020	7.00 - 12.00	1.61 - 7.50	2.80 - 3.70	2.50 - 5.30	2020

10. TAGIHAN AKSEPTASI

10. ACCEPTANCE RECEIVABLES

a. Berdasarkan pihak dan mata uang

a. By party and currency

	2021	2020	
Rupiah			Rupiah
Debitur non-bank	14,529,448	16,220,765	Non-bank debtors
Bank	101,923	52,926	Banks
	<u>14,631,371</u>	<u>16,273,691</u>	
Mata uang asing			Foreign currencies
Debitur non-bank	6,879,954	4,805,475	Non-bank debtors
Bank	46,115	695,874	Banks
	<u>6,926,069</u>	<u>5,501,349</u>	
Total	21,557,440	21,775,040	Total
Cadangan kerugian penurunan nilai	(1,014,673)	(1,199,374)	Allowance for impairment losses
	<u>20,542,767</u>	<u>20,575,666</u>	

Perincian tagihan akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance receivables based on currencies are as follows:

	2021	2020	
Rupiah	14,631,371	16,273,691	Rupiah
Mata uang asing			Foreign currencies
Dolar Amerika Serikat	6,387,118	4,840,444	United States Dollar
Euro Eropa	377,788	545,249	European Euro
Dolar Singapura	64,237	19,715	Singapore Dollar
Pound Sterling Inggris	43,582	19,636	Great Britain Pound Sterling
Yen Jepang	32,440	66,704	Japanese Yen
Yuan China	9,445	4,543	Chinese Yuan
Dolar Australia	9,061	5,058	Australian Dollar
Franc Swiss	2,398	-	Swiss Franc
	<u>6,926,069</u>	<u>5,501,349</u>	
Total	21,557,440	21,775,040	Total
Cadangan kerugian penurunan nilai	(1,014,673)	(1,199,374)	Allowance for impairment losses
	<u>20,542,767</u>	<u>20,575,666</u>	

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10. TAGIHAN AKSEPTASI (lanjutan)

10. ACCEPTANCE RECEIVABLES (continued)

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah	3,530,885	6,261,436	Rupiah
Mata uang asing	2,952,002	1,394,546	Foreign currencies
Total pihak berelasi	6,482,887	7,655,982	Total related parties
Pihak ketiga			Third parties
Rupiah	11,100,486	10,012,255	Rupiah
Mata uang asing	3,974,067	4,106,803	Foreign currencies
Total pihak ketiga	15,074,553	14,119,058	Total third parties
Total	21,557,440	21,775,040	Total
Cadangan kerugian penurunan nilai	(1,014,673)	(1,199,374)	Allowance for impairment losses
	20,542,767	20,575,666	

c. Berdasarkan kolektibilitas

c. By collectibility

	2021		2020		
	<u>Pokok/ Principal</u>	<u>Cadangan kerugian penurunan nilai/ Allowance for impairment losses</u>	<u>Pokok/ Principal</u>	<u>Cadangan kerugian penurunan nilai/ Allowance for impairment losses</u>	
Lancar	20,217,253	(661,275)	18,639,259	(78,192)	Current
Dalam perhatian khusus	1,340,187	(353,398)	3,115,946	(1,108,836)	Special mention
Diragukan	-	-	19,835	(12,346)	Doubtful
	21,557,440	(1,014,673)	21,775,040	(1,199,374)	

**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:

	31 Desember/December 2021					
	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	Syariah/ Sharia	Total/Total	
Tagihan akseptasi						Acceptance receivables
Saldo awal	16,113,536	2,623,822	2,960,228	77,454	21,775,040	Beginning balance
Pengalihan dari:						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(7,150,355)	7,150,355	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	651,568	(651,568)	-	-	-	Lifetime ECL not credit impaired
Pengalihan dari/ke						
kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(1,639)	1,639	-	-	Transfer from/to Lifetime ECL credit - impaired - net
Pengukuran kembali bersih penyisihan kerugian	13,325,416	2,366,693	5,760,678	-	21,452,787	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	3,644,689	395,441	-	-	4,040,130	New financial assets originated or purchased
Pembayaran penuh	(14,163,618)	(3,951,402)	(7,542,362)	-	(25,657,382)	Fully repayment
Valuta asing dan perubahan lain	25,176	3,022	(3,879)	-	24,319	Foreign exchange and other movements
Dampak kehilangan pengendalian*)	-	-	-	(77,454)	(77,454)	Impact of loss of control*)
	12,446,412	7,934,724	1,176,304	-	21,557,440	

*) Lihat Catatan 1

Refer to Note 1*)

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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 nilai tercatat bruto adalah sebagai
berikut: (lanjutan)

Movements in the gross carrying amount are
as follows: (continued)

31 Desember/December 2020						
	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	Syariah/ Sharia	Total/Total	
Tagihan akseptasi						Acceptance receivables
Saldo awal	13,748,145	3,690,314	1,679,816	-	19,118,275	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	5,017,899	(5,017,899)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya – tidak mengalami penurunan nilai	(5,300,324)	5,300,324	-	-	-	Lifetime ECL credit - -not impaired
- Kerugian kredit ekspektasian sepanjang umurnya – mengalami penurunan nilai	-	(84,008)	84,008	-	-	Lifetime ECL credit - -impaired
Pengukuran kembali bersih penyisihan kerugian	13,296,829	(78,244)	3,440,554	-	16,659,139	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	6,391,588	61,993	-	77,454	6,531,035	New financial assets originated or purchased
Pembayaran kembali	(15,503,018)	(1,206,629)	(2,280,877)	-	(18,990,524)	Repayment
Valuta asing dan perubahan lain	(1,537,583)	(42,029)	36,727	-	(1,542,885)	Foreign exchange and other movements
	16,113,536	2,623,822	2,960,228	77,454	21,775,040	

Perubahan cadangan kerugian penurunan nilai
adalah sebagai berikut:

The movements in the allowance for
impairment losses are as follows:

31 Desember/December 2021						
	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	Syariah/ Sharia	Total/Total	
Tagihan akseptasi						Acceptance receivables
Saldo awal	65,377	18,100	1,115,114	783	1,199,374	Beginning balance
Pengalihan dari:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	(50,701)	50,701	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya – kredit tidak memburuk	90,870	(90,870)	-	-	-	Lifetime ECL credit - -not impaired
- Kerugian kredit ekspektasian sepanjang umurnya – kredit memburuk	-	20,614	(20,614)	-	-	Lifetime ECL credit-impaired -
Pengukuran kembali bersih penyisihan kerugian	(48,274)	853,558	1,626,786	-	2,432,070	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	23,544	3,218	-	-	26,762	New financial assets originated or purchased
Pembayaran penuh	(42,633)	(101,755)	(2,498,793)	-	(2,643,181)	Fully repayment
Valuta asing dan perubahan lain	(60)	(94)	585	-	431	Foreign exchange and other movements
Dampak kehilangan pengendalian*)	-	-	-	(783)	(783)	Impact of loss of control*)
	38,123	753,472	223,078	-	1,014,673	

*) Lihat Catatan 1

Refer Note 1*)

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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)

	31 Desember/December 2020					
	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	Syariah/ Sharia	Total/Total	
Tagihan akseptasi						Acceptance receivables
Saldo 1 Januari	36,965	4,903	599,798	-	641,666	Balance at 1 January
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	39,687	(39,687)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(12,816)	12,816	-	-	-	Lifetime ECL credit - -not impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	-	(9,642)	9,642	-	-	Lifetime ECL credit - -impaired
Pengukuran kembali bersih penyisihan kerugian	41,994	70,706	860,839	-	973,539	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	9,761	511	-	783	11,055	New financial assets originated or purchased
Pembayaran kembali	(50,776)	(21,520)	(383,333)	-	(455,629)	Repayment
Valuta asing dan perubahan lain	562	13	28,168	-	28,743	Foreign exchange and other movements
	65,377	18,100	1,115,114	783	1,199,374	

Manajemen berpendapat bahwa jumlah
cadangan kerugian penurunan nilai telah
memadai.

Management believes that the above
allowance for impairment losses is adequate.

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11. TAGIHAN DAN LIABILITAS DERIVATIF

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.

a. Berdasarkan jenis dan mata uang

11. DERIVATIVE RECEIVABLES AND PAYABLES

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. By type and currency

31 Desember/December 2021				
Instrumen	Jumlah nosional mata uang asing (jumlah penuh)/ <i>Notional amount in foreign currency (full amount)</i>	Nilai wajar/ <i>Fair values</i>		Instruments
		Tagihan derivatif/ <i>Derivative receivables</i>	Liabilitas derivatif/ <i>Derivative payables</i>	
Terkait Nilai Tukar				
Kontrak berjangka - beli				<i>Exchange Rate Related</i> <i>Forward contract - buy</i>
USD	113,692,000	418	(10,876)	USD
Kontrak berjangka - jual				<i>Forward contract - sell</i>
USD	203,494,247	10,149	(1,170)	USD
Swap mata uang asing - beli				<i>Foreign currency swaps - buy</i>
EUR	396,204	1	(34)	EUR
USD	897,705,593	5,342	(66,598)	USD
Swap mata uang asing - jual				<i>Foreign currency swaps - sell</i>
EUR	31,000,000	71	(18)	EUR
GBP	8,000,000	-	(883)	GBP
USD	2,490,090,459	445,133	(5,733)	USD
Spot mata uang asing - beli				<i>Foreign currency spots - buy</i>
EUR	7,520,000	-	(232)	EUR
GBP	1,050,000	8	-	GBP
USD	60,286,000	284	(595)	USD
Spot mata uang asing - jual				<i>Foreign currency spots - sell</i>
EUR	1,150,000	28	(3)	EUR
USD	68,810,000	1,048	(182)	USD
Terkait Nilai Tukar dan Suku Bunga				
Swap atas suku bunga				<i>Exchange and Interest Rate Related</i> <i>Interest rate swap</i>
USD	468,026,229	31,471	(23,398)	USD
Swap mata uang asing dan suku bunga				<i>Cross currency swaps and interest rate</i>
USD	699,842	230	(226)	USD
		494,183	(109,948)	

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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)

31 Desember/December 2020				
Instrumen	Jumlah nosional mata uang asing (jumlah penuh)/ <i>Notional amount in foreign currency (full amount)</i>	Nilai wajar/ <i>Fair values</i>		<i>Instruments</i>
		Tagihan derivatif/ <i>Derivative receivables</i>	Liabilitas derivatif/ <i>Derivative payables</i>	
Terkait Nilai Tukar				
Kontrak berjangka - beli				<i>Exchange Rate Related</i> <i>Forward contract - buy</i>
USD	234,259,900	-	(243,504)	USD
Kontrak berjangka - jual				<i>Forward contract - sell</i>
EUR	926,440	568	-	EUR
USD	217,639,471	108,816	-	USD
Swap mata uang asing - beli				<i>Foreign currency swaps - buy</i>
EUR	21,903,488	11,274	(1)	EUR
USD	684,779,500	185	(98,315)	USD
Swap mata uang asing - jual				<i>Foreign currency swaps - sell</i>
AUD	15,000,000	-	(576)	AUD
EUR	79,850,000	73	(23,041)	EUR
USD	1,484,784,471	1,283,345	-	USD
Spot mata uang asing - beli				<i>Foreign currency spots - buy</i>
EUR	1,500,000	-	(31)	EUR
GBP	10,000,000	-	(294)	GBP
USD	22,700,000	5	(897)	USD
Spot mata uang asing - jual				<i>Foreign currency spots - sell</i>
GBP	10,000,000	26		GBP
USD	72,400,000	2,657	(142)	USD
Terkait Nilai Tukar dan Suku Bunga				
<i>Exchange and Interest Rate Related</i>				
Swap atas suku bunga				<i>Interest rate swap</i>
USD	238,026,229	45,878	(40,454)	USD
Swap mata uang asing dan suku bunga				<i>Cross currency swaps and interest rate</i>
USD	37,275,585	7,787	(7,025)	USD
		1,460,614	(414,280)	

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Tagihan derivatif			Derivatives receivables
Pihak berelasi			Related parties
Mata uang asing	29,948	139,757	Foreign currencies
Pihak ketiga			Third parties
Mata uang asing	464,235	1,320,857	Foreign currencies
Total	494,183	1,460,614	Total
Liabilitas derivatif			Derivatives payables
Pihak berelasi			Related parties
Mata uang asing	(12,277)	(55,108)	Foreign currencies
Pihak ketiga			Third parties
Mata uang asing	(97,671)	(359,172)	Foreign currencies
Total	(109,948)	(414,280)	Total

Berdasarkan hasil penelaahan dan evaluasi manajemen Bank, seluruh tagihan derivatif pada tanggal 31 Desember 2021 dan 2020 digolongkan lancar.

Based on the Bank's management review and evaluation, all derivative receivables as of 31 December 2021 and 2020 are classified as current.

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12. PINJAMAN YANG DIBERIKAN

Informasi mengenai pinjaman yang diberikan kepada pihak-pihak berelasi diungkapkan pada Catatan 46j.

12. LOANS

Information related to loans to related parties are disclosed in Note 46j.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2021	2020	
Rupiah			Rupiah
Modal kerja	236,068,627	224,708,054	Working capital
Investasi	106,256,507	110,375,838	Investment
Konsumen	95,173,361	103,339,788	Consumer
Sindikasi	27,528,283	39,061,067	Syndicated
Karyawan	3,922,764	4,165,944	Employee
Program pemerintah	127,594	165,037	Government programs
	<u>469,077,136</u>	<u>481,815,728</u>	
Mata uang asing			Foreign currencies
Modal kerja	75,350,577	66,915,718	Working capital
Investasi	25,629,217	24,613,324	Investment
Sindikasi	12,212,694	12,715,538	Syndicated
Konsumen	161,749	142,171	Consumer
Karyawan	4,857	4,308	Employee
	<u>113,359,094</u>	<u>104,391,059</u>	
Total	582,436,230	586,206,787	Total
Cadangan kerugian penurunan nilai	(50,294,886)	(44,227,986)	Allowance for impairment losses
	<u>532,141,344</u>	<u>541,978,801</u>	

Perincian pinjaman yang diberikan berdasarkan mata uang adalah sebagai berikut:

Loans based on currencies are as follows:

	2021	2020	
Rupiah	469,077,136	481,815,728	Rupiah
Mata uang asing			Foreign currencies
Dolar Amerika Serikat	110,569,955	101,515,897	United States Dollar
Yen Jepang	1,218,250	1,085,357	Japanese Yen
Euro Eropa	780,585	727,139	European Euro
Won Korea Selatan	353,410	284,826	South Korean Won
Yuan China	299,519	653,461	Chinese Yuan
Dolar Hong Kong	111,063	96,704	Hong Kong Dollar
Dolar Singapura	19,875	21,303	Singapore Dollar
Pound Sterling Inggris	6,437	6,372	Great Britain Pound Sterling
	<u>113,359,094</u>	<u>104,391,059</u>	
Total	582,436,230	586,206,787	Total
Cadangan kerugian penurunan nilai	(50,294,886)	(44,227,986)	Allowance for impairment losses
	<u>532,141,344</u>	<u>541,978,801</u>	

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah			Rupiah
Modal kerja	56,239,889	63,846,829	Working capital
Sindikasi	22,226,132	29,681,763	Syndicated
Investasi	5,645,181	9,935,385	Investment
Konsumen	87,928	119,436	Consumer
Karyawan	74,076	100,416	Employee
	84,273,206	103,683,829	
Mata uang asing			Foreign currencies
Modal kerja	10,861,971	5,801,631	Working capital
Sindikasi	1,859,271	2,229,464	Syndicated
Investasi	559,602	1,192,516	Investment
	13,280,844	9,223,611	
Total pihak berelasi	97,554,050	112,907,440	Total related parties
Pihak ketiga			Third parties
Rupiah			Rupiah
Modal kerja	179,828,738	160,861,225	Working capital
Investasi	100,611,326	100,440,453	Investment
Konsumen	95,085,433	103,220,352	Consumer
Sindikasi	5,302,151	9,379,304	Syndicated
Karyawan	3,848,688	4,065,528	Employee
Program pemerintah	127,594	165,037	Government programs
	384,803,930	378,131,899	
Mata uang asing			Foreign currencies
Modal kerja	64,488,606	61,114,087	Working capital
Investasi	25,069,615	23,420,808	Investment
Sindikasi	10,353,423	10,486,074	Syndicated
Konsumen	161,749	142,171	Consumer
Karyawan	4,857	4,308	Employee
	100,078,250	95,167,448	
Total pihak ketiga	484,882,180	473,299,347	Total third parties
Total	582,436,230	586,206,787	Total
Cadangan kerugian penurunan nilai	(50,294,886)	(44,227,986)	Allowance for impairment losses
	532,141,344	541,978,801	

c. Berdasarkan sektor ekonomi

c. By economic sector

	2021	2020	
Rupiah			Rupiah
Perdagangan, restoran dan hotel	92,014,646	89,552,132	Trading, restaurants and hotels
Perindustrian	68,720,712	72,327,935	Manufacturing
Pertanian	55,717,884	58,548,593	Agriculture
Konstruksi	54,699,273	51,190,484	Construction
Jasa dunia usaha	34,758,985	37,321,876	Business services
Pengangkutan, pergudangan dan komunikasi	32,715,436	30,364,747	Transportation, warehousing and communications
Jasa pelayanan sosial	18,646,982	20,850,232	Social services
Pertambangan	6,127,907	5,625,247	Mining
Listrik, gas dan air	5,971,716	8,005,271	Electricity, gas and water
Lain-lain	99,703,595	108,029,211	Others
	469,077,136	481,815,728	

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

c. Berdasarkan sektor ekonomi (lanjutan)

c. By economic sector (continued)

	2021	2020	
Mata uang asing			Foreign currencies
Perindustrian	53,275,895	38,635,139	Manufacturing
Listrik, gas dan air	14,329,374	15,338,970	Electricity, gas and water
Pengangkutan, pergudangan dan komunikasi	10,294,387	10,163,684	Transportation, warehousing and communications
Perdagangan, restoran dan hotel	9,661,449	8,226,524	Trading, restaurants and hotels
Pertambangan	9,557,197	9,604,360	Mining
Jasa dunia usaha	8,200,225	12,804,551	Business services
Pertanian	3,712,387	3,847,153	Agriculture
Jasa pelayanan sosial	2,278,062	2,735,253	Social services
Konstruksi	510,578	732,515	Construction
Lain-lain	1,539,540	2,302,910	Others
	113,359,094	104,391,059	
Total	582,436,230	586,206,787	Total
Cadangan kerugian penurunan nilai	(50,294,886)	(44,227,986)	Allowance for impairment losses
	532,141,344	541,978,801	

d. Berdasarkan penilaian secara kolektif dan individual

d. By assessment as collective and individual

	2021	2020	
Pokok			Principal
Individual	77,809,184	58,497,026	Individual
Kolektif	504,627,046	527,709,761	Collective
	582,436,230	586,206,787	
Cadangan kerugian penurunan nilai			Allowance for impairment losses
Individual	(39,047,140)	(32,006,262)	Individual
Kolektif	(11,247,746)	(12,221,724)	Collective
	(50,294,886)	(44,227,986)	
	532,141,344	541,978,801	

e. Berdasarkan kolektibilitas Bank Indonesia

e. By Bank Indonesia collectibility

	2021	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	2020	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	
	Pokok/ Principal		Pokok/ Principal		
Lancar	533,438,860	(17,557,712)	532,514,659	(11,541,893)	Current
Dalam perhatian khusus	27,469,565	(15,455,383)	29,062,284	(13,779,071)	Special mention
Kurang lancar	4,113,774	(3,202,723)	9,320,499	(7,044,918)	Substandard
Diragukan	2,346,329	(1,889,092)	3,490,266	(2,520,742)	Doubtful
Macet	15,067,702	(12,189,976)	11,819,079	(9,341,362)	Loss
	582,436,230	(50,294,886)	586,206,787	(44,227,986)	

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

f. Pinjaman bermasalah dan cadangan kerugian penurunan nilai berdasarkan sektor ekonomi

f. Non-performing loans and allowance for impairment losses by economic sector

	2021		2020		
	Pokok/ Principal	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	Pokok/ Principal	Cadangan kerugian penurunan nilai/ Allowance for impairment losses	
Perdagangan, restoran dan hotel	7,226,635	(5,752,409)	6,925,551	(5,377,981)	Trading, restaurants and hotels
Perindustrian	6,390,417	(5,718,118)	8,207,291	(6,659,422)	Manufacturing
Jasa dunia usaha	1,445,318	(940,907)	898,906	(647,107)	Business services
Konstruksi	1,434,742	(1,118,429)	1,226,174	(893,489)	Construction
Pertanian	813,180	(444,403)	1,368,557	(1,022,503)	Agriculture
Pertambangan	759,926	(668,991)	1,200,605	(1,001,814)	Mining
Listrik, gas dan air	524,209	(520,414)	532,500	(338,426)	Electricity, gas and water
Jasa pelayanan sosial	336,149	(248,040)	358,823	(218,624)	Social services
Pengangkutan, pergudangan dan komunikasi	333,554	(227,656)	1,157,116	(917,484)	Transportation, warehousing and communications
Lain-lain	2,263,675	(1,642,424)	2,754,321	(1,830,172)	Others
	21,527,805	(17,281,791)	24,629,844	(18,907,022)	

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 2021 dan 2020 masing-masing sebesar 3,70% dan 4,20% (rasio untuk BNI saja 3,70% dan 4,25% masing-masing pada tanggal 31 Desember 2021 dan 2020), sedangkan rasio kredit bermasalah BNI dan Entitas Anak secara neto pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar 0,73% dan 0,98% (rasio untuk BNI saja 0,73% dan 0,95% masing-masing pada tanggal 31 Desember 2021 dan 2020).

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 2021 and 2020 were 3.70% and 4.20%, respectively (the ratios for BNI only were 3.70% and 4.25% as 31 December 2021 and 2020, respectively), while the non-performing loans ratio of BNI and Subsidiaries on a net basis as of 31 December 2021 and 2020 were 0.73% and 0.98%, respectively (the ratios for BNI only were 0.73% and 0.95% as 31 December 2021 and 2020, respectively).

g. Tingkat suku bunga per tahun

g. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	Yuan Cina/ Chinese Yuan %	Yen Jepang/ Japanese Yen %	
Bunga kontrak					Contractual rates
2021	5.00 - 24.00	0.02 - 8.50	4.00 - 7.00	0.50 - 2.09	2021
2020	5.50 - 38.50	1.13 - 11.00	7.00	0.50 - 2.06	2020
Bunga efektif					Effective interest rate
2021	5.99 - 51.48	1.13 - 13.00	6.50	0.50 - 2.09	2021
2020	6.00 - 43.20	1.13 - 12.49	7.00	0.50 - 2.06	2020

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

h. Pinjaman yang direstrukturisasi

Berikut ini adalah jenis dan jumlah kredit yang telah direstrukturisasi per 31 Desember 2021 dan 2020:

	2021
Perpanjangan jangka waktu	33,912,027
Penurunan suku bunga kredit	34,983,766
Lainnya*)	54,033,048
	122,928,841

*) Program restrukturisasi lain-lain terutama terdiri dari penambahan fasilitas kredit, Perjanjian Penyelesaian Hutang (PPH) dan *Interest Balloon Payments (IBP)*.

Jumlah kredit yang telah direstrukturisasi dan dalam kategori kredit bermasalah pada tanggal 31 Desember 2021 dan 2020 adalah masing-masing sebesar Rp11.294.115 dan Rp12.673.131.

BNI telah melakukan restrukturisasi kredit untuk debitur yang terdampak pandemi Covid-19 sesuai dengan POJK No. 11/POJK.03/2020, "Stimulus Perekonomian Nasional sebagai kebijakan *countercyclical* Dampak Penyebaran *Coronavirus Disease 2019*" tertanggal 13 Maret 2020.

Sehubungan dengan kepatuhan terhadap Otoritas Jasa Keuangan (OJK), Bank menerapkan Peraturan OJK No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang "Penilaian Kualitas Aset Bank Umum" yang kemudian diubah dengan Peraturan OJK No. 48/POJK.03/2020 tentang "Perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional sebagai kebijakan *countercyclical* dampak penyebaran *Corona Virus Disease 2019*" tanggal 3 Desember 2020.

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 Rp39.740.977 dan Rp51.776.605 masing-masing pada tanggal 31 Desember 2021 dan 2020.

h. Restructured loans

Below are the types and amounts of restructured loans as of 31 December 2021 and 2020:

	2021	2020	
Perpanjangan jangka waktu	33,912,027	45,581,922	<i>Extension of loan maturity dates</i>
Penurunan suku bunga kredit	34,983,766	32,359,550	<i>Reduction of interest rates</i>
Lainnya*)	54,033,048	70,996,797	<i>Others*)</i>
	122,928,841	148,938,269	

*) *Other restructuring scheme mainly includes additions of loan facilities, debt settlement agreements (PPH) and Interest Balloon Payments (IBP).*

Restructured loans and those categorized as non-performing loan amounted to Rp11,294,115 and Rp12,673,131 as of 31 December 2021 and 2020, respectively.

BNI has restructured credit for debtors affected by the Covid-19 pandemic in accordance with POJK No. 11/POJK.03/2020, "National Economic Stimulus as countercyclical Policy Impact of Coronavirus Disease spread 2019" dated 13 March 2020.

In compliance with Financial Service Authority (OJK), the Bank implements OJK Regulation No. 40/POJK.03/2019 dated 19 December 2019 regarding "Assessment of Commercial Banks' Asset Quality" which amended subsequently by OJK Regulation No. 48/POJK.03/2020 regarding "Amendment on Financial Service Authority Regulation No. 11/POJK.03/2020 regarding National Economic Stimulus as countercyclical policy impact of Corona virus Disease Spread 2019" dated 3 December 2020.

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 Rp39,740,977 and Rp51,776,605 as of 31 December 2021 and 2020, respectively.

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

i. Pinjaman sindikasi (lanjutan)

i. Syndicated loans (continued)

Persentase bagian BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai pimpinan sindikasi adalah sebagai berikut

BNI's percentage shares in syndicated loans, in which BNI acts as the lead arranger, is as follows:

	2021	2020	
% Partisipasi	5.04% - 83.30%	5.04% - 83.30%	% Participation

Keikutsertaan BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai anggota sindikasi adalah sebagai berikut:

BNI's participation in syndicated loans, in which BNI acts as the syndication member, is as follows:

	2021	2020	
% Partisipasi	0.04% - 66.58%	4.40% - 66.58%	% Participation

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

j. Gross carrying amount and allowance for impairment losses

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	31 Desember/December 2021					
	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	Syariah/ Sharia	Total/Total	
Pinjaman yang diberikan						Loans
Saldo awal	446,363,559	72,797,258	33,945,652	33,100,318	586,206,787	<i>Beginning balance</i>
Pengalihan dari:						<i>Transfer from:</i>
- Kerugian kredit ekspektasian 12 bulan	(84,302,132)	84,302,132	-	-	-	<i>12-month ECL-</i>
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	59,396,763	(59,396,763)	-	-	-	<i>Lifetime ECL not credit - impaired</i>
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	412,049	(8,015,618)	7,603,569	-	-	<i>Transfer from/to lifetime ECL credit impaired - net</i>
Pengukuran kembali bersih penyisihan kerugian	(84,102,061)	(32,020,697)	(5,382,892)	-	(121,505,650)	<i>Net remeasurement of loss allowance</i>
Aset keuangan baru yang diterbitkan atau dibeli	232,606,675	48,482,087	5,284,283	-	286,373,045	<i>New financial assets originated or purchased</i>
Pembayaran penuh	(113,587,122)	(12,826,736)	(850,216)	-	(127,264,074)	<i>Fully repayment</i>
Penghapusbukuan	(19,440)	(62,903)	(9,423,338)	-	(9,505,681)	<i>Write-offs</i>
Penerimaan kembali aset keuangan yang telah dihapusbukukan	-	-	-	-	-	<i>Recoveries of amounts previously written off</i>
Valuta asing dan perubahan lain	1,149,373	(1,857)	84,605	-	1,232,121	<i>Foreign exchange and other movements</i>
Dampak kehilangan pengendalian*)	-	-	-	(33,100,318)	(33,100,318)	<i>Impact of loss of control*)</i>
	457,917,664	93,256,903	31,261,663	-	582,436,230	

*) Lihat Catatan 1

Refer to Note 1*)

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

12. LOANS (continued)

**j. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai (lanjutan)**

**j. 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)

	31 Desember/December 2020					
	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	Syariah/ Sharia	Total/Total	
Pinjaman yang diberikan						Loans
Saldo awal	3,649,460	6,648,545	21,209,015	1,054,478	32,561,498	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	(1,781,541)	1,781,541	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	5,890,898	(5,890,898)	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	1,363,739	(953,311)	(410,428)	-	-	- Lifetime ECL credit-impaired -
Pengukuran kembali bersih penyisihan kerugian	(5,121,161)	10,494,687	11,761,446	552,035	17,687,007	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	1,643,746	2,350,895	2,956,790	-	6,951,431	New financial assets originated or purchased
Pembayaran kembali	(1,801,414)	(1,485,593)	(34,003)	-	(3,321,010)	Repayment
Penghapusbukuan	(9,542)	(50,202)	(9,709,804)	(477,012)	(10,246,560)	Write-offs
Penerimaan kembali aset keuangan yang telah dihapusbukuan	-	-	327,758	159,896	487,654	Recoveries of amounts previously written off
Valuta asing dan perubahan lain	(325,004)	(82,098)	515,068	-	107,966	Foreign exchange and other movements
	3,509,181	12,813,566	26,615,842	1,289,397	44,227,986	

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

k. Loans written off

Kredit yang telah dihapusbukukan oleh BNI
dicatat sebagai kredit ekstra-komtabel di
dalam rekening administratif.

The loans written off by BNI are recorded as
extra-comptable in the administrative account.

**l. Fasilitas pembiayaan dengan perusahaan
pembiayaan**

**l. Financing arrangements with multi-finance
companies**

BNI memiliki perjanjian pembiayaan dengan
beberapa lembaga pembiayaan untuk
membiayai kepemilikan kendaraan bermotor
sebesar Rp1.127.104 dan Rp1.610.532
masing-masing pada tanggal 31 Desember
2021 dan 2020.

BNI has financing arrangements with several
multi-finance companies with respect to motor
vehicles financing amounting to Rp1,127,104
and Rp1,610,532 as of 31 December 2021
and 2020, respectively.

**m. Informasi pokok lainnya sehubungan
dengan pinjaman yang diberikan**

**m. Other significant information relating to
loans**

Grup memiliki agunan atas pinjaman yang
diberikan dalam bentuk kas, deposito, agunan
yang diikat dengan hipotik, garansi serta
jaminan dalam bentuk aset lainnya.

The Group holds collateral against loans in the
form of cash, deposits, registered mortgages,
guarantees and other assets held as
collaterals.

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12. PINJAMAN YANG DIBERIKAN (lanjutan)

m. Informasi pokok lainnya sehubungan dengan pinjaman yang diberikan (lanjutan)

Termasuk di dalam pinjaman yang diberikan adalah pembiayaan syariah masing-masing sebesar nihil dan Rp33.100.318 pada tanggal 31 Desember 2021 dan 2020.

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.

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat pelanggaran maupun pelampauan Batas Maksimum Pemberian Kredit (BMPK) kepada pihak berelasi dan pihak ketiga sesuai dengan peraturan yang ditetapkan Otoritas Jasa Keuangan.

Rasio kredit usaha mikro dan kecil terhadap jumlah kredit yang diberikan BNI per 31 Desember 2021 dan 2020 masing-masing adalah sebesar 13,17% dan 11,60%, sedangkan bila rasio tersebut ditambahkan dengan kredit menengah maka rasionya menjadi sebesar 20,14% dan 20,66% masing-masing untuk tanggal 31 Desember 2021 dan 2020.

12. LOANS (continued)

m. Other significant information relating to loans (continued)

Loans include sharia receivables amounting to nil and Rp33,100,318 as of 31 December 2021 and 2020, respectively.

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.

As of 31 December 2021 and 2020, 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.

The micro and small scale loans to total loans ratio for BNI and the small scale loans to total loans ratio for BNI as of 31 December 2021 and 2020 were 13.17% and 11.60%, respectively, whereas if that ratio is added with middle scale loans, the ratio will become 20.14% and 20.66% as of 31 December 2021 and 2020, respectively.

13. OBLIGASI PEMERINTAH

Informasi mengenai Obligasi Pemerintah diungkapkan pada Catatan 46f.

a. Berdasarkan jenis dan mata uang

	2021		2020	
	Nilai Nominal/ Nominal Value	Nilai Tercatat/ Carrying Value	Nilai Nominal/ Nominal Value	Nilai Tercatat/ Carrying Value
Nilai wajar melalui laba rugi				
Rupiah				
Tingkat bunga tetap	3,841,813	3,836,997	2,364,048	2,963,890
Mata uang asing				
Tingkat bunga tetap	249,062	274,608	51,634	58,954
Total nilai wajar melalui laba rugi	4,090,875	4,111,605	2,415,682	3,022,844
Nilai wajar melalui penghasilan komprehensif lain				
Rupiah				
Tingkat bunga tetap	61,612,384	65,712,860	42,565,820	46,745,798
Tingkat bunga mengambang	100,000	100,007	100,000	100,012
	61,712,384	65,812,867	42,665,820	46,845,810
Mata uang asing				
Tingkat bunga tetap	18,565,959	19,384,791	10,988,422	11,826,510
	18,565,959	19,384,791	10,988,422	11,826,510
Total nilai wajar melalui penghasilan komprehensif lain	80,278,343	85,197,658	53,654,242	58,672,320
Biaya perolehan diamortisasi				
Rupiah				
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi, sebesar Rp481.150 per 31 Desember 2021 dan Rp479.090 per 31 Desember 2020	12,850,436	13,331,586	18,896,121	19,375,211

*Fair value through profit or loss
Rupiah
Fixed rate*

*Foreign currencies
Fixed rate*

Total fair value through profit or loss

*Fair value through other comprehensive income
Rupiah
Fixed rate
Floating rate*

*Foreign currencies
Fixed rate*

Total fair value through other comprehensive income

*Amortized cost
Rupiah
Fixed rate,
net of unamortized discount/premium of Rp481,150 as of 31 December 2021 and Rp479,090 as of 31 December 2020*

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13. OBLIGASI PEMERINTAH (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

	2021	
	Nilai Nominal/ Nominal Value	Nilai Tercatat/ Carrying Value
Biaya perolehan diamortisasi (lanjutan)		
Mata uang asing		
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi sebesar Rp45.510 per 31 Desember 2021 dan Rp72.573 per 31 Desember 2020	8,743,620	8,789,130
	8,743,620	8,789,130
Total biaya perolehan diamortisasi	21,594,056	22,120,716
Total Obligasi Pemerintah		111,429,979
Cadangan kerugian penurunan nilai		(1,649)
Obligasi Pemerintah - bersih		111,428,330

Jumlah nominal Obligasi Pemerintah yang diterima BNI dari program rekapitalisasi masing-masing sebesar Rp100.000 pada tanggal 31 Desember 2021 dan 2020.

Jumlah Obligasi Pemerintah yang dikelompokkan sebagai nilai wajar melalui penghasilan komprehensif lain yang dijual selama tahun berjalan adalah sebagai berikut:

	Total dijual/ Sold		Kepada pihak ketiga/ To third parties	
	Nilai nominal/ Nominal value	Nilai nominal/ Nominal value	Nilai nominal/ Nominal value	Harga jual/ Selling price
31 Desember 2021	605,000	605,000		615,406
31 Desember 2020	2,470,000	2,010,000		2,239,844

Jumlah nilai nominal Obligasi Pemerintah yang telah jatuh tempo pada 31 Desember 2021 dan 2020 masing-masing adalah sebesar Rp2.631.785 dan Rp2.451.614.

Untuk tingkat bunga tetap, harga pasar Obligasi Pemerintah berkisar antara 100,74% sampai dengan 132,60% dan antara 95,35% sampai dengan 132,86% masing-masing pada tanggal 31 Desember 2021 dan 2020.

Untuk obligasi tingkat bunga mengambang, harga pasar Obligasi Pemerintah adalah 100% dan 100% pada tanggal 31 Desember 2021 dan 2020 dari nilai nominal.

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 Rp516.641 (laba) dan Rp361.878 (laba) masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 yang dicatat pada bagian ekuitas laporan posisi keuangan konsolidasian.

Pada 31 Desember 2021 dan 2020, Obligasi Pemerintah dengan tingkat bunga tetap dengan jumlah nominal Rp2.200.024 dan Rp2.990.081 telah dijual dengan janji dibeli kembali hingga jatuh tempo (lihat Catatan 23).

13. GOVERNMENT BONDS (continued)

a. By type and currency (continued)

	2021		2020	
	Nilai Nominal/ Nominal Value	Nilai Tercatat/ Carrying Value	Nilai Nominal/ Nominal Value	Nilai Tercatat/ Carrying Value
Biaya perolehan diamortisasi (lanjutan)				
Mata uang asing				
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi sebesar Rp45.510 per 31 Desember 2021 dan Rp72.573 per 31 Desember 2020	8,743,620	8,789,130	9,518,173	9,590,746
	8,743,620	8,789,130	9,518,173	9,590,746
Total biaya perolehan diamortisasi	21,594,056	22,120,716	28,414,294	28,965,957
Total Obligasi Pemerintah		111,429,979		90,661,121
Cadangan kerugian penurunan nilai		(1,649)		(1,803)
Obligasi Pemerintah - bersih		111,428,330		90,659,318

*Amortized cost (continued)
Foreign currencies
Fixed rate,
net of unamortized discount/
premium of Rp45,510 as of
31 December 2021 and Rp72,573
as of 31 December 2020*

Total amortized cost

Total Government Bonds

Allowance for impairment losses

Government Bonds - net

The total outstanding nominal amount of Government Bonds received by BNI from the recapitalization program amounted to Rp100,000 as of 31 December 2021 and 2020, respectively.

The total Government Bonds at fair value through other comprehensive income sold during the current year are as follows:

Total nominal amount of Government Bonds which have matured amounted to Rp2,631,785 and Rp2,451,614 as of 31 December 2021 and 2020, respectively.

For fixed interest rate bonds, the market price of Government Bonds ranged from 100.74% to 132.60% and from 95.35% to 132.86% as of 31 December 2021 and 2020, respectively.

For floating interest rate bonds, the market price of Government Bonds is 100% and 100% as of 31 December 2021 and 2020 of the nominal amounts.

BNI recognized the unrealized gains or losses from the changes in the market value of the Government Bonds categorized as fair value through other comprehensive income (net of taxes) in the amount of Rp516,641 (gain) and Rp361,878 (gain) for the years ended 31 December 2021 and 2020, respectively, both recorded in the equity section of the consolidated statement of financial position.

As of 31 December 2021 and 2020, the fixed rate government bonds have been sold under agreements to repurchase at maturity with nominal amount of Rp2,200,024 and Rp2,990,081, respectively (refer to Note 23).

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13. OBLIGASI PEMERINTAH (lanjutan)

13. GOVERNMENT BONDS (continued)

b. Berdasarkan kisaran tanggal jatuh tempo dan jenis bunga

b. Based on maturity date and type of interest rate

	2021	
Nilai wajar melalui laba rugi		<i>Fair value through profit of loss</i>
Obligasi tingkat bunga tetap	06/01/2022 - 12/03/2071	<i>Fixed rate bonds</i>
Nilai wajar melalui penghasilan komprehensif lain		<i>Fair value through other comprehensive income</i>
Obligasi tingkat bunga tetap	08/01/2022 - 15/07/2038	<i>Fixed rate bonds</i>
Obligasi tingkat bunga mengambang	25/04/2025	<i>Floating rate bonds</i>
Biaya perolehan diamortisasi		<i>Amortized cost</i>
Obligasi tingkat bunga tetap	08/01/2022 - 15/05/2037	<i>Fixed rate bonds</i>
	2020	
Nilai wajar melalui laba rugi		<i>Fair value through profit of loss</i>
Obligasi tingkat bunga tetap	08/01/2021 - 15/04/2070	<i>Fixed rate bonds</i>
Nilai wajar melalui penghasilan komprehensif lain		<i>Fair value through other comprehensive income</i>
Obligasi tingkat bunga tetap	05/02/2021 - 20/12/2039	<i>Fixed rate bonds</i>
Obligasi tingkat bunga mengambang	25/04/2025	<i>Floating rate bonds</i>
Biaya perolehan diamortisasi		<i>Amortized cost</i>
Obligasi tingkat bunga tetap	15/06/2021 - 15/05/2037	<i>Fixed rate bonds</i>

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:

31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL	Syariah/ Sharia	Total/Total		
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi						Government Bond at amortized cost
Saldo awal	22,527,631	-	6,438,326	28,965,957		<i>Beginning balance</i>
Pengukuran kembali bersih penyisihan kerugian**)	(1,950,597)	-	-	(1,950,597)		<i>Net remeasurement of loss allowances**)</i>
Aset keuangan baru yang diterbitkan atau dibeli	1,403,000	-	-	1,403,000		<i>New financial assets originated or purchased</i>
Valuta asing dan perubahan lain	140,682	-	-	140,682		<i>Foreign exchange and other movements</i>
Dampak kehilangan pengendalian*)	-	-	(6,438,326)	(6,438,326)		<i>Impact of loss of control*)</i>
	22,120,716	-	-	22,120,716		
31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL	Syariah/ Sharia	Total/Total		
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain						Government Bond at fair value through other comprehensive income
Saldo awal	58,619,434	-	52,886	58,672,320		<i>Beginning balance</i>
Pengukuran kembali bersih penyisihan kerugian**)	(39,917,456)	-	-	(39,917,456)		<i>Net remeasurement of loss allowances**)</i>
Aset keuangan baru yang diterbitkan atau dibeli	66,501,474	-	-	66,501,474		<i>New financial assets originated or purchased</i>
Valuta asing dan perubahan lain	(5,794)	-	-	(5,794)		<i>Foreign exchange and other movements</i>
Dampak kehilangan pengendalian*)	-	-	(52,886)	(52,886)		<i>Impact of loss of control*)</i>
	85,197,658	-	-	85,197,658		

*) Lihat Catatan 1

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali

Refer to Note 1*)
Including in the net measurement of loss allowance, is repayment**)

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13. OBLIGASI PEMERINTAH (lanjutan)

13. GOVERNMENT BONDS (continued)

**c. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai (lanjutan)**

**c. 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)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi					Government Bond at amortised cost
Saldo awal	16,056,449	-	5,930,587	21,987,036	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	(1,515,442)	-	-	(1,515,442)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	8,343,991	-	507,739	8,851,730	New financial assets originated or purchased
Valuta asing dan perubahan lain	(357,367)	-	-	(357,367)	Foreign exchange and other movements
	22,527,631	-	6,438,326	28,965,957	

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					Government Bond at fair value through other comprehensive income
Saldo awal	54,963,937	-	751,332	55,715,269	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	(23,277,544)	-	-	(23,277,544)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	28,044,323	-	-	28,044,323	New financial assets originated or purchased
Pembayaran kembali	(799,886)	-	(698,446)	(1,498,332)	Repayment
Valuta asing dan perubahan lain	(311,396)	-	-	(311,396)	Foreign exchange and other movements
	58,619,434	-	52,886	58,672,320	

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13. OBLIGASI PEMERINTAH (lanjutan)

13. GOVERNMENT BONDS (continued)

**c. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai (lanjutan)**

**c. Gross carrying amount and allowance for
impairment losses (continued)**

Perubahan cadangan kerugian penurunan nilai
adalah sebagai berikut:

The movements in the allowance for
impairment losses are as follows:

31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total ⁷⁾	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					Government Bond at amortized cost
Saldo awal	1,803	-	-	-	1,803
Pengukuran kembali bersih penyisihan kerugian	(179)	-	-	-	(179)
Valuta asing dan perubahan lain	25	-	-	-	25
	1,649	-	-	-	1,649
31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total ⁷⁾	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					Government Bond at fair value through other comprehensive income
Saldo awal	2,105	-	-	-	2,105
Pengukuran kembali bersih penyisihan kerugian	(3,219)	-	-	-	(3,219)
Aset keuangan baru yang diterbitkan atau dibeli	4,557	-	-	-	4,557
Pembayaran penuh	(24)	-	-	-	(24)
Valuta asing dan perubahan lain	13	-	-	-	13
	3,432	-	-	-	3,432

⁷⁾ 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.

⁷⁾ 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.

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13. OBLIGASI PEMERINTAH (lanjutan)

13. GOVERNMENT BONDS (continued)

**c. Nilai tercatat bruto dan cadangan kerugian
penurunan nilai (lanjutan)**

**c. 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)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					Government Bond at amortized cost
Saldo awal	1,377	-	-	-	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	425	-	-	-	Net remeasurement of loss allowances
Valuta asing dan perubahan lain	1	-	-	-	Foreign exchange and other movements
	1,803	-	-	-	1,803
31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					Government Bond at fair value through other comprehensive income
Saldo awal	-	-	-	-	Beginning balance
Pengukuran kembali bersih penyisihan kerugian	2,382	-	-	-	Net remeasurement of loss allowances
Aset keuangan baru yang diterbitkan atau dibeli	1,824	-	-	-	New financial assets originated or purchased
Pembayaran kembali	(2,132)	-	-	-	Repayment
Valuta asing dan perubahan lain	31	-	-	-	Foreign exchange and other movements
	2,105	-	-	-	2,105

⁷⁾ 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.

⁷⁾ 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.

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13. OBLIGASI PEMERINTAH (lanjutan)

13. GOVERNMENT BONDS (continued)

d. Tingkat suku bunga tetap tahunan

d. Annual fixed interest rates

	Rupiah %	Amerika Serikat/ United States Dollar %	Dolar Singapura/ Singapore Dollar %	Euro Eropa/ European Euro %	Yen Jepang/ Japanese Yen %	
Suku bunga:						Interest rate:
2021	3.79 - 12.90	0.74 - 5.88	2.75 - 3.13	0.90 - 2.15	0.30 - 0.92	2021
2020	5.45 - 12.90	1.86 - 5.86	2.25 - 3.13	0.95 - 1.40	0.92 - 3.00	2020

e. Tingkat suku bunga mengambang tahunan

e. Annual floating interest rates

	Tingkat suku bunga per tahun/ Annual interest rates	
2021	3.79 - 4.54	2021
2020	4.04	2020

**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 2021 dan 2020 terdiri dari:

Securities purchased under agreements to resell as of 31 December 2021 and 2020 are as follows:

31 Desember/December 2021

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/ Unrealized Interest	Nilai Tercatat/ Carrying Value
Pihak berelasi/Related party							
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	22/12/2021	05/01/2022	466,950	181	466,769
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	28/12/2021	04/01/2022	467,096	136	466,960
		1,000,000			934,046	317	933,729
Pihak ketiga/Third parties							
Bank Indonesia, Jakarta	OBN	3,199,595	27/12/2021	03/01/2022	3,534,145	686	3,533,459
Bank Indonesia, Jakarta	OBN	3,880,984	28/12/2021	04/01/2022	3,938,238	1,148	3,937,090
Bank Indonesia, Jakarta	OBN	8,239,850	29/12/2021	05/01/2022	7,860,547	3,054	7,857,493
PT Bank Pan Indonesia Tbk	OBN	1,000,000	30/12/2021	03/01/2022	908,199	144	908,055
Bank Indonesia, Jakarta	OBN	2,318,377	30/12/2021	06/01/2022	2,465,655	1,198	2,464,457
Bank Indonesia, Jakarta	OBN	2,501,002	31/12/2021	07/01/2022	2,378,072	1,387	2,376,685
		21,139,808			21,084,856	7,617	21,077,239
		22,139,808			22,018,902	7,934	22,010,968

31 Desember/December 2020

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/ Unrealized Interest	Nilai Tercatat/ Carrying Value
Pihak berelasi/Related party							
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	17/12/2020	15/01/2021	468,756	740	468,016
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	200,000	15/12/2020	15/01/2021	186,368	294	186,074
		700,000			655,124	1,034	654,090

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**14. EFEK-EFEK YANG DIBELI DENGAN JANJI
DIJUAL KEMBALI (lanjutan)**

**14. SECURITIES PURCHASED UNDER
AGREEMENTS TO RESELL (continued)**

31 Desember/December 2020 (lanjutan/continued)

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/ Unrealized Interest	Nilai Tercatat/ Carrying Value
Pihak ketiga/Third party							
Bank Indonesia, Jakarta	OBN	5,000,000	30/12/2020	06/01/2021	4,794,490	2,995	4,791,495
Bank Indonesia, Jakarta	OBN	1,000,000	29/12/2020	05/01/2021	1,012,707	527	1,012,180
Bank Indonesia, Jakarta	OBN	807,500	28/12/2020	04/01/2021	807,058	336	806,722
Bank Indonesia, Jakarta	OBN	655,132	29/12/2020	05/01/2021	663,457	345	663,112
Bank Indonesia, Jakarta	OBN	344,868	29/12/2020	05/01/2021	325,303	169	325,134
Bank Indonesia, Jakarta	OBN	185,000	28/12/2020	04/01/2021	200,662	84	200,578
Bank Indonesia, Jakarta	OBN	150,000	14/10/2020	13/01/2021	156,905	216	156,689
Bank Indonesia, Jakarta	OBN	50,000	12/06/2020	12/03/2021	48,330	421	47,909
Bank Indonesia, Jakarta	OBN	7,500	28/12/2020	04/01/2021	8,185	3	8,182
		8,200,000			8,017,097	5,096	8,012,001
		8,900,000			8,672,221	6,130	8,666,091

Efek-efek yang dibeli dengan janji dijual kembali tersebut di atas diklasifikasikan sebagai lancar.

Securities purchased under agreements to resell are classified as current.

Tingkat suku bunga tetap tahunan:

Annual fixed interest rates:

	Rupiah %	Contractual interest rate:
Suku bunga kontrak:		
2021	2.78 - 3.50	2021
2020	3.75 - 4.57	2020

15. BEBAN DIBAYAR DIMUKA

15. PREPAID EXPENSES

Beban dibayar dimuka terdiri dari:

Prepaid expenses consist of:

	2021	2020	
Asuransi	2,015,215	1,355,093	Insurance
Sewa dibayar dimuka	539,046	733,750	Prepaid rent
Perbaikan dan pemeliharaan	238,986	306,009	Service and maintenance
Biaya tangguhan	138,362	218,439	Deferred expenses
Promosi	102,297	89,412	Promotion
Lainnya	62,021	104,389	Others
	3,095,927	2,807,092	

16. INVESTASI PADA ENTITAS ASOSIASI

16. INVESTMENTS IN ASSOCIATE

Otoritas Jasa Keuangan (OJK) Pasar Modal telah menyetujui pernyataan penggabungan usaha PT BRISyariah 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 BRISyariah 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.

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16. INVESTASI PADA ENTITAS ASOSIASI (lanjutan)

Pada tanggal 31 Desember 2021, entitas asosiasi yang dimiliki oleh Grup yang menurut pendapat Direksi material terhadap Grup adalah sebagai berikut:

16. INVESTMENTS IN ASSOCIATE (continued)

As at 31 December 2021, the associate is of the Group, which, in the opinion of the Directors, are material to the Group were as follow:

Nama Perusahaan	Persentase Kepemilikan/ Percentage of Ownership			Company Name
	Kegiatan Usaha/ Business Activity	31 Desember/ December 2021	Nilai tercatat/ Carrying Value	
PT Bank Syariah Indonesia Tbk	Perbankan/Banking	24.91%	8,688,406	PT Bank Syariah Indonesia Tbk

Berikut ini adalah ringkasan informasi keuangan PT Bank Syariah Indonesia Tbk pada tanggal 31 Desember 2021 dan untuk tahun yang berakhir pada tanggal tersebut, yang dicatat dengan menggunakan metode ekuitas.

The following table is the summarised financial information for PT Bank Syariah Indonesia Tbk as of 31 Desember 2021 and for the year then ended, which are accounted for using the equity method.

	2021	
Aset	265,289,081	Assets
Liabilitas	240,275,147	Liabilities
Aset bersih	25,013,934	Net assets
Pendapatan	14,229,215	Revenue
Laba bersih tahun berjalan	3,028,205	Net income for the year
Penghasilan komprehensif lain setelah pajak	157,340	Other comprehensive income after tax
Jumlah penghasilan komprehensif tahun berjalan	3,185,545	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:

	2021	
Bagian atas laba bersih	698,334	Share of net income
Bagian atas laba komprehensif lain	5,121	Share of other comprehensive gain
Jumlah bagian atas penghasilan komprehensif	703,455	Total share of comprehensive income
Nilai perolehan	7,984,951	Acquisition value
Jumlah tercatat	8,688,406	Carrying value

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:

	2021	
Pengakuan awal aset bersih	21,743,144	Net asset initial recognition
Laba bersih periode berjalan	3,028,205	Net income for the year
Penghasilan komprehensif lain setelah pajak	157,340	Other comprehensive income after tax
Lain-lain	148,066	Others
	25,076,755	
Persentase kepemilikan efektif	24.91%	Percentage of effective ownership
	6,246,620	
Goodwill	2,441,786	Goodwill
Nilai tercatat	8,688,406	Carrying value

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17. PENYERTAAN SAHAM - BERSIH

17. EQUITY INVESTMENTS - NET

Penyertaan jangka panjang

Long-term equity investments

	Nilai Wajar/ Fair Value		
	2021	2020	
Klasifikasi nilai wajar melalui penghasilan komprehensif lain	829,763	530,262	<i>Classified as fair value through other comprehensive income</i>
Klasifikasi nilai wajar melalui laba rugi	-	282,825	<i>Classified as fair value through profit and loss</i>
	829,763	813,087	

Penyertaan jangka panjang kolektibilitas Bank Indonesia adalah: *The classification of long-term equity investments based on Bank Indonesia collectibility are as follows:*

	2021	2020	
Lancar	829,763	530,262	<i>Current</i>
Kurang lancar	-	282,825	<i>Substandard</i>
Diragukan	-	-	<i>Doubtful</i>
Total	829,763	813,087	<i>Total</i>

Pada tanggal 1 Januari 2020, 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.

On 1 January 2020, 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.

Penyertaan saham terdiri dari:

Equity investment consist of:

	Persentase Kepemilikan/ Percentage of Ownership	2021		2020	
Nama Perusahaan/ Company Name		Biaya perolehan/ Acquisition cost	Nilai wajar/ Fair value	Biaya perolehan/ Acquisition cost	Nilai wajar/ Fair value
Nilai wajar melalui penghasilan komprehensif lain/fair value through other comprehensive income					
PT Fintek Karya Nusantara	9.92%	200,000	701,800	200,000	412,210
PT Bank Mizuho Indonesia	1.00%	75,375	75,375	75,375	75,375
PT Bank BTPN Tbk	0.15%	37,342	37,342	37,342	37,342
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	17.50%	3,500	4,857	3,500	4,293
PT Kustodian Sentral Efek Indonesia	2.50%	750	750	750	750
PT Bursa Efek Indonesia	1.20%	135	135	135	135
PT Pemeringkat Efek Indonesia	0.64%	157	157	157	157
Lain-lain	0.01%	9,347	9,347	-	-
		326,606	829,763	317,259	530,262
Nilai wajar melalui laba rugi/ fair value through profit or loss					
PT PANN Pembiayaan Maritim	48.40%	724,338	-	724,338	282,825
		1,050,944	829,763	1,041,597	813,087

Meskipun Grup memiliki lebih dari 20% saham di PT PANN Pembiayaan Maritim, Grup tidak memiliki pengaruh signifikan atas perusahaan tersebut, sesuai dengan perjanjian kontraktual dengan pemegang saham pengendali PT PANN Pembiayaan Maritim.

Although the Group holds more than 20% of the equity shares of PT PANN Pembiayaan Maritim, the Group does not have significant influence over this company, based on the contractual agreement with controlling shareholder of PT PANN Pembiayaan Maritim.

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18. ASET LAIN-LAIN - BERSIH

Aset lain-lain - bersih terdiri dari:

	2021	2020
Piutang lain-lain	3,333,395	3,874,790
Piutang bunga	3,057,796	2,382,329
Piutang terkait transaksi ATM dan kartu kredit	2,051,031	3,908,683
Agunan yang diambil alih setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp535.040 pada tanggal 31 Desember 2021 dan Rp247.507 pada tanggal 31 Desember 2020	1,527,739	1,867,506
Persediaan kantor	102,583	92,095
Beban komisi ditangguhkan	71,111	77,778
Lain-lain setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp28.041 pada tanggal 31 Desember 2021 dan Rp32.339 pada tanggal 31 Desember 2020	1,705,565	1,554,630
	11,849,220	13,757,811

Piutang lain-lain sebagian besar merupakan piutang kepada pemerintah, imbal jasa penjaminan dan penjualan obligasi.

Pada tanggal 31 Desember 2021, piutang bunga sebagian besar merupakan bunga yang berasal dari pinjaman yang diberikan dan Obligasi Pemerintah masing-masing sebesar Rp932.050 dan Rp1.350.384 (31 Desember 2020: Rp876.734 dan Rp960.736).

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 Rp1.891 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.618 pada tanggal 31 Desember 2021 dan sebesar Rp1.924 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp28.642 pada tanggal 31 Desember 2020.

BNI telah melakukan upaya penyelesaian atas properti terbengkalai dalam bentuk pemanfaatan untuk kegiatan operasional Bank (kantor, outlet, galeri, rumah dinas dan gudang kearsipan).

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang dibentuk atas aset-aset yang disebutkan di atas telah memadai.

18. OTHER ASSETS - NET

Other assets - net consist of:

Other receivables
Interest receivables
Receivables from transactions related to ATM and credit card
Foreclosed collaterals, net of allowance for impairment losses of Rp535,040 as of 31 December 2021 and Rp 247,507 as of 31 December 2020
Office supplies
Deferred commission expenses
Others, net of allowance for impairment losses of Rp28,041 as of 31 December 2021 and Rp32,339 as of 31 December 2020

Other receivables mostly comprised of governments receivables, guarantee fee and sale of bonds receivables.

As of 31 December 2021, interest receivables are mostly comprised of interest from loans and Government Bonds amounting to Rp932,050 and Rp1,350,384, respectively (31 December 2020: Rp876,734 and Rp960,736).

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 Rp1,891, net of allowance for impairment losses of Rp27,618, as of 31 December 2021 and amounting to Rp1,924, net of allowance for impairment losses of Rp28,642, as of 31 December 2020.

BNI has made efforts to resolve abandoned properties by utilizing them for the Bank's operational activities (offices, outlets, gallery, official houses and warehouse).

Management believes that the allowance for impairment losses on the respective assets outlined above is adequate.

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19. ASET TETAP DAN ASET HAK GUNA

**19. FIXED ASSETS AND RIGHT OF USE OF
ASSETS**

Aset tetap kepemilikan langsung:

Direct ownership of fixed assets:

31 Desember/December 2021							
	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassification	Revaluasi/ Revaluation	Dampak kehilangan pengendalian/ Impact of loss of control*)	Saldo akhir/ Ending balance
Biaya perolehan							Acquisition cost
Tanah	16,023,730	151,216	(177,648)	5,724	617,963	(652,082)	Land
Bangunan	7,200,216	333,681	(84,545)	813,420	294,893	(170,958)	Buildings
Perlengkapan kantor dan kendaraan bermotor	12,526,587	993,171	(118,460)	(223,052)	-	(431,041)	Office equipment and motor vehicles
	35,750,533	1,478,068	(380,653)	596,092	912,856	(1,254,081)	
Aset dalam penyelesaian	1,011,868	113,558	-	(573,685)	-	(30,216)	Construction In progress
Aset hak guna	2,195,844	468,597	(231,520)	(22,407)	-	(200,290)	Right of use of assets
	38,958,245	2,060,223	(612,173)	-	912,856	(1,484,587)	
Akumulasi penyusutan							Accumulated depreciation
Bangunan	1,247,703	401,687	(960)	612,634	6,566	(17,924)	Buildings
Perlengkapan kantor dan kendaraan bermotor	9,770,345	1,076,808	(81,194)	(590,227)	-	(286,209)	Office equipment and motor vehicles
	11,018,048	1,478,495	(82,154)	22,407	6,566	(304,133)	
Aset hak guna	577,797	528,421	(196,714)	(22,407)	-	(74,744)	Right of use of assets
	11,595,845	2,006,916	(278,868)	-	6,566	(378,877)	
Nilai buku bersih	27,362,400						Net book value

*) Lihat Catatan 1

Refer to Note 1*)

31 Desember/December 2020					
	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassification	Saldo akhir/ Ending balance
Biaya perolehan					
Tanah	15,781,444	118,991	-	123,295	16,023,730
Bangunan	6,487,266	183,957	-	528,993	7,200,216
Perlengkapan kantor dan kendaraan bermotor	10,718,944	257,697	(135,269)	1,685,215	12,526,587
Total biaya perolehan	32,987,654	560,645	(135,269)	2,337,503	35,750,533
Aset dalam penyelesaian	2,674,196	712,796	-	(2,375,124)	1,011,868
Aset hak guna	1,803,759	358,060	(3,596)	37,621	2,195,844
	37,465,609	1,631,501	(138,865)	-	38,958,245
Akumulasi penyusutan					
Bangunan	820,511	459,781	-	(32,589)	1,247,703
Perlengkapan kantor dan kendaraan bermotor	8,316,580	1,568,131	(114,366)	-	9,770,345
	9,137,091	2,027,912	(114,366)	(32,589)	11,018,048
Aset hak guna	-	548,804	(3,596)	32,589	577,797
	9,137,091	2,576,716	(117,962)	-	11,595,845
Nilai buku bersih	28,328,518				27,362,400

Beban penyusutan untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp1.478.495 dan Rp2.027.912 dicatat pada beban umum dan administrasi pada laporan laba rugi.

Aset tetap yang telah terdepresiasi penuh namun masih digunakan oleh Grup sebesar Rp7.484.482 dan Rp6.961.677 masing-masing pada tanggal 31 Desember 2021 dan 2020, antara lain berupa perlengkapan kantor dan kendaraan bermotor.

Depreciation expense for the year ended 31 December 2021 and 2020 amounted to Rp1,478,495 and Rp2,027,912 are recorded on general and administrative expense in the statement of profit or loss.

The fixed assets that have been fully depreciated but still in use by the Group amounted to Rp7,484,482 and Rp6,961,677 as of 31 December 2021 and 2020, respectively, including, among others, office equipment and motor vehicles.

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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 2021 diasuransikan terhadap risiko kebakaran dan pencurian dengan nilai pertanggungan sebesar Rp16.226.239 (31 Desember 2020: Rp16.679.758). Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutupi kemungkinan kerugian atas aset tersebut.

Aset dalam penyelesaian pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	2021	2020
Tanah	100	5,825
Bangunan	305,610	501,753
Peralatan kantor dan kendaraan bermotor	215,815	504,289
	<u>521,525</u>	<u>1,011,867</u>

Estimasi persentase tingkat penyelesaian aset dalam penyelesaian pada tanggal 31 Desember 2021 adalah berkisar antara 72% - 99% dan 31 Desember 2020: 0% - 94%.

Nilai wajar tanah dan bangunan yang dimiliki Grup pada tanggal 31 Desember 2021 tidak berbeda jauh dengan nilai tercatat karena Grup melakukan penilaian pada tanah dan bangunan pada tanggal 30 September 2021.

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 dan 2018, maka pada tanggal 31 Desember 2021 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.

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 2021, the fixed assets of the Bank were insured against risk of fire and theft with sum insured amounting to Rp16,226,239 (31 December 2020: Rp16,679,758). Management believes that the sum insured is adequate to cover possible losses on the assets insured.

Construction in progress as of 31 December 2021 and 2020 are as follows:

Land
Buildings
Office equipment
and motor vehicles

The estimated percentage of completion of construction in progress as of 31 December 2021 is between 72% - 99% and 31 December 2020: 0% - 94%.

There is no significant difference between fair value and carrying value of land and building owned by the Group as of 31 December 2021 because the Group performed revaluation over land and buildings on 30 September 2021.

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 and 2018, therefore on 31 December 2021, the Group assigned registered independent appraisers to appraise (revalue) 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.

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19. ASET TETAP DAN ASET HAK GUNA (lanjutan)

Penilaian atas tanah dan bangunan dilakukan oleh penilai independen eksternal sebagai berikut:

- KJPP Toha Okky Heru & Rekan
- KJPP Rengganis Hamid & Rekan
- KJPP Toto Suharto & Rekan
- KJPP Abdullah Fitriantoro & Rekan

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:

- Jenis dan hak yang melekat pada properti
- Kondisi pasar
- Lokasi
- Karakteristik fisik
- Karakteristik dalam menghasilkan pendapatan
- Karakteristik tanah

Informasi mengenai penilaian kembali aset tetap pada tanggal 31 Desember 2021 untuk kelompok aset tanah dan bangunan Grup di Indonesia dan luar negeri adalah sebagai berikut:

	Nilai Buku sebelum Revaluasi/ Carrying Amount Before Revaluation	Nilai Buku Setelah Revaluasi/ Carrying Amount after Revaluation	Keuntungan Revaluasi bersih/ Net gain revaluation	
Tanah	15,350,940	15,968,903	617,963	Land
Bangunan	5,842,108	6,137,001	294,893	Buildings
Jumlah	21,193,048	22,105,904	912,856	Total

Penilaian kembali yang dilakukan atas tanah menghasilkan jumlah kenaikan nilai tercatat sebesar Rp617.963 yang terdiri dari kenaikan nilai tanah yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp669.629 dan penurunan nilai tanah yang diakui sebagai beban tahun 2021 sebesar Rp51.666.

Kenaikan nilai tercatat yang timbul dari revaluasi bangunan dicatat sebesar Rp294.893. Kenaikan ini terdiri dari kenaikan nilai bangunan yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp315.945 dan penurunan nilai bangunan yang diakui sebagai beban tahun 2021 sebesar Rp21.052.

Secara total kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Penghasilan Komprehensif Lain" adalah sebesar Rp912.856. Penurunan nilai tercatat yang timbul dari revaluasi dicatat sebagai beban pada tahun 2021 adalah sebesar Rp72.718.

**19. FIXED ASSETS AND RIGHT OF USE OF
ASSETS (continued)**

The valuations of land and buildings are performed by the following external independent appraisers:

- KJPP Toha Okky Heru & Rekan
- KJPP Rengganis Hamid & Rekan
- KJPP Toto Suharto & Rekan
- KJPP Abdullah Fitriantoro & Rekan

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:

- Types and rights attached to the property
- Market condition
- Location
- Physical characteristics
- Income producing characteristics
- Land characteristics

Information on revaluation of land and buildings of the Group on 31 December 2021 located in Indonesia and overseas are as follows:

The revaluation of land resulted in an increase in the carrying amount of land amounting to Rp617,963 which consists of the increase in the carrying amount of land recognized as "Other Comprehensive Income" amounting to Rp669,629 and a decrease in carrying amount of land recognized current year expenses amounting to Rp51,666.

Increase in carrying amount of buildings from the revaluation of building is recorded at Rp294,893. The increase consists of the increase in the carrying amount of buildings recognized in "Other Comprehensive Income" amounting to Rp315,945 and decrease in the carrying amount of buildings recognized as current year expenses amounting to Rp21,052.

In total, the increase in the carrying amount from revaluation of land and buildings is recognized in "Other Comprehensive Income" amounting to Rp912,856. The decrease of carrying amount from revaluation results recognized as current year expenses amounting to Rp72,718.

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19. ASET TETAP DAN ASET HAK GUNA (lanjutan)

Pada tahun 2018, Bank juga melakukan penilaian kembali atas tanah dan bangunan. Informasi mengenai penilaian kembali aset tetap pada tanggal 31 Desember 2018 untuk kelompok aset tanah dan bangunan Grup di Indonesia dan luar negeri adalah sebagai berikut:

	Nilai Buku sebelum Revaluasi/ Carrying Amount Before Revaluation	Nilai Buku Setelah Revaluasi/ Carrying Amount after Revaluation	Keuntungan Revaluasi bersih/ Net gain revaluation	
Tanah	14,097,701	15,511,328	1,413,627	Land
Bangunan	3,823,459	5,188,926	1,365,467	Buildings
Jumlah	17,921,160	20,700,254	2,779,094	Total

Pada tahun 2018, penilaian kembali yang dilakukan atas tanah menghasilkan jumlah kenaikan nilai tercatat sebesar Rp1.413.627 yang terdiri dari kenaikan nilai tanah yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp1.418.055 dan penurunan nilai tanah yang diakui sebagai beban tahun 2018 sebesar Rp4.428.

Kenaikan nilai tercatat yang timbul dari revaluasi bangunan dicatat sebesar Rp1.365.467. Kenaikan ini terdiri dari kenaikan nilai bangunan yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp1.397.454 dan penurunan nilai bangunan yang diakui sebagai beban tahun 2018 sebesar Rp31.987.

Secara total kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Penghasilan Komprehensif Lain" adalah sebesar Rp2.815.509. Penurunan nilai tercatat yang timbul dari revaluasi dicatat sebagai beban pada tahun 2018 adalah sebesar Rp36.415.

Pada tahun 2015, Bank juga melakukan penilaian kembali atas tanah dan bangunan di Indonesia untuk tujuan perpajakan. Penilaian kembali dilakukan atas tanah dan bangunan dengan nilai buku pajak sebelum revaluasi sebesar Rp1.917.157 dan menghasilkan keuntungan revaluasi sebesar Rp6.337.806. Pembayaran pajak final atas keuntungan revaluasi sebesar Rp190.134 dicatat mengurangi "Cadangan Revaluasi Aset".

Penilaian kembali tanah dan bangunan untuk tujuan perpajakan dilakukan setelah mendapatkan persetujuan dari Direktorat Jenderal Pajak dengan Surat Keputusan No. KEP-2547/WPJ.19/2015 tanggal 18 Desember 2015. BNI melakukan penilaian kembali aset tetap dengan mengacu pada ketentuan Peraturan Menteri Keuangan (PMK) No. 191/PMK.010/2015 tanggal 15 Oktober 2015 sebagaimana telah diubah dengan PMK No. 233/PMK.03/2015 tanggal 21 Desember 2015.

Ketentuan penyusutan fiskal aset tetap setelah penilaian kembali dengan tujuan perpajakan dimulai sejak tanggal 1 Januari 2016.

19. FIXED ASSETS AND RIGHT OF USE OF ASSETS (continued)

In 2018, the Bank also performed revaluation for tax purposes of land and buildings. Information on revaluation of land and buildings of the Group on 31 December 2018 located in Indonesia and overseas are as follows:

In 2018, the revaluation of land resulted in an increase in the carrying amount of land amounting to Rp1,413,627 which consists of the increase in the carrying amount of land recognized as "Other Comprehensive Income" amounting to Rp1,418,055 and a decrease in carrying amount of land recognized expenses in 2018 amounting to Rp4,428.

Increase in carrying amount of buildings from the revaluation of building is recorded at Rp1,365,467. The increase consists of the increase in the carrying amount of buildings recognized in "Other Comprehensive Income" amounting to Rp1,397,454 and decrease in the carrying amount of buildings recognized as expenses in 2018 expenses amounting to Rp31,987.

In total, the increase in the carrying amount from revaluation of land and buildings is recognized in "Other Comprehensive Income" amounting to Rp2,815,509. The decrease of carrying amount from revaluation results recognized as expenses in 2018 amounting to Rp36,415.

In 2015, the Bank also performed revaluation for tax purposes of land and buildings located in Indonesia. The revaluation of the land and buildings with fiscal book value before revaluation amounting to Rp1,917,157 resulted in gain on revaluation amounting to Rp6,337,806. The payment of final tax over the gain on revaluation amounting to Rp190,134 was recorded as a deduction of "Asset Revaluation Reserve".

Revaluation of land and buildings for tax purposes is performed after approval from Directorate General of Tax through its letter No. KEP-2547/WPJ.19/2015 dated 18 December 2015. BNI performed revaluation of fixed assets in accordance with the Finance Minister Regulation (PMK) No. 191/PMK.010/2015, dated 15 October 2015, with its amendments (PMK No. 233/PMK.03/2015) dated 21 December 2015.

The provision on the fiscal depreciation of fixed assets after revaluation for tax purposes is valid from 1 January 2016.

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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:

	2021	2020	
Tanah	1,760,546	1,785,347	
Bangunan			Land Buildings
Harga perolehan	2,814,454	2,876,301	Cost
Akumulasi penyusutan	(2,648,998)	(2,572,463)	Accumulated depreciation
Nilai buku bangunan	165,456	303,838	Net book amount
Jumlah nilai buku bersih	1,926,002	2,089,185	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 2020	14,962,961	Balance as of 31 December 2020
Surplus revaluasi	912,855	Surplus revaluation
Realisasi surplus revaluasi akibat dampak kehilangan pengendalian	(433,791)	Revaluation surplus realization due to impact of loss of control
Saldo per 31 Desember 2021	15,442,025	Balance as of 31 December 2021
	Cadangan revaluasi aset, bersih setelah pajak/ Asset revaluation reserve, net of tax	
Saldo per 31 Desember 2019	14,946,879	Balance as of 31 December 2019
Pelepasan tanah/bangunan yang telah direvaluasi (lihat Catatan 1)	16,082	Land/building disposal after revaluation (refer to Note 1)
Saldo per 31 Desember 2020	14,962,961	Balance as of 31 December 2020

Pada tanggal 31 Desember 2021 dan 2020, selain tanah dan bangunan, tidak terdapat perbedaan yang signifikan antara nilai wajar aset tetap dengan nilai tercatatnya.

As of 31 December 2021 and 2020, there is no significant difference between the fair value and carrying value of fixed assets other than land and buildings.

Perhitungan keuntungan/kerugian penjualan dan penghapusan aset tetap sebagai berikut:

Calculation of gain/loss on sale and write-off of fixed assets as follows:

	2021	2020	
Harga perolehan	612,173	138,865	Acquisition cost
Akumulasi penyusutan	(278,868)	(117,962)	Accumulated depreciation
Nilai buku aset tetap yang dijual	333,305	20,903	Book value of disposed fixed asset
Hasil penjualan aset tetap	326,725	26,008	Proceeds from sales of fixed assets
(Kerugian)/keuntungan dari penjualan aset tetap	(6,580)	5,105	(Loss)/gain on sale of fixed assets

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19. ASET TETAP DAN ASET HAK GUNA (lanjutan)

**19. FIXED ASSETS AND RIGHT OF USE OF
ASSETS (continued)**

Aset hak guna pada 31 Desember 2021 dan 2020
adalah sebagai berikut:

Right of use of assets as of 31 December 2021 and
2020 as follows:

31 Desember/December 2021

	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassification	Dampak kehilanganan pengendalian Impact of loss of control*)	Saldo akhir/ Ending balance	
Biaya perolehan							Cost
Tanah dan bangunan	1,936,529	456,333	(119,410)	-	(168,091)	2,105,361	Land and buildings
Perlengkapan kantor dan kendaraan bermotor	259,315	12,264	(112,110)	(22,407)	(32,199)	104,863	Office equipment and motor vehicles
	2,195,844	468,597	(231,520)	(22,407)	(200,290)	2,210,224	
Akumulasi penyusutan							Accumulated depreciation
Tanah dan bangunan	440,189	453,992	(85,429)	-	(66,359)	742,393	Land and buildings
Perlengkapan kantor dan kendaraan bermotor	137,608	74,429	(111,285)	(22,407)	(8,385)	69,960	Office equipment and motor vehicles
	577,797	528,421	(196,714)	(22,407)	(74,744)	812,353	
Nilai buku bersih	1,618,047					1,397,871	Net book value

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	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassification		Saldo akhir/ Ending balance	
Biaya perolehan							Cost
Tanah dan bangunan	1,616,107	322,440	(2,018)	-		1,936,529	Land and buildings
Perlengkapan kantor dan kendaraan bermotor	187,652	35,620	(1,578)	37,621		259,315	Office equipment and motor vehicles
	1,803,759	358,060	(3,596)	37,621		2,195,844	
Akumulasi penyusutan							Accumulated depreciation
Tanah dan bangunan	-	442,207	(2,018)	-		440,189	Land and buildings
Perlengkapan kantor dan kendaraan bermotor	-	106,597	(1,578)	32,589		137,608	Office equipment and motor vehicles
	-	548,804	(3,596)	32,589		577,797	
Nilai buku bersih	1,803,759					1,618,047	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 had rent a number of assets which
include official houses, offices, ATM space, vehicle
and others. The average of lease term is 5 (five)
years.

Jumlah pengeluaran kas untuk sewa selama tahun
yang berakhir pada 31 Desember 2021 adalah
Rp1.157.278 (31 Desember 2020: Rp1.510.305).

The total cash outflow for leases for the year ended
31 December 2021 is amounting to Rp1,157,278
(31 December 2020: Rp1,510,305).

Beban penyusutan untuk tahun yang berakhir pada
tanggal 31 Desember 2021 dan 2020 masing-
masing sebesar Rp528.421 dan Rp548.804 dicatat
pada beban umum dan administrasi pada laporan
laba rugi.

Depreciation expense for the period ended
31 December 2021 and 2020 amounted to
Rp528,421 and Rp548,408 are recorded on
general and administrative expense in the
statement of profit or loss.

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20. LIABILITAS SEGERA

20. OBLIGATIONS DUE IMMEDIATELY

	2021	2020	
Rupiah			Rupiah
Kewajiban sebagai <i>issuer</i> bank (ATM)	2,065,084	3,353,056	Obligation as issuer bank
Simpanan sementara yang belum diselesaikan	1,425,473	1,228,816	Temporary deposit transactions not yet settled
Kerjasama pihak ketiga	543,560	364,480	Third party agreements
Setoran pajak sebagai bank persepsi	202,349	224,620	Tax collection received by BNI as collecting bank
Dana setoran <i>smartpay</i>	127,836	111,315	Fund deposits for smartpay
Dana setoran cek	18,989	20,195	Fund deposits for cheques
Kiriman uang	8,119	10,693	Money transfers
Dana <i>trust</i>	6,284	24,921	Fund deposits for trust
Lainnya	7,812	28,388	Others
	4,405,506	5,366,484	
Mata uang asing			Foreign currencies
Dana <i>trust</i>	111,958	126,792	Fund deposits for trust
Kiriman uang	15,164	34,285	Money transfers
Simpanan sementara yang belum diselesaikan	9,775	10,163	Temporary deposit transactions not yet settled
Setoran pajak sebagai bank persepsi	7,234	18,866	Tax collection received by BNI as collecting Bank
Kerjasama pihak ketiga	4,098	4,112	Third party agreements
	148,229	194,218	
	4,553,735	5,560,702	

21. SIMPANAN NASABAH

21. DEPOSITS FROM CUSTOMERS

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 46l.

Information with respect to transactions with related parties are disclosed in Note 46l.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2021	2020	
Rupiah			Rupiah
Giro	197,760,132	162,545,774	Current accounts
Tabungan	215,222,385	209,030,866	Savings accounts
Deposito berjangka	195,789,906	162,350,211	Time deposits
	608,772,423	533,926,851	
Mata uang asing			Foreign currencies
Giro	83,637,910	62,117,096	Current accounts
Tabungan	9,447,177	14,654,813	Savings accounts
Deposito berjangka	27,311,101	36,872,984	Time deposits
	120,396,188	113,644,893	
	729,168,611	647,571,744	

Perincian simpanan nasabah berdasarkan mata uang adalah sebagai berikut:

Deposits from customers based on currencies are as follows:

	2021	2020	
Rupiah	608,772,423	533,926,851	Rupiah

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21. SIMPANAN NASABAH (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

	2021	2020
Mata uang asing		
Dolar Amerika Serikat	117,299,040	110,676,823
Yen Jepang	997,284	816,551
Dolar Singapura	995,223	821,147
Euro Eropa	690,551	1,115,894
Yuan China	191,643	19,269
Dolar Hong Kong	88,021	60,619
Dolar Australia	83,499	48,899
Pound Sterling Inggris	40,810	34,804
Won Korea Selatan	5,080	1,832
Franc Swiss	1,905	46,916
Lain-lain	3,132	2,139
	120,396,188	113,644,893
	729,168,611	647,571,744

Simpanan nasabah berdasarkan prinsip syariah termasuk di dalamnya adalah giro wadiah, tabungan wadiah, tabungan Mudharabah dan deposito Mudharabah.

Giro wadiah dan tabungan wadiah merupakan simpanan wadiah yad-dhamanah dimana pemilik dana akan memperoleh pendapatan bonus. Jumlah giro wadiah pada tanggal-tanggal 31 Desember 2021 dan 2020, masing-masing sebesar nihil dan Rp2.660.071, sedangkan jumlah tabungan wadiah masing-masing sebesar nihil dan Rp12.407.769.

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.

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.

Pada tanggal 31 Desember 2021 dan 2020, BNI adalah peserta dari program penjaminan tersebut.

21. DEPOSITS FROM CUSTOMERS (continued)

a. By type and currency (continued)

Foreign currencies
United States Dollar
Japanese Yen
Singapore Dollar
European Euro
Chinese Yuan
Hong Kong Dollar
Australian Dollar
Great Britain Pound Sterling
South Korean Won
Swiss Franc
Others

Deposits from customers based on sharia principles include wadiah current accounts, wadiah savings, Mudharabah savings and Mudharabah deposits.

Wadiah current accounts and wadiah savings represent a wadiah yad-dhamanah deposit in which the customers are entitled to receive bonus income. The balances of wadiah current accounts as of 31 December 2021 and 2020 were nil and Rp2,660,071, respectively, while the balances of wadiah savings were nil and Rp12,407,769, respectively.

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 Agency (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.

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.

As of 31 December 2021 and 2020, BNI was a participant of the above guarantee program.

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21. SIMPANAN NASABAH (lanjutan)

21. DEPOSITS FROM CUSTOMERS (continued)

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah			Rupiah
Giro	69,863,657	44,053,324	Current accounts
Tabungan	288,512	171,451	Savings accounts
Deposito berjangka	37,213,016	26,870,089	Time deposits
	<u>107,365,185</u>	<u>71,094,864</u>	
Mata uang asing			Foreign currencies
Giro	36,587,462	29,603,005	Current accounts
Tabungan	98,167	261,210	Savings accounts
Deposito berjangka	8,206,227	9,426,760	Time deposits
	<u>44,891,856</u>	<u>39,290,975</u>	
Total pihak berelasi	<u>152,257,041</u>	<u>110,385,839</u>	Total related parties
Pihak ketiga			Third parties
Rupiah			Rupiah
Giro	127,896,475	118,492,450	Current accounts
Tabungan	214,933,873	208,859,415	Savings accounts
Deposito berjangka	158,576,890	135,480,122	Time deposits
	<u>501,407,238</u>	<u>462,831,987</u>	
Mata uang asing			Foreign currencies
Giro	47,050,448	32,514,091	Current accounts
Tabungan	9,349,010	14,393,603	Savings accounts
Deposito berjangka	19,104,874	27,446,224	Time deposits
	<u>75,504,332</u>	<u>74,353,918</u>	
Total pihak ketiga	<u>576,911,570</u>	<u>537,185,905</u>	Total third parties
	<u>729,168,611</u>	<u>647,571,744</u>	

c. Tabungan berdasarkan jenis

c. Savings accounts by type

	2021	2020	
Tabungan BNI	224,122,735	210,696,113	BNI savings accounts
Tabungan Haji	546,827	2,826,242	Haji savings accounts
Tabungan Syariah	-	10,163,324	Sharia savings accounts
	<u>224,669,562</u>	<u>223,685,679</u>	

d. Deposito berjangka berdasarkan jangka waktu kontrak

d. Time deposits by contractual period

	2021	2020	
<1 bulan	9,313,184	4,899,398	<1 month
1 - <3 bulan	71,039,134	64,909,982	1 - <3 months
3 - <6 bulan	75,180,511	94,350,571	3 - <6 months
6 - 12 bulan	38,181,078	20,705,902	6 - 12 months
>12 bulan	29,387,100	14,357,342	>12 months
	<u>223,101,007</u>	<u>199,223,195</u>	

e. Simpanan yang diblokir dan dijadikan jaminan

e. Deposits blocked and pledged as collateral

	2021	2020	
Giro	35,918,249	35,716,760	Current accounts
Tabungan	24,494,628	25,490,577	Savings accounts
Deposito berjangka	7,952,589	7,548,862	Time deposits
Total	<u>68,365,466</u>	<u>68,756,199</u>	Total

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21. SIMPANAN NASABAH (lanjutan)

21. DEPOSITS FROM CUSTOMERS (continued)

f. Tingkat suku bunga dan bagi hasil per tahun

f. 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 %	
2021	0.00 - 7.30	0.00 - 1.50	0.00 - 0.75	0.00 - 0.75	0.01 - 0.01	2021
2020	0.00 - 8.00	0.00 - 3.65	0.00 - 0.50	0.00 - 0.75	0.00 - 0.01	2020

22. SIMPANAN DARI BANK LAIN

22. DEPOSITS FROM OTHER BANKS

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 46m.

Information with respect to transactions with related parties are disclosed in Note 46m.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2021	2020	
Rupiah			Rupiah
Giro	800,838	652,800	Current accounts
Deposito berjangka	87,406	103,865	Time deposits
Negotiable Certificate of Deposit	-	373,453	Negotiable Certificate of Deposits
Simpanan lainnya	582,004	880,351	Other deposits
	<u>1,470,248</u>	<u>2,010,469</u>	
Mata uang asing			Foreign currencies
Giro	5,391,295	1,740,020	Current accounts
Pinjaman pasar uang antar bank	4,540,539	2,654,735	Interbank money market
Deposito berjangka	1,442,415	1,823,556	Time deposits
Simpanan lainnya	1,532,512	794,251	Other deposits
	<u>12,906,761</u>	<u>7,012,562</u>	
	<u>14,377,009</u>	<u>9,023,031</u>	

Perincian simpanan dari bank lain berdasarkan mata uang adalah sebagai berikut:

Deposits from other banks based on currencies are as follows:

	2021	2020	
Rupiah	<u>1,470,248</u>	<u>2,010,469</u>	Rupiah
Mata uang asing			Foreign currencies
Dolar Amerika Serikat	9,137,559	4,845,891	United States Dollar
Yen Jepang	3,086,881	1,425,028	Japanese Yen
Dolar Singapura	367,348	560,652	Singapore Dollar
Euro Eropa	278,355	124,802	European Euro
Dolar Hong Kong	18,695	45,465	Hong Kong Dollar
Pound Sterling Inggris	17,923	10,683	Great Britain Pound Sterling
Dolar Australia	-	8	Australian Dollar
Real Arab Saudi	-	23	Saudi Arabian real
Dolar Kanada	-	2	Canadian Dollar
Franc Swiss	-	6	Swiss Franc
Yuan China	-	2	Chinese Yuan
	<u>12,906,761</u>	<u>7,012,562</u>	
	<u>14,377,009</u>	<u>9,023,031</u>	

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22. SIMPANAN DARI BANK LAIN (lanjutan)

22. DEPOSITS FROM OTHER BANKS (continued)

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah			Rupiah
Giro	77,291	1,279	Current accounts
Negotiable Certificate of Deposit	-	98,036	Negotiable Certificate of Deposits
Simpanan lainnya	25	-	Other deposits
	<u>77,316</u>	<u>99,315</u>	
Mata uang asing			Foreign currencies
Pinjaman pasar uang antar bank	1,068,938	904,820	Interbank money market
Giro	122,862	79,609	Current accounts
	<u>1,191,800</u>	<u>984,429</u>	
Total pihak berelasi	<u>1,269,116</u>	<u>1,083,744</u>	Total related parties
Pihak ketiga			Third parties
Rupiah			Rupiah
Giro	723,547	651,521	Current accounts
Deposito berjangka	87,406	103,865	Time deposits
Negotiable Certificate of Deposit	-	275,417	Negotiable Certificate of Deposits
Simpanan lainnya	581,979	880,351	Other deposits
	<u>1,392,932</u>	<u>1,911,154</u>	
Mata uang asing			Foreign currencies
Giro	5,268,433	1,660,411	Current accounts
Deposito berjangka	1,442,415	1,823,556	Time deposits
Pinjaman pasar uang antar bank	3,471,601	1,749,915	Interbank money market
Simpanan lainnya	1,532,512	794,251	Other deposits
	<u>11,714,961</u>	<u>6,028,133</u>	
Total pihak ketiga	<u>13,107,893</u>	<u>7,939,287</u>	Total third parties
	<u>14,377,009</u>	<u>9,023,031</u>	

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 %	Yen Jepang/ Japanese Yen %	Dolar Singapura/ Singapore Dollar %	
2021	0.00 - 3.25	0.00 - 0.82	0.00 - 0.37	0.00 - 0.80	2021
2020	0.00 - 5.48	0.00 - 1.27	0.00 - 0.35	0.00 - 1.00	2020

d. Simpanan yang diblokir dan dijadikan jaminan

d. Deposits blocked and pledged as collateral

	2021	2020	
Giro	29,592	119,223	Current accounts
Tabungan	10,302	32,014	Savings accounts
Deposito berjangka	8,261	14,159	Time deposits
	<u>48,155</u>	<u>165,396</u>	

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**23. EFEK-EFEK YANG DIJUAL DENGAN JANJI
DIBELI KEMBALI**

**23. SECURITIES SOLD UNDER AGREEMENTS TO
REPURCHASE**

31 Desember/December 2021

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/ Unamortized Interest Expenses	Nilai Bersih/ Net Value
Pihak ketiga/Third parties							
Mata uang asing/Foreign currencies							
JP Morgan Chase Bank, Jakarta	OBN	362,156	17/9/2021	15/5/2024	485,837	14,706	471,131
Standard Chartered Bank, Jakarta	OBN	504,000	11/5/2021	15/5/2022	431,549	2,810	428,739
BNP Paribas Jakarta	OBN	454,250	11/5/2021	15/5/2022	359,389	2,298	357,091
Standard Chartered Bank, Jakarta	OBN	523,618	11/5/2021	15/5/2023	295,258	9,249	286,009
JP Morgan Chase Bank, Jakarta	OBN	356,000	11/5/2021	15/5/2022	287,611	1,929	285,682
		2,200,024			1,859,644	30,992	1,828,652

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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/ Unamortized Interest Expenses	Nilai Bersih/ Net Value
Pihak ketiga/Third parties							
Mata uang asing/Foreign currencies							
BNP Paribas Paris	OBN	962,425	11/12/2020	03/12/2021	890,421	6,313	884,108
Standard Chartered Bank, Jakarta	OBN	504,000	11/05/2020	15/05/2022	432,274	9,665	422,609
UOB Singapore	OBN	351,250	07/09/2020	09/03/2021	369,168	1,110	368,057
BNP Paribas Jakarta	OBN	454,250	11/05/2020	15/05/2022	359,890	7,904	351,986
Standard Chartered Bank, Jakarta	OBN	356,000	11/05/2020	15/05/2023	296,772	14,861	281,911
JP Morgan Chase Bank, Jakarta	OBN	362,156	11/05/2020	15/05/2022	288,231	6,635	281,597
Total		2,990,081			2,636,756	46,488	2,590,268

Tingkat suku bunga tetap tahunan:

Annual fixed interest rates:

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	
Suku bunga kontrak:			<i>Contractual interest rate:</i>
2021	-	1.00 - 2.00	2021
2020	-	0.60 - 2.20	2020

24. LIABILITAS AKSEPTASI

24. ACCEPTANCE PAYABLES

a. Berdasarkan pihak dan mata uang

a. By party and currency

	2021	2020	
Rupiah			Rupiah
Bank	1,541,672	2,720,050	Banks
Kreditur non-bank	231,252	265,083	Non-bank creditors
	1,772,924	2,985,133	
Mata uang asing			Foreign currencies
Bank	3,629,761	2,345,273	Banks
Kreditur non-bank	185,384	169,954	Non-bank creditors
	3,815,145	2,515,227	
	5,588,069	5,500,360	

Perincian liabilitas akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance payables based on currencies are as follows:

	2021	2020	
Rupiah	1,772,924	2,985,133	Rupiah

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24. LIABILITAS AKSEPTASI (lanjutan)

24. ACCEPTANCE PAYABLES (continued)

a. Berdasarkan pihak dan mata uang (lanjutan)

a. By party and currency (continued)

Perincian liabilitas akseptasi berdasarkan mata uang adalah sebagai berikut: (lanjutan)

Acceptance payables based on currencies are as follows: (continued)

	2021	2020	
Mata uang asing			Foreign currencies
Dolar Amerika Serikat	3,726,634	2,461,943	United States Dollar
Euro Eropa	74,891	48,765	European Euro
Yuan China	9,445	1,439	Chinese Yuan
Franc Swiss	2,398	-	Swiss Franc
Yen Jepang	1,777	3,000	Japanese Yen
Dolar Singapura	-	80	Singapore Dollar
	3,815,145	2,515,227	
	5,588,069	5,500,360	

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah	94,157	730,488	Rupiah
Mata uang asing	150,072	15,993	Foreign currencies
Total pihak berelasi	244,229	746,481	Total related parties
Pihak ketiga			Third parties
Rupiah	1,678,767	2,254,643	Rupiah
Mata uang asing	3,665,073	2,499,236	Foreign currencies
Total pihak ketiga	5,343,840	4,753,879	Total third parties
	5,588,069	5,500,360	

25. BEBAN YANG MASIH HARUS DIBAYAR

25. ACCRUED EXPENSES

Beban yang masih harus dibayar terdiri dari:

Accrued expenses consist of the following:

	2021	2020	
Biaya kantor	501,009	438,895	Office expenses
Biaya teknologi dan telekomunikasi	476,031	387,790	Technology and telecommunication expenses
Kewajiban sebagai Bank penerbit	97,640	126,594	Issuer Bank liabilities
Biaya <i>loyalty</i>	51,695	78,501	Loyalty expenses
Biaya promosi	5,896	9,053	Sales promotion expenses
Deposito <i>mudharabah</i>	-	30,337	Mudharabah time deposits
Lain-lain	109,859	110,364	Others
	1,242,130	1,181,534	

26. PENYISIHAN

26. PROVISION

	2021	2020	
Estimasi kerugian atas komitmen dan kontinjensi	2,232,039	1,376,013	Estimated losses from commitments and contingencies
Penyisihan atas perkara hukum	44,358	45,901	Provision for legal cases
	2,276,397	1,421,914	

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26. PENYISIHAN (lanjutan)

- a. Perubahan cadangan atas perkara hukum adalah sebagai berikut:

	2021	2020
Saldo awal	45,901	45,661
(Pembalikan)/penyisihan selama tahun berjalan	(1,543)	240
	44,358	45,901

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 2021 dan 2020 masing-masing sebesar Rp31.840 dan Rp33.134. Pada tanggal 31 Desember 2021 dan 2020, Manajemen berpendapat bahwa jumlah cadangan atas perkara hukum telah memadai.

- b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut:

26. PROVISION (continued)

- a. The movements of the allowance for legal cases are as follows:

*Beginning balance
(Reversal)/
provision during the year*

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 the legal process.

The Bank's total potential financial exposure and estimation on settlement of legal cases arising from outstanding lawsuits as of 31 December 2021 and 2020 amounted to Rp31,840 and Rp33,134, respectively. As of 31 December 2021 and 2020, Management believes that the provision for legal cases is adequate.

- b. The movements of gross carrying amount on commitments and contingencies are as follows:

	31 Desember/December 2021					
	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	Syariah/ Sharia	Total/Total	
Garansi bank yang diterbitkan						Bank guarantees issued
Saldo awal	48,522,559	8,687,279	230,034	81,919	57,521,791	<i>Beginning balance</i>
Pengalihan dari:						<i>Transfer from:</i>
- Kerugian kredit ekspektasian 12 bulan	(3,583,220)	3,583,220	-	-	-	<i>12-month ECL-</i>
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	3,801,021	(3,801,021)	-	-	-	<i>Lifetime ECL not credit - impaired</i>
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(178,037)	197,247	(19,210)	-	-	<i>Transfer from/to lifetime ECL credit-impaired - net</i>
Pengukuran kembali bersih penyisihan kerugian**)	(23,787,114)	(5,756,696)	(825,432)	-	(30,369,242)	<i>Net remeasurement of loss allowance**)</i>
Aset keuangan baru yang diterbitkan atau dibeli	32,118,916	6,261,083	1,257,234	-	39,637,233	<i>New financial assets originated or purchased</i>
Pembayaran penuh	(6,688,363)	(2,528,614)	-	-	(9,216,977)	<i>Fully repayment</i>
Valuta asing dan perubahan lain	132,403	37,900	(141)	-	170,162	<i>Foreign exchange and other movements</i>
Dampak kehilangan pengendalian*)	-	-	-	(81,919)	(81,919)	<i>Impact of loss of control*)</i>
	50,338,165	6,680,398	642,485	-	57,661,048	

*) Lihat Catatan 1

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali

Refer to Note 1*)

Including in the net measurement of loss allowance, is repayment**)

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26. PENYISIHAN (lanjutan)

26. PROVISION (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)

31 Desember/December 2020						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Garansi bank yang diterbitkan						Bank guarantees issued
Saldo awal	56,949,902	765,593	88,263	55,496	57,859,254	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	1,913,316	(1,913,316)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(9,037,852)	9,037,852	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	(115,412)	(103,670)	219,082	-	-	- Lifetime ECL credit-impaired -
Pengukuran kembali bersih penyisihan kerugian	(51,213,584)	(1,198,531)	(116,555)	26,423	(52,502,247)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	55,739,819	2,087,704	41,549	-	57,869,072	New financial assets originated or purchased
Pembayaran kembali	(5,909,315)	-	-	-	(5,909,315)	Repayment
Valuta asing dan perubahan lain	195,685	11,647	(2,305)	-	205,027	Foreign exchange and other movements
	48,522,559	8,687,279	230,034	81,919	57,521,791	
31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Irrevocable letters of credit						Irrevocable letters of credit
Saldo awal	6,997,568	2,811,274	302,628	1,826	10,113,296	Beginning balance
Pengalihan dari:						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(2,778,596)	2,778,596	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	3,588,502	(3,588,502)	-	-	-	Lifetime ECL not credit - impaired
Pengalihan dari/ke:						
kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	79,487	(79,487)	-	-	Transfer from/to lifetime ECL credit-impaired - net
Pengukuran kembali bersih penyisihan kerugian	12,088,223	1,478,343	3,113,271	-	16,679,837	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	8,921,155	581,987	180,066	-	9,683,208	New financial assets originated or purchased
Pembayaran penuh	(21,443,682)	(2,929,134)	(3,313,933)	-	(27,686,749)	Fully repayment
Valuta asing dan perubahan lain	(27,815)	(35,929)	22,390	-	(41,354)	Foreign exchange and other movements
Dampak kehilangan pengendalian*)	-	-	-	(1,826)	(1,826)	Impact of loss of control*)
	7,345,355	1,176,122	224,935	-	8,746,412	

*) Lihat Catatan 1

Refer to Note 1*)

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26. PENYISIHAN (lanjutan)

26. PROVISION (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)

31 Desember/December 2020						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Irrevocable letters of credit						Irrevocable letters of credit
Saldo awal	8,091,282	88,579	973,424	17,081	9,170,366	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	468,737	(468,737)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(2,669,605)	2,669,605	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	(260)	(230)	490	-	-	Lifetime ECL credit-impaired -
Pengukuran kembali bersih penyisihan kerugian	3,776,809	518,974	(598,877)	(15,255)	3,681,651	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	12,225,761	593,761	1,571,545	-	14,391,067	New financial assets originated or purchased
Pembayaran kembali	(15,004,399)	(537,352)	(1,621,025)	-	(17,162,776)	Repayment
Valuta asing dan perubahan lain	109,243	(53,326)	(22,929)	-	32,988	Foreign exchange and other movements
	6,997,568	2,811,274	302,628	1,826	10,113,296	

- c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut:

- c. The movements of estimated losses on commitments and contingencies are as follows:

31 Desember/December 2021						
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total		
Garansi bank yang diterbitkan						Bank guarantees issued
Saldo awal	81,008	228,549	98,008	824	408,389	Beginning balance
Pengalihan dari:						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(6,632)	6,632	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	49,496	(49,496)	-	-	-	Lifetime ECL not credit - impaired
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	309,593	158,711	(468,304)	-	-	Transfer from/to lifetime ECL credit-impaired - net
Pengukuran kembali bersih penyisihan kerugian	(358,179)	507,338	382,532	-	531,691	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	50,394	208,434	629,477	-	888,305	New financial assets originated or purchased
Pembayaran penuh	(11,800)	(58,336)	-	-	(70,136)	Fully repayment
Valuta asing dan perubahan lain	129	6	124	-	259	Foreign exchange and other movements
Dampak kehilangan pengendalian*)	-	-	-	(824)	(824)	Impact of loss of control*)
	114,009	1,001,838	641,837	-	1,757,684	

*) Lihat Catatan 1

Refer to Note 1*)

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26. PENYISIHAN (lanjutan)

- c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

26. PROVISION (continued)

- c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

31 Desember/December 2020						
	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	Syariah/ Sharia	Total/Total	
Garansi bank yang diterbitkan						Bank guarantees issued
Saldo awal	73,273	24,742	11,752	568	110,335	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian 12 bulan	28,765	(28,765)	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(16,457)	16,457	-	-	-	Lifetime ECL not credit - impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	(167)	2,292	(2,125)	-	-	Lifetime ECL credit - impaired
Pengukuran kembali bersih penyisihan kerugian	(60,188)	164,015	88,428	256	192,511	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	109,882	43,404	3,340	-	156,626	New financial assets originated or purchased
Pembayaran kembali	(10,273)	-	-	-	(10,273)	Repayment
Valuta asing dan perubahan lain	(43,827)	6,404	(3,387)	-	(40,810)	Foreign exchange and other movements
	81,008	228,549	98,008	824	408,389	
31 Desember/December 2021						
	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	Syariah/ Sharia	Total/Total	
Irrevocable letters of credit						Irrevocable letters of credit
Saldo awal	13,936	30,198	67,549	18	111,701	Beginning balance
Pengalihan dari:						Transfer from:
- Kerugian kredit ekspektasian 12 bulan	(842)	842	-	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	23,183	(23,183)	-	-	-	Lifetime ECL not credit - impaired
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	98,045	(98,045)	-	-	Transfer from/to lifetime ECL credit-impaired -net
Pengukuran kembali bersih penyisihan kerugian	1,250	(24,225)	506,987	-	484,012	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	10,749	9,130	31,733	-	51,612	New financial assets originated or purchased
Pembayaran penuh	(31,009)	(2,404)	(507,224)	-	(540,637)	Fully repayment
Valuta asing dan perubahan lain	172	(2,413)	(990)	-	(3,231)	Foreign exchange and other movements
Dampak kehilangan pengendalian*)	-	-	-	(18)	(18)	Impact of loss of control*)
	17,439	85,990	10	-	103,439	

*) Lihat Catatan 1

Refer to Note 1*)

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26. PENYISIHAN (lanjutan)

- c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

26. PROVISION (continued)

- c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

31 Desember/December 2020					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Irrevocable letters of credit					Irrevocable letters of credit
Saldo awal	7,940	988	-	171	9,099
Pengalihan ke:					Beginning balance
- Kerugian kredit ekspektasian 12 bulan	7,259	(7,259)	-	-	Transfer to:
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(12,187)	12,187	-	-	12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	-	(101)	101	-	Lifetime ECL not - credit-impaired
Pengukuran kembali bersih penyisihan kerugian	12,915	26,694	(58,439)	(153)	(18,983)
Aset keuangan baru yang diterbitkan atau dibeli	22,559	6,193	224,966	-	253,718
Pembayaran kembali	(24,461)	(8,310)	(98,646)	-	(131,417)
Valuta asing dan perubahan lain	(89)	(194)	(433)	-	(716)
	13,936	30,198	67,549	18	111,701
31 Desember/December 2021					
	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ Lifetime ECL Not Credit- impaired	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ Lifetime ECL Credit- impaired	Syariah/ Sharia	Total/Total	
Fasilitas kredit kepada nasabah yang belum ditarik					Unused loan facilities to debtors
Saldo awal	855,920	-	-	-	855,920
Pengalihan dari:					Beginning balance
- Kerugian kredit ekspektasian 12 bulan	(65,679)	65,679	-	-	Transfer from:
Pengalihan ke:					12-month ECL-
- Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	(297)	-	297	-	Transfer to:
Pengukuran kembali bersih penyisihan kerugian	(593,284)	(65,679)	(297)	-	(659,260)
Aset keuangan baru yang diterbitkan atau dibeli	62,651	-	-	-	62,651
Pembayaran penuh	113,031	-	-	-	113,031
Penghapusbukuan	(1,460)	-	-	-	(1,460)
Valuta asing dan perubahan lain	34	-	-	-	34
	370,916	-	-	-	370,916

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26. PENYISIHAN (lanjutan)

- c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

26. PROVISION (continued)

- c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

31 Desember/December 2020						
	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	Syariah/ Sharia	Total/Total	
Fasilitas kredit kepada nasabah yang belum ditarik						Unused loan facilities to debtors
Saldo awal	569,403	134	398	-	569,935	Beginning balance
Pengalihan ke:						Transfer to:
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	(170,540)	170,540	-	-	-	Lifetime ECL not - credit-impaired
- Kerugian kredit ekspektasian sepanjang umurnya - mengalami penurunan nilai	(2,429)	(12)	2,441	-	-	Lifetime ECL credit - impaired
Pengukuran kembali bersih penyisihan kerugian	(333,098)	(170,629)	(2,809)	-	(506,536)	Net remeasurement of loss allowance
Aset keuangan baru yang diterbitkan atau dibeli	88,753	-	-	-	88,753	New financial assets originated or purchased
Pembayaran kembali	705,105	-	-	-	705,105	Repayment
Valuta asing dan perubahan lain	(1,274)	(33)	(30)	-	(1,337)	Foreign exchange and other movements
	855,920	-	-	-	855,920	

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.

27. LIABILITAS LAIN-LAIN

27. OTHER LIABILITIES

	2021	2020	
Utang ke pemegang polis	14,816,920	13,628,993	Obligation to policy holders
Liabilitas sewa	1,281,576	1,270,076	Lease liabilities
Kewajiban pada pihak ketiga	660,624	870,998	Liability to third parties
Pendapatan yang belum diakui ¹⁾	576,546	88,912	Unearned income ¹⁾
Utang bunga	538,846	422,672	Interest payable
Rekening dalam penyelesaian	251,572	215,858	Unsettled account
Setoran jaminan	237,452	659,780	Guarantee deposits
Utang nasabah - Entitas anak	126,563	337,834	Payable to customers - Subsidiary
Utang reasuransi dan komisi	86,496	54,704	Reinsurance payable and commission
Lain-lain	1,965,406	730,658	Others
	20,542,001	18,280,485	

¹⁾ Termasuk di dalam pendapatan yang belum diakui adalah klaim asuransi yang telah diterima oleh Bank atas Kredit Usaha Rakyat.

¹⁾ Including in unearned income is insurance claim that has been received by the Bank from Kredit Usaha Rakyat (KUR).

Utang kepada pemegang polis merupakan liabilitas Entitas Anak yang terdiri dari liabilitas kontrak asuransi jangka panjang, liabilitas manfaat polis masa depan, cadangan premi yang belum merupakan pendapatan dan estimasi klaim.

Obligation to policyholders represent liabilities of Subsidiary which consist of liabilities for long-term insurance contracts, liabilities for future policy benefits, unearned premium reserves and estimated claims.

Jumlah beban bunga atas liabilitas sewa sebesar Rp68.822 pada tanggal 31 Desember 2021 dan Rp92.159 pada tanggal 31 Desember 2020.

The balances of interest expense from lease liabilities amounted to Rp68,822 as of 31 December 2021 and Rp92,159 as of 31 December 2020.

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27. LIABILITAS LAIN-LAIN (lanjutan)

Analisis jatuh tempo liabilitas lain-lain terkait sewa adalah sebagai berikut:

27. OTHER LIABILITIES (continued)

The maturity analysis of other liabilities related to lease is as follows:

	<u>2021</u>	<u>2020</u>	
1 tahun	80,198	124,556	1 year
2 tahun	121,541	121,241	2 years
3 tahun	202,646	89,218	3 years
4 tahun	131,210	118,500	4 years
5 tahun	745,981	816,561	5 years
	<u>1,281,576</u>	<u>1,270,076</u>	

28. PERPAJAKAN

28. TAXATION

a. Pajak dibayar dimuka

a. Prepaid taxes

	<u>2021</u>	<u>2020</u>	
Pajak penghasilan badan			Corporate income tax
BNI	1,048,889	1,048,889	BNI
Entitas Anak	2,300	898	Subsidiaries
	<u>1,051,189</u>	<u>1,049,787</u>	

b. Utang pajak

b. Taxes payable

	<u>2021</u>	<u>2020</u>	
Pajak penghasilan badan			Corporate income tax
BNI			BNI
Pasal 25	42,503	-	Article 25
Pasal 29	1,160,902	917,428	Article 29
	1,203,405	917,428	
Entitas Anak			Subsidiaries
Pasal 25	6,183	21,780	Article 25
Pasal 29	564	52,829	Article 29
Total pajak penghasilan badan	1,210,152	992,037	Total corporate income tax
Pajak lainnya			Other taxes
BNI	61,175	112,852	BNI
Entitas Anak	12,925	42,888	Subsidiaries
Total pajak lainnya	74,100	155,740	Total other taxes
	<u>1,284,252</u>	<u>1,147,777</u>	

c. Beban pajak

c. Tax expense

	<u>2021</u>	<u>2020</u>	
BNI			BNI
Kini	3,239,975	2,008,644	Current
Tangguhan	(1,215,866)	(413,155)	Deferred
Tangguhan atas dampak penurunan tarif pajak	(478,500)	-	Effect of changes in tax rate - deferred tax
Pajak penghasilan - BNI	1,545,609	1,595,489	Income tax - BNI
Entitas Anak			Subsidiaries
Kini	53,238	209,680	Current
Tangguhan	(24,911)	(14,458)	Deferred
Pajak penghasilan - Entitas Anak	28,327	195,222	Income tax - Subsidiaries
	<u>1,573,936</u>	<u>1,790,711</u>	

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28. PERPAJAKAN (lanjutan)

28. TAXATION (continued)

c. Beban pajak (lanjutan)

c. Tax expense (continued)

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:

	2021	2020	
Laba konsolidasian sebelum pajak penghasilan	12,550,987	5,112,153	Consolidated income before income tax
Pajak dihitung dengan tarif pajak yang berlaku	2,394,258	994,153	Tax calculated at applicable tax rates
Pendapatan yang tidak dapat dikurangkan untuk tujuan perpajakan, termasuk dampak perubahan tarif pajak			Income not deductible for tax purpose including effect of changes in tax rate
BNI	(299,967)	79,619	BNI
Entitas Anak	(41,855)	27,699	Subsidiaries
	(341,822)	107,318	
Dampak penyesuaian tarif pajak	(478,500)	689,240	Effect of tax rate adjustments
Beban pajak	1,573,936	1,790,711	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:

	2021	2020	
Grup			The Group
Laba konsolidasian sebelum pajak penghasilan	12,550,987	5,112,153	Consolidated income before income tax
Laba sebelum pajak penghasilan dari Entitas Anak	(319,004)	(761,469)	Income before income tax of Subsidiaries
Laba sebelum pajak penghasilan - BNI	12,231,983	4,350,684	Income before income tax - BNI
Beda waktu			Timing differences
- Penyusutan aset tetap	153,163	489,541	Depreciation of fixed assets -
- Pencadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	4,185,583	4,615,042	Provision for impairment losses on earning assets - loans
- Pembalikan cadangan hukum, kecurangan (fraud) dan lainnya	(4,251)	(1,882)	Reversal of allowance for legal, fraud and others -
- Laba/(rugi) yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	573,111	(948,315)	Unrealized gain/(loss) on trading securities and derivative transactions -
- Pembentukan cadangan imbalan kerja	236,628	398,625	Provision for allowance for employee benefits -
- Amortisasi Aset atas Hak Guna	54,599	-	Right of Use of Asset Amortization -
- Penambahan cadangan kerugian penurunan nilai aset produktif selain pinjaman yang diberikan	1,200,462	1,249,064	Provision for impairment earning assets - other than loans
	6,399,295	5,802,075	
Beda tetap			Permanent differences
- Kenikmatan karyawan	329,612	314,063	Employees' fringe benefits -
- Keuntungan atas reksadana	(612,096)	(374,686)	Gain on mutual funds -
- Laba dari cabang luar negeri	(900,833)	-	Profit from overseas branch offices -
- Lain-lain	(395,458)	479,673	Others -
	(1,578,775)	419,050	
Penghasilan kena pajak - BNI	17,052,503	10,571,809	Taxable income - BNI

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28. PERPAJAKAN (lanjutan)

28. TAXATION (continued)

c. Beban pajak (lanjutan)

Beban pajak penghasilan tahun berjalan dan taksiran utang pajak penghasilan BNI adalah sebagai berikut:

	2021
Beban pajak penghasilan sesuai tarif pajak yang berlaku	3,239,975
19% x Rp17.052.503	-
19% x Rp10.571.809	-
Beban pajak penghasilan	3,239,975
Pajak dibayar dimuka	(2,036,570)
Utang pajak penghasilan - BNI	1,203,405

Pada tanggal 31 Maret 2020, Pemerintah menerbitkan Peraturan Pemerintah Pengganti Undang-Undang (Perpu) Republik Indonesia No. 1 Tahun 2020 yang telah menjadi Undang-Undang (UU) No. 2 Tahun 2020, serta menetapkan Peraturan Pemerintah (PP) No. 30 Tahun 2020 tentang Penurunan Tarif Pajak Penghasilan bagi Wajib Pajak Badan Dalam Negeri yang Berbentuk Perseroan Terbuka dan berlaku sejak tanggal 19 Juni 2020. Aturan tersebut menetapkan penurunan tarif pajak penghasilan wajib pajak badan dalam negeri dan bentuk usaha tetap dari semula 25% menjadi 22% untuk tahun pajak 2020 dan 2021 dan 20% mulai tahun pajak 2022 dan seterusnya.

Pada tanggal 29 Oktober 2021, Pemerintah menerbitkan Undang-Undang Republik Indonesia No. 7 Tahun 2021 tentang Harmonisasi Peraturan Perpajakan. Aturan tersebut menetapkan tarif pajak penghasilan wajib pajak dalam negeri dan bentuk usaha tetap sebesar 22% yang mulai berlaku pada tahun pajak 2022 dan seterusnya. Dengan demikian, penetapan tarif pajak sebelumnya sebesar 20% menjadi tidak berlaku setelah Undang-Undang ini disahkan.

c. Tax expense (continued)

Taxable income for the current year and the estimated corporate income tax payable of BNI are as follows:

	2020	
Income tax based on the applicable tax rates	-	
19% x Rp17,052,503	2,008,644	
19% x Rp10,571,809	-	
Corporate income tax expense	2,008,644	
Prepaid tax	(1,091,216)	
Corporate income tax payable - BNI	917,428	

On 31 March 2020, the Government issue Government Regulation in Lieu of Law (Perpu) of the Republic of Indonesia No. 1 year 2020 which has become Law (UU) No. 2 year 2020, as well as stipulated Government Regulation (PP) No. 30 year 2020 concerning Tariff Reduction for Domestic Public Companies Taxpayers and effective since 19 June 2020. The regulation has stipulated the reduction in the income tax rates for domestic corporate taxpayers and business establishments from 25% to 22% for Fiscal Year 2020 and 2021 and 20% for the Fiscal Year 2022 onwards.

On 29 October 2021, the Government issue Law of the Republic of Indonesia No.7 year 2021 concerning Harmonization of Tax Regulations. The regulation has stipulated the income tax rate for domestic taxpayers and business establishments of 22% which will be effective from the Fiscal Year 2022 onwards, and a further reduction of the tax rate by 3% for domestic taxpayers who meet certain requirements. Hence, the previously tax rate determination of 20% will be invalid after the ratification of this Law.

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28. PERPAJAKAN (lanjutan)

c. Beban pajak (lanjutan)

Untuk tahun pajak 2021 dan 2020, berdasarkan Pasal 3 dari Peraturan Pemerintah No. 30 tahun 2020 tentang Penurunan Tarif Pajak Penghasilan ("PPH") 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/2022-0024 tanggal 3 Januari 2022 dan Nomor DE/I/2021-0281 tanggal 8 Januari 2021 dari Biro Administrasi Efek, Datindo Entrycom, atas kepemilikan saham BNI selama tahun 2021 dan 2020, semua kriteria untuk memperoleh fasilitas penurunan tarif pajak tersebut di atas telah terpenuhi.

Pajak penghasilan badan BNI untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020 telah dihitung dengan menggunakan tarif pajak 19%.

28. TAXATION (continued)

c. Tax expense (continued)

For the fiscal year 2021 and 2020, based on Article 3 of Government Regulation No. 30 year 2020 regarding the Decrease in Income Tax Rates ("PPH") 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/2022-0024 dated 3 January 2022 and DE/I/2021-0281 dated 8 January 2021 from the Registrar, Datindo Entrycom, regarding BNI's shares during the years 2021 and 2020, BNI has met all criteria mentioned above to obtain a facility of tax rate reduction.

BNI's corporate income tax for the year ended 31 December 2021 and 2020 are calculated using the tax rate of 19%.

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28. PERPAJAKAN (lanjutan)

28. TAXATION (continued)

d. Aset pajak tangguhan - bersih

Aset pajak tangguhan pada tanggal-tanggal 31 Desember 2021 dan 2020 merupakan pengaruh beda pajak dengan rincian sebagai berikut:

d. Deferred tax assets - net

The deferred tax assets as of 31 December 2021 and 2020 represent the tax effects on the following:

31 Desember/December 2021						
	Saldo awal/ Beginning balance	Dampak perubahan tarif pajak yang ditangguhkan/ Effect of changes in tax rate - equity	Dampak perubahan tarif pajak yang ditangguhkan/ Effect of changes in tax rate - profit or loss	Dikreditkan/ (dibebankan) ke laporan laba rugi komprehensif konsolidasian/ Credited/ (charged) to Consolidated statement of profit or loss and other comprehensive income	Dibebankan ke ekuitas/ Charged to equity	Saldo akhir/ Ending balance
(Laba) rugi yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(404,404)	(16,059)	-	-	158,220	(262,243)
Cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	3,795,693	-	408,584	795,261	-	4,999,538
Cadangan imbalan kerja	791,416	46,656	37,629	44,959	(222,817)	697,843
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	670,752	-	35,724	228,088	-	934,564
Cadangan hukum, kecurangan (fraud) dan lainnya	9,236	-	-	(808)	-	8,428
(Laba) rugi yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(275,408)	-	-	108,891	-	(166,517)
Amortisasi Aset Hak Guna	-	-	-	10,375	-	10,375
Penyusutan aset tetap	(29,213)	-	(3,437)	29,101	(56,030)	(59,579)
Aset pajak tangguhan BNI - bersih	4,558,072	30,597	478,500	1,215,867	(120,627)	6,162,409
Aset pajak tangguhan Entitas Anak - bersih *)	241,760					67,884
Aset pajak tangguhan konsolidasian - bersih	4,799,832					6,230,293

*) Termasuk dampak kehilangan pengendalian sebesar Rp 208.872. Lihat Catatan 1.

Including impact of loss of control amounting Rp208,872. Refer to Note 1 *)

Bank telah membukukan pengaruh dari perubahan tarif pajak penghasilan badan tersebut pada laporan keuangan konsolidasian untuk tahun yang berakhir 31 Desember 2021 berupa kenaikan aset pajak tangguhan sebesar Rp509.097 dimana jumlah sebesar Rp478.500 dikreditkan ke laba rugi tahun berjalan dan sebesar Rp30.597 dibebankan ke penghasilan komprehensif lainnya.

The Bank has recorded the effect of changes in the corporate income tax rate in the consolidated financial statements for the year ended 31 December 2021 in form of a increase in deferred tax assets amounting to Rp509,097 in which the amount of Rp478,500 was credited to current year's profit or loss and Rp30,597 was charged to other comprehensive income.

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28. PERPAJAKAN (lanjutan)

28. TAXATION (continued)

d. Aset pajak tangguhan - bersih (lanjutan)

d. Deferred tax assets - net (continued)

Aset pajak tangguhan pada tanggal-tanggal 31 Desember 2021 dan 2020 merupakan pengaruh beda pajak dengan rincian sebagai berikut: (lanjutan)

The deferred tax assets as of 31 December 2021 and 2020 represent the tax effects on the following: (continued)

31 Desember/December 2020							
	Saldo awal/ Beginning balance	Dampak penerapan awal PSAK 71/ Effect of initial implemen- tation SFAS 71	Dampak perubahan tarif pajak yang ditangguhkan/ Effect of changes in tax rate - deferred	Dikreditkan/ (dibebankan) ke laporan laba rugi komprehensif konsolidasian/ Credited/ (charged) to Consolidated statement of profit or loss and other comprehensive income	Dibebankan ke ekuitas/ Charged to equity	Saldo akhir/ Ending balance	
(Laba) rugi yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	146,292	(135,353)	12,988	-	(428,331)	(404,404)	Unrealized (gain) loss on financial assets at fair value through other comprehensive income
Cadangan kerugian penurunan nilai aset produktif- pinjaman yang diberikan	423,422	3,078,697	(583,284)	876,858	-	3,795,693	Allowance for impairment losses on earning assets - loans
Cadangan imbalan kerja	375,501	-	(56,403)	75,739	396,579	791,416	Allowance for employee benefits
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	360,644	133,198	(60,412)	237,322	-	670,752	Allowance for impairment losses on earning assets - other than loans
Cadangan hukum, kecurangan (fraud) dan lainnya	10,099	-	(505)	(358)	-	9,236	Allowance for legal, fraud and others
(Laba) rugi yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(100,240)	-	5,012	(180,180)	-	(275,408)	Unrealized (gain) loss on trading securities and derivative transactions
Penyusutan aset tetap	(132,276)	-	7,580	93,013	2,470	(29,213)	Depreciation of fixed assets
Aset pajak tangguhan BNI - bersih	1,083,442	3,076,542	(675,024)	1,102,394	(29,282)	4,558,072	Net deferred tax assets - BNI
Aset pajak tangguhan Entitas Anak - bersih	265,901					241,760	Net deferred tax assets - Subsidiaries
Aset pajak tangguhan konsolidasian - bersih	1,349,343					4,799,832	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

e. Tax assessment letters

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.

On 5 February 2018, BNI received tax assesment 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.

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28. PERPAJAKAN (lanjutan)

e. Surat ketetapan pajak (lanjutan)

Pada tanggal 30 April 2019, BNI menerima Keputusan Direktorat Jenderal Pajak yang mengabulkan sebagian keberatan BNI dan mengurangi 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 dimuka 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 yang belum dikabulkan ke Pengadilan Pajak. Sampai dengan tanggal laporan keuangan konsolidasian ini, Pengadilan Pajak belum menerbitkan putusan atas permohonan banding yang diajukan oleh BNI tersebut. Bank berkeyakinan bahwa permohonan banding yang diajukan dapat dikabulkan sehingga Bank tidak membentuk cadangan atas SKPKB tersebut.

28. 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 objection that has not been granted to the Tax Court. Up to the date of this consolidated financial statements, the Tax Court has not yet issued any decision on the appeal letter filed by BNI. The Bank believes that the appeal submitted will be accepted therefore Bank did not provide any provision for the SKPKB.

29. EFEK-EFEK YANG DITERBITKAN

a. Berdasarkan jenis

	2021	
	Saldo/ Balance	Peringkat/ Rating *)
Obligasi - BNI, setelah dikurangi biaya penerbitan yang belum diamortisasi masing-masing sebesar Rp161 pada tanggal 31 Desember 2021 dan Rp447 pada tanggal 31 Desember 2020	2,986,530	idAAA*)

*) Pefindo

Pada tanggal 22 Juni 2017, BNI telah mendapatkan pernyataan efektif dari OJK melalui surat nomor S-349/D.04/2017 untuk menerbitkan Obligasi Berkelanjutan I BNI Rupiah Tahap I Tahun 2017 ("Obligasi"). Nilai obligasi yang diterbitkan sebesar Rp3.000.000, jangka waktu 5 tahun, dengan kupon sebesar 8% per tahun yang akan dibayarkan secara triwulanan. Obligasi BNI diterbitkan pada tanggal 11 Juli 2017 dan listing di Bursa Efek Indonesia pada tanggal 12 Juli 2017. Pembayaran kupon pertama kepada para pemegang obligasi telah dilakukan pada tanggal 11 Oktober 2017.

29. SECURITIES ISSUED

a. By type

	2020	
	Saldo/ Balance	Peringkat/ Rating *)
Bonds - BNI, net of unamortized issuance cost amounting to Rp161 as of 31 December 2021 and Rp447 as of 31 December 2020, respectively	2,985,011	idAAA*)

Pefindo*)

On 22 June 2017, BNI obtained an effective statement from OJK through letter number S-349/D.04/2017 to issue Continuous Bonds I BNI Rupiah Phase I Year 2017 ("Bonds"). The value of bonds issued amounted to Rp3,000,000 with term of 5 years and coupon of 8% per annum to be paid quarterly. BNI Bonds was issued on 11 July 2017 and listed on the Indonesia Stock Exchange on 12 July 2017. The first coupon payment to bondholders has been made on 11 October 2017.

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29. EFEK-EFEK YANG DITERBITKAN (lanjutan)

29. SECURITIES ISSUED (continued)

a. Berdasarkan jenis (lanjutan)

a. By type (continued)

Bertindak sebagai Penjamin Pelaksana Emisi Efek adalah PT BNI Sekuritas, PT Mandiri Sekuritas, PT Bahana Sekuritas, PT Danareksa Sekuritas, PT Indo Premier Sekuritas dan PT BCA Sekuritas. Bertindak sebagai Wali Amanat adalah PT Bank Rakyat Indonesia (Persero) Tbk.

Acting as Underwriters are PT BNI Sekuritas, PT Mandiri Sekuritas, PT Bahana Sekuritas, PT Danareksa Sekuritas, PT Indo Premier Sekuritas and PT BCA Sekuritas. Acting as Trustee is PT Bank Rakyat Indonesia (Persero) Tbk.

Sesuai dengan POJK No. 07/2017 dan Peraturan No.IX.C.11, dalam rangka penerbitan Obligasi ini, BNI telah memperoleh hasil pemeringkatan atas surat hutang jangka panjang dari PT Pemeringkat Efek Indonesia ("Pefindo") untuk periode 5 Juli 2021 sampai dengan 1 Juli 2022 sesuai dengan press release tanggal 7 Juli 2021, dengan peringkat idAAA (Triple A). BNI akan melakukan pemeringkatan atas obligasi yang diterbitkan setiap tahun selama kewajiban atas efek tersebut belum lunas.

In accordance with POJK No. 07/2017 and Regulation No.IX.C.11, for the issuance of this Bond, BNI obtained the rating of long-term debt from PT Pemeringkat Efek Indonesia ("Pefindo") for the period 5 July 2021 until 1 July 2022, through press release dated 7 July 2021, with idAAA rating (Triple A). BNI will obtain a rating of the bonds issued annually as long as the obligations on such securities have not been paid off.

Dana obligasi setelah dikurangi biaya-biaya akan digunakan bank untuk ekspansi bisnis terutama penyaluran kredit.

Proceeds from the issuance of the bond after deducting expenses was used by the Bank for business expansion, in particular loans.

Selama jangka waktu obligasi dan selama seluruh jumlah pokok obligasi belum seluruhnya dilunasi dan/atau seluruh jumlah bunga obligasi serta kewajiban pembayaran lainnya (bila ada) belum seluruhnya dibayar menurut ketentuan Perjanjian Perwalianamanatan ini, BNI berjanji dan mengikatkan diri bahwa tanpa persetujuan tertulis dari Wali Amanat tidak akan melakukan hal-hal sebagai berikut:

During the term of the bonds and as long as the entire principal amount of the bonds has not been fully repaid and/or the full amount of bonds interest and other payment obligations (if any) have not been fully paid under the terms of the Trustee Agreement, BNI promises and binds that without the written approval of the Trust Agent, will not do the following:

- melakukan penggabungan, peleburan dan/atau akuisisi; atau
- mengizinkan atau memberikan persetujuan kepada Anak Perusahaan (jika ada) untuk melakukan penggabungan, peleburan dan/atau akuisisi; yang secara material akan mempunyai akibat negatif.

- merger, consolidation and/or acquisition; or
- permit or give consent to Subsidiaries (if any) for merger, consolidation and/or acquisition; which will materially have negative consequences.

Pada periode yang berakhir pada 31 Desember 2021 dan 2020, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

During the year ended 31 December 2021 and 2020, the Bank has fulfilled the terms required set forth in the agreements.

b. Berdasarkan mata uang

b. By currency

	2021	2020
Rupiah		
Obligasi-BNI, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp161 pada tanggal 31 Desember 2021 dan Rp447 pada tanggal 31 Desember 2020	2,986,530	2,985,011
	<u>2,986,530</u>	<u>2,985,011</u>
Rupiah Bonds-BNI, net of unamortized discount cost of Rp161 as of 31 December 2021 and Rp447 as of 31 December 2020		

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29. EFEK-EFEK YANG DITERBITKAN (lanjutan)

29. SECURITIES ISSUED (continued)

c. Berdasarkan hubungan

c. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah	1,012,145	1,165,026	Rupiah
Pihak ketiga			Third parties
Rupiah	1,974,385	1,819,985	Rupiah
	2,986,530	2,985,011	

Informasi mengenai efek-efek yang diterbitkan kepada pihak-pihak berelasi diungkapkan pada Catatan 46n.

Information related to securities issued to related parties are disclosed in Note 46n.

d. Tingkat suku bunga per tahun

d. Annual interest rates

	Rupiah %	
2021	8.00	2021
2020	8.00	2020

30. PINJAMAN YANG DITERIMA

30. BORROWINGS

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2021	2020	
Rupiah			Rupiah
Pinjaman penerusan	2,916	3,459	Two step loans
Kredit likuiditas untuk kredit koperasi primer kepada anggotanya	925	926	Liquidity loan for member of primary cooperatives
Lain-lain	782,132	1,142,585	Others
	785,973	1,146,970	
Mata uang asing			Foreign currencies
Pinjaman bilateral	28,314,782	37,999,171	Bilateral loans
Bankers acceptance	3,278,075	4,872,533	Bankers acceptance
Pinjaman penerusan	53,726	59,987	Two step loans
Lain-lain	25,380	35,653	Others
	31,671,963	42,967,344	
	32,457,936	44,114,314	

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 juta dengan jangka waktu pinjaman selama 10 tahun serta tingkat suku bunga LIBOR 6 bulan ditambah marjin tertentu dan akan jatuh tempo pada tanggal 16 September 2025. Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USD372 juta (nilai penuh) atau ekuivalen Rp5.308.301 dan USD465 juta (nilai penuh) atau ekuivalen Rp6.536.986.

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 million with tenure of 10 years and with interest of 6 months LIBOR plus a certain margin and will mature on 16 September 2025. As of 31 December 2021 and 2020, outstanding loan less unamortized issuance costs amounted to USD372 million (full amount) or equivalent to Rp5,308,301 and USD465 million (full amount) or equivalent to Rp6,536,986, respectively.

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30. 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 juta dengan jangka waktu pinjaman selama 15 tahun serta tingkat suku bunga LIBOR 6 bulan ditambah margin tertentu dan akan jatuh tempo pada tanggal 15 September 2025. Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USD151 juta atau ekuivalen Rp2.157.285 dan USD189 juta atau ekuivalen Rp2.658.541.
- c) Pinjaman bilateral luar negeri sebagai *Mandated Lead Arrangers & Bookrunners* ANZ, BNP Paribas, BTMU, Citibank, Commerzbank, CTBC, DBS, OCBC, dan UOB sebesar USD500 juta dengan jangka waktu pinjaman selama 5 tahun serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan telah jatuh tempo pada tanggal 22 Desember 2021. Pada tanggal 31 Desember 2020, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi sebesar USD498 juta atau ekuivalen Rp7.003.339.
- d) 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 USD 750 juta yang terbagi dalam dua seri, yaitu Seri A dan Seri B. Seri A sebesar USD375 juta dengan jangka waktu 42 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 25 Mei 2023. Sedangkan Seri B sebesar USD375 juta dengan jangka waktu 60 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 25 November 2024. Standard Chartered Bank (Hong Kong) Ltd bertindak sebagai Agen untuk fasilitas pinjaman ini.

30. BORROWINGS (continued)

a. By type and currency (continued)

Bilateral loans (continued)

- b) *Offshore bilateral loan with China Development Bank amounting to USD189 million with tenure of 15 years and with interest of 6 months LIBOR plus a certain margin and will mature on 15 September 2025. As of 31 December 2021 and 2020, outstanding loan less unamortized issuance costs amounted to USD151 million or equivalent to Rp2,157,285 and USD189 million or equivalent to Rp2,658,541*
- c) *Offshore bilateral loan as Mandated Lead Arrangers & Bookrunners ANZ, BNP Paribas, BTMU, Citibank, Commerzbank, CTBC, DBS, OCBC, and UOB amounting to USD500 million with tenure of 5 years and with interest of 3 months LIBOR plus a certain margin per annum and has matured on 22 December 2021. As of 31 December 2020, outstanding loan less unamortized issuance costs amounted to USD498 million or equivalent to Rp7,003,339 respectively.*
- d) *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 million which was split into two tranches, A tranche and B tranche. A tranche amounting to USD375 million with tenure of 42 months with interest of 3 months LIBOR plus a certain margin per annum will mature on 25 May 2023 while B tranche amounting to USD375 million with tenure of 60 months with interest of 3 months LIBOR plus a certain margin per annum will mature on 25 November 2024. Standard Chartered Bank (Hong Kong) Ltd acted as the Agent.*

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

- d) Pada tanggal 25 Februari 2020, BNI memperoleh fasilitas tambahan fasilitas Pinjaman Bilateral senilai USD220 Juta yang terbagi dalam dua seri, yaitu Seri A dan Seri B. Seri A mendapat tambahan sebesar USD135 juta dengan jangka waktu 39 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 25 Mei 2023. Sedangkan Seri B sebesar USD85 juta dengan jangka waktu 57 bulan serta tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 25 November 2024.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman setelah dikurangi dengan biaya penerbitan yang belum diamortisasi masing-masing sebesar USD963 juta atau ekuivalen Rp13.722.946 dan USD962 juta ekuivalen Rp13.510.805.

- e) BNI, melalui BNI cabang New York memiliki pinjaman bilateral luar negeri dengan CoBank Greenwood Village Colorado US sebesar USD130 juta dengan jangka waktu pinjaman selama 357-359 hari dan tingkat suku bunga 2,45%-3,54% dan telah jatuh tempo pada tanggal 26 Juli 2021. Pada tanggal 31 Desember 2020, saldo pinjaman fasilitas tersebut sebesar USD90 juta atau ekuivalen Rp1.264.500.
- f) BNI, melalui BNI cabang New York memiliki pinjaman bilateral luar negeri dengan Wells Fargo sebesar USD40 juta dengan jangka waktu pinjaman selama 180 hari dan tingkat suku bunga 0,69% dan telah jatuh tempo pada tanggal 17 Desember 2021. Pada tanggal 31 Desember 2020, saldo pinjaman fasilitas tersebut sebesar USD40 juta atau ekuivalen Rp562.000.
- g) BNI, melalui BNI cabang London memiliki pinjaman bilateral luar negeri dengan konsorsium bank yang terdiri dari Bank of Tokyo Mitsubishi UFJ Ltd, BNP Paribas, Hong Kong & Shanghai Banking Corporation Ltd, Overseas-Chinese Banking Corporation Ltd, United Overseas Bank Ltd, dan Westpack Banking Co sebesar USD500 juta dengan jangka waktu pinjaman selama 5 tahun dan tingkat suku bunga LIBOR 3 bulan ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 30 Agustus 2022. Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar USD500 juta atau ekuivalen Rp7.126.250 dan USD500 juta atau ekuivalen Rp7.025.000.

30. BORROWINGS (continued)

a. By type and currency (continued)

Bilateral loans (continued)

- d) On 25 February 2020, BNI obtained additional offshore bilateral loan with amounting to USD220 million split into two tranches, A tranche and B tranche. A tranche obtained additional amounting to USD135 million with tenure of 39 months with interest of 3 months LIBOR plus a certain margin per annum and will mature on 25 May 2023. While B tranche obtained additional amounting to USD85 million with tenure of 57 months with interest of 3 months LIBOR plus a certain margin per annum and will mature on 25 November 2024.

As of 31 December 2021 and 2020, outstanding loan less unamortized issuance costs amounted to USD963 million or equivalent to Rp13,722,946 and USD962 million equivalent to Rp13,510,805, respectively.

- e) BNI, through its New York branch, has offshore bilateral loan with CoBank Greenwood Village Colorado US amounting to USD130 million with tenure of 357-359 days and with all in interest rate of 2.45%-3.54% and has matured on 26 July 2021. As of 31 December 2020, the outstanding loan balance under this facility amounted to USD90 million or equivalent to Rp1,264,500.
- f) BNI, through its New York branch, has offshore bilateral loan with Wells Fargo amounting to USD40 million with tenure of 180 days and with all in interest rate of 0.69% and has matured on 17 December 2021. As of 31 December 2020, the outstanding loan balance under this facility amounted to USD40 million equivalent to Rp562,000.
- g) BNI, through its London branch, has offshore bilateral loan with consortium of banks consisting of Bank of Tokyo Mitsubishi UFJ Ltd, BNP Paribas, Hong Kong & Shanghai Banking Corporation Ltd, Overseas-Chinese Banking Corporation Ltd, United Overseas Bank Ltd, and Westpack Banking Co amounting to USD500 million with tenure of 5 years and with interest of 3 months LIBOR plus a certain margin per annum and will mature on 30 August 2022. As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to USD500 million or equivalent to Rp7,126,250 and USD500 million or equivalent to Rp7,025,000, respectively.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

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 2021 dan 2020, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

Pinjaman penerusan

Pinjaman penerusan pada tanggal 31 Desember 2021 dan 2020 mencakup pinjaman penerusan dari *Kreditanstalt für 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 juta. 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.

Pada tanggal 31 Desember 2021, saldo pinjaman penerusan adalah sebesar Rp3.397 dan EUR3,4 juta.

Pada tanggal 31 Desember 2020, saldo pinjaman penerusan adalah sebesar Rp3.459 dan EUR3,5 juta.

30. BORROWINGS (continued)

a. By type and currency (continued)

Bilateral loans (continued)

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 years ended 31 December 2021 and 2020, the Bank has fulfilled the terms required set forth in the agreements.

Two step loans

Two step loans as of 31 December 2021 and 2020 are step loans from *Kreditanstalt für 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 EUR 9 million. 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.

As of 31 December 2021, two step loans amounted to Rp3,397 and EUR3.4 million.

As of 31 December 2020, two step loans amounted to Rp3,459 and EUR3.5 million.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

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 (Persero), 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.

	2021	2020
Wells Fargo Bank N.A.	855,150	491,750
CoBank, Singapore	712,625	702,500
Mitsubishi UFJ Trust and Banking Corporation, Singapura	712,625	210,750
CTBC Bank Co Ltd Singapura	427,575	-
KDB Bank	427,575	281,000
DZ Bank Singapore	142,525	281,000
United Overseas Bank Limited, Singapura	-	983,500
Standard Chartered Bank, Hongkong	-	702,500
Emirates NBD Bank PJSC, London	-	517,033
DBS Bank Ltd, London	-	281,000
Wells Fargo Bank London	-	281,000
CoBank, Seoul	-	140,500
	<u>3,278,075</u>	<u>4,872,533</u>

Lain-lain

PT BNI Multifinance (BNIMF):

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 akan jatuh tempo pada tanggal 28 Agustus 2023.

Pada tanggal 16 September 2019, berdasarkan Perjanjian Kredit No. 18, PT Bank Mandiri (Persero) 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 yang berlaku sampai 16 September 2023.

30. BORROWINGS (continued)

a. By type and currency (continued)

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 (Persero), 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.

Wells Fargo Bank N.A.	
CoBank, Singapore	
Mitsubishi UFJ Trust and Banking Corporation, Singapore	
CTBC Bank Co Ltd Singapura	
KDB Bank	
DZ Bank Singapore	
United Overseas Bank Limited, Singapore	
Standard Chartered Bank, Hong kong	
Emirates NBD Bank PJSC, London	
DBS Bank Ltd, London	
Wells Fargo Bank London	
CoBank, Seoul	

Others

PT BNI Multifinance (BNIMF):

PT Bank Mandiri (Persero) Tbk

On 28 August 2018, BNIMF obtain working capital loan facility from PT Bank Mandiri (Persero) Tbk with maximum facility amounting to Rp250,000 and tenure of 60 months and will mature on 28 August 2023.

On 16 September 2019, based on the Credit Agreement No. 18, PT Bank Mandiri (Persero) 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 that will mature on 16 September 2023.

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30. 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 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.

Tingkat suku bunga pinjaman berkisar antara 9,00% dan 8,00%-9,25% untuk pencairan tanggal 31 Desember 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp196.707 dan bunga pinjaman sebesar Rp40.126.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp349.201 dan Rp539.167.

PT Bank Victoria International Tbk

Pada tanggal 20 September 2017, berdasarkan Perjanjian Kredit No. 15, PT Bank Victoria International Tbk setuju untuk memberikan fasilitas kredit *fixed loan line limit non revolving* dengan jumlah maksimum dana yang disediakan adalah sebesar Rp200.000 yang digunakan sebagai tambahan modal kerja yang berlaku sampai 28 April 2020. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya. Fasilitas ini telah diperpanjang sampai dengan 28 September 2021. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

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 yang berlaku sampai 25 Juli 2023.

Tingkat suku bunga pinjaman berkisar antara 9,25% dan 8,00%-9,50% untuk pencairan tanggal 31 Desember 2021 dan 2020.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank Mandiri (Persero) Tbk (continued)

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.

Interest rate of the borrowing ranged from 9.00% and 8.00%-9.25% for withdrawal as of 31 December 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp196,707 and interest amounting Rp40,126.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp349,201 and Rp539,167, respectively.

PT Bank Victoria International Tbk

On 20 September 2017, based on the Credit Agreement No. 15, PT Bank Victoria International Tbk agreed to provide a fixed loan line limit non revolving loan facility with a maximum available fund amounting to Rp200,000, which was used as an additional working capital that will mature on 28 April 2020. As of 31 December 2019, the bank loan facility had been fully used. This facility been extended until 28 September 2021. This facility had been repaid at maturity date and was not renewed.

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 that will mature on 25 July 2023.

Interest rate of the borrowing ranged from 9.25% and 8.00%-9.50% for withdrawal as of 31 December 2021 and 2020.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Victoria International Tbk (lanjutan)

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp145.982 dan bunga pinjaman sebesar Rp11.488.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp132.500 dan Rp133.124.

PT Bank CIMB Niaga Tbk

Pada tanggal 8 Oktober 2019, berdasarkan Perjanjian Kredit No. 174/CB/JKT/2019, PT Bank CIMB Niaga Tbk setuju untuk memberikan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp200.000 yang digunakan sebagai tambahan modal kerja yang berlaku sampai 8 April 2023.

Tingkat suku bunga pinjaman berkisar antara 9,25% dan 9,00%-9,25% untuk pencairan tanggal 31 Desember 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp69.048 dan bunga pinjaman sebesar Rp8.900.

Pada tanggal 31 Desember 2021 dan 2020 saldo pinjaman fasilitas tersebut sebesar Rp58.833 dan Rp127.881.

PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta

Pada tanggal 14 Juni 2017, berdasarkan Perjanjian Kredit No. 10, PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta setuju untuk memberikan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen yang berlaku sampai 14 Desember 2020. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank Victoria International Tbk (continued)

During 2021, the company has paid the principal of the facility amounting Rp145,982 and interest amounting Rp11,488.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp132,500 and Rp133,124, respectively.

PT Bank CIMB Niaga Tbk

On 8 October 2019, based on the Credit Agreement No. 174/CB/JKT/2019, PT Bank CIMB Niaga Tbk agreed to provide a working capital loan facility with a maximum available fund amounting to Rp200,000, which was used as an additional working capital that will mature on 8 April 2023.

Interest rate of the borrowing ranged from 9.25% and 9.00%-9.25% for withdrawal as of 31 December 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp69,048 and interest amounting Rp8,900.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp58,833 and Rp127,881, respectively.

PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta

On 14 June 2017, based on the Credit Agreement No. 10, PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta agreed to provide a working capital loan facility with a maximum available fund amounting to Rp50,000, which was used as an additional working capital for consumer financing that matured on 14 December 2020. The bank loan facility had been fully used in 31 December 2019.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

**PT Bank Pembangunan Daerah Provinsi
Daerah Istimewa Yogyakarta (lanjutan)**

Pada tanggal 15 Agustus 2018, berdasarkan Perjanjian Kredit No. 28, PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen yang berlaku sampai 20 Agustus 2021. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya.

Pada tanggal 4 April 2019, berdasarkan Perjanjian Kredit No. 08, PT Bank Pembangunan Daerah Propinsi Daerah Istimewa Yogyakarta setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp100.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen yang berlaku sampai 4 Oktober 2022. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya.

Pada tanggal 10 Maret 2020, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan fasilitas sebesar Rp150.000 dengan jangka waktu pinjaman 36 bulan sejak tanggal penarikan tiap fasilitas kredit.

Tingkat suku bunga pinjaman berkisar antara 9,25% dan 9,00%-9,50% untuk pencairan tanggal 31 Desember 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp68.010 dan bunga pinjaman sebesar Rp8.098.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp56.004 dan Rp119.015.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

**PT Bank Pembangunan Daerah Provinsi
Daerah Istimewa Yogyakarta (continued)**

On 15 August 2018, based on the Credit Agreement No. 28, PT Bank Pembangunan Daerah Provinsi Daerah Istimewa Yogyakarta 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 that will mature on 20 August 2021. As of 31 December 2019, the bank loan facility had been fully used.

On 4 April 2019, based on the Credit Agreement No. 08, PT Bank Pembangunan Daerah Propinsi Daerah Istimewa Yogyakarta agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp100,000, which was used as an additional working capital for consumer financing that will mature on 4 October 2022. As of 31 December 2019, the bank loan facility had been fully used.

On 10 March 2020, BNIMF obtained additional working capital loan facility amounting to Rp150,000 and tenure of 36 months since the withdrawal date of each credit facility.

Interest rate of the borrowing ranged from 9.25% and 9.00%-9.50% for withdrawal as of 31 December 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp68,010 and interest amounting Rp8,098.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp56,004 and Rp119,015, respectively.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk (BJB)

Pada tanggal 20 November 2019, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk dengan maksimum fasilitas sebesar Rp100.000 dan jangka waktu pinjaman selama 42 bulan dan akan jatuh tempo pada tanggal 20 Mei 2023.

Tingkat suku bunga pinjaman adalah 9.50% dan 9.00%-9.50% untuk pencairan tanggal 31 Desember 2021 dan 31 Desember 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp33.333 dan bunga pinjaman sebesar Rp5.215

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut sebesar Rp36.111 dan Rp69.444.

PT Bank JTrust Indonesia

Pada tanggal 19 Desember 2020, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank JTrust Indonesia dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 12 bulan dan telah jatuh tempo pada tanggal 19 Desember 2021.

Pada tanggal 19 Desember 2020, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank JTrust Indonesia dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 48 bulan dan akan jatuh tempo pada tanggal 19 Desember 2023.

Tingkat suku bunga pinjaman adalah nihil dan 9,25% untuk pencairan tanggal 31 Desember 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp57.976 dan bunga pinjaman sebesar Rp4.572.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut sebesar Rp32.023 dan Rp50.000.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk (BJB)

On 20 November 2019, BNIMF obtained working capital loan facility from PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk with maximum facility amounting to Rp100,000 and tenure of 42 months and will mature on 20 May 2023.

Interest rate of the borrowing is 9.50% and 9.00%-9.50% for withdrawal as of 31 December 2021 and 31 December 2020.

During 2021, the company has paid the principal of the facility amounting Rp33,333 and interest amounting Rp5,215.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp36,111 and Rp69,444, respectively.

PT Bank JTrust Indonesia

On 19 December 2020, BNIMF obtained working capital loan facility with PT Bank JTrust Indonesia with maximum facility amounting to Rp50,000 and tenure of 12 months and has matured on 19 December 2021.

On 19 December 2020, BNIMF obtained working capital loan facility with PT Bank JTrust Indonesia with maximum facility amounting to Rp50,000 and tenure of 48 months and will mature on 19 December 2023.

Interest rate of the borrowing is nil and 9.25% for withdrawal as of 31 December 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp57,976 and interest amounting Rp4,572.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp32,023 and Rp50,000, respectively.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank DKI

Pada tanggal 20 Desember 2017, berdasarkan Perjanjian Kredit No. 20, PT Bank DKI setuju untuk memberikan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa operasi yang berlaku sampai 20 Juni 2020. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya.

Pada tanggal 2 Oktober 2018, berdasarkan Perjanjian Kredit No. 01, PT Bank DKI setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan yang berlaku sampai 2 April 2021. Pada tanggal 31 Desember 2019, seluruh fasilitas pinjaman bank ini telah digunakan seluruhnya.

Pada tanggal 21 Agustus 2019, berdasarkan Perjanjian Kredit No. 18, PT Bank DKI setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp75.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan yang berlaku sampai 21 Februari 2022.

Tingkat suku bunga pinjaman berkisar antara 9,75% dan 9,00%-9,75% untuk pencairan tanggal 31 Desember 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp35.740 dan bunga pinjaman sebesar Rp1.957.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp4.547 dan Rp40.288.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank DKI

On 20 December 2017, based on the Credit Agreement No. 20, PT Bank DKI agreed to provide a 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 operating lease that matured on 20 June 2020. As of 31 December 2019, the bank loan facility had been fully used.

On 2 October 2018, based on the Credit Agreement No. 01, 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 matured on 2 April 2021. As of 31 December 2019, the bank loan facility had been fully used.

On 21 August 2019, based on the Credit Agreement No. 18, PT Bank DKI agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp75,000, which was used as an additional working capital for consumer financing and finance lease that will mature on 21 February 2022.

Interest rate of the borrowing ranged from 9.75% and 9.00%-9.75% for withdrawal as of 31 December 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp35,740 and interest amounting Rp1,957.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp4,547 and Rp40,288, respectively.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank CTBC Indonesia

Pada tanggal 10 Desember 2020, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank CTBC Indonesia dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 12 bulan dan telah jatuh tempo pada tanggal 20 Desember 2021.

Tingkat suku bunga pinjaman adalah 8,50% untuk pencairan selama tahun 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp60.000 dan bunga pinjaman sebesar Rp2.966.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp10.000 dan Rp20.000.

PT Bank Nationalnoba Tbk

Pada tanggal 26 September 2019, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Nationalnoba Tbk dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 24 bulan dan telah jatuh tempo pada 26 September 2021.

Tingkat suku bunga pinjaman adalah 9,25% untuk pencairan selama tahun 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp18.750 dan bunga pinjaman sebesar Rp723.

Pada tanggal 31 Desember 2020, saldo pinjaman fasilitas tersebut sebesar Rp18.750.

PT Bank Central Asia Tbk

Pada tanggal 29 November 2017, berdasarkan Perjanjian Kredit No. 14, PT Bank Central Asia Tbk setuju untuk memberikan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp200.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan/atau sewa guna usaha yang berlaku sampai 23 Mei 2021. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank CTBC Indonesia

On 10 December 2020, BNIMF obtained working capital loan facility with PT Bank CTBC Indonesia with maximum facility amounting to Rp50,000 and tenure of 12 months and has matured on 20 December 2021.

Interest rate of the borrowing is 8.50% for withdrawal during the year 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp60,000 and interest amounting Rp2,966.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp10,000 and Rp20,000.

PT Bank Nationalnoba Tbk

On 26 September 2019, BNIMF obtained working capital loan facility with PT Bank Nationalnoba Tbk with maximum facility amounting to Rp50,000 and tenure of 24 months and has matured on 26 September 2021.

Interest rate of the borrowing is 9.25% for withdrawal during the year 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp18,750 and interest amounting Rp723.

As of 31 December 2020, the outstanding loan balance under this facility amounted to Rp18,750.

PT Bank Central Asia Tbk

On 29 November 2017, based on the Credit Agreement No. 14, PT Bank Central Asia Tbk agreed to provide a 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/or finance lease that will mature on 23 May 2021. This facility had been repaid at maturity date and was not renewed.



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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Central Asia Tbk

Tingkat suku bunga pinjaman adalah 9,00% untuk pencairan tanggal 23 Mei 2021 dan 31 Desember 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp15.556 dan bunga pinjaman sebesar Rp296.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp nihil dan Rp15.555.

Lembaga Pembiayaan Ekspor Indonesia

Pada tanggal 11 Januari 2018, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan Lembaga Pembiayaan Ekspor Indonesia dengan maksimum fasilitas sebesar Rp50.000 dan jangka waktu pinjaman selama 42 bulan dan telah jatuh tempo pada tanggal 11 Juli 2021.

Tingkat suku bunga pinjaman adalah 9,00% untuk pencairan selama tahun 2021 dan 2020.

Selama periode 2021, perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp8.537 dan bunga pinjaman sebesar Rp259.

Pada tanggal 31 Desember 2020 saldo pinjaman fasilitas tersebut sebesar Rp8.537.

PT Bank Rakyat Indonesia (Persero) Tbk

Pada tanggal 25 Oktober 2018, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Rakyat Indonesia (Persero) Tbk dengan maksimum fasilitas sebesar Rp300.000 dengan jangka waktu pinjaman 6 bulan dan telah jatuh tempo pada tanggal 25 Oktober 2019.

Pada tanggal 25 November 2019, perjanjian ini telah diperpanjang kembali dan telah jatuh tempo pada tanggal 25 Oktober 2020.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank Central Asia Tbk

Interest rate of the borrowing is 9.00% for withdrawal as of 23 May 2021 and 31 December 2020.

During 2021, the company has paid the principal of the facility amounting Rp15,556 and interest amounting Rp296.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to Rp Nil and Rp15,555, respectively.

Lembaga Pembiayaan Ekspor Indonesia

On 11 January 2018, BNIMF obtained working capital loan facility from Lembaga Pembiayaan Ekspor Indonesia with maximum facility amounting to Rp50,000 and tenure of 42 months and has matured on 11 July 2021.

Interest rate of the borrowing is 9.00% for withdrawal during the year 2021 and 2020.

During 2021, the company has paid the principal of the facility amounting Rp8,537 and interest amounting Rp259.

As of 31 December 2020, the outstanding loan balance under this facility amounted to Rp8,537.

PT Bank Rakyat Indonesia (Persero) Tbk

On 25 October 2018, BNIMF obtained working capital loan facility with PT Bank Rakyat Indonesia (Persero) Tbk with maximum facility amounting to Rp300,000 and tenure of 6 months and matured on 25 October 2019.

On 25 November 2019, it has been re-extended and matured on 25 October 2020.

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30. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Rakyat Indonesia (Persero) Tbk (lanjutan)

Pada tanggal 15 Oktober 2020, perjanjian ini telah diperpanjang kembali dan akan jatuh tempo pada tanggal 25 Januari 2021 dan untuk fasilitas tersebut sudah dipakai seluruhnya dan dilunasi pada Desember 2020.

Tingkat suku bunga pinjaman berkisar antara 8,15% - 9,50% untuk pencairan selama tahun 2020.

Pada tanggal 31 Desember 2021 dan 2020, saldo pinjaman fasilitas tersebut adalah sebesar nihil.

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 Rp68.125 dengan jangka waktu pinjaman 48 bulan dan akan jatuh tempo pada tanggal 30 Maret 2025.

Tingkat suku bunga pinjaman adalah 9,25% untuk pencairan tanggal 31 Desember 2021.

Selama periode 2021, Perusahaan telah melakukan pembayaran atas pokok fasilitas pinjaman sebesar Rp18.500 dan bunga pinjaman sebesar Rp4.921.

Pada tanggal 31 Desember 2021, saldo pinjaman fasilitas tersebut sebesar Rp101.597.

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, di dalam bidang 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.

30. BORROWINGS (continued)

a. By type and currency (continued)

Others (continued)

PT BNI Multifinance (BNIMF): (continued)

PT Bank Rakyat Indonesia (Persero) Tbk (continued)

On 15 October 2020, it has been re-extended and will mature on 25 January 2021 and for those facilities have been fully used and paid in December 2020.

Interest rate of the borrowing ranged from 8.15%-9.50% for withdrawal during 2020.

As of 31 December 2021 and 2020, the outstanding loan balance under this facility amounted to nil, 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 Rp68,125 and tenure of 48 months and will mature on 30 March 2025.

Interest rate of the borrowing is 9.25% for withdrawal as of 31 December 2021.

During 2021, the company has paid the principal of the facility amounting Rp18,500 and interest amounting Rp4,921.

As of 31 December 2021, the outstanding loan balance under this facility amounted to Rp101,597.

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.

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30. PINJAMAN YANG DITERIMA (lanjutan)

30. BORROWINGS (continued)

b. Berdasarkan hubungan

b. By relationship

	2021	2020	
Pihak berelasi			Related parties
Rupiah	352,290	552,289	Rupiah
Mata uang asing	54,742	342,087	Foreign currencies
Total pihak berelasi	407,032	894,376	Total related parties
Pihak ketiga			Third parties
Rupiah	433,683	594,681	Rupiah
Mata uang asing	31,617,221	42,625,257	Foreign currencies
Total pihak ketiga	32,050,904	43,219,938	Total third parties
	32,457,936	44,114,314	

c. Tingkat suku bunga per tahun

c. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ United States Dollar %	Euro Eropa/ European Euro %	Yuan China/ Chinese Yuan %	
2021	8.75 - 11.50	0.05 - 3.50	-	-	2021
2020	5.70 - 11.50	0.96 - 2.20	0.02 - 0.85	2.85	2020

31. EFEK-EFEK SUBORDINASI

31. SUBORDINATED SECURITIES

a. Berdasarkan jenis

a. By type

	2021		2020	
	Saldo/ Balance	Peringkat/ Rating *)	Saldo/ Balance	Peringkat/ Rating *)
MTN Subordinasi, setelah dikurangi biaya penerbitan yang belum diamortisasi masing-masing sebesar Rp15 pada tanggal 31 Desember 2021 dan Rp25 pada tanggal 31 Desember 2020	99,985	idAA*)	99,975	AA*)
BNI Tier 2 Subordinated Notes setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp4,155 pada tanggal 31 Desember 2021	7,122,095	Ba2**) BB***)	-	-
BNI Additional Tier 1 Capital Securities setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp8,899 pada tanggal 31 Desember 2021	8,542,602	Ba3****)	-	-
	15,764,682		99,975	

*) Pefindo
**) Moody's Ba2
***) Fitch BBB
****) Moody's Ba3

MTN Subordinasi I BNI tahun 2018

Pada tanggal 8 Juni 2018, BNI telah mendapatkan pernyataan efektif dari OJK melalui surat nomor S-73/PB.31/2018 untuk menerbitkan Medium Term Notes Subordinasi I BNI Tahun 2018 ("MTN Subordinasi"). Nilai MTN Subordinasi yang diterbitkan sebesar Rp100.000, jangka waktu 5 tahun, dengan kupon sebesar 8% per tahun yang akan dibayarkan secara triwulanan. MTN Subordinasi BNI diterbitkan dengan penawaran terbatas. Pembayaran kupon pertama kepada para pemegang MTN Subordinasi telah dilakukan pada tanggal 10 November 2018.

Subordinated MTN I BNI year 2018

On 8 June 2018, BNI obtained an effective statement from OJK through letter number S-73/PB.31/2018 to issue Continuous Subordinated Medium Term Notes I BNI Year 2018 ("Subordinated MTN"). The value of subordinated MTN issued amounted to Rp100,000 with the term of 5 years and coupon of 8% per annum to be paid quarterly. BNI Subordinated MTN was issued with limited offering. The first coupon payment to Subordinated MTN holders was made on 10 November 2018.

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31. EFEK-EFEK SUBORDINASI (lanjutan)

a. Berdasarkan jenis (lanjutan)

MTN Subordinasi I BNI tahun 2018 (lanjutan)

Pada tanggal 31 Desember 2021, MTN Subordinasi BNI memiliki nilai bersih sebesar Rp99.985 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp15 (31 Desember 2020: Rp99.975).

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 2021, *BNI Tier 2 Capital Bond 2021* memiliki nilai bersih sebesar Rp7.122.095 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp4.155.

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 2021 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.

31. SUBORDINATED SECURITIES (continued)

a. By type (continued)

Subordinated MTN I BNI year 2018 (continued)

As of 31 December 2021, the net value of Subordinated MTN BNI was Rp99,985 after deducting unamortized issuance cost amounted Rp15 (31 December 2020: Rp99,975).

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 2021, the net value of *BNI Tier 2 Capital Bond 2021* was Rp7,122,095 after deducting unamortized issuance cost amounted Rp4,155.

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 2021, 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.

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31. EFEK-EFEK SUBORDINASI (lanjutan)

a. Berdasarkan jenis (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 2021, BNI *Additional Tier 1 Capital Bond 2021* memiliki nilai bersih sebesar Rp8.542.602 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp8.898.

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 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.

31. SUBORDINATED SECURITIES (continued)

a. By type (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 2021, the net value of BNI *Additional Tier 1 Capital Bond 2021* was Rp8,542,602 after deducting unamortized issuance cost amounted Rp8,898.

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*.

32. DANA SYIRKAH TEMPORER - GIRO MUDHARABAH

a. Berdasarkan jenis produk

	2021	2020
Bukan Bank		
Giro iB Hasanah (Mudharabah)	-	2,812,156

**32. TEMPORARY SYIRKAH FUNDS - MUDHARABAH
CURRENT ACCOUNTS**

a. By product

Non-Bank
iB Hasanah (Mudharabah)
current accounts

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**32. DANA SYIRKAH TEMPORER - GIRO MUDHARABAH
(lanjutan)**

a. Berdasarkan jenis produk (lanjutan)

	2021	2020
Bank		
Giro iB Hasanah (Mudharabah)	-	11,996
	-	2,824,152

*Bank
iB Hasanah (Mudharabah)
current accounts*

b. Berdasarkan hubungan

	2021	2020
Bukan Bank		
Pihak berelasi	-	1,056,206
Pihak ketiga	-	1,755,950
	-	2,812,156
Bank		
Pihak ketiga	-	11,996
	-	2,824,152

*Non-Bank
Related parties
Third parties*

*Bank
Third parties*

c. Nisbah dan tangkat bagi hasil

Nisbah dan tingkat bagi hasil rata-rata untuk giro Mudharabah untuk tahun yang berakhir pada 31 Desember 2020 adalah sebagai berikut:

2020	
Nisbah (%)/ Ratio (%)	Tingkat bagi hasil (%)/ Profit sharing rate (%)
Giro Mudharabah	3:97
	0.21 - 0.27

Mudharabah current accounts

**32. TEMPORARY SYIRKAH FUNDS - MUDHARABAH
CURRENT ACCOUNTS (continued)**

a. By product (continued)

b. By relationship

c. Ratio and profit sharing rate

The average rate of ratio and profit sharing for Mudharabah current accounts for the year ended 31 December 2020 are as follows:

**33. DANA SYIRKAH TEMPORER - TABUNGAN
MUDHARABAH**

a. Berdasarkan jenis produk

	2021	2020
Bukan Bank		
Tabungan iB Syariahplus		
Perorangan	-	6,742,505
Tabungan iB Bisnis	-	1,919,080
Tabungan Baitullah iB Hasanah	-	1,516,199
Tabungan Prima iB Hasanah	-	988,610
Tabungan iB Bisnis Non-Perorangan	-	920,295
Tabungan iB Syariahplus		
Non-Perorangan	-	514,766
Tapenas iB Hasanah	-	282,801
Tabungan iB Tunas Hasanah	-	86,305
Tapma iB Hasanah	-	36,978
Tabungan iB Hasanah Card	-	2,736
	-	13,010,275
Bank		
Tabungan iB Bisnis		
Non-Perorangan	-	148,573
Tabungan iB Syariahplus	-	34,632
Tabungan iB Bisnis	-	2,274
	-	185,479
	-	13,195,754

*Non-Bank
iB Savings Shariplus
Individual
iB Savings Business
iB Savings Baitullah Hasanah
iB Savings Prima Hasanah
iB Savings Business Non-Individual
iB Savings Shariplus
Non-Individual
iB Tapenas Hasanah
iB Savings Hasanah Card
iB Tapma Hasanah
iB Savings Hasanah Card*

*Bank
iB Savings Business
Non-Individual
iB Savings Shariplus
iB Savings Business*

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**33. DANA SYIRKAH TEMPORER - TABUNGAN
MUDHARABAH (lanjutan)**

a. Berdasarkan jenis produk (lanjutan)

	2021	2020
Bukan Bank		
Pihak berelasi	-	13,950
Pihak ketiga	-	12,996,325
	-	13,010,275
Bank		
Pihak ketiga	-	185,479
	-	13,195,754

Tabungan *mudharabah* merupakan simpanan dana pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan Entitas Anak atas penggunaan dana tersebut dengan *nisbah* yang ditetapkan dan disetujui sebelumnya.

b. Nisbah dan tingkat bagi hasil

Nisbah dan tingkat bagi hasil rata-rata untuk tabungan *Mudharabah* untuk tahun yang berakhir pada 31 Desember 2020 adalah sebagai berikut:

	2020
	Tingkat bagi hasil (%) / Profit sharing rate (%)
Tabungan iB <i>Hasanah</i>	1 : 99 - 43:57

Non-Bank
Related parties
Third parties

Bank
Third parties

Mudharabah savings deposits represent deposits from third parties who receive a share in the revenue derived by the Subsidiaries from the use of such funds based on a pre-determined and pre-agreed ratio.

b. Ratio and profit sharing rate

The average rate of ratio and profit sharing for *Mudharabah savings deposits* for the years ended 31 December 2020 are as follows:

iB *Hasanah Savings Deposit*

**34. DANA SYIRKAH TEMPORER - DEPOSITO
MUDHARABAH**

a. Berdasarkan hubungan

	2021	2020
Bukan Bank		
Pihak berelasi	-	2,010,466
Pihak ketiga	-	14,047,804
	-	16,058,270
Bank		
Pihak ketiga	-	151,387
	-	16,209,657

b. Berdasarkan jangka waktu kontrak

	2021	2020
Bukan Bank		
<1 bulan	-	4,440,686
1 - <3 bulan	-	2,508,654
3 - <6 bulan	-	1,595,793
6 - 12 bulan	-	7,513,137
	-	16,058,270
Bank		
<1 bulan	-	103,612
1 - <3 bulan	-	6,554
3 - <6 bulan	-	877
6 - 12 bulan	-	40,344
	-	151,387
	-	16,209,657

Non-Bank
Related parties
Third parties

Bank
Third parties

b. By contractual period

Non-Bank
<1 month
1 - <3 months
3 - <6 months
6 - 12 months

Bank
<1 month
1 - <3 months
3 - <6 months
6 - 12 months

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**34. DANA SYIRKAH TEMPORER - DEPOSITO
MUDHARABAH (lanjutan)**

**34. TEMPORARY SYIRKAH FUNDS - MUDHARABAH
TIME DEPOSITS (continued)**

c. Berdasarkan sisa umur jatuh tempo

c. By remaining period to maturity

	<u>2021</u>	<u>2020</u>	
Bukan Bank			<i>Non-Bank</i>
< 1 bulan	-	5,556,723	<i>< 1 month</i>
1 - <3 bulan	-	4,137,727	<i>1 - <3 months</i>
3 - <6 bulan	-	1,889,652	<i>3 - <6 months</i>
6 - 12 bulan	-	4,288,250	<i>6 - <12 months</i>
>12 bulan	-	185,918	<i>>12 months</i>
	-	16,058,270	
Bank			<i>Bank</i>
< 1 bulan	-	110,714	<i>< 1 month</i>
1 - <3 bulan	-	7,077	<i>1 - <3 months</i>
3 - <6 bulan	-	12,667	<i>3 - <6 months</i>
6 - 12 bulan	-	17,238	<i>6 - <12 months</i>
>12 bulan	-	3,691	<i>>12 months</i>
	-	151,387	
	-	16,209,657	

d. Deposito *mudharabah* merupakan investasi pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan Entitas Anak atas penggunaan dana tersebut dengan *nisbah* yang ditetapkan dan disetujui sebelumnya.

d. *Mudharabah time deposits represent investments from other parties who receive share in the income derived by a Subsidiary from the use of such funds based on a pre-determined and pre-agreed ratio.*

Nisbah dan tingkat bagi hasil rata-rata untuk deposito *mudharabah* untuk tahun yang berakhir pada tanggal 31 Desember 2020 adalah sebagai berikut:

The average rate of ratio and profit sharing for Mudharabah time deposits for the years ended 31 December 2020, are as follows:

	<u>2020</u>	
	<u>Nisbah (%)/ Ratio (%)</u>	<u>Tingkat bagi hasil (%)/ Profit sharing rate (%)</u>
1 Bulan	43 : 57	3.16
3 Bulan	44 : 56	3.23
6 Bulan	45 : 55	3.31
12 Bulan	46 : 54	3.38

e. Deposito *mudharabah* yang dijadikan jaminan atas piutang dan pembiayaan yang diberikan oleh Bank untuk tahun yang berakhir pada tanggal 31 Desember 2020 sebesar Rp486.211.

e. *Mudharabah deposits that were used as collateral for the Bank's receivables and financing for the years ended 31 December 2020 amounted to Rp486,211.*

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**35. MODAL SAHAM DAN TAMBAHAN MODAL
DISETOR**

Modal Saham

Pada tanggal-tanggal 31 Desember 2021 dan 2020, kepemilikan modal saham BNI adalah sebagai berikut:

**35. SHARE CAPITAL AND ADDITIONAL PAID-IN
CAPITAL**

Share Capital

As of 31 December 2021 and 2020, BNI's share capital ownership are as follows:

31 Desember/December 2021				
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 Negara Republik Indonesia	1	-	-	Class A Dwiwarna share Republic of Indonesia
Saham Seri B Negara Republik Indonesia Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	217,006,399 72,335,467	1.16 0.39	1,627,548 542,516	Class B shares Republic of Indonesia Public (ownership less than 5% each)
Total saham Seri B	289,341,866	1.55	2,170,064	Total Class B shares
Saham Seri C Negara Republik Indonesia Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	10,972,187,475 1,639,158,841	58.90 8.80	4,114,570 614,685	Class C shares Republic of Indonesia Limited liability company (ownership less than 5% each)
Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	3,771,732,232	20.25	1,414,400	Foreign investment entities (ownership less than 5% each)
Bob Tyasika Ananta (Direktur)	1,088,761	0.01	408	Bob Tyasika Ananta (Director)
Adi Sulistyowati (Direktur)	1,007,373	0.01	378	Adi Sulistyowati (Director)
Sis Apik Wijayanto (Direktur)	454,997	0.00	171	Sis Apik Wijayanto (Director)
Corina Leyla Karnalies (Direktur)	365,041	0.00	137	Corina Leyla Karnalies (Director)
Hariantono (Direktur)	364,997	0.00	137	Hariantono (Director)
Ratih Nurdianti (Komisaris)	299,000	0.00	112	Ratih Nurdianti (Commissioner)
Askolani (Komisaris)	244,205	0.00	92	Askolani (Commissioner)
Ronny Venir (Direktur)	172,746	0.00	65	Ronny Venir (Director)
Royke Tumilaar (Direktur)	163,584	0.00	61	Royke Tumilaar (Director)
Susyanto (Komisaris)	156,959	0.00	59	Susyanto (Commissioner)
Henry Panjaitan (Direktur)	149,890	0.00	56	Henry Panjaitan (Director)
Novita Widya Anggraini (Direktur)	139,046	0.00	52	Novita Widya Anggraini (Director)
Silvano W. Rumanitir (Direktur)	139,046	0.00	52	Silvano W. Rumanitir (Director)
David Pirzada (Direktur)	139,046	0.00	52	David Pirzada (Director)
Muhammad Iqbal (Direktur)	139,046	0.00	52	Muhammad Iqbal (Director)
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	1,946,529,706	10.48	729,949	Public (ownership less than 5% each)
Total saham Seri C	18,334,631,991	98.45	6,875,488	Total Class C shares
Total	18,623,973,858	100.00	9,045,552	Total
Saham treasury	24,682,600		9,255	Treasury shares

Sampai dengan tanggal 31 Desember 2021, BNI telah melakukan pembelian saham sebanyak 44.262.300 lembar saham (nilai nominal Rp375 (nilai penuh) per lembar saham) dengan harga perolehan sebesar Rp207.475.

As of 31 December 2021, BNI has purchased amounting to 44,262,300 shares (nominal value Rp375 (full amount) per share), with acquisition price amounting to Rp207,475.

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**35. MODAL SAHAM DAN TAMBAHAN MODAL
DISETOR (lanjutan)**

Modal Saham (lanjutan)

**35. SHARE CAPITAL AND ADDITIONAL PAID-IN
CAPITAL (continued)**

Share Capital (continued)

31 Desember/December 2020				
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 Negara Republik Indonesia	1	-	-	Class A Dwiwarna share Republic of Indonesia
Saham Seri B Negara Republik Indonesia Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	217,006,399 72,335,467	1.16 0.39	1,627,548 542,516	Class B shares Republic of Indonesia Public (ownership less than 5% each)
Total saham Seri B	289,341,866	1.55	2,170,064	Total Class B shares
Saham Seri C Negara Republik Indonesia Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak) Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	10,972,187,475 1,672,478,906 3,448,015,073	58.90 8.98 18.51	4,114,570 627,180 1,293,006	Class C shares Republic of Indonesia Limited liability company (ownership less than 5% each) Foreign investment entities (ownership less than 5% each)
Bob Tyasika Ananta (Direktur)	657,669	0.00	247	Bob Tyasika Ananta (Director)
Adi Sulistyowati (Direktur)	575,102	0.00	216	Adi Sulistyowati (Director)
Joni Swastanto (Komisaris)	235,120	0.00	88	Joni Swastanto (Commissioner)
Ratih Nurdianti (Komisaris)	116,628	0.00	44	Ratih Nurdianti (Commissioner)
Sis Apik Wijayanto (Direktur)	90,000	0.00	34	Sis Apik Wijayanto (Director)
Askolani (Komisaris)	61,833	0.00	23	Askolani (Commissioner)
Ronny Venir (Direktur)	26,700	0.00	10	Ronny Venir (Director)
Henry Panjaitan (Direktur)	10,844	0.00	4	Henry Panjaitan (Director)
Corina Leyla Karnalies (Direktur)	44	0.00	-	Corina Leyla Karnalies (Director)
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	2,245,279,497	12.05	841,979	Public (ownership less than 5% each)
Total saham Seri C	18,339,734,891	98.45	6,877,401	Total Class C shares
Total	18,629,076,758	100.00	9,047,465	Total
Saham treasury	19,579,700		7,342	Treasury shares

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.

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).

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**35. MODAL SAHAM DAN TAMBAHAN MODAL
DISETOR (lanjutan)**

Modal Saham (lanjutan)

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 16 Maret 2020 sampai dengan 15 Juni 2020, sesuai dengan tanggal Keterbukaan Informasi. Bank melakukan pembelian kembali Saham Seri C sejumlah 195.797 lot atau sebanyak 19.579.700 lembar saham dengan rata-rata biaya perolehan rata-rata sebesar Rp4.057,70 (nilai penuh) per lembar saham.

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.

Tambahan Modal Disetor

Perubahan tambahan modal disetor adalah sebagai berikut:

Saldo pada tanggal 1 Januari 2010	591,156
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas I pada tahun 2000 (lihat Catatan 1c)	56,883,826
	57,474,982
Pengurangan tambahan modal disetor akibat pengembalian dana rekaptalisasi kepada pemerintah Indonesia (lihat Catatan 1d)	(581,474)
	56,893,508
Dieliminasi dengan akumulasi kerugian dalam rangka kuasi-reorganisasi per tanggal 30 Juni 2003 (lihat Catatan 1e)	(54,367,847)
	2,525,661
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas II pada tahun 2007 (lihat Catatan 1f)	3,287,218
Biaya emisi penerbitan saham	(195,280)
	5,617,599
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas III pada tahun 2010 (lihat Catatan 1g)	9,196,100
Biaya emisi penerbitan saham	(245,231)
	14,568,468
Tambahan modal disetor akibat penyertaan saham pada Bank Syariah Indonesia	2,441,786
	17,010,254

**35. SHARE CAPITAL AND ADDITIONAL PAID-IN
CAPITAL (continued)**

Share Capital (continued)

In accordance with the Disclosure of Information in relation to the stabilization 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 ("FSA") 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 FSA 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 16 March 2020 to 15 June 2020, consistent with the date of Disclosure of Information. The Bank repurchased 195,797 lots of Class C Shares, or 19,579,700 shares with an average acquisition cost amounting to Rp4,057.70 (full amount) per share.

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.

Additional Paid in Capital

The movements in additional paid in capital are as follows:

Balance as of 1 January 2010
Additional paid in capital due to Right Issue I in 2000 (refer to Note 1c)
Reduction of paid in capital due to refund of excess recapitalization funds to the Government of Indonesia (refer to Note 1d)
Elimination against accumulated losses in relation to the quasi-reorganization as of 30 June 2003 (refer to Note 1e)
Additional paid in capital due to Right Issue II in 2007 (refer to Note 1f) Shares issuance cost
Additional paid in capital due to Right Issue III in 2010 (refer to Note 1g) Shares issuance cost
Additional paid in capital due to equity investment at Bank Syariah Indonesia

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36. PENGGUNAAN LABA BERSIH

Berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan tanggal 29 Maret 2021 dan 20 Februari 2020, pengalokasian laba bersih masing-masing untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2020 dan 2019 adalah sebagai berikut:

	2020	2019
Pembagian dividen	820,101	3,846,119
Saldo laba	2,460,302	11,538,357
	3,280,403	15,384,476

Rapat Umum Pemegang Saham telah menyetujui pembagian dividen dari laba bersih tahun 2020 dan 2019, sebesar Rp820.101 pada tanggal 29 April 2021 dan Rp3.846.119 pada tanggal 24 Maret 2020.

36. APPROPRIATION OF NET INCOME

In accordance with the resolutions of the Annual General Shareholders' Meetings held on 29 March 2021 and 20 February 2020, the allocation of the net income for the years ended 31 December 2020 and 2019, respectively, are as follows:

*Distribution of dividends
Retained earnings*

General Shareholders' meeting has approved the dividend distribution of Rp820,101 and Rp3,846,119 from the 2020 net income on 29 April 2021 and 2019 net income on 24 March 2020.

37. 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.

37. 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.

38. 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 di tangan 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.

38. 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 September 22, 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.

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39. PENDAPATAN BUNGA DAN PENDAPATAN SYARIAH

39. INTEREST INCOME AND SHARIA INCOME

	2021	2020	
Pinjaman yang diberikan	43,129,389	45,321,425	Loans
Obligasi Pemerintah	4,846,749	4,635,240	Government Bonds
Penempatan pada bank lain dan Bank Indonesia	667,630	984,609	Placements with other banks and Bank Indonesia
Efek-efek	506,161	549,398	Marketable securities
Wesel ekspor dan tagihan lainnya	478,945	500,918	Bills and other receivables
Margin, pendapatan bagi hasil dan bonus syariah	333,264	4,028,813	Margin, profit-sharing revenue and sharia bonus
Lain-lain	63,749	152,468	Others
	50,025,887	56,172,871	

40. BEBAN BUNGA DAN BEBAN SYARIAH

40. INTEREST EXPENSE AND SHARIA EXPENSE

	2021	2020	
Simpanan nasabah dan bank lain	10,382,314	16,155,848	Deposits from customers and other banks
Pinjaman yang diterima	769,911	1,688,763	Borrowings
Efek-efek yang diterbitkan	551,584	248,275	Securities issued
Bagi hasil <i>Mudharabah</i>	58,213	914,306	<i>Mudharabah</i> profit-sharing expense
Lain-lain	17,134	13,713	Others
	11,779,156	19,020,905	

41. BEBAN GAJI DAN TUNJANGAN

41. SALARIES AND EMPLOYEE BENEFITS EXPENSE

	2021	2020	
Gaji, upah dan tunjangan pajak	5,070,960	5,137,496	Salaries, wages and tax allowance
Tunjangan hari raya, kesehatan, kesejahteraan dan lainnya	3,204,044	2,973,005	Yearly allowance, medical, welfare and others
Bonus, insentif dan tantiem	1,978,312	917,661	Bonus, incentives and tantiem
Pendidikan dan pelatihan	200,349	249,480	Training and development
Lainnya	741,603	473,139	Others
	11,195,268	9,750,781	

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41. BEBAN GAJI DAN TUNJANGAN (lanjutan)

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 2021 dan 2020 adalah sebagai berikut:

**41. SALARIES AND EMPLOYEE BENEFITS
EXPENSE (continued)**

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 2021 and 2020 are as follows:

31 Desember/December 2021					
	Gaji dan tunjangan/ Salaries and allowances	Bonus/tantiem/ Bonus/tantiem	Imbalan kerja jangka panjang/ Long-term employment benefits	Jumlah/ Total	
Dewan Komisaris	23,701	49,169	3,432	76,302	Board of Commissioners
Direksi	62,963	85,479	8,760	157,202	Board of Directors
Komite Audit	1,082	-	-	1,082	Audit Committee
SEVP, EVP dan SVP	168,862	13,613	-	182,475	SEVP, EVP and SVP
	256,608	148,261	12,192	417,061	
31 Desember/December 2020					
	Gaji dan tunjangan/ Salaries and allowances	Bonus/tantiem/ Bonus/tantiem	Imbalan kerja jangka panjang/ Long-term employment benefits	Jumlah/ Total	
Dewan Komisaris	19,978	55,412	3,093	78,483	Board of Commissioners
Direksi	52,304	144,588	7,881	204,773	Board of Directors
Komite Audit	840	-	-	840	Audit Committee
SEVP, EVP dan SVP	103,155	25,893	-	129,048	SEVP, EVP and SVP
	176,277	225,893	10,974	413,144	

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.

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.

42. BEBAN UMUM DAN ADMINISTRASI

42. GENERAL AND ADMINISTRATIVE EXPENSES

	2021	2020	
Penyusutan (Catatan 19)	2,006,916	2,576,716	Depreciation (Note 19)
Beban tenaga alih daya	1,924,978	2,009,228	Outsourcing expenses
Komunikasi	1,416,999	1,321,849	Communications
Biaya sewa	818,425	813,399	Rental expenses
Perlengkapan kantor	732,136	598,496	Office supplies
Perbaikan dan pemeliharaan	616,038	646,616	Repairs and maintenance
Listrik dan air	312,501	354,952	Electricity and water
Jasa profesional	290,921	51,062	Professional services
Transportasi	238,149	232,588	Transportation
Penelitian dan pengembangan	104,867	88,573	Research and development
Teknologi informasi	11,726	22,103	Information technology
Beban lain-lain	291,300	347,095	Other expenses
	8,764,956	9,062,677	

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43. IMBALAN KERJA

	2021	2020
Imbalan kerja jangka pendek	2,229,024	1,135,226
Imbalan pasca kerja jangka panjang		
Program pensiun manfaat pasti	1,583,467	2,605,239
Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya	2,325,272	2,603,803
	3,908,739	5,209,042
	6,137,763	6,344,268

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.

Program pensiun manfaat pasti

Penilaian aktuarial atas manfaat pensiun pada tahun-tahun yang berakhir tanggal 31 Desember 2021 dan 2020, dilakukan oleh perusahaan konsultan aktuarial terdaftar, Kantor Konsultan Aktuarial Santhi Devi dan Ardianto Handoyo (2020: PT Towers Watson Purbajaga), dengan menggunakan metode "Projected Unit Credit".

Rekonsiliasi status pembiayaan atas program pensiun berdasarkan laporan aktuarial tanggal 18 Januari 2022 dan 4 Januari 2021 disajikan sebagai berikut:

	2021	2020
Nilai wajar aset dana pensiun	6,786,624	6,377,183
Nilai kini liabilitas manfaat pasti yang didanai	(8,370,091)	(8,982,422)
Selisih (kurang) lebih pendanaan	(1,583,467)	(2,605,239)

Mutasi nilai kini liabilitas manfaat pasti yang didanai selama tahun berjalan adalah sebagai berikut:

	2021	2020
Pada awal periode	8,982,422	6,843,994
Biaya jasa kini	387,839	294,695
Biaya bunga	422,734	471,767
	9,792,995	7,610,456
Pengukuran kembali: (Keuntungan)/kerugian aktuarial yang timbul dari perubahan asumsi keuangan	(668,862)	1,748,942
(Keuntungan)/kerugian aktuarial yang timbul karena penyesuaian atas pengalaman	(197,074)	173,446
	(865,936)	1,922,388
Pembayaran dari program: Iuran peserta	24,725	22,650
Imbalan yang dibayar	(581,693)	(573,072)
	(556,968)	(550,422)
	8,370,091	8,982,422

43. EMPLOYEE BENEFITS

Short-term employee benefits

*Long-term employee benefits
Defined benefit pension plan*

*Post employment benefits and other
long-term employee benefits*

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.

Defined benefit pension plan

The actuarial calculations of pension benefits for the years ended 31 December 2021 and 2020 are prepared by a registered actuarial consulting firm, Kantor Konsultan Aktuarial Santhi Devi dan Ardianto Handoyo (2020: 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 18 January 2022 and dated 4 January 2021 are as follows:

*Fair value of pension plan assets
Present value of funded defined
benefit obligation*

Funding (deficit) surplus

The movements in the present value of funded defined benefit obligations for the year are as follows:

*At beginning of the period
Current service cost
Interest cost*

Remeasurements:

*Actuarial (gain)/losses from changes
in financial assumption*

*Actuarial (gains)/losses from
changes in experience*

*Payments from plan:
Employees' contributions
Benefits paid*

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43. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Rekonsiliasi atas perubahan aset bersih selama tahun yang berakhir 31 Desember 2021 dan 2020 yang diakui di laporan posisi keuangan dana pensiun adalah sebagai berikut:

	2021	2020
Kewajiban bersih pada awal periode	2,605,239	135,624
Beban tahun berjalan	387,839	294,695
Kontribusi pemberi kerja	(128,749)	(96,807)
Jumlah yang diakui pada penghasilan komprehensif lain	(1,280,862)	2,271,727
	1,583,467	2,605,239

Mutasi nilai wajar aset program untuk tahun yang berakhir adalah sebagai berikut:

	2021	2020
Pada awal periode	6,377,183	6,708,370
Hasil dari aset program	422,734	471,767
Keuntungan aktuarial	414,926	(349,339)
Kontribusi pemberi kerja	128,749	96,807
Kontribusi pekerja	24,725	22,650
Imbalan yang dibayar dan beban administrasi	(581,693)	(573,072)
	6,786,624	6,377,183

Biaya imbalan pensiun yang dibebankan pada laporan laba rugi adalah sebagai berikut:

	2021	2020
Biaya jasa kini	178,767	146,610
Biaya jasa lalu	75,116	132,876
Bunga bersih	133,956	15,209
Biaya yang dibebankan pada laporan laba rugi	387,839	294,695
Biaya yang dilaporkan pada laba rugi	387,839	294,695
Pengukuran kembali yang diakui pada penghasilan komprehensif lain	(1,280,862)	2,271,727
Biaya imbalan pasti	(893,023)	2,566,422

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah:

	2021	2020
Asumsi ekonomi:		
Tingkat diskonto	7.00% - 9.25%	6.25% - 9.50%
Tingkat kenaikan gaji	7.00%	7.00%
Pendapatan dari dana pensiun iuran pasti	6.00%	6.25%
Tingkat kenaikan manfaat pensiun	3%	3% - 4%
	per tahun/annually	per tahun/annually

43. EMPLOYEE BENEFITS (continued)

Defined benefit pension plan (continued)

The reconciliation of the movements of the net assets during the years ended 31 December 2021 and 2020 recognized in the pension fund's statement of financial position is as follows:

Net liabilities at beginning of period
Current year expenses
Employer's contributions
Total amount recognized in other comprehensive income

The movements in the fair value of plan assets for the years ended are as follows:

At beginning of the period
Return on plan assets
Actuarial gains
Employer's contributions
Employees' contributions
Benefits paid and administrative expenses paid

Pension expenses recognized in profit or loss, are as follows:

Current service cost
Past service cost
Net interest

Expense recognized in profit or loss

Expense recognized in profit or loss
Remeasurement effect recognized in other comprehensive income

Defined benefit cost

The key assumptions used in the above calculation are:

Economic assumptions:
Discount rate
Rate of salary increases
Interest credited to defined contribution fund
Pension increase rate

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43. IMBALAN KERJA (lanjutan)

43. EMPLOYEE BENEFITS (continued)

Program pensiun manfaat pasti (lanjutan)

Defined benefit pension plan (continued)

	2021	2020	
Asumsi ekonomi: (lanjutan)			Economic assumptions: (continued)
Manfaat lain	2,500,000	2,500,000	Other benefits
Tunjangan Peningkatan Kesejahteraan sebesar manfaat bulanan yang dibayarkan pada bulan September dan Desember untuk tahun 2021/ <i>Welfare Allowance for monthly pension amounted to monthly pension benefit that will be paid in September and December for the year 2021</i>		Tunjangan Peningkatan Kesejahteraan sebesar manfaat bulanan yang dibayarkan pada bulan September dan Desember untuk tahun 2020/ <i>Welfare Allowance for monthly pension amounted to monthly pension benefit that will be paid in September and December for the year 2020</i>	
Asumsi lainnya:			Other assumptions:
Usia pensiun normal	55 tahun/years	55 tahun/years	Normal retirement age
Tingkat kematian	Modifikasi Tabel Mortalita/ <i>Adjusted Mortality Table</i> Indonesia 2019 (TMI2019)	Modifikasi Tabel Mortalita/ <i>Adjusted Mortality Table</i> Indonesia 2019 (TMI2019)	Mortality rate
Tingkat cacat	10% dari tingkat/kematian/10% <i>from mortality rate</i>	10% dari tingkat/kematian/10% <i>from mortality rate</i>	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%	0%	Age >52

Sensitivitas dari kewajiban manfaat pasti terhadap perubahan asumsi aktuarial 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**

2021	Perubahan asumsi/ Change in assumption	Nilai kini kewajiban manfaat pasti/ Present value of benefit obligation	2021
Tingkat diskonto	Kenaikan/increase 1% Penurunan/decrease 1%	(806,439) 968,866	Discount rate
Tingkat kenaikan gaji	Kenaikan/increase 1% Penurunan/decrease 1%	160,217 (149,818)	Salary increase rate

**Dampak terhadap kewajiban manfaat pasti/
Impact on defined benefit obligation**

2020	Perubahan asumsi/ Change in assumption	Nilai kini kewajiban manfaat pasti/ Present value of benefit obligation	2020
Tingkat diskonto	Kenaikan/increase 1% Penurunan/decrease 1%	(929,210) 1,127,614	Discount rate
Tingkat kenaikan gaji	Kenaikan/increase 1% Penurunan/decrease 1%	195,926 (182,172)	Salary increase rate

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43. 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 2021 dan 2020, aset program terdiri dari:

	2021	2020
Obligasi pemerintah	1,762,924	1,671,958
Penempatan langsung	1,650,568	1,364,014
Obligasi Saham	1,617,067	1,838,469
Properti	954,490	810,522
Deposito	346,682	344,045
Reksa Dana	299,176	243,112
Deposito on call	148,956	87,812
	6,761	17,251
	6,786,624	6,377,183

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.

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.

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.

43. EMPLOYEE BENEFITS (continued)

Defined benefit pension plan (continued)

The sensitivity analysis are 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 recognized within the consolidated statement of financial position.

As of 31 December 2021 and 2020, plan assets comprise the following:

Government bonds
Direct participation
Bonds
Shares
Property
Time deposits
Mutual funds
On call deposits

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.

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.

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.

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43. IMBALAN KERJA (lanjutan)

43. EMPLOYEE BENEFITS (continued)

Program pensiun manfaat pasti (lanjutan)

Defined benefit pension plan (continued)

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.

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.

Rata-rata durasi kewajiban manfaat pasti pada tanggal 31 Desember 2021 adalah 10,87 tahun (31 Desember 2020: 11,21 tahun)

The average duration of the defined benefit obligation as of 31 December 2021 is 10.87 years (31 December 2020: 11.21 years)

Analisis jatuh tempo yang diharapkan dari manfaat pensiun yang tidak terdiskonto untuk Entitas Induk adalah sebagai berikut:

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	
2021					2021
Pensiun	527,991	2,714,702	26,873,792	30,116,485	Pension
Cuti besar	93,608	446,765	1,613,924	2,154,297	Long leave
Penghargaan masa kerja	28,467	190,494	1,398,516	1,617,477	Gratuity
Total	650,066	3,351,961	29,886,232	33,888,259	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	
2020					2020
Pensiun	520,028	2,574,423	28,135,674	31,230,125	Pension
Cuti besar	151,911	401,118	1,599,171	2,152,200	Long leave
Penghargaan masa kerja	78,899	170,827	1,325,606	1,575,332	Gratuity
Total	750,838	3,146,368	31,060,451	34,957,657	Total

Program pensiun iuran pasti

Defined contribution pension plan

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.

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.

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, mana yang lebih tinggi.

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, whichever is higher.

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Program pensiun iuran pasti (lanjutan)

Beban pensiun iuran pasti yang telah dibebankan pada laporan laba rugi adalah sebesar Rp199.372 dan Rp175.100 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020.

Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya

Liabilitas atas imbalan pasca kerja lainnya meliputi uang jasa, uang pisah dan pesangon sesuai dengan Undang-Undang No. 11 Tahun 2020 dan kompensasi 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 tahun-tahun yang berakhir tanggal 31 Desember 2021 dan 2020 dilakukan oleh perusahaan konsultan aktuarial terdaftar, Kantor Konsultan Aktuarial Santhi Devi dan Ardianto Handoyo (2020: PT Towers Watson Purbajaga), dengan menggunakan metode "*Projected Unit Credit*" sebagaimana yang tercantum dalam laporan masing-masing pada tanggal 18 Januari 2022 dan 4 Januari 2021.

Perubahan liabilitas imbalan kerja yang diakui Bank pada laporan posisi keuangan konsolidasian adalah sebagai berikut:

	2021	2020
Liabilitas bersih pada awal periode	2,603,803	2,174,230
Biaya selama tahun berjalan	267,091	512,307
Jumlah yang diakui pada penghasilan komprehensif lain	108,195	122,667
Pembayaran imbalan	(653,817)	(205,401)
	2,325,272	2,603,803

Biaya imbalan kerja yang dibebankan Bank pada laporan laba rugi:

	2021	2020
Biaya jasa kini	193,111	235,060
Biaya jasa lalu		(20,885)
Biaya bunga	134,905	129,309
(Keuntungan)/kerugian aktuarial periode berjalan - bersih	(60,925)	168,823
Biaya yang dibebankan pada laba rugi	267,091	512,307

Pengukuran kembali yang diakui pada penghasilan komprehensif lainnya

	108,195	122,667
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Biaya imbalan pasti	375,286	634,974
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43. EMPLOYEE BENEFITS (continued)

Defined contribution pension plan (continued)

Defined contribution pension expense that was charged to profit or loss amounted to Rp199,372 and Rp175,100 for the year ended 31 December 2021 and 2020, respectively.

Post employment benefits and other long-term employee benefits

The liability for post employment benefits consisted of service payments, severance and termination benefits based on Labor Law No. 11 Tahun 2020 and other compensations.

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 years ended 31 December 2021 and 2020 were prepared by a registered actuarial consulting firm, Kantor Konsultan Aktuarial Santhi Devi dan Ardianto Handoyo (2020: PT Towers Watson Purbajaga), using the "*Projected Unit Credit*" method as stated in its reports dated 18 January 2022 and 4 January 2021.

The movements of the employee benefits liability recognized by the Bank in the consolidated statement of financial position are as follows:

Net liability at the beginning of the period
Expense recognized during the current year
Total amount recognized in other comprehensive income
Actual benefit payments

Employee benefits expense recognized by Bank in profit or loss:

Current service cost
Past service cost
Interest cost
Net actuarial (gain)/losses recognized in current period

Expense recognized in profit or loss

Remeasurement effect recognized in other comprehensive income

Defined benefit cost

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43. IMBALAN KERJA (lanjutan)

43. EMPLOYEE BENEFITS (continued)

**Imbalan pasca kerja lainnya dan imbalan kerja
jangka panjang lainnya (lanjutan)**

**Post employment benefits and other long-term
employee benefits (continued)**

Asumsi-asumsi utama yang digunakan dalam
perhitungan di atas adalah:

The key assumptions used in the above calculation
are:

	2021	2020	
Asumsi ekonomi:			Economic assumptions:
Tingkat diskonto per tahun	7.00%	6.25%	Annual discount rate
Tingkat kenaikan gaji	7.00%	7.00%	Rate of salary increases
Pendapatan dari dana pensiun iuran pasti	6.00%	6.25%	Interest credited to defined contribution fund
Asumsi lainnya:			Other assumptions:
Usia pensiun normal	55 tahun/years	55 tahun/years	Normal retirement age
Tingkat kematian	Tabel Mortalita yang disesuaikan/ Adjusted Mortality Table Indonesia 2019 (TMI2019)	Tabel Mortalita yang disesuaikan/ 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%	0%	Age >52

Sensitivitas dari kewajiban imbalan pasca kerja
lainnya terhadap perubahan asumsi aktuarial
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				
2021	Perubahan Asumsi/ Change in Assumption	Nilai kini kewajiban imbalan kerja/ Present value of benefit obligation	Biaya jasa kini/ Current service cost	2021
Tingkat diskonto	Kenaikan/increase 1%	(140,207)	(2,298)	Discount rate
	Penurunan/decrease 1%	158,279	6,020	
Tingkat kenaikan gaji	Kenaikan/increase 1%	223,358	7,454	Salary increase rate
	Penurunan/decrease 1%	(183,242)	(3,175)	

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43. IMBALAN KERJA (lanjutan)

**Imbalan pasca kerja lainnya dan imbalan kerja
jangka panjang lainnya (lanjutan)**

43. EMPLOYEE BENEFITS (continued)

**Post employment benefits and other long-term
employee benefits (continued)**

		Dampak program 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	
2020	Perubahan Asumsi/ Change in Assumption				2020
Tingkat diskonto	Kenaikan/increase 1%	(196,866)		3,945	
	Penurunan/decrease 1%	198,287		27,458	Discount rate
Tingkat kenaikan gaji	Kenaikan/increase 1%	274,732		32,320	
	Penurunan/decrease 1%	(247,692)		795	Salary increase rate

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 are 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 recognized within the consolidated statement of financial position.

**44. LABA PER SAHAM DASAR DAN DILUSIAN
DIATRIBUSIKAN KEPADA PEMILIK ENTITAS
INDUK**

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.

**44. BASIC AND DILUTED EARNINGS PER SHARE
ATTRIBUTABLE TO EQUITY HOLDERS OF THE
PARENT ENTITY**

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.

	2021	2020	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik entitas induk	10,898,518	3,280,403	Income for the year attributable to owners of the parent entity:
Rata-rata tertimbang jumlah lembar saham biasa yang beredar (dalam nilai penuh)	18,620,149,016	18,632,340,041	Weighted average number of outstanding ordinary shares (in full amount)
Laba per saham dasar diatribusikan kepada pemilik entitas induk (dalam Rupiah penuh)	585	176	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.

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45. KOMITMEN DAN KONTINJENSI

45. COMMITMENTS AND CONTINGENCIES

	2021	2020	
Tagihan komitmen			Commitment receivables
Pembelian berjangka mata uang asing yang belum diselesaikan	71,604,677	54,457,465	Unsettled purchased of foreign currency futures
Lain-lain	417,623	296,470	Others
	72,022,300	54,753,935	
Liabilitas komitmen			Commitment payables
Penjualan berjangka mata uang asing yang belum diselesaikan	70,965,780	53,145,899	Sales of foreign currency futures unresolved
Fasilitas kredit kepada debitur yang belum digunakan	59,613,881	47,273,485	Unused loan facilities
Irrevocable letters of credit yang masih berjalan	8,746,412	10,113,295	Outstanding irrevocable letters of credit
	139,326,073	110,532,679	
Tagihan kontinjensi			Contingent receivables
Garansi bank yang diterima	17,895,802	18,202,239	Bank guarantees received
Pendapatan bunga dalam penyelesaian	11,043,107	7,173,509	Interest receivable on non performing assets
Lainnya	329,515	300,031	Others
	29,268,424	25,675,779	
Liabilitas kontinjensi			Contingent payables
Garansi yang diterbitkan dalam bentuk:			Guarantees issued in the form of:
Performance bonds	25,883,030	28,254,793	Performance bonds
Standby letters of credit	12,568,336	8,839,588	Standby letters of credit
Advance payment bonds	7,850,160	8,895,987	Advance payment bonds
Bid bonds	1,478,993	1,280,030	Bid bonds
Shipping guarantee	5,779	5,784	Shipping guarantee
Garansi bank lainnya	9,874,750	10,245,610	Other bank guarantees
	57,661,048	57,521,791	
Transaksi komitmen dan kontinjensi yang terjadi dalam kegiatan normal Bank yang mempunyai risiko kredit adalah sebagai berikut:			Commitments and contingent transactions in the normal course of the Bank's activities that have credit risk are as follows:
	2021	2020	
Garansi bank yang diterbitkan			Bank guarantees issued
Pihak berelasi (Catatan 46v)	19,083,801	17,983,136	Related parties (Note 46v)
Pihak ketiga	38,577,247	39,538,655	Third parties
Irrevocable letters of credit			Irrevocable letters of credit
Pihak berelasi (Catatan 46w)	3,705,213	5,395,504	Related parties (Note 46w)
Pihak ketiga	5,041,199	4,717,791	Third parties
	66,407,460	67,635,086	

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45. KOMITMEN DAN KONTINJENSI (lanjutan)

Transaksi komitmen dan kontinjensi yang mempunyai risiko kredit berdasarkan kolektibilitas adalah sebagai berikut:

	2021	2020
Lancar	64,607,323	66,006,030
Dalam perhatian khusus	1,158,056	1,610,721
Kurang lancar	500	1,786
Diragukan	1,774	2,396
Macet	639,807	14,153
	66,407,460	67,635,086

**45. COMMITMENTS AND CONTINGENCIES
(continued)**

Commitments and contingent transactions that have credit risk by collectibility are as follows:

Current
Special mention
Substandard
Doubtful
Loss

46. 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

Lembaga Pembiayaan Ekspor Indonesia (LPEI)

Perum Badan Usaha Logistik (Bulog) dan Entitas Anak

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia dan Entitas Anak

Perum Perhutani dan Entitas Anak

Perum Perikanan Indonesia

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk dan Entitas Anak

PT Amarta Karya (Persero)

PT Aneka Tambang Tbk dan Entitas Anak

46. 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

Finance Minister of the Republic of Indonesia

Lembaga Kantor Berita Nasional (LKBN) Antara

Lembaga Pembiayaan Ekspor Indonesia (LPEI)

Perum Badan Usaha Logistik (Bulog) and Subsidiaries

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia and Subsidiaries

Perum Perhutani and Subsidiaries

Perum Perikanan Indonesia

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk and Subsidiaries

PT Amarta Karya (Persero)

PT Aneka Tambang Tbk and Subsidiaries

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**46. TRANSAKSI DENGAN PIHAK BERELASI
(lanjutan)**

a. Jenis hubungan (lanjutan)

**Pengendalian melalui Pemerintah Republik
Indonesia (lanjutan)**

PT Asuransi Jasa Indonesia
PT Jasa Raharja dan Entitas Anak
PT Asuransi Jiwasraya (Persero)
PT Asuransi Kredit Indonesia dan Entitas Anak
PT Bahana Pembinaan Usaha Indonesia (Persero)
dan Entitas Anak
PT Balai Pustaka (Persero)
PT Bank Mandiri (Persero) Tbk dan Entitas Anak
PT Bank Rakyat Indonesia (Persero) Tbk dan
Entitas Anak
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Berdikari (Persero) dan Entitas Anak
PT Bhanda Ghara Reksa (Persero) dan Entitas
Anak
PT Bina Karya (Persero)
PT Bio Farma (Persero)
PT Biro Klasifikasi Indonesia (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Dahana (Persero)
PT Danareksa (Persero) dan Entitas Anak
PT Dirgantara Indonesia (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 Garam (Persero)
PT Garuda Indonesia (Persero) Tbk dan Entitas
Anak
PT Hotel Indonesia Natour (Persero)
PT Utama Karya (Persero) dan Entitas Anak
PT Industri Gelas (Persero)
PT Indah Karya (Persero)
PT Indofarma (Persero) Tbk dan Entitas Anak
PT Indonesia Asahan Aluminium (Persero)
PT Indra Karya (Persero)
PT Industri Gula Glenmore
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) dan Entitas Anak
PT Industri Sandang Nusantara (Persero)
PT Industri Telekomunikasi Indonesia (Persero)

46. RELATED PARTY TRANSACTIONS (continued)

a. Type of relationships (continued)

**Control through The Government of The
Republic of Indonesia (continued)**

PT Asuransi Jasa Indonesia
PT Jasa Raharja and Subsidiaries
PT Asuransi Jiwasraya (Persero)
PT Asuransi Kredit Indonesia and Subsidiaries
PT Bahana Pembinaan Usaha Indonesia (Persero)
and Subsidiaries
PT Balai Pustaka (Persero)
PT Bank Mandiri (Persero) Tbk and Subsidiaries
PT Bank Rakyat Indonesia (Persero) Tbk and
Subsidiaries
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Berdikari (Persero) and Subsidiaries
PT Bhanda Ghara Reksa (Persero) and
Subsidiaries
PT Bina Karya (Persero)
PT Bio Farma (Persero)
PT Biro Klasifikasi Indonesia (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Dahana (Persero)
PT Danareksa (Persero) and Subsidiaries
PT Dirgantara Indonesia (Persero) and Subsidiaries
PT Djakarta Lloyd (Persero) and Subsidiaries
PT Dok and Perkapalan Kodja Bahari (Persero)
PT Dok and Perkapalan Surabaya (Persero)
PT Garam (Persero)
PT Garuda Indonesia (Persero) Tbk and
Subsidiaries
PT Hotel Indonesia Natour (Persero)
PT Utama Karya (Persero) and Subsidiaries
PT Industri Gelas (Persero)
PT Indah Karya (Persero)
PT Indofarma (Persero) Tbk and Subsidiaries
PT Indonesia Asahan Aluminium (Persero)
PT Indra Karya (Persero)
PT Industri Gula Glenmore
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) and Subsidiaries
PT Industri Sandang Nusantara (Persero)
PT Industri Telekomunikasi Indonesia (Persero)

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**46. TRANSAKSI DENGAN PIHAK BERELASI
(lanjutan)**

a. Jenis hubungan (lanjutan)

**Pengendalian melalui Pemerintah Republik
Indonesia (lanjutan)**

PT Istaka Karya (Persero)
PT Jaminan Kredit Indonesia
PT Jasa Marga (Persero) Tbk dan Entitas Anak
PT Kawasan Berikat Nusantara (Persero)
PT Kawasan Industri Makassar (Persero)
PT Kawasan Industri Medan (Persero)
PT Kawasan Industri Wijayakusuma (Persero)
PT Kereta Api Indonesia (Persero) dan Entitas Anak
PT Kertas Kraft Aceh (Persero)
PT Kimia Farma (Persero) Tbk dan Entitas Anak
PT Kliring Berjangka Indonesia (Persero)
PT Krakatau Steel (Persero) dan Entitas Anak
PT Len Industri (Persero) dan Entitas Anak
PT Merpati Nusantara Airlines (Persero)
PT PAL Indonesia (Persero) dan Entitas Anak
PT Pengembangan Armada Niaga Nasional (PANN)
(Persero) dan Entitas Anak
PT Pegadaian (Persero) dan Entitas Anak
PT Pelabuhan Indonesia I (Persero) dan Entitas
Anak
PT Pelabuhan Indonesia II (Persero) dan Entitas
Anak
PT Pelabuhan Indonesia III (Persero) dan Entitas
Anak
PT Pelabuhan Indonesia IV (Persero) dan Entitas
Anak
PT Pelayaran Nasional Indonesia (Persero) dan
Entitas Anak
PT PP (Persero) dan Entitas Anak
PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) dan Entitas
Anak
PT Perkebunan Nusantara IX (Persero) dan Entitas
Anak
PT Permodalan Nasional Madani (Persero) dan
Entitas Anak
PT Pertamina (Persero) dan Entitas Anak
PT Pertani (Persero)
PT Perusahaan Gas Negara (Persero) Tbk dan
Entitas Anak
PT Perusahaan Listrik Negara (Persero) dan Entitas
Anak
PT Perusahaan Pengelola Aset (Persero) dan
Entitas Anak

46. RELATED PARTY TRANSACTIONS (continued)

a. Type of relationships (continued)

**Control through The Government of The
Republic of Indonesia (continued)**

PT Istaka Karya (Persero)
PT Jaminan Kredit Indonesia
PT Jasa Marga (Persero) Tbk and Subsidiaries
PT Kawasan Berikat Nusantara (Persero)
PT Kawasan Industri Makassar (Persero)
PT Kawasan Industri Medan (Persero)
PT Kawasan Industri Wijayakusuma (Persero)
PT Kereta Api Indonesia (Persero) and Subsidiaries
PT Kertas Kraft Aceh (Persero)
PT Kimia Farma (Persero) Tbk and Subsidiaries
PT Kliring Berjangka Indonesia (Persero)
PT Krakatau Steel (Persero) and Subsidiaries
PT Len Industri (Persero) and Subsidiaries
PT Merpati Nusantara Airlines (Persero)
PT PAL Indonesia (Persero) and Subsidiaries
PT Pengembangan Armada Niaga Nasional
(PANN) (Persero) and Subsidiaries
PT Pegadaian (Persero) and Subsidiaries
PT Pelabuhan Indonesia I (Persero) and
Subsidiaries
PT Pelabuhan Indonesia II (Persero) and
Subsidiaries
PT Pelabuhan Indonesia III (Persero) and
Subsidiaries
PT Pelabuhan Indonesia IV (Persero) and
Subsidiaries
PT Pelayaran Nasional Indonesia (Persero) and
Subsidiaries
PT PP (Persero) and Subsidiaries
PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) and
Subsidiaries
PT Perkebunan Nusantara IX (Persero) and
Subsidiaries
PT Permodalan Nasional Madani (Persero) and
Subsidiaries
PT Pertamina (Persero) and Subsidiaries
PT Pertani (Persero)
PT Perusahaan Gas Negara (Persero) Tbk and
Subsidiaries
PT Perusahaan Listrik Negara (Persero) and
Subsidiaries
PT Perusahaan Pengelola Aset (Persero) and
Subsidiaries

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(lanjutan)**

a. Jenis hubungan (lanjutan)

**Pengendalian melalui Pemerintah Republik
Indonesia (lanjutan)**

PT Perusahaan Perdagangan Indonesia (Persero)
PT Pindad (Persero) dan Entitas Anak
PT Pos Indonesia (Persero) dan Entitas Anak
PT Primmisima (Persero)
PT Pupuk Indonesia Holding Company (Persero) dan Entitas Anak
PT Rajawali Nusantara Indonesia (Persero) dan Entitas Anak
PT Sang Hyang Seri (Persero)
PT Sarana Karya (Persero)
PT Sarana Multigriya Finansial (Persero)
PT Sarinah (Persero) dan Entitas Anak
PT Semen Baturaja (Persero) Tbk
PT Semen Indonesia (Persero) Tbk dan Entitas Anak
PT Sucofindo (Persero) dan Entitas Anak
PT Surveyor Indonesia (Persero)
PT Bukit Asam (Persero) Tbk dan Entitas Anak
PT Taspen (Persero) dan Entitas Anak
PT Telekomunikasi Indonesia (Persero) Tbk dan Entitas Anak
PT Timah (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 Perusahaan

Manajemen Kunci

**Berdasarkan Kepemilikan dan/atau
Kepengurusan**

Dana Pensiun BNI
Dana Pensiun Lembaga Keuangan (DPLK) BNI
PT Asuransi Tripakarta

b. Giro pada bank lain

	2021	2020
PT Bank Mandiri (Persero) Tbk	1,559,840	469,246
PT Bank Rakyat Indonesia (Persero) Tbk	34	4,289
Lembaga Pembiayaan Ekspor Indonesia (LPEI)	-	73
PT Bank Tabungan Negara (Persero) Tbk	-	100
	1,559,874	473,708

46. RELATED PARTY TRANSACTIONS (continued)

a. Type of relationships (continued)

**Control through The Government of The
Republic of Indonesia (continued)**

PT Perusahaan Perdagangan Indonesia (Persero)
PT Pindad (Persero) and Subsidiaries
PT Pos Indonesia (Persero) and Subsidiaries
PT Primmisima (Persero)
PT Pupuk Indonesia Holding Company (Persero) and Subsidiaries
PT Rajawali Nusantara Indonesia (Persero) and Subsidiaries
PT Sang Hyang Seri (Persero)
PT Sarana Karya (Persero)
PT Sarana Multigriya Finansial (Persero)
PT Sarinah (Persero) and Subsidiaries
PT Semen Baturaja (Persero) Tbk
PT Semen Indonesia (Persero) Tbk and Subsidiaries
PT Sucofindo (Persero) and Subsidiaries
PT Surveyor Indonesia (Persero)
PT Bukit Asam (Persero) Tbk and Subsidiaries
PT Taspen (Persero) and Subsidiaries
PT Telekomunikasi Indonesia (Persero) Tbk and Subsidiaries
PT Timah (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 Company's Activities

Key Management

By Ownership and/or Management

Dana Pensiun BNI
Dana Pensiun Lembaga Keuangan (DPLK) BNI
PT Asuransi Tripakarta

b. Current accounts with other banks

PT Bank Mandiri (Persero) Tbk
PT Bank Rakyat Indonesia (Persero) Tbk
Lembaga Pembiayaan Ekspor Indonesia (LPEI)
PT Bank Tabungan Negara (Persero) Tbk

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**46. TRANSAKSI DENGAN PIHAK BERELASI
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c. Penempatan pada bank lain dan Bank Indonesia

	2021
PT Bank Rakyat Indonesia (Persero) Tbk	410,019
PT Bank Mandiri (Persero) Tbk	283,869
PT Bank Tabungan Negara (Persero) Tbk	435
	694,323

d. Efek-efek

	2021
PT Permodalan Nasional Madani (Persero)	978,000
PT Perusahaan Listrik Negara (Persero)	896,619
PT Bank Tabungan Negara (Persero) Tbk	715,603
PT Bank Mandiri (Persero) Tbk	706,957
PT Bank Rakyat Indonesia (Persero) Tbk	695,552
PT Hutama Karya (Persero)	434,193
PT Bahana Pembinaan Usaha Indonesia (Persero)	218,466
PT Pegadaian (Persero)	183,646
PT Danareksa (Persero)	167,254
PT Sarana Multi Infrastruktur (Persero)	149,086
PT Pelabuhan Indonesia II (Persero)	138,987
PT Sarana Multigriya Finansial (Persero)	118,143
PT Semen Indonesia (Persero) Tbk	105,779
PT Kereta Api Indonesia (Persero)	105,334
PT Telekomunikasi Indonesia (Persero) Tbk	68,733
PT Pertamina (Persero)	68,045
PT Jasa Marga (Persero) Tbk	67,536
PT Lembaga Pembiayaan Ekspor Indonesia (Persero)	49,694
PT Pupuk Indonesia (Persero)	23,781
PT Kimia Farma (Persero) Tbk	15,221
Lain-lain	9,347
	5,915,976

e. Efek-efek yang dibeli dengan janji dijual kembali

	2021
PT Bank Rakyat Indonesia (Persero) Tbk	933,729

f. Obligasi Pemerintah

	2021
Pemerintah Republik Indonesia	111,401,474

46. RELATED PARTY TRANSACTIONS (continued)

c. Placements with other banks and Bank Indonesia

	2020
PT Bank Rakyat Indonesia (Persero) Tbk	652,651
PT Bank Mandiri (Persero) Tbk	31,747
PT Bank Tabungan Negara (Persero) Tbk	10,435
	694,833

d. Marketable securities

	2020
PT Permodalan Nasional Madani (Persero)	783,251
PT Perusahaan Listrik Negara (Persero)	1,015,110
PT Bank Tabungan Negara (Persero) Tbk	767,617
PT Bank Mandiri (Persero) Tbk	655,501
PT Bank Rakyat Indonesia (Persero) Tbk	562,462
PT Hutama Karya (Persero)	856,159
PT Bahana Pembinaan Usaha Indonesia (Persero)	293,618
PT Pegadaian (Persero)	507,745
PT Danareksa (Persero)	319,540
PT Sarana Multi Infrastruktur (Persero)	221,937
PT Pelabuhan Indonesia II (Persero)	139,628
PT Sarana Multigriya Finansial (Persero)	262,772
PT Semen Indonesia (Persero) Tbk	313,119
PT Kereta Api Indonesia (Persero)	70,634
PT Telekomunikasi Indonesia (Persero) Tbk	51,759
PT Pertamina (Persero)	72,874
PT Jasa Marga (Persero) Tbk	214,123
PT Lembaga Pembiayaan Ekspor Indonesia (Persero)	89,077
PT Pupuk Indonesia (Persero)	50,691
PT Kimia Farma (Persero) Tbk	79,788
Others	130,853
	7,458,258

e. Securities purchased under agreements to resell

	2020
PT Bank Rakyat Indonesia (Persero) Tbk	654,090

f. Government Bonds

	2020
The Government of The Republic of Indonesia	89,355,412

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46. RELATED PARTY TRANSACTIONS (continued)

g. Wesel ekspor dan tagihan lainnya

g. Bills and other receivables

	2021	2020	
PT Adhi Karya (Persero) Tbk	4,615,915	2,229,358	PT Adhi Karya (Persero) Tbk
PT Brantas Abipraya (Persero)	1,471,426	714,783	PT Brantas Abipraya (Persero)
PT Wijaya Karya (Persero) Tbk	1,434,765	1,267,256	PT Wijaya Karya (Persero) Tbk
PT Hutama Karya (Persero)	1,335,712	1,228,259	PT Hutama Karya (Persero)
PT Semen Indonesia (Persero) Tbk	553,599	345,800	PT Semen Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk	297,792	251,121	PT Bank Mandiri (Persero) Tbk
PT Bank Rakyat Indonesia (Persero) Tbk	169,686	85,174	PT Bank Rakyat Indonesia (Persero) Tbk
PT Nindya Karya (Persero)	121,535	229,017	PT Nindya Karya (Persero)
PT Telekomunikasi Indonesia (Persero) Tbk	78,118	199,922	PT Telekomunikasi Indonesia (Persero) Tbk
PT Semen Baturaja (Persero) Tbk	17,028	48,502	PT Semen Baturaja (Persero) Tbk
PT Garuda Indonesia (Persero) Tbk	-	839,094	PT Garuda Indonesia (Persero) Tbk
PT Pelabuhan Indonesia III (Persero)	-	30,651	PT Pelabuhan Indonesia III (Persero)
PT Waskita Karya (Persero) Tbk	-	3,174,581	PT Waskita Karya (Persero) Tbk
PT Barata Indonesia (Persero)	-	9,729	PT Barata Indonesia
	10,095,576	10,653,247	

h. Tagihan akseptasi

h. Acceptance receivables

	2021	2020	
PT Krakatau Steel (Persero) Tbk	1,398,563	2,939,516	PT Krakatau Steel (Persero) Tbk
PT Pertamina (Persero)	1,219,390	-	PT Pertamina (Persero)
PT PP (Persero) Tbk	738,343	556,483	PT PP (Persero) Tbk
PT Hutama Karya (Persero)	602,756	516,347	PT Hutama Karya (Persero)
PT Petrokimia Gresik	423,739	-	PT Petrokimia Gresik
PT Len Industri (Persero)	359,012	175,663	PT Len Industri (Persero)
PT Adhi Karya (Persero) Tbk	338,811	2,160,261	PT Adhi Karya (Persero) Tbk
PT Nindya Karya (Persero)	209,096	106,545	PT Nindya Karya (Persero)
PT Wijaya Karya (Persero) Tbk	180,606	33,085	PT Wijaya Karya (Persero) Tbk
PT Telekomunikasi Indonesia (Persero) Tbk	174,210	-	PT Telekomunikasi Indonesia (Persero) Tbk
PT Semen Indonesia (Persero) Tbk	158,607	170,446	PT Semen Indonesia (Persero) Tbk
PT Pindad (Persero)	125,390	243,357	PT Pindad (Persero)
PT Dahana (Persero)	118,539	61,191	PT Dahana (Persero)
PT Garuda Indonesia (Persero) Tbk	82,633	44,320	PT Garuda Indonesia (Persero) Tbk
PT Infrastruktur Telekomunikasi Indonesia	79,487	98,764	PT Infrastruktur Telekomunikasi Indonesia
PT Dirgantara Indonesia (Persero)	70,086	87,917	PT Dirgantara Indonesia (Persero)
PT Rekayasa Industri	40,211	69,704	PT Rekayasa Industri
PT Bank Mandiri (Persero) Tbk	39,651	14,041	PT Bank Mandiri (Persero) Tbk
PT Boma Bisma Indra (Persero)	29,071	10,400	PT Boma Bisma Indra (Persero)
PT Industri Kereta Api (Persero)	25,986	68,408	PT Industri Kereta Api (Persero)
PT Perusahaan Perdagangan Indonesia (Persero)	21,635	77,728	PT Perusahaan Perdagangan Indonesia (Persero)
PT Rajawali Nusindo	17,240	19,655	PT Rajawali Nusindo
PT Bank Rakyat Indonesia (Persero) Tbk	12,507	108,523	PT Bank Rakyat Indonesia (Persero) Tbk
PT Brantas Abipraya (Persero)	9,049	4,087	PT Brantas Abipraya (Persero)
PT Pupuk Kujang	6,757	67,564	PT Pupuk Kujang
PT Indofarma (Persero) Tbk	1,512	945	PT Indofarma (Persero) Tbk
PT Barata Indonesia (Persero)	-	21,032	PT Barata Indonesia (Persero)
	6,482,887	7,655,982	

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46. RELATED PARTY TRANSACTIONS (continued)

c. Penempatan pada bank lain dan Bank Indonesia

c. Placements with other banks and Bank Indonesia

	2021	2020
PT Bank Rakyat Indonesia (Persero) Tbk	410,019	652,651
PT Bank Mandiri (Persero) Tbk	283,869	31,747
PT Bank Tabungan Negara (Persero) Tbk	435	10,435
	694,323	694,833

*PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk
PT Bank Tabungan Negara (Persero) Tbk*

d. Efek-efek

d. Marketable securities

	2021	2020
PT Permodalan Nasional Madani (Persero)	978,000	783,251
PT Perusahaan Listrik Negara (Persero)	896,619	1,015,110
PT Bank Tabungan Negara (Persero) Tbk	715,603	767,617
PT Bank Mandiri (Persero) Tbk	706,957	655,501
PT Bank Rakyat Indonesia (Persero) Tbk	695,552	562,462
PT Hutama Karya (Persero)	434,193	856,159
PT Bahana Pembinaan Usaha Indonesia (Persero)	218,466	293,618
PT Pegadaian (Persero)	183,646	507,745
PT Danareksa (Persero)	167,254	319,540
PT Sarana Multi Infrastruktur (Persero)	149,086	221,937
PT Pelabuhan Indonesia II (Persero)	138,987	139,628
PT Sarana Multigriya Finansial (Persero)	118,143	262,772
PT Semen Indonesia (Persero) Tbk	105,779	313,119
PT Kereta Api Indonesia (Persero)	105,334	70,634
PT Telekomunikasi Indonesia (Persero) Tbk	68,733	51,759
PT Pertamina (Persero)	68,045	72,874
PT Jasa Marga (Persero) Tbk	67,536	214,123
PT Lembaga Pembiayaan Ekspor Indonesia (Persero)	49,694	89,077
PT Pupuk Indonesia (Persero)	23,781	50,691
PT Kimia Farma (Persero) Tbk	15,221	79,788
Lain-lain	9,347	130,853
	5,915,976	7,458,258

*PT Permodalan Nasional Madani (Persero)
PT Perusahaan Listrik Negara (Persero)
PT Bank Tabungan Negara (Persero) Tbk
PT Bank Mandiri (Persero) Tbk
PT Bank Rakyat Indonesia (Persero) Tbk
PT Hutama Karya (Persero)
PT Bahana Pembinaan Usaha Indonesia (Persero)
PT Pegadaian (Persero)
PT Danareksa (Persero)
PT Sarana Multi Infrastruktur (Persero)
PT Pelabuhan Indonesia II (Persero)
PT Sarana Multigriya Finansial (Persero)
PT Semen Indonesia (Persero) Tbk
PT Kereta Api Indonesia (Persero)
PT Telekomunikasi Indonesia (Persero) Tbk
PT Pertamina (Persero)
PT Jasa Marga (Persero) Tbk
PT Lembaga Pembiayaan Ekspor Indonesia (Persero)
PT Pupuk Indonesia (Persero)
PT Kimia Farma (Persero) Tbk
Others*

e. Efek-efek yang dibeli dengan janji dijual kembali

e. Securities purchased under agreements to resell

	2021	2020
PT Bank Rakyat Indonesia (Persero) Tbk	933,729	654,090

PT Bank Rakyat Indonesia (Persero) Tbk

f. Obligasi Pemerintah

f. Government Bonds

	2021	2020
Pemerintah Republik Indonesia	111,401,474	89,355,412

The Government of The Republic of Indonesia

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46. RELATED PARTY TRANSACTIONS (continued)

k. Investasi pada entitas asosiasi dan penyertaan saham	2021	2020	k. Investment in associates and equity investments
PT Bank Syariah Indonesia Tbk	8,688,406	-	PT Bank Syariah Indonesia Tbk
PT Fintek Karya Nusantara	701,800	412,210	PT Fintek Karya Nusantara
PT PANN (Persero)	-	282,825	PT PANN (Persero)
	9,390,206	659,035	
l. Simpanan nasabah	2021	2020	l. Deposits from customers
Entitas dikendalikan melalui Pemerintah Republik Indonesia	152,148,865	110,272,737	Entities controlled through The Government of Republic of Indonesia
Manajemen Kunci	108,176	113,102	Key Management
	152,257,041	110,385,839	
m. Simpanan dari bank lain	2021	2020	m. Deposits from other banks
Entitas dikendalikan melalui Pemerintah Republik Indonesia	1,269,116	1,083,744	Entities controlled through The Government of Republic of Indonesia
n. Efek-efek yang diterbitkan	2021	2020	n. Securities issued
PT Bank Rakyat Indonesia (Persero) Tbk	593,168	773,085	PT Bank Rakyat Indonesia (Persero)
Dana Pensiun Lembaga Keuangan BNI	199,989	199,970	Dana Pensiun Lembaga Keuangan BNI
PT Bank Mandiri (Persero) Tbk	148,992	148,978	PT Bank Mandiri (Persero) Tbk
PT Penjaminan Infrastruktur Indonesia (Persero)	39,998	12,997	PT Penjaminan Infrastruktur Indonesia (Persero)
Dana Pensiun BNI	29,998	29,996	Dana Pensiun BNI
	1,012,145	1,165,026	
o. Pinjaman yang diterima	2021	2020	o. Borrowings
PT Bank Mandiri (Persero) Tbk	349,201	821,038	PT Bank Mandiri (Persero) Tbk
Kementerian Keuangan Republik Indonesia	57,831	64,801	Finance Ministry of the Republic of Indonesia
Lembaga Pembiayaan Ekspor Indonesia	-	8,537	Lembaga Pembiayaan Ekspor Indonesia
	407,032	894,376	
p. Efek-efek subordinasi	2021	2020	p. Subordinated securities
PT Asuransi Tripakarta	24,996	24,994	PT Asuransi Tripakarta
PT Bank Mandiri (Persero) Tbk	2,849	-	PT Bank Mandiri (Persero) Tbk
	27,845	24,994	

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46. TRANSAKSI DENGAN PIHAK BERELASI
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46. RELATED PARTY TRANSACTIONS (continued)

q. Liabilitas derivatif

q. Derivative payables

	2021	2020	
PT Bank Rakyat Indonesia (Persero) Tbk	7,834	30,884	PT Bank Rakyat Indonesia (Persero) Tbk
PT Bank Mandiri (Persero) Tbk	2,920	24,224	PT Bank Mandiri (Persero) Tbk
PT Pertamina (Persero)	1,523	-	PT Pertamina (Persero)
	12,277	55,108	

r. Liabilitas akseptasi

r. Acceptance payables

	2021	2020	
PT Indonesia Asahan Alumunium	166,252	-	PT Indonesia Asahan Alumunium
PT Bank Mandiri (Persero) Tbk	40,207	453,411	PT Bank Mandiri (Persero) Tbk
PT Semen Indonesia (Persero) Tbk	20,921	22,997	PT Semen Indonesia (Persero) Tbk
PT Bank Rakyat Indonesia (Persero) Tbk	13,780	216,192	PT Bank Rakyat Indonesia (Persero) Tbk
PT Barata Indonesia (Persero)	2,367	-	PT Barata Indonesia (Persero)
PT Pindad (Persero)	370	9,397	PT Pindad (Persero)
Perum Percetakan Negara Republik Indonesia	332	-	Perum Percetakan Negara Republik Indonesia
Lain-lain	-	44,484	Others
	244,229	746,481	

s. Dana Syirkah Temporer - Giro Mudharabah

s. Temporary Syirkah Funds - Mudharabah Current Accounts

	2021	2020	
Entitas dikendalikan melalui Pemerintah Republik Indonesia	-	1,056,206	Entities controlled through The Government of Republic of Indonesia

t. Dana Syirkah Temporer - Deposito Mudharabah

t. Temporary Syirkah Funds - Mudharabah Deposit Accounts

	2021	2020	
Entitas dikendalikan melalui Pemerintah Republik Indonesia	-	1,991,889	Entities controlled through The Government of Republic of Indonesia
Manajemen kunci	-	18,577	Key Management
	-	2,010,466	

u. Dana Syirkah Temporer - Tabungan Mudharabah

u. Temporary Syirkah Funds - Mudharabah Saving Accounts

	2021	2020	
Manajemen kunci	-	13,517	Key Management
Entitas dikendalikan melalui Pemerintah Republik Indonesia	-	433	Entities controlled through The Government of Republic of Indonesia
	-	13,950	

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46. RELATED PARTY TRANSACTIONS (continued)

v. Garansi bank yang diterbitkan

v. Bank guarantees issued

	2021	2020	
PT Utama Karya (Persero)	2,402,746	2,536,591	PT Utama Karya (Persero)
PT Wijaya Karya (Persero) Tbk	2,308,786	1,853,638	PT Wijaya Karya (Persero) Tbk
PT Pertamina (Persero)	2,057,123	937,386	PT Pertamina (Persero)
PT Telkom (Persero) Tbk	1,890,126	1,549,534	PT Telkom (Persero) Tbk
PT Rekayasa Industri	1,588,368	1,597,466	PT Rekayasa Industri
PT Nindya Karya (Persero)	1,575,672	1,202,499	PT Nindya Karya (Persero)
PT Brantas Abipraya (Persero)	916,556	831,251	PT Brantas Abipraya (Persero)
PT Adhi Karya (Persero)	893,971	1,033,249	PT Adhi Karya (Persero)
PT Bank Mandiri (Persero) Tbk	856,835	738,878	PT Bank Mandiri (Persero) Tbk
PT Petrokimia Gresik	787,407	839,628	PT Petrokimia Gresik
PT PP (Persero) Tbk	747,155	788,967	PT PP (Persero) Tbk
PT Industri Kereta Api (Persero)	614,178	217,773	PT Industri Kereta Api (Persero)
PT Waskita Karya (Persero) Tbk	551,459	434,369	PT Waskita Karya (Persero) Tbk
PT Pindad (Persero)	526,431	377,797	PT Pindad (Persero)
PT Len Industri (Persero)	265,680	83,301	PT Len Industri (Persero)
PT Dirgantara Indonesia (Persero)	231,229	390,986	PT Dirgantara Indonesia (Persero)
PT Perusahaan Listrik Negara (Persero)	220,535	136,359	PT Perusahaan Listrik Negara (Persero)
PT Rajawali Nusindo	102,327	101,084	PT Rajawali Nusindo
PT Barata Indonesia (Persero)	87,628	103,877	PT Barata Indonesia (Persero)
PT Biro Klasifikasi Indonesia (Persero)	53,629	35,318	PT Biro Klasifikasi Indonesia (Persero)
PT Sucofindo (Persero)	53,391	51,264	PT Sucofindo (Persero)
PT Bank Rakyat Indonesia (Persero) Tbk	46,057	4,330	PT Bank Rakyat Indonesia (Persero) Tbk
PT Pelabuhan Indonesia II (Persero)	38,608	38,014	PT Pelabuhan Indonesia II (Persero)
PT Bukit Asam (Persero) Tbk	31,385	1,555	PT Bukit Asam (Persero) Tbk
PT Djakarta Lloyd (Persero)	28,802	19,899	PT Djakarta Lloyd (Persero)
PT Angkasa Pura II (Persero)	28,234	32,156	PT Angkasa Pura II (Persero)
PT Dahana (Persero)	27,184	33,715	PT Dahana (Persero)
PT Asuransi Jasa Indonesia	22,193	37,786	PT Asuransi Jasa Indonesia
PT Virama Karya (Persero)	21,373	38,058	PT Virama Karya (Persero)
PT Angkasa Pura I (Persero)	20,879	30,601	PT Angkasa Pura I (Persero)
PT Infrastruktur Telekomunikasi Indonesia	16,229	7,435	PT Infrastruktur Telekomunikasi Indonesia
PT Indra Karya (Persero)	9,069	5,230	PT Indra Karya (Persero)
PT Pengembangan Pariwisata Indonesia (Persero)	8,056	-	PT Pengembangan Pariwisata Indonesia (Persero)
PT Perusahaan Perdagangan Indonesia	7,634	9,580	PT Perusahaan Perdagangan Indonesia
Lain-lain	46,866	1,883,562	Others
	19,083,801	17,983,136	

w. Letters of Credit

w. Letters of Credit

	2021	2020	
PT Perusahaan Listrik Negara (Persero)	1,247,723	1,136,946	PT Perusahaan Listrik Negara (Persero)
PT PP (Persero) Tbk	495,905	387,582	PT PP (Persero) Tbk
PT Kereta Api Indonesia (Persero)	476,734	1,071,641	PT Kereta Api Indonesia (Persero)
PT Bio Farma (Persero)	290,550	-	PT Bio Farma (Persero)
PT Petrokimia Gresik	235,038	392,297	PT Petrokimia Gresik
PT Semen Indonesia (Persero) Tbk	135,366	178,585	PT Semen Indonesia (Persero) Tbk
PT Utama Karya (Persero)	116,404	183,726	PT Utama Karya (Persero)
PT Nindya Karya (Persero)	110,863	234,690	PT Nindya Karya (Persero)
PT Dahana (Persero)	98,293	36,462	PT Dahana (Persero)
PT Pertamina (Persero)	79,167	365,752	PT Pertamina (Persero)
PT Pindad (Persero)	75,227	301,484	PT Pindad (Persero)
PT Perkebunan Nusantara V (Persero)	59,691	24,964	PT Perkebunan Nusantara V (Persero)
PT Wijaya Karya (Persero) Tbk	53,774	182,031	PT Wijaya Karya (Persero) Tbk
PT Dirgantara Indonesia (Persero)	39,600	114,994	PT Dirgantara Indonesia (Persero)
Perum Percetakan Uang Republik Indonesia	33,297	8,161	Perum Percetakan Uang Republik Indonesia
PT Boma Bisma Indra (Persero)	27,605	1,636	PT Boma Bisma Indra (Persero)
PT Adhi Karya (Persero) Tbk	24,150	31,426	PT Adhi Karya (Persero) Tbk
PT Perusahaan Perdagangan Indonesia	22,075	-	PT Perusahaan Perdagangan Indonesia
PT PAL Indonesia (Persero)	17,750	-	PT PAL Indonesia (Persero)
PT Industri Kereta Api (Persero)	16,423	-	PT Industri Kereta Api (Persero)

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46. RELATED PARTY TRANSACTIONS (continued)

w. Letters of Credit (lanjutan)

w. Letters of Credit (continued)

	2021	2020	
PT Rajawali Nusindo	11,373	6,152	PT Rajawali Nusindo
PT Len Industri (Persero)	9,020	6,800	PT Len Industri (Persero)
PT Rekayasa Industri	5,361	93,739	PT Rekayasa Industri
PT Pupuk Kujang	5,140	182,525	PT Pupuk Kujang
PT Brantas Abipraya (Persero)	4,557	2,256	PT Brantas Abipraya (Persero)
PT Timah (Persero) Tbk	4,211	-	PT Timah (Persero) Tbk
PT Krakatau Steel (Persero) Tbk	2,676	83,139	PT Krakatau Steel (Persero) Tbk
PT Pupuk Indonesia Holding Company (Persero)	1,840	16,087	PT Pupuk Indonesia Holding Company (Persero)
Lain-lain	5,400	352,429	Others
	3,705,213	5,395,504	

x. Gaji dan tunjangan

x. Salaries and benefits

31 Desember/December 2021					
	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	23,701	49,169	3,432	76,302	Board of Commissioners
Direksi	62,963	85,479	8,760	157,202	Board of Directors
Komite Audit	1,082	-	-	1,082	Audit Committee
SEVP, EVP dan SVP	168,862	13,613	-	182,475	SEVP, EVP and SVP
	256,608	148,261	12,192	417,061	
31 Desember/December 2020					
	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	19,978	55,412	3,093	78,483	Board of Commissioners
Direksi	52,304	144,588	7,881	204,773	Board of Directors
Komite Audit	840	-	-	840	Audit Committee
SEVP, EVP dan SVP	103,155	25,893	-	129,048	SEVP, EVP and SVP
	176,277	225,893	10,974	413,144	

Rincian saldo transaksi dengan pihak-pihak berelasi pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

The details of balances of transactions with related parties as of 31 December 2021 and 2020 are as follows:

	2021	2020	
Aset			Assets
Giro pada bank lain	1,559,874	473,708	Current accounts with other bank
Penempatan pada bank lain	694,323	694,833	Placements with other banks
Efek-efek	5,915,976	7,458,258	Marketable securities
Efek-efek yang dibeli dengan janji dijual kembali	933,729	654,090	Securities purchased under agreements to resell
Obligasi Pemerintah	111,401,474	89,355,412	Government bonds
Wesel ekspor dan tagihan lainnya	10,095,576	10,653,247	Bills and other receivables
Tagihan akseptasi	6,482,887	7,655,982	Acceptance receivables
Tagihan derivatif	29,948	139,757	Derivative receivables
Pinjaman yang diberikan	97,554,050	112,907,440	Loans
Investasi pada entitas asosiasi dan penyertaan saham	9,390,206	695,035	Investment in associates and equity investments
Jumlah aset kepada pihak-pihak berelasi	244,058,043	230,687,762	Total assets with related parties
Jumlah aset konsolidasian	964,837,692	891,337,425	Total consolidated assets
Persentase jumlah aset kepada pihak-pihak berelasi terhadap jumlah aset konsolidasian	25.3%	25.9%	Percentage of total assets with related parties to total consolidated assets

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**46. TRANSAKSI DENGAN PIHAK BERELASI
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46. RELATED PARTY TRANSACTIONS (continued)

	2021	2020	
Liabilitas			Liabilities
Simpanan nasabah	152,257,041	110,385,839	Deposits from customers
Simpanan dari bank lain	1,269,116	1,083,744	Deposit from other banks
Efek-efek yang diterbitkan	1,012,145	1,165,026	Securities issued
Pinjaman yang diterima	407,032	894,376	Borrowings
Efek-efek subordinasi	27,845	24,994	Subordinated securities
Liabilitas derivatif	12,277	55,108	Derivative payables
Liabilitas akseptasi	244,229	746,481	Acceptance payables
Jumlah liabilitas kepada pihak-pihak berelasi	155,229,685	114,383,878	Total liabilities with related parties
Jumlah liabilitas konsolidasian	838,317,715	746,235,663	Total consolidated liabilities
Persentase jumlah liabilitas kepada pihak-pihak berelasi terhadap jumlah liabilitas konsolidasian	18.5%	15.3%	Percentage of total liabilities with related parties to total consolidated liabilities
Dana Syirkah Temporer			Temporary Syirkah Funds
Simpanan Mudharabah	-	3,080,622	Mudharabah Saving
Jumlah Dana Syirkah Temporer Pihak-pihak berelasi	-	3,080,622	Total Temporary Syirkah Funds with related parties
Jumlah Dana Syirkah Temporer	-	32,229,563	Total Temporary Syirkah Funds
Persentase jumlah Dana Syirkah Temporer kepada pihak-pihak Berelasi terhadap jumlah Dana Syirkah Temporer konsolidasian	-	9.6%	Percentage of total temporary syirkah funds with related parties to total consolidated Temporary syirkah funds

47. INFORMASI SEGMENT

Segmen operasi Grup dibagi berdasarkan kelompok nasabah utama dan produk, sebagai berikut: Korporasi, Menengah dan Kecil, Konsumer, Tresuri dan Institusi Keuangan, Kantor Pusat dan Entitas Anak. Dalam menentukan hasil segmen, beberapa akun aset dan liabilitas dan pendapatan dan biaya yang terkait diatribusikan ke masing-masing segmen berdasarkan kebijakan pelaporan internal manajemen. Transaksi antar segmen usaha diperlakukan seperti transaksi pihak ketiga yang dicatat ke dalam masing-masing segmen dan dieliminasi di tingkat Bank.

Ringkasan berikut menjelaskan operasi masing-masing segmen dalam pelaporan segmen Bank:

- **Korporasi:** termasuk kredit yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya atas nasabah korporasi termasuk BUMN.
- **Menengah dan Kecil:** termasuk kredit yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya atas nasabah dengan skala kecil hingga menengah.

47. SEGMENT INFORMATION

The Group's operating segments represent the key customers and product groups, as follows: Corporate, Middle and Small, Consumer, Treasury and Financial Institution, Head Office and Subsidiaries. In determining the segment results, certain assets and liabilities items and related revenues and expenses are attributed to each segment based on internal management reporting policies. Transactions between business segments are recorded within the segment as if they are third party transactions and are eliminated at the Bank level.

The following summary describes the operations in each of the Bank's reportable segments:

- **Corporate:** includes loans, deposits and other transactions and balances with corporate customers including state-owned enterprise.
- **Middle and Small:** includes loans, deposits and other transactions and balances with small to middle size customers.

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47. INFORMASI SEGMENT (lanjutan)

Ringkasan berikut menjelaskan operasi masing-masing segmen dalam pelaporan segmen Bank: (lanjutan)

- **Konsumer:** termasuk kredit pembiayaan konsumsi antara lain kredit kepemilikan rumah, kartu kredit dan transaksi-transaksi lain atas nasabah konsumer.
- **Tresuri dan Institusi Keuangan:** terkait dengan kegiatan tresuri Bank termasuk transaksi valuta asing, *money market*, *capital market* dan *fixed income*, termasuk antara lain bisnis perbankan internasional dan cabang luar negeri.
- **Kantor Pusat:** merupakan penyediaan jasa secara sentralisasi kepada segmen lainnya.
- **Entitas Anak:** seluruh transaksi yang dilakukan oleh Entitas Anak yang bergerak di bidang perbankan syariah, asuransi, pembiayaan konsumen dan sekuritas.

Kinerja diukur berdasarkan laba segmen sebelum pajak penghasilan, sebagaimana dilaporkan dalam laporan internal manajemen yang direview 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.

Informasi yang berkaitan dengan segmen usaha yang utama dari Grup disajikan dalam tabel di bawah ini:

47. SEGMENT INFORMATION (continued)

The following summary describes the operations in each of the Bank's reportable segments: (continued)

- **Consumer:** includes consumer loan such as housing loans, credit cards and other transactions with consumer loans.
- **Treasury and Financial Institution:** treasury activities including foreign exchange, money market, capital market and fixed income, also including international banking and overseas branch.
- **Head Office:** represent centralized services for other segments.
- **Subsidiaries:** all transactions from Subsidiaries in sharia banking, insurance, consumer financing 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.

Information concerning the operating between segments of the Group are set out in the tables below:

	31 Desember/December 2021									
	Korporasi/ Corporate	Menengah/ Middle	Kecil/ Small	Konsumer dan Ritel/ Consumer and Retail	Tresuri dan Institusi Keuangan/ Treasury and Financial Institution	Kantor Pusat/ Head Office	Entitas Anak/ Subsidiaries	Penyesuaian dan eliminasi/ Adjustment and elimination**)	Konsolidasian /Consolidation	
Pendapatan bunga dan pendapatan syariah - bersih *)	13,731,006	3,977,445	6,189,403	11,999,669	4,000,114	-	371,296	(2,022,202)	38,246,731	Interest income and sharia income - net *)
Pendapatan premi - bersih	-	-	-	-	-	-	1,398,957	-	1,398,957	Premium income - net
Pendapatan operasional lainnya	3,655,255	920,719	1,050,299	8,150,720	5,222,711	-	593,853	(3,373,858)	16,219,699	Other operating income
Pembentukan cadangan kerugian penurunan nilai	(8,067,012)	(4,194,414)	(1,911,448)	(993,757)	(762,544)	(2,317,041)	(50,935)	-	(18,297,151)	Allowance for impairment losses
Beban operasional lainnya	(5,944,561)	(1,329,417)	(2,293,444)	(11,582,124)	(2,240,281)	-	(1,909,666)	498,541	(24,800,952)	Other operating expenses
Laba (rugi) operasional	3,374,688	(625,667)	3,034,810	7,574,508	6,220,000	(2,317,041)	403,505	(4,897,519)	12,767,284	Operating income (loss)
Pendapatan/(beban) bukan operasional - bersih	(1,516)	(792)	(794)	32,487	(1,637)	(145,271)	(97,627)	(1,147)	(216,297)	Non operating income/(expenses) - net
Laba sebelum beban pajak	3,373,172	(626,459)	3,034,016	7,606,995	6,218,363	(2,462,312)	305,878	(4,898,666)	12,550,987	Income before tax expense
Beban pajak	-	-	-	-	-	(1,509,702)	(64,234)	-	(1,573,936)	Tax expense
Laba bersih	3,373,172	(626,459)	3,034,016	7,606,995	6,218,363	(3,972,014)	241,644	(4,898,666)	10,977,051	Net income
Total aset	260,746,768	84,474,794	92,840,478	99,584,317	412,545,301	49,560,519	25,686,351	(60,600,836)	964,837,692	Total assets
Total liabilitas	422,405,670	7,171,123	2,645,588	299,585,884	75,632,039	8,930,757	18,228,094	3,718,560	838,317,715	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 component's of *internal transfer pricing* between operating segment
**) Includes elimination of *internal transfer pricing* or reclassification between operating segment and elimination of subsidiaries

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47. INFORMASI SEGMENT (lanjutan)

47. SEGMENT INFORMATION (continued)

	31 Desember/December 2020									
	Korporasi/ Corporate	Menengah/ Middle	Kecil/ Small	Konsumer dan Ritel/ Consumer and Retail	Tresuri dan Institusi Keuangan/ Treasury and Financial Institution	Kantor Pusat/ Head Office	Entitas Anak/ Subsidiaries	Penyesuaian dan eliminasi/ Adjustment and elimination**)	Konsolidasi/ Consolidation	
Pendapatan bunga dan pendapatan syariah - bersih *)	14,113,782	2,521,102	4,757,756	11,558,741	2,928,779	-	3,262,239	(1,990,433)	37,151,966	Interest income and sharia income - net *)
Pendapatan premi - neto	-	-	-	-	-	-	1,471,088	-	1,471,088	Premium income - net
Pendapatan operasional lainnya	3,325,486	445,549	777,372	7,032,629	4,500,467	-	686,821	(3,355,714)	13,412,581	Other operating income
Pembentukan cadangan kerugian penurunan nilai	(11,141,206)	(5,916,228)	(1,801,066)	(2,489,868)	(444,906)	(237,814)	(559,346)	(1)	(22,590,435)	Allowance for impairment losses
Beban operasional lainnya	(6,170,982)	(602,548)	(1,196,387)	(10,489,862)	(2,418,814)	-	(3,854,629)	519,466	(24,213,756)	Other operating expenses
Laba (rugi) operasional	127,080	(3,552,125)	2,537,675	5,611,640	4,565,526	(237,814)	1,006,143	(4,826,711)	5,231,444	Operating income (loss)
Pendapatan/(beban) bukan operasional - neto	(387)	(192)	(194)	27,673	16,016	(56,327)	(103,449)	(2,431)	(119,291)	Non operating income/(expenses) - net
Laba sebelum beban pajak	126,693	(3,552,317)	2,537,481	5,639,313	4,581,542	(294,141)	902,724	(4,829,142)	5,112,153	Income before tax expense
Beban pajak	-	-	-	-	-	(1,608,141)	(182,570)	-	(1,790,711)	Tax expense
Laba bersih	126,693	(3,552,317)	2,537,481	5,639,313	4,581,542	(1,902,282)	720,154	(4,829,142)	3,321,442	Net income
Total aset	285,497,695	58,073,837	82,738,751	90,214,571	306,013,725	53,316,643	78,652,975	(63,170,772)	891,337,425	Total assets
Total liabilitas	328,796,929	9,658,373	3,619,509	293,318,818	79,531,757	7,477,355	66,152,470	(42,319,548)	746,235,663	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 component's of internal transfer pricing between operating segment
*) Includes elimination of internal transfer pricing or reclassification between operating segment and elimination of subsidiaries

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:

	31 Desember/December 2021						
	Indonesia	New York	Eropa/ Europe	Asia	Penyesuaian dan eliminasi/ Adjustment and elimination	Konsolidasian/ Consolidated	
Pendapatan bunga dan pendapatan syariah - bersih	36,381,183	324,838	425,192	1,132,501	(16,983)	38,246,731	Interest income and sharia income - net
Pendapatan premi - bersih	1,398,957	-	-	-	-	1,398,957	Premium income - net
Pendapatan operasional lainnya	16,148,959	160,398	234,520	257,890	(582,068)	16,219,699	Other operating income
Pembentukan cadangan kerugian penurunan nilai	(17,845,190)	(4)	(94,879)	(357,078)	-	(18,297,151)	Allowance for impairment losses
Beban operasional lainnya	(23,917,545)	(266,029)	(114,775)	(502,603)	-	(24,800,952)	Other operating expenses
Laba operasional	12,166,364	219,203	450,058	530,710	(599,051)	12,767,284	Operating income
Pendapatan/(beban) bukan operasional - bersih	(218,228)	(67)	(1,239)	2,091	1,146	(216,297)	Non operating income/(expenses) - net
Laba sebelum beban pajak	11,948,136	219,136	448,819	532,801	(597,905)	12,550,987	Income before tax expense
Beban pajak	(1,573,936)	-	-	-	-	(1,573,936)	Tax expense
Laba bersih						10,977,051	Net income
Total aset	882,365,085	17,120,548	16,062,916	55,658,808	(6,369,665)	964,837,692	Total assets
Total liabilitas	750,739,281	17,126,353	16,065,089	55,590,188	(1,203,196)	838,317,715	Total liabilities

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47. INFORMASI SEGMENT (lanjutan)

47. SEGMENT INFORMATION (continued)

31 Desember/December 2020							
	Indonesia	New York	Eropa/ Europe	Asia	Penyesuaian dan eliminasi/ Adjustment and elimination	Konsolidasi/ Consolidated	
Pendapatan bunga dan pendapatan syariah - bersih	35,438,434	255,299	391,778	1,085,782	(19,327)	37,151,966	Interest income and sharia income - net
Pendapatan premi - bersih	1,471,088	-	-	-	-	1,471,088	Premium income - net
Pendapatan operasional lainnya	13,404,389	192,641	247,413	649,561	(1,081,423)	13,412,611	Other operating income
Pembentukan cadangan kerugian penurunan nilai	(22,482,789)	(402)	(876)	(106,368)	-	(22,590,435)	Allowance for impairment losses
Beban operasional lainnya	(23,255,380)	(225,059)	(165,621)	(567,696)	-	(24,213,756)	Other operating expenses
Laba operasional	4,575,712	222,479	472,694	1,061,279	(1,100,720)	5,231,444	Operating income
Pendapatan/(beban) bukan operasional - neto	(138,089)	(70)	(1,057)	17,487	2,438	(119,291)	Non operating income/(expenses) - net
Laba sebelum beban pajak	4,437,623	222,409	471,637	1,078,766	(1,098,282)	5,112,153	Income before tax expense
Beban pajak	-	-	-	-	-	(1,790,711)	Tax expense
Laba bersih						3,321,442	Net income
Total aset	822,274,967	17,517,711	14,308,839	49,025,258	(11,789,350)	891,337,425	Total assets
Total liabilitas	667,289,905	17,531,363	14,301,802	48,739,512	(1,626,919)	746,235,663	Total liabilities

48. MANAJEMEN RISIKO

48. RISK MANAGEMENT

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.

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.

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.

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.

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.

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 minimize 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.

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48. MANAJEMEN RISIKO (lanjutan)

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.

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 Perusahaan 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.

48. RISK MANAGEMENT (continued)

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.

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 Units to optimize 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.

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48. MANAJEMEN RISIKO (lanjutan)

Secara berkala dilakukan evaluasi terhadap kebijakan dan prosedur manajemen risiko agar sesuai dengan perkembangan bisnis dan perubahan regulasi.

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 49 sampai dengan Catatan 52 adalah sesuai dengan definisi dari Regulator.

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 strategis untuk mengurangi kemungkinan kerugian akibat ketidaktepatan dalam pengambilan dan/ atau pelaksanaan suatu keputusan strategis 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.

48. RISK MANAGEMENT (continued)

Periodic evaluation is applied to Risk Management Policies and Procedures to ensure it reflects the Bank's current business and regulations.

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 49 to 52 are consistent with Regulator's definition.

BNI also has risk management for other risks as regulated by Regulator, as follows (i) legal risk to minimize possible losses from lawsuits or weakness in juridical aspects such as the absence of laws and regulations, or weaknesses such as noncompliance with the terms of the engagements validity of contracts or binding of imperfect collaterals; (ii) reputation risk to minimize possible losses due to stakeholder's declining levels of trust which comes from the negative perception of the Bank; (iii) strategic risk to minimize 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 minimize possible losses of the Bank from non-compliance or failure to implement the prevailing laws and regulations.

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48. MANAJEMEN RISIKO (lanjutan)

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;
- 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;
- Melakukan pemantauan terhadap jenis, signifikansi dan frekuensi pelanggaran terhadap ketentuan (*track record* kepatuhan BNI).

Sesuai dengan Surat Edaran OJK 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.

48. 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:

- 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;
- 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 realization of the business;
- Compliance certification to all policies and procedures in accordance with applicable regulations;
- 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 conglomerate shareholder value of BNI as a whole.

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48. MANAJEMEN RISIKO (lanjutan)

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 intern yang melakukan pemantauan kepatuhan terhadap kontrol internal secara rutin dan berkala.

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 (KPM) Konsolidasi, KPM Terintegrasi, penilaian Tingkat Kesehatan Bank (TKB) konsolidasi, serta penilaian Profil Risiko Konsolidasi dan penilaian Profil Risiko Terintegrasi Konglomerasi Keuangan BNI.

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 Strategik, 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 2021 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).

48. RISK MANAGEMENT (continued)

Generally, all of the Financial Services Institutions (FSI) as part of the BNI Financial Conglomerate, 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.

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, and also integrated risk profile assessment on BNI Financial Conglomerate.

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 2021 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).

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48. 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 Strategik, Risiko Kepatuhan, Risiko Transaksi Intra-Grup dan Risiko Asuransi. Penilaian Profil Risiko BNI Terintegrasi tersebut telah dilakukan sesuai dengan lampiran SE OJK 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 2021 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).

Pandemi Covid-19 mempengaruhi tingkat Risiko di BNI namun tidak signifikan. Hal ini terlihat dari hasil penilaian Tingkat Kesehatan Bank (TKB) BNI *self assesment* posisi 31 Desember 2021 yang berada pada Peringkat 2 dengan predikat "sehat" atau stabil dibandingkan dengan TKB BNI posisi Desember 2020. Dampak Pandemi Covid 19 pada parameter TKB BNI posisi 31 Desember 2021 sebagai berikut (tidak diaudit):

- 1. Profil Risiko**
Hasil penilaian Profil Risiko BNI periode 31 Desember 2021 masih stabil di Peringkat 2 (*Low to Moderate*) dengan tren menurun Beberapa Risiko yang terdampak pandemi Covid-19 antara lain di Risiko Kredit (penurunan pada rasio kualitas kredit).
- 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 modal tier 2 melalui penerbitan *subdebt*.
- 4. Tata Kelola**
Tata kelola BNI posisi Desember 2021 dibandingkan dengan posisi Desember 2020 relatif stabil, tidak terpengaruh dengan Covid-19.

48. RISK MANAGEMENT (continued)

Integrated Risk Profile assessment is the assessment of the 10 (ten) types of risks based on 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 Risk Insurance. Assessment of the Integrated Risk Profile has complied with the SE OJK 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, the inherent risk rank of BNI as of 31 December 2021 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 conglomerate is 2 (low to moderate) (unaudited).

The Covid-19 pandemic affects the level of risk at BNI but not significant. This can be seen from the results of the BNI Bank Soundness Level (TKB) assessment for the position as of 31 December 2021 which is in Rank 2 (PK 2) with the predicate "healthy" or stable compared to the TKB BNI at the position in December 2020. Impact of Covid-19 pandemic to BNI's TKB parameter as of 31 December 2021 as follows (unaudited):

- 1. Risk Profile**
The results of the BNI Risk Profile assessment for the period 31 December 2021 are still stable at Rank 2 (Low to Moderate) with decreasing trend. Some of the risks affected by the covid 19 pandemic are credit risk (decrease in credit quality ratio).
- 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 a increase in the BNI's total capital component due to a increase of 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 in December 2021 is relatively stable compared to the position in December 2020, not affected by Covid-19.

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48. MANAJEMEN RISIKO (lanjutan)

BNI telah menyusun rencana perbaikan dampak pandemi Covid-19 untuk memperbaiki dan memperkuat penerapan Manajemen Risiko di BNI.

49. RISIKO KREDIT

Pengelolaan kredit Bank diarahkan untuk melakukan ekspansi kredit dan mengelola kualitas setiap kredit sejak saat diberikan sampai dengan dilunasi 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 Risiko dan Anti Fraud sub Komite Manajemen Risiko (KRA-RMC) yang beranggotakan Direksi dan beberapa anggota manajemen senior serta Rapat Direksi (Radisi). Kebijakan Perkreditan Bank disetujui oleh Dewan Komisaris dan direview 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.

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. RISK MANAGEMENT (continued)

BNI has prepared an enhanced action plan to improve the impact of the Covid-19 pandemic on the implementation of Risk Management at BNI.

49. 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 minimize the risk of losses and optimize 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 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 decided by Board of Commissioner at least once in 3 (three) years. These policy also as 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.

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.

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49. 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 direview oleh unit risiko kredit. Mekanisme 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 *Senior Relationship Manager* dan *Relationship Manager* 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 *scoring system* (untuk kredit konsumtif dan kredit produktif segmen ritel), sekaligus juga strategi mitigasi risikonya. Hasil proses analisis dan penilaian tingkat risiko kredit kemudian diajukan kepada Komite Kredit untuk mendapatkan persetujuan.

49. CREDIT RISK (continued)

Credit risk management is implemented both at the individual and portfolio level. At the individual level, for productive loans, each loan proposal is made through a process of analysis by the Business Unit and being 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 a small segment, the marketing and credit 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 Senior Relationship Managers and Relationship Managers who are in the business unit and have the task of processing the proposals from perspective 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 decide 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 scoring system (for consumer and retail loans), 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.

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49. RISIKO KREDIT (lanjutan)

Kredit yang bermasalah dikelola oleh Divisi Penyelamatan dan Penyelesaian Kredit Korporasi untuk segmen Korporasi dan Divisi Penyelamatan dan Penyelesaian Kredit Komersial dan Usaha Kecil untuk segmen menengah dan kecil, agar penyelamatan/ penyelesaian kredit dapat dilakukan secara lebih baik dan memungkinkan 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 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 berdasar *Loan Exposure Limit* (LEL).

Pengembangan manajemen risiko kredit dilakukan secara bertahap sesuai dengan kerangka kerja yang ditetapkan Bank Indonesia/Otoritas Jasa Keuangan. Khusus untuk pengukuran risiko kredit, BNI menggunakan metode standar. Saat ini BNI juga mempersiapkan dan mengembangkan metodologi perhitungan risiko kredit dengan metode *rating internal* (*internals - based approach*).

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.

49. CREDIT RISK (continued)

Non-performing loan is managed by a Corporate Remedial and Recovery Division for corporate segment and Commercial Remedial and Recovery Division for middle and small 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 portfolio, the loan exposure limit is determined annually to diversify loan portfolio among different industry sectors in order to optimize 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 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 Bank Indonesia/Financial Services Authority. Specifically for measuring credit risk, BNI utilizes the standardized approach method. Furthermore, BNI also prepares and develops internal ratings-based methodology.

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.

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49. RISIKO KREDIT (lanjutan)

49. CREDIT RISK (continued)

(i) Eksposur maksimum risiko kredit.

(i) Maximum exposure of the credit risk.

Eksposur risiko kredit terhadap aset-bersih sesudah cadangan kerugian penurunan nilai pada laporan posisi keuangan konsolidasian pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

Credit risk exposures relating to the assets-net of allowance for possible losses on the consolidated statement of financial position as of 31 December 2021 and 2020 are as follows:

Keterangan	Eksposur maksimum/ Maximum exposure		Description
	2021	2020	
Giro pada Bank Indonesia	48,682,431	35,065,701	Current accounts with Bank Indonesia
Giro pada bank lain	19,569,891	16,107,788	Current accounts with other banks
Penempatan pada bank lain dan Bank Indonesia	92,290,120	61,329,259	Placements with other banks and Bank Indonesia
Efek-efek			Marketable securities
- Nilai wajar melalui laporan laba rugi	9,572,228	7,211,758	Fair value through profit or loss -
- Nilai wajar melalui penghasilan komprehensif lain	16,213,504	15,398,931	Fair value through other comprehensive income -
- Biaya perolehan diamortisasi	6,004	7,060,496	Amortized cost -
Efek-efek yang dibeli dengan janji dijual kembali	22,010,968	8,666,091	Securities purchased under agreement to resell
Wesel ekspor dan tagihan lainnya	19,563,318	17,893,534	Bills and other receivables
Tagihan akseptasi	20,542,767	20,575,666	Acceptance receivables
Tagihan derivatif	494,183	1,460,614	Derivative receivables
Pinjaman yang diberikan	532,141,344	541,978,801	Loans
Obligasi Pemerintah			Government Bonds
- Nilai wajar melalui laba rugi	4,111,605	3,022,844	Fair value through profit or loss -
- Nilai wajar melalui penghasilan komprehensif lain	85,194,226	58,670,215	Fair value through other comprehensive income -
- Biaya perolehan diamortisasi	22,119,067	28,964,154	Amortized cost -
Penyertaan saham	829,763	813,087	Equity investments
Aset lain-lain - bersih*)	8,442,222	10,169,474	Other assets - net*)
	901,783,641	834,388,413	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain dan piutang premi asuransi.

*) Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and insurance premium receivables.

Eksposur risiko kredit terhadap rekening administratif konsolidasian pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

Credit risk exposures relating to consolidated administrative accounts items as of 31 December 2021 and 2020, are as follows:

Keterangan	Eksposur maksimum/ Maximum exposure		Description
	2021	2020	
Fasilitas kredit kepada debitur yang belum digunakan (committed)	187,235	282,673	Unused loan facilities (committed)
Irrevocable letters of credit yang masih berjalan	8,746,412	10,113,295	Outstanding irrevocable letters of credit
Garansi bank yang diterima	-	18,202,239	Bank guarantees received
Garansi yang diterbitkan	57,661,048	57,521,791	Guarantees issued
	66,594,695	86,119,998	

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49. RISIKO KREDIT (lanjutan)

(i) Eksposur maksimum risiko kredit (lanjutan)

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Grup pada tanggal 31 Desember 2021 dan 2020. Untuk aset laporan posisi keuangan konsolidasian, eksposur di atas ditentukan berdasarkan nilai tercatat bersih seperti yang diungkapkan pada laporan posisi keuangan konsolidasian.

Pada tanggal 31 Desember 2021 dan 2020, masing-masing sebesar 59,01% dan 64,96% 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 proses kredit, 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.

49. 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 2021 and 2020. 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 2021 and 2020, the total maximum credit risk exposure in the consolidated statement of financial position from loans is 59.01% and 64.96%, 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 credit processes, 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 non-normal 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.

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49. 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 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:

49. 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:

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	
Menengah/ Middle	Agunan lain yang diterima oleh Bank/Other collaterals held by the Bank	125% dari limit kredit/from credit limit
	Aset tetap/Fixed Asset	
	Kas/Cash	
	SBLC	
	Tanah dan Bangunan/Land and Building	
	Piutang/Receivable	
Kecil/Retail	Kendaraan/Vehicle	110% dari limit kredit/from credit limit
	Agunan lain yang diterima oleh Bank/Other collaterals held by the Bank	
	Aset tetap/Fixed Asset	
	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.

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49. 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 2021 dan 2020.

49. 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 2021 and 2020:

31 Desember/December 2021				
Keterangan	Eksposur maksimum/ Maximum exposure	Agunan/ Collateral	Eksposur Bersih/ Net Exposure	Description
Efek-efek yang dibeli dengan janji dijual kembali	22,010,968	22,152,365	(141,397)	Securities purchased under agreements to resell
31 Desember/December 2020				
Keterangan	Eksposur maksimum/ Maximum exposure	Agunan/ Collateral	Eksposur Neto/ Net Exposure	Description
Efek-efek yang dibeli dengan janji dijual kembali	8,666,091	8,733,924	-	Securities purchased under agreements to resell

- (iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2021 dan 2020 sebagai berikut:

- (iii) The information on the credit quality of financial assets as of 31 December 2021 and 2020 are as follows:

31 Desember/December 2021								
	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	-	48,682,431	-	-	-	-	-	48,682,431
Giro pada bank lain	-	19,569,897	-	-	-	-	-	19,569,897
Penempatan pada bank lain dan Bank Indonesia	16,540,636	75,749,594	-	-	-	-	-	92,290,230
Efek-efek	7,044,273	18,439,018	-	-	-	-	569,719	26,053,010
Efek-efek yang dibeli dengan janji dijual kembali	19,634,282	2,376,686	-	-	-	-	-	22,010,968
Wesel ekspor dan tagihan lainnya	5,552,282	14,413,654	-	-	-	-	-	19,965,936
Tagihan akseptasi	1,300,033	17,918,849	299,462	-	716,289	1,322,807	-	21,557,440
Tagihan derivatif	-	494,183	-	-	-	-	-	494,183
Pinjaman yang diberikan								
Modal kerja	19,197,476	209,180,138	8,216,757	48,615	45,040,164	14,635,252	15,100,801	311,419,203
Investasi	7,942,065	84,593,148	3,464,677	6,900	25,971,633	5,761,213	4,146,088	131,885,724
Konsumen	9,060,668	66,636,155	9,232,565	279,248	6,210,507	1,728,516	2,187,452	95,335,111
Sindikasi	85,515	25,478,818	145,600	-	8,706,169	5,324,875	-	39,740,977
Karyawan	65,393	3,385,428	297,382	2,764	79,720	19,709	77,225	3,927,621
Program Pemerintah	-	111,096	-	-	259	-	16,239	127,594
Obligasi Pemerintah	25,878,656	85,551,323	-	-	-	-	-	111,429,979
Penyerahan saham	-	829,763	-	-	-	-	-	829,763
Aset lain-lain - bersih*)	-	8,442,222	-	-	-	-	-	8,442,222
Total	112,301,279	681,852,403	21,656,443	337,527	86,724,741	28,792,372	22,097,524	953,762,289
Cadangan kerugian penurunan nilai							(51,963,990)	
Bersih								901,798,299

*) 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.

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49. RISIKO KREDIT (lanjutan)

49. CREDIT RISK (continued)

(iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2021 dan 2020 sebagai berikut: (lanjutan)

(iii) The information on the credit quality of financial assets as of 31 December 2021 and 2020 are as follows: (continued)

31 Desember/December 2020									
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			
	Grup 1/ Group 1	Grup 2/ Group 2	Grup 3/ Group 3	Grup 4/ Group 4	Grup 5/ Group 5			Total	
Giro pada Bank Indonesia	-	35,065,701	-	-	-	-	-	35,065,701	Current accounts with Bank Indonesia
Giro pada bank lain	-	16,113,866	-	-	-	-	-	16,113,866	Current accounts with other banks
Penempatan pada bank lain dan Bank Indonesia	59,839,126	1,490,306	-	-	-	-	-	61,329,432	Placements with other banks and Bank Indonesia
Efek-efek	2,446,860	26,978,443	-	-	-	-	521,513	29,946,816	Marketable securities
Efek-efek yang dibeli dengan janji dijual kembali	8,618,182	47,909	-	-	-	-	-	8,666,091	Securities purchased under agreements to resell
Wesel ekspor dan tagihan lainnya	3,663,956	14,299,033	-	-	-	-	53,446	18,016,435	Bills and other receivables
Tagihan akseptasi	1,897,909	16,663,895	77,455	-	-	3,115,946	19,835	21,775,040	Acceptance receivables
Tagihan derivatif	-	1,460,614	-	-	-	-	-	1,460,614	Derivative receivables
Pinjaman yang diberikan	-	-	-	-	-	-	-	-	Loans
Modal kerja	21,313,575	180,831,091	6,489,257	3,267,506	48,277,308	15,589,324	15,855,710	291,623,771	Working capital
Investasi	6,054,310	76,871,068	3,025,328	822,019	37,165,316	5,033,016	6,018,104	134,989,161	Investment
Konsumen	9,983,875	62,281,264	11,046,841	1,169,136	13,223,469	3,088,810	2,688,567	103,481,962	Consumer
Sindikasi	178,132	27,363,991	3,773,238	-	15,127,428	5,333,815	-	51,776,604	Syndicated
Karyawan	201,616	1,831,434	1,609,582	441,492	1,347	17,318	67,463	4,170,252	Employee
Program Pemerintah	-	164,100	-	-	937	-	-	165,037	Government programs
Obligasi Pemerintah	18,176,474	72,484,647	-	-	-	-	-	90,661,121	Government Bonds
Penyerahan saham	-	530,263	-	-	-	-	282,824	813,087	Equity investments
Aset lain-lain - neto*)	-	10,169,475	-	-	-	-	-	10,169,475	Other assets - net*)
Total	132,374,015	544,647,100	26,021,701	5,700,153	113,795,805	32,178,229	25,507,462	880,224,465	Total
Cadangan kerugian penurunan nilai								(45,818,534)	Allowance for impairment losses
Neto								834,405,931	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.

- **Grup 1** : Debitur baru (kurang dari 6 bulan).

- **Group 1** : New customers (less than 6 months).

- **Grup 2** : Nasabah lama yang tidak memiliki historis pernah menunggak dalam 3 tahun terakhir.

- **Group 2** : Existing customers with no history of overdue for the past 3 years.

- **Grup 3** : Nasabah lama yang memiliki historis pernah menunggak (dibawah 90 hari) dalam 3 tahun terakhir.

- **Group 3** : Existing customers with history of overdue below 90 days in the past 3 years.

- **Grup 4** : Nasabah lama yang memiliki historis pernah menunggak diatas 90 hari dalam 3 tahun terakhir.

- **Group 4** : Existing customers with history of default more than 90 days in the past 3 years.

- **Grup 5** : Nasabah lama yang pinjamannya pernah/telah direstrukturasikan.

- **Group 5** : Existing customers with loans that was/has been restructured.

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49. RISIKO KREDIT (lanjutan)

49. CREDIT RISK (continued)

(iv) Analisis umur pinjaman yang jatuh tempo tetapi tidak mengalami penurunan nilai pada tanggal 31 Desember 2021 dan 2020:

(iv) The aging analysis of past due but not impaired loans as of 31 December 2021 and 2020:

31 Desember/December 2021					
	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	391,649	3,162,514	11,081,089	14,635,252	Working capital
Investasi	109,101	39,677	5,612,435	5,761,213	Investment
Konsumen	475,725	6,599	1,246,192	1,728,516	Consumer
Sindikasi	-	-	5,324,875	5,324,875	Syndicated
Karyawan	115	1	19,593	19,709	Employee
Total	976,590	3,208,791	23,284,184	27,469,565	Total
Cadangan kerugian penurunan nilai	(874,493)	(1,026,153)	(13,554,737)	(15,455,383)	Allowance for impairment losses
Bersih	102,097	2,182,638	9,729,447	12,014,182	Net

31 Desember/December 2020					
	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	1,514,513	1,014,315	13,060,496	15,589,324	Working capital
Investasi	188,216	89,580	4,755,220	5,033,016	Investment
Konsumen	628,787	5,384	2,454,639	3,088,810	Consumer
Sindikasi	-	-	5,333,815	5,333,815	Syndicated
Karyawan	359	31	16,928	17,318	Employee
Total	2,331,875	1,109,310	25,621,098	29,062,283	Total
Cadangan kerugian penurunan nilai	(1,041,124)	(465,850)	(12,272,097)	(13,779,071)	Allowance for impairment losses
Bersih	1,290,751	643,460	13,349,001	15,283,212	Net

(v) Konsentrasi risiko aset keuangan konsolidasian dengan eksposur risiko kredit

(v) Concentration of risks of consolidated financial assets with credit risk exposure

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 2021 dan 2020. Untuk tabel ini, Grup telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi.

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 categorized by geographical region as of 31 December 2021 and 2020. For this table, the Group has allocated exposures to the regions based on the geographical area where activities are undertaken.

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49. RISIKO KREDIT (lanjutan)

49. CREDIT RISK (continued)

31 Desember/December 2021							
	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ East Indonesia	Lain-lain *)/ Others *)	Total
Giro pada Bank Indonesia	48,682,431	-	-	-	-	-	48,682,431
Giro pada bank lain	10,598,597	4	15	7	6	8,971,268	19,569,897
Penempatan pada bank lain dan Bank Indonesia	90,722,617	-	-	-	-	1,567,613	92,290,230
Efek-efek							
Nilai wajar melalui laba rugi	9,572,228	-	-	-	-	-	9,572,228
Nilai wajar melalui penghasilan komprehesif lain	14,257,359	-	-	-	-	1,967,371	16,224,730
Biaya peroleh diamortisasi	159,406	22,841	391	2,151	-	71,263	256,052
Efek-efek yang dibeli dengan janji dijual kembali	22,010,968	-	-	-	-	-	22,010,968
Wesel ekspor dan tagihan lainnya	19,869,290	22,841	391	2,151	-	71,263	19,965,936
Tagihan akseptasi	18,447,357	334,588	556	329,339	-	2,445,600	21,557,440
Tagihan derivatif	493,545	-	-	-	-	638	494,183
Pinjaman yang diberikan	412,879,483	50,894,711	24,312,915	27,188,743	7,111,210	60,049,168	582,436,230
Obligasi pemerintah							
Nilai wajar melalui laba rugi	4,078,923	-	-	-	-	32,682	4,111,605
Nilai wajar melalui penghasilan komprehensif lain	66,057,952	-	-	-	-	19,139,706	85,197,658
Biaya perolehan diamortisasi	15,843,744	-	-	-	-	6,276,972	22,120,716
Penyertaan saham	829,763	-	-	-	-	-	829,763
Aset lain-lain - bersih**)	6,010,943	255,922	32,223	192,452	7,958	1,942,724	8,442,222
Total	740,514,606	51,530,907	24,346,491	27,714,843	7,119,174	102,536,268	953,762,289
Cadangan kerugian penurunan nilai							(51,963,990)
Neto							901,798,299

31 Desember/December 2020							
	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ East Indonesia	Lain-lain *)/ Others *)	Total
Giro pada Bank Indonesia	33,549,946	-	-	-	-	1,515,755	35,065,701
Giro pada bank lain	5,655,777	4	16	2	6	10,458,061	16,113,866
Penempatan pada bank lain dan Bank Indonesia	55,194,433	-	-	-	-	6,134,999	61,329,432
Efek-efek							
Nilai wajar melalui laba rugi	7,148,671	-	-	-	-	63,088	7,211,759
Nilai wajar melalui penghasilan komprehesif lain	9,574,489	-	-	-	-	5,839,853	15,414,342
Biaya peroleh diamortisasi	6,614,182	-	-	-	-	706,533	7,320,715
Efek-efek yang dibeli dengan janji dijual kembali	8,666,091	-	-	-	-	-	8,666,091
Wesel ekspor dan tagihan lainnya	17,283,722	33,271	3,215	2,078	1,935	692,214	18,016,435
Tagihan akseptasi	19,090,621	153,094	-	229,582	-	2,301,743	21,775,040
Tagihan derivatif	1,460,614	-	-	-	-	-	1,460,614
Pinjaman yang diberikan	392,674,728	48,649,931	24,881,627	25,936,601	6,524,279	87,539,621	586,206,787
Obligasi pemerintah							
Nilai wajar melalui laba rugi	2,394,387	-	-	-	-	628,457	3,022,844
Nilai wajar melalui penghasilan komprehensif lain	47,703,909	-	-	-	-	10,968,411	58,672,320
Biaya perolehan diamortisasi	17,437,299	-	-	-	-	11,528,658	28,965,957
Penyertaan saham	813,087	-	-	-	-	-	813,087
Aset lain-lain - neto**)	8,237,246	277,133	27,786	229,839	7,213	1,390,258	10,169,475
Total	633,499,202	49,113,433	24,912,644	26,398,102	6,533,433	139,767,651	880,224,465
Cadangan kerugian penurunan nilai							(45,818,534)
Neto							834,405,931

*)

Termasuk kantor cabang luar negeri dan Entitas Anak

**)

Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, dan piutang lain-lain.

*)

Includes overseas branches and Subsidiaries

**)

Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, and other receivables.

*) Termasuk kantor cabang luar negeri dan Entitas Anak
 **) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, dan piutang lain-lain.

*) Includes overseas branches and Subsidiaries
 **) Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, and other receivables.

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50. 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 Manajemen Risiko Bank (ERM), Divisi Tresuri (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 TRS 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*, Indikator Peringatan Dini, *Liquidity Contingency Plan Head Office* maupun Kantor Cabang Luar Negeri, dll
- b. Pengukuran Risiko Likuiditas : Rasio Likuiditas, Proyeksi Arus Kas, Profil Maturitas, Rasio Kecukupan Likuiditas, *Stress testing*, dll
- c. Pemantauan Risiko Likuiditas
- d. Pengendalian Risiko Likuiditas
- e. Penetapan Limit Likuiditas: Pagu Kas Wilayah, Pagu Kas *Bank Wide*, SR Ideal, Limit Profil Maturitas, Limit Kredit Valas berdasarkan ketersediaan likuiditas.

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*.

50. 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 Bank's Risk Management Division (ERM), Treasury Division (TRS), and Branch Offices of Foreign Affairs. Liquidity Risk Policies and Procedures was prepared by the Division ERM, subsequently implemented by the Division of TRS 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 Indicators, Liquidity Contingency Plan Head Office or Branch Office of Foreign Affairs, etc.*
- b. *Measurement of Liquidity Risk: Liquidity Ratio, Cash Flow Projection, Maturity Profile, Liquidity Adequacy Ratio, Stress testing, etc.*
- c. *Liquidity Risk Monitoring*
- d. *Liquidity Risk Management*
- e. *Determination of Liquidity Limit: Cash Ceiling for Regional Area, Cash Ceiling Bank Wide, Ideal SR, Maturity Profile Limit, Credit in Foreign Currency Limit based on the availability of liquidity.*

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.

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50. RISIKO LIKUIDITAS (lanjutan)

Penetapan dan pemantauan limit, yaitu *Secondary Reserve Ideal* (SR Ideal) dan limit ketersediaan kredit 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*.

50. LIQUIDITY RISK (continued)

The setting and monitoring of limits, i.e. *Ideal Secondary Reserve (Ideal SR)* and credit availability in foreign currency limit is conducted periodically by the ERM Division. While the availability of the whole reserve is monitored daily, weekly, and monthly by the Treasury Division and the ERM Division.

The table below shows the remaining contractual maturities of the financial liabilities based on *undiscounted cashflows*.

31 Desember/December 2021								
	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	4,553,735	-	-	-	-	4,553,735	Obligations due immediately	
Simpanan nasabah	604,151,580	76,106,157	29,089,853	16,588,525	4,674,701	730,610,816	Deposits from customers	
Simpanan dari bank lain	10,975,479	1,899,175	713,900	129,851	658,604	14,377,009	Deposits from other banks	
Liabilitas derivatif	109,948	-	-	-	-	109,948	Derivative payables	
Liabilitas akseptasi	1,636,093	757,256	710,984	954,833	1,528,903	5,588,069	Acceptance payables	
Efek-efek yang diterbitkan	60,000	2,000	62,000	2,760,530	102,000	2,986,530	Securities issued	
Efek-efek yang dijual dengan janji dibeli kembali	-	-	12,978	1,041,513	774,161	1,828,652	Securities sold under agreements to repurchase	
Pinjaman yang diterima	427,907	2,797,278	9,095,627	1,052,278	19,084,845	32,457,935	Borrowings	
Efek-efek subordinasi	-	317,474	-	317,474	18,819,358	19,454,306	Subordinated securities	
Liabilitas lain-lain*)	16,064,806	-	-	-	-	16,064,806	Other liabilities*)	
Total	637,979,548	81,879,340	39,685,342	22,845,004	45,642,572	828,031,806	Total	
Total aset lancar **)	235,343,674	18,372,039	2,726,516	535,206	28,678,700	285,656,135	Total liquid assets**)	
KOMITMEN DAN KONTINGJENSI							COMMITMENT AND CONTINGENCIES	
Fasilitas kredit kepada debitur yang belum digunakan	59,613,881	-	-	-	-	59,613,881	Unused loan facilities	
Irrevocable letters of credit yang masih berjalan	4,340,640	1,309,902	1,446,584	936,494	712,792	8,746,412	Outstanding irrevocable letters of credit	
Garansi yang diterbitkan	20,163,974	6,546,937	4,100,960	9,350,343	17,498,834	57,661,048	Guarantees issued	
Total	84,118,495	7,856,839	5,547,544	10,286,837	18,211,626	126,021,341	Total	
31 Desember/December 2020								
	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	5,560,702	-	-	-	-	5,560,702	Obligations due immediately	
Simpanan nasabah	549,700,534	75,858,411	13,672,221	5,772,927	4,034,099	649,038,192	Deposits from customers	
Simpanan dari bank lain	6,768,769	1,375,930	667,751	210,347	233	9,023,030	Deposits from other banks	
Liabilitas derivatif	414,280	-	-	-	-	414,280	Derivative payables	
Liabilitas akseptasi	1,770,971	2,804,837	580,340	344,212	-	5,500,360	Acceptance payables	
Efek-efek yang diterbitkan	60,000	-	60,000	120,000	3,180,000	3,420,000	Securities issued	
Efek-efek yang dijual dengan janji dibeli kembali	-	-	12,068	12,068	2,566,132	2,590,268	Securities sold under agreements to repurchase	
Pinjaman yang diterima	2,117,947	1,166,977	483,880	9,746,244	36,689,332	50,204,380	Borrowings	
Liabilitas lain-lain*)	14,897,169	-	-	-	-	14,897,169	Other liabilities*)	
Total	581,290,372	81,206,155	15,476,260	16,205,798	46,469,795	740,648,380	Total	
Total aset lancar **)	114,566,917	19,093,681	2,682,754	295,494	83,855,322	220,494,168	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 policy holders, 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.

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50. RISIKO LIKUIDITAS (lanjutan)

50. LIQUIDITY RISK (continued)

	31 Desember/December 2020					
	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 KONTINGENSI						COMMITMENT AND CONTINGENCIES
Fasilitas kredit kepada debitur yang belum digunakan	47,273,485	-	-	-	-	47,273,485
<i>Irrevocable letters of credit</i>						
yang masih berjalan	155,273	3,722,730	1,471,463	2,650,426	2,113,403	10,113,403
Garansi yang diterbitkan	3,491,222	21,502,101	5,676,403	9,832,385	17,019,680	57,521,791
Total	50,919,980	25,224,831	7,147,866	12,482,811	19,133,083	114,908,571
						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 (*bank only*) maupun konsolidasi dengan perusahaan anak.

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 (bank only) or consolidated with subsidiaries.

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).

BNI Liquidity Adequacy Ratio are reported monthly and quarterly to the Otoritas Jasa Keuangan (OJK).

51. RISIKO PASAR

51. 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 Manajemen Risiko Bank (Divisi ERM) yang bertanggung jawab kepada Direktur Manajemen Risiko (Dir. MR), Divisi Tata Kelola Kebijakan (Divisi PGV) yang bertanggung jawab kepada Wakil Direktur Utama (Wadiu), Divisi Tresuri (Divisi TRS) dan Kantor Cabang Luar Negeri dalam pengawasan Divisi Internasional (Divisi INT) yang bertanggung jawab kepada Direktur Tresuri dan Internasional (Dir. TS). Dalam mengelola Risiko Pasar, Direksi didukung oleh *Risk Management Committee* (RMC) dan Komite Aset dan Liabilitas (ALCO) serta dalam pengawasannya didukung oleh Komisariss 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, Policy Governance Division (PGV) which report to the Vice Director, and Treasury Division (TRS) as well as Overseas branches supervised by the International Division (INT) which report to the Director of Treasury and International. 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.

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51. 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 book* secara bulanan menggunakan *Assets & Liabilities Gap Report* serta pengukuran Risiko Nilai Tukar pada *banking book* melalui perhitungan Posisi Devisa Neto (PDN) secara harian dan bulanan sesuai ketentuan Regulator.

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 ekstrem 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 kerugian
 - (v) Limit *off market*

Limit ditetapkan pada masing-masing *desk* (*Forex, Fixed Income, Money Market, Investasi, Likuiditas*).

- b. Limit Risiko Pasar pada *banking book*:
 - (i) Limit Gap Aset & Liabilitas – Rupiah
 - (ii) Limit Gap Aset & Liabilitas - Valuta Asing
 - (iii) Limit Posisi Devisa Neto internal BNI.

51. 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 monthly basis the measurement of interest rate risk on *banking book* using *Assets & Liabilities Gap Report (A/L Gap Report)* 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.

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) *Loss limit*
 - (v) *Off Market Limit*

These limits are performed for each trading desk (*Forex, Fixed Income, Money Market, Investment, Liquidity*).

- b. Market Risk limits on *banking book*:
 - (i) *Gap Asset & Liability Limit – Indonesian Rupiah*
 - (ii) *Gap Asset & Liability Limit - Foreign Currency*
 - (iii) *Internal BNI Net Open Position Limit.*

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51. 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 ekstrem atau *stress*. BNI melakukan *stress testing* untuk kondisi pasar yang ekstrem tersebut.

51. MARKET RISK (continued)

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.

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.

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51. RISIKO PASAR (lanjutan)

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.

Karena VaR adalah bagian dari pengelolaan Risiko Pasar Bank, limit-limit VaR telah dibentuk untuk seluruh *trading operation* dan eksposur perlu direview oleh manajemen secara harian terhadap limit-limit.

Tabel dibawah ini menunjukkan VaR agregat pada portofolio *trading book* dan *banking book* milik Bank: (tidak diaudit)

51. MARKET RISK (continued)

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.

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)

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	Risiko mata uang asing/ <i>Foreign exchange risk</i>	Risiko nilai wajar suku bunga/ <i>Fair value interest rate risk</i>		
		<i>Trading book</i>	<i>Banking book</i>	
2021 - 31 Desember	20,916	8,939	213,729	2021 - 31 December
2021 - Rata-rata harian	17,694	11,061	251,928	2021 - Average daily
2021 - Tertinggi	61,618	16,966	332,559	2021 - Highest
2021 - Terendah	4,700	4,536	203,569	2021 - Lowest

31 Desember/December 2020

	Risiko mata uang asing/ <i>Foreign exchange risk</i>	Risiko nilai wajar suku bunga/ <i>Fair value interest rate risk</i>		
		<i>Trading book</i>	<i>Banking book</i>	
2020 - 31 Desember	23,837	4,037	281,880	2020 - 31 December
2020 - Rata-rata harian	23,937	2,364	307,810	2020 - Average daily
2020 - Tertinggi	86,543	6,368	379,056	2020 - Highest
2020 - Terendah	3,707	518	70,680	2020 - Lowest

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51. RISIKO PASAR (lanjutan)

51. MARKET RISK (continued)

(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 Risiko dan Kapital Sub Komite Manajemen Risiko (KRK-RMC) BNI, bertanggung jawab untuk menetapkan, melaksanakan serta menjaga kebijakan pengelolaan risiko tingkat suku bunga sesuai dengan pedoman umum BNI. Tujuan utama Komite Risiko dan Kapital Sub Komite Manajemen Risiko (KRK-RMC) BNI adalah memaksimalkan hasil usaha BNI dengan tetap memperhatikan *limit* risiko yang ditetapkan.

Tabel di bawah ini merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas konsolidasian yang signifikan pada tanggal 31 Desember 2021 dan 2020:

(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 and Capital Committee sub Committee Risk Management (KRK-RMC) which consists of members of the Board of Directors and selected members of senior management 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 and Capital Committee Sub Committee Risk Management (KRK-RMC) is to maximize BNI's returns within the predetermined risk limits.

The tables below summarize the range of contractual interest rates per annum for significant consolidated assets and liabilities as of 31 December 2021 and 2020:

31 Desember/December 2021							
Rupiah %	Dolar Amerika Serikat/ United States Dollar %	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	2.75-10.00	0.02-2.39	-	-	-	0.55 - 2.15	Placements with other banks and Bank Indonesia
Efek-efek	4.75-12.90	0.16-5.63	-	0.3-0.92	-	-	Marketable securities
Wesel ekspor dan tagihan lainnya	4.00-7.71	0.68-5.15	-	-	-	-	Bills and other receivables
Efek-efek yang dibeli dengan janji dijual kembali	2.78-3.50	-	-	-	-	-	Securities purchased under agreements to resell
Pinjaman yang diberikan	5.00-24.00	0.02-8.50	1.00-4.75	0.50-2.09	4.00-7.00	1.35-4.00	Loans
Obligasi Pemerintah	3.79-12.90	0.74-5.88	0.90-2.15	0.30-0.92	2.75-3.13	-	Government Bonds
- Tingkat bunga tetap	-	-	-	-	-	-	Fixed interest rate -
- Tingkat bunga mengambang	3.79 - 4.54	-	-	-	-	-	Floating interest rate -
LIABILITAS							LIABILITIES
Simpanan nasabah	0.00-7.30	0.00-1.50	0.00-0.75	0.01-0.01	0.00-0.75	-	Deposits from customers
Simpanan dari bank lain	0.00-3.25	0.00-0.82	-	0.00-0.37	0.00-0.80	-	Deposits from other banks
Efek-efek yang dijual dengan janji dibeli kembali	-	1.00-2.00	-	-	-	-	Securities sold under agreements to repurchase
Efek-efek yang diterbitkan	8.00	-	-	-	-	-	Securities issued
Pinjaman yang diterima	8.75-11.50	0.05-3.50	-	0.11-0.28	-	-	Borrowings
Efek-efek subordinasi	-	3.75-4.30	-	-	-	-	Subordinated securities

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51. RISIKO PASAR (lanjutan)

51. MARKET RISK (continued)

(i) Risiko tingkat suku bunga (lanjutan)

(i) Interest rate risk (continued)

31 Desember/December 2020

Rupiah %	Dolar Amerika Serikat/ United States Dollar %	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	3.00-10.00	0.05-1.80	-	-	-	0.50-0.80	Placements with other banks and Bank Indonesia
Efek-efek	6.35-11.25	0.79-5.50	0.09-2.15	0.3-0.92	-	-	Marketable securities
Wesel ekspor dan tagihan lainnya	7.00-12.00	1.61-7.50	2.80 - 3.70	-	-	-	Bills and other receivables
Efek-efek yang dibeli dengan janji dijual kembali	3.75-4.57	-	-	-	-	-	Securities purchased under agreements to resell
Pinjaman yang diberikan	5.50-38.50	1.13-11.00	1.60 -4.75	0.50-2.06	4.00-6.50	2.20-4.50	Loans
Obligasi Pemerintah	-	-	-	-	-	-	Government Bonds
- Tingkat bunga tetap	5.45-12.90	1.86-5.86	0.95-1.40	0.92-3.00	2.25-3.13	-	Fixed interest rate -
- Tingkat bunga mengambang	4.54-5.79	-	-	-	-	-	Floating interest rate -
LIABILITAS							LIABILITIES
Simpanan nasabah	0.00-8.00	0.00-3.65	0.00-0.75	0.00-0.01	0.00-0.50	-	Deposits from customers
Simpanan dari bank lain	0.00-5.48	0.00-1.27	-	0.00-0.35	0.00-0.45	-	Deposits from other banks
Efek-efek yang dijual dengan janji dibeli kembali	-	0.60-2.20	-	-	-	-	Securities sold under agreements to repurchase
Efek-efek yang diterbitkan	8.00	-	-	-	-	-	Securities issued
Pinjaman yang diterima	5.70-11.50	0.96-2.20	0.2-0.85	-	-	2.85	Borrowings

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.

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.

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Perubahan presentase/ Percentage Change	Pengaruh terhadap laporan laba rugi/ Impact to profit or loss
±25 bps	±208,481
±50 bps	±416,962

31 Desember/December 2020

Perubahan presentase/ Percentage Change	Pengaruh terhadap laporan laba rugi/ Impact to profit or loss
±25 bps	±159,916
±50 bps	±319,831

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 other 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.

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51. RISIKO PASAR (lanjutan)

51. MARKET RISK (continued)

(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.

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2021 per mata uang, sesuai dengan peraturan Bank Indonesia:

(ii) Currency risk

Foreign currency risks arise from 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.

Presented below is the Net Open Position (NOP), in absolute amounts, of BNI as of 31 December 2021 by currency, based on Bank Indonesia regulations:

31 Desember/December 2021

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	406,553,272	406,676,338	123,066	United States Dollar
Euro	9,065,692	9,107,264	41,572	Euro
Yen Jepang	6,486,088	6,307,104	178,984	Japanese Yen
Dolar Singapura	2,924,820	2,959,799	34,979	Singapore Dollar
Yuan China	1,988,313	1,939,170	49,143	Chinese Yuan
Dolar Hong kong	624,960	589,762	35,198	Hong Kong Dollar
Poundsterling Inggris	486,736	501,153	14,417	British Pound Sterling
Lain-lain	1,410,720	980,404	652,994 *)	Others
			1,130,353	
LAPORAN POSISI KEUANGAN				STATEMENT OF FINANCIAL POSITION
Dolar Amerika Serikat	263,520,180	239,058,278	24,461,902	United States Dollar
Yen Jepang	4,418,469	4,239,742	178,727	Japanese Yen
Dolar Singapura	2,624,375	2,387,084	237,291	Singapore Dollar
Euro	2,271,275	1,120,853	1,150,422	Euro
Yuan China	1,777,576	551,047	1,226,529	Chinese Yuan
Dolar Hong kong	397,220	238,982	158,238	Hong Kong Dollar
Poundsterling Inggris	278,434	159,058	119,376	British Pound Sterling
Lain-lain	1,250,128	604,203	645,925 *)	Others
			28,178,410	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 54)			125,616,033	Total Tier I and II Capital less investment in Subsidiaries (Note 54)
Rasio PDN (Keseluruhan)			0.90%	NOP Ratio (Aggregate)
Rasio PDN (Laporan Posisi Keuangan)			22.43%	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

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51. RISIKO PASAR (lanjutan)

51. MARKET RISK (continued)

(ii) Risiko mata uang (lanjutan)

(ii) Currency risk (continued)

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2020 per mata uang, sesuai dengan peraturan Bank Indonesia:

Presented below is the Net Open Position, in absolute amounts, of BNI as of 31 December 2020 by currency, based on Bank Indonesia regulations:

31 Desember/December 2020

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)
Yuan China	1,842,588	2,049,445	206,857	Chinese Yuan
Dolar Amerika Serikat	330,529,303	331,401,069	871,766	United States Dollar
Euro	11,758,826	12,102,964	344,138	Euro
Yen Jepang	7,301,530	6,951,243	350,287	Japanese Yen
Dolar Singapura	1,998,299	2,272,232	273,933	Singapore Dollar
Poundsterling Inggris	790,407	559,764	230,643	British Pound Sterling
Dolar Hong kong	671,484	549,848	121,636	Hong Kong Dollar
Lain-lain	1,397,555	535,426	862,129 ^{*)}	Others
			3,261,389	
LAPORAN POSISI KEUANGAN				STATEMENT OF FINANCIAL POSITION
Dolar Amerika Serikat	226,105,802	215,359,679	10,746,123	United States Dollar
Euro	3,226,726	2,586,452	640,274	Euro
Yen Jepang	3,778,388	3,278,100	500,288	Japanese Yen
Dolar Singapura	1,628,219	1,681,015	52,796	Singapore Dollar
Poundsterling Inggris	397,755	167,113	230,642	British Pound Sterling
Dolar Hong kong	418,488	225,197	193,291	Hong Kong Dollar
Yuan China	1,613,270	124,244	1,489,026	Chinese Yuan
Lain-lain	1,491,579	552,361	939,218 ^{*)}	Others
			14,791,658	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 54)			103,145,466	Total Tier I and II Capital less investment in Subsidiaries (Note 54)
Rasio PDN (Keseluruhan)			3.16%	NOP Ratio (Aggregate)
Rasio PDN (Laporan Posisi Keuangan)			14.34%	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

52. RISIKO OPERASIONAL

52. OPERATIONAL RISK

Dalam rangka menerapkan manajemen risiko operasional, BNI mengacu kepada ketentuan Bank Indonesia/ Otoritas Jasa Keuangan serta *International Best Practices*. Pengelolaan risiko operasional meliputi proses identifikasi, penilaian, pengukuran, pemantauan dan pengendalian risiko operasional.

In order to implement operational risk management, BNI made reference to Bank Indonesia or Financial Authority Regulations, and also *International Best Practices*. Operational risk management encompasses the identification, assessment, measurement, monitoring and operational control processes.

1. Identifikasi Risiko

Mekanisme identifikasi risiko operasional dilakukan dengan menerapkan *Macro Process Mapping Assessment* atas proses kerja/ aktivitas masing-masing unit untuk menangkap potensi risiko operasional yang dilakukan dengan metode interview (*one on one meeting*).

1. Risk Identification

The operational risk identification mechanism is carried out by applying a macro process mapping assessment of the work processes/ activities of each unit to capture the potential operational risks conducted by interview method (*one-on-one meeting*).

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52. RISIKO OPERASIONAL (lanjutan)

2. Penilaian Risiko
Dilakukan oleh masing-masing unit pemilik risiko melalui metode *operational risk self assessment*, mencakup penilaian atas dampak, frekuensi dan penyebab risiko serta solusinya.
3. Pengukuran Risiko
Pengukuran risiko operasional saat ini menggunakan metode Pendekatan Indikator Dasar (*Basic Indicator Approach*).
4. Pemantauan Risiko
Dilakukan oleh seluruh satuan kerja sebagai *first line of defense* pada saat aktivitas operasional berlangsung.

Divisi Manajemen Risiko Bank melakukan evaluasi dan laporan/ *feedback* atas penilaian risiko berdasarkan hasil *self assessment* serta realisasi atas kerugian risiko operasional yang terjadi, meliputi:

- *Feedback report* untuk seluruh divisi/ satuan/ unit/ wilayah/ cabang.
- Laporan bulanan Pemantauan Beban Risiko Operasional kepada Direksi dan segenap unit.
- Laporan Profil Risiko Operasional.

5. Pengendalian Risiko
Mekanisme mitigasi risiko operasional tergambar pada proses pengendalian internal dengan menerapkan 4 (empat) strategi mitigasi, yaitu hindari, kurangi, transfer dan terima. Keempat strategi mitigasi tersebut tertuang dalam prosedur mitigasi risiko operasional yang meliputi prosedur pengendalian, prosedur penyelesaian transaksi, prosedur akuntansi, prosedur penyimpanan aset dan kustodian, prosedur penyediaan produk dan prosedur pencegahan *fraud*.

Salah satu perangkat yang digunakan untuk melakukan pengelolaan risiko operasional di BNI adalah New PERISKOP (Perangkat Risiko Operasional). New PERISKOP terdiri dari tiga (3) modul utama, yaitu:

- Modul *Risk Control Self Assessment (RCSA)*, merupakan salah satu metode yang digunakan untuk mendeteksi kemungkinan terjadinya risiko operasional di suatu unit. Metode ini terdiri dari serangkaian kegiatan penilaian yang dilakukan sendiri (*self assessment*) oleh setiap unit pemilik risiko (*risk owner*) secara independen dalam mengidentifikasi, menilai, mengontrol dan memantau risiko operasional yang terjadi di unitnya. Modul *RCSA* wajib diisi oleh segenap unit setiap 6 (enam) bulan sekali, dengan melakukan pengukuran terhadap frekuensi dan dampak setiap *risk issue* di unitnya serta mencari penyebab risiko tersebut timbul serta menentukan solusinya.

52. OPERATIONAL RISK (continued)

2. Risk Assessment
Performed by individual risk owner unit through the operational risk self assessment method, including assessment of the impact, frequency, and causes of risk and their solutions.
3. Risk Measurement
Current operational risk measurement uses the Basic Indicator Approach method.
4. Risk Monitoring
Performed by all units as the first line of defense at the time of operational activity on the main risks in ongoing activities.

Enterprise Risk Management Division evaluates and report/feedback on risk assessment based on self assessment result and realization of loss of operational risk that happened, consisting of :

- Feedback report for all divisions/units/ regions/branches.
- Operational Risk Expenses monthly reports to the Board of Directors and all units.
- Operational Risk Profile report.

5. Risk Control
Operational risk mitigation mechanism are reflected in the internal control process by implementing 4 (four) mitigation strategies, ie. avoid, mitigate, transfer, and accept. The four mitigation strategies are carried out in operational risk mitigation procedures that include control procedures, transaction settlement procedures, accounting procedures, asset storage procedures and custodians, product supply procedures and fraud prevention procedures.

One of the tools used to perform risk management at BNI is New PERISKOP (Perangkat Risiko Operasional). New Periskop consists of three (3) main modules:

- Risk Control Self Assessment (RCSA) Module, is a methodology to detect the possibility that an operational risk has occurred. This method is a self-assessment process conducted by every risk owner independently in identifying, assessing, controlling and monitoring operational risk in each unit. RCSA module should be filed by all units, once every six-month; by conducting an assessment of the existing risk issue frequency and impacts; and finding solutions to mitigate emerging operational risks and define the solutions.

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52. RISIKO OPERASIONAL (lanjutan)

Salah satu perangkat yang digunakan untuk melakukan pengelolaan risiko operasional di BNI adalah New PERISKOP (Perangkat Risiko Operasional). New PERISKOP terdiri dari tiga (3) modul utama, yaitu: (lanjutan)

- *Loss Event Database*, merupakan sarana yang digunakan untuk mencatat setiap peristiwa risiko operasional yang menimbulkan dampak finansial yang meliputi *actual loss* dan *near miss* secara langsung. Setiap kali unit pemilik risiko (*risk owner*) mengalami kerugian risiko operasional, maka unit tersebut harus melakukan input dalam modul *Loss Event Database* tersebut. Dari modul ini akan diketahui tipe risiko yang terjadi, penyebab kejadian tersebut, lokasi (lini bisnis) tempat terjadinya risiko serta besarnya (*amount*) risiko yang terjadi atau liabilitas hukum yang terjadi serta pengembalian kerugian (*recovery*). Sarana ini sangat penting untuk memonitor profil dan eksposur risiko operasional secara teratur. Data yang diperoleh dari *Loss Event Database* (LED) merupakan input data utama dalam penerapan metode pendekatan standar (*Standardized Approach*) yang akan diterapkan mulai 1 Januari 2023 berdasarkan SEOJK Nomor 6/SEOJK.03/ 2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar Bagi Bank Umum.
- *Key Risk Indicator*, merupakan serangkaian parameter yang ditetapkan untuk mengidentifikasi potensi kerugian risiko operasional yang utama/ dominan, yang berpotensi mengganggu pencapaian *Key Performance Indicator* (KPI) unit kerja, sebelum peristiwa risiko operasional tersebut terjadi. Perangkat tersebut akan memberikan *warning/alert* jika nilainya sudah di luar *range/threshold* yang ditetapkan sebelumnya (*early warning signal*) yang menuntut adanya tindak lanjut manajemen unit untuk mengatasi permasalahan tersebut.

Selain New PERISKOP, BNI saat ini telah memiliki rekening Beban Risiko Operasional (BRO) serta *Recovery BRO*, yang digunakan untuk membukukan kerugian atau *recovery* yang disebabkan oleh risiko operasional. Setiap bulan dilakukan monitoring terhadap rekening BRO dan *Recovery BRO* ini guna mitigasi risiko operasional.

52. OPERATIONAL RISK (continued)

One of the tools used to perform risk management at BNI is New PERISKOP (Perangkat Risiko Operasional). New Periskop consists of three (3) main modules: (continued)

- *The Loss Event Database is a system to identify and record every operational risk that causes direct financial impact which includes actual loss and near miss directly. Each time the risk owner unit experience financial loss from operational risk, the unit should record it in the Lost Event Database module. The module will generate information such as type of risk, cause of risk, location where the risk emerge and the amount of risk or legal obligation and the recovery (if any). This system is very important to monitor operational risk exposure and profile in an orderly manner. The data gathered from the Loss Event Database will become the main input when the Bank applies standardize approaches to measure its minimum operational risk capital adequacy ratio, that will be implemented at 1 January 2023 based on SEOJK Number 6/SEOJK.03/ 2020 related to Calculation of Risk Weighted Assets for Operational Risk using the Standard Approach for Commercial Banks.*
- *Key Risk Indicators, is a series of parameters established to identify main potential loss from operational risk, that potentially disrupts the achievement of Key Performance Indicators (KPI) before it happens. The module will give a warning/alert when the exposure exceeds a predetermined range/threshold that has been set and requires follow up from unit's management to overcome the problems.*

In addition to New PERISKOP, BNI has Operational Risk Expense (Beban Risiko Operasional (BRO)) and BRO Recovery accounts, which will be used to record losses or recoveries caused by operational risks. To mitigate the operational risk, BRO account and recovery will be monitored monthly.

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52. RISIKO OPERASIONAL (lanjutan)

Terkait dengan kelangsungan usaha bila terjadi kondisi *disaster* (bencana), BNI juga sudah mempunyai kebijakan *Business Continuity Management* (BCM), yaitu suatu mekanisme formal yang merupakan kombinasi antara strategi, kebijakan, prosedur, dan organisasi yang dikembangkan untuk memastikan kelangsungan operasional dari fungsi-fungsi usaha yang kritis pada tingkat layanan tertentu pada saat terjadi gangguan atau bencana. Kebijakan ini mencakup semua unit usaha yang ada di BNI, baik di dalam negeri maupun diluar negeri.

BNI memiliki infrastruktur yang dibutuhkan dalam implementasi BCM seperti *Disaster Recovery Center* (DRC), *Data Center* (DC), Lokasi Alternatif Gedung BCM dan *Command Center*. Secara rutin BNI melakukan pengujian sistem dan aplikasi pada divisi/unit kritis setiap 6 (enam) bulan sekali, melakukan site visit dan simulasi pada cabang dan wilayah guna memastikan kesiapan menghadapi bencana.

52. OPERATIONAL RISK (continued)

Regarding the business resilience when disaster occurs, BNI has Business Continuity Management (BCM) policies, which is a formal mechanism which combined strategies, policies, procedures and organizations developed to ensure operational continuity of critical functions under certain levels of services when a disturbance or disaster is encountered. This policy is applied for all business units in BNI for both domestic and overseas.

BNI has the infrastructure needed to implement BCM such as Disaster Recovery Center (DRC), Data Center (DC), BCM alternative building and Command Center. Regularly BNI performs a system and application testing on critical Division/Unit every 6 (six) months, do a site visit and simulation to the branch and region to ensure the disaster readiness.

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN

Tabel berikut 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 2021 dan 2020, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

The next table 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 2021 and 2020, and not updated to reflect changes in market conditions which have occurred after this date.

	2021		2020		
	Nilai Tercatat/ Carrying Value	Nilai wajar/ Fair value	Nilai Tercatat/ Carrying Value	Nilai wajar/ Fair value	
Aset keuangan					Financial assets
Kas	13,683,598	13,683,598	17,324,047	17,324,047	Cash
Nilai wajar melalui laba rugi					Fair value through profit or loss
Efek-efek	9,572,228	9,572,228	7,211,758	7,211,758	Marketable securities
Obligasi Pemerintah	4,111,605	4,111,605	3,022,844	3,022,844	Government Bonds
Tagihan derivatif	494,183	494,183	1,460,614	1,460,614	Derivatives receivable
Penyertaan saham	-	-	282,825	282,825	Equity investments
	27,861,614	27,861,614	11,978,041	11,978,041	
Nilai wajar melalui penghasilan komprehensif lain					Fair value through other comprehensive income
Efek-efek	16,224,730	16,224,730	15,414,343	15,414,343	Marketable securities
Obligasi Pemerintah	85,196,011	85,196,011	58,672,320	58,672,320	Government Bonds
Penyertaan saham	829,763	829,763	530,262	530,262	Equity investments
	102,250,504	102,250,504	74,616,925	74,616,925	

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**53. NILAI WAJAR ASET DAN LIABILITAS
KEUANGAN (lanjutan)**

**53. FAIR VALUE OF FINANCIAL ASSETS AND
LIABILITIES (continued)**

	2021		2020		
	Nilai Tercatat/ Carrying Value	Nilai wajar/ Fair value	Nilai Tercatat/ Carrying Value	Nilai wajar/ Fair value	
Aset keuangan (lanjutan)					Financial assets (continued)
Biaya perolehan diamortisasi					Amortized cost
Efek-efek	6,004	6,697	7,060,496	7,065,326	Marketable securities
Obligasi Pemerintah	22,120,716	24,093,358	28,965,957	31,290,872	Government Bonds
Pinjaman yang diberikan	532,141,344	532,141,344	541,978,801	541,978,801	Loans
Tagihan akseptasi	20,542,767	20,542,767	20,575,666	20,575,666	Acceptance receivables
Wesel ekspor dan tagihan lainnya	19,563,318	19,563,318	17,893,534	17,893,534	Bills and other receivables
Giro pada Bank Indonesia	48,682,431	48,682,431	35,065,701	35,065,701	Current accounts with Bank Indonesia
Giro pada bank lain	19,569,891	19,569,891	16,107,788	16,107,788	Current accounts with other banks
Penempatan pada bank lain dan Bank Indonesia	92,290,120	92,290,120	61,329,259	61,329,259	Placements with other banks and Bank Indonesia
Efek-efek yang dibeli dengan janji dijual kembali	22,010,968	22,010,968	8,666,091	8,666,091	Securities purchased under agreement to resell
Aset lain-lain - bersih*)	8,442,222	8,442,222	10,169,802	10,169,802	Other assets - net*)
	<u>785,369,781</u>	<u>787,343,116</u>	<u>747,813,095</u>	<u>750,142,840</u>	
	915,481,899	889,593,620	851,732,108	854,061,853	
Liabilitas keuangan					Financial liabilities
Nilai wajar melalui laporan laba rugi					Fair value through profit or loss
Liabilitas derivatif	109,948	109,948	414,280	414,280	Derivative payables
Liabilitas keuangan lainnya					Other financial liabilities
Liabilitas segera	4,553,735	4,553,735	5,560,702	5,560,702	Obligation due immediately
Simpanan nasabah					Deposits from customers
Giro	281,398,042	281,398,042	224,662,870	224,662,870	Current accounts
Tabungan	224,669,562	224,669,562	223,685,679	223,685,679	Savings account
Deposito berjangka	223,101,007	223,101,007	199,223,195	199,223,195	Time deposits
Simpanan dari bank lain					Deposits from other banks
Pinjaman pasar uang antar bank	4,540,539	4,540,539	2,654,735	2,654,735	Inter-bank call money
Giro	6,192,133	6,192,133	2,392,820	2,392,820	Current accounts
Deposito berjangka	1,529,821	1,529,821	1,927,421	1,927,421	Time deposit
Negotiable Certificate of Deposit			373,453	373,453	Negotiable Certificate of Deposit
Simpanan lainnya	2,114,516	2,114,516	1,674,602	1,674,602	Other deposits
Efek-efek yang dijual dengan janji dibeli kembali	1,828,652	1,828,652	2,590,268	2,590,268	Securities sold under agreements to repurchase
Liabilitas akseptasi	5,588,069	5,588,069	5,500,360	5,500,360	Acceptance payables
Efek-efek yang diterbitkan	2,986,530	3,071,490	2,985,011	3,115,200	Securities issued
Pinjaman yang diterima	32,457,936	32,457,936	44,114,314	44,114,314	Borrowings
Efek-efek subordinasi	15,764,682	15,914,545	99,975	99,975	Subordinated securities
Liabilitas lain-lain**)	16,064,806	16,064,806	14,897,169	14,897,169	Other liabilities**)
	<u>822,790,030</u>	<u>823,024,853</u>	<u>732,342,574</u>	<u>732,472,763</u>	
	822,899,978	823,134,801	732,756,854	732,887,043	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, dan piutang lain-lain.

**) 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, and other receivables.

**) Other liabilities consist of obligation to policyholders, guarantee deposits, unsettled account, reinsurance payable and commission, and payable to customers - Subsidiary.

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**53. NILAI WAJAR ASET DAN LIABILITAS
KEUANGAN (lanjutan)**

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).

Tabel di bawah ini menunjukkan instrumen keuangan yang diukur pada nilai wajar yang dikelompokkan berdasarkan hirarki nilai wajar:

**53. FAIR VALUE OF FINANCIAL ASSETS AND
LIABILITIES (continued)**

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).

The table below shows the financial instruments measured at fair value grouped according to the fair value hierarchy:

31 Desember/ December 2021				
	Nilai wajar/ <i>Fair value</i>			
	Nilai tercatat/ <i>Carrying value</i>	Tingkat/ <i>Level 1</i>	Tingkat/ <i>Level 2</i>	Tingkat/ <i>Level 3</i>
Aset keuangan				<i>Financial assets</i>
Nilai wajar melalui laba rugi				<i>Fair value through profit or loss</i>
Efek-efek	9,572,228	-	9,572,228	- <i>Marketable securities</i>
Obligasi Pemerintah	4,111,605	4,111,605	-	- <i>Government Bonds</i>
Tagihan derivatif	494,183	-	494,183	- <i>Derivative receivables</i>
Penyertaan saham	-	-	-	- <i>Equity investments</i>
	14,178,016	4,111,605	10,066,411	-
Nilai wajar melalui penghasilan komprehensif lain				<i>Fair value through other comprehensive income</i>
Efek-efek	16,224,730	10,333,865	5,890,865	- <i>Marketable securities</i>
Obligasi Pemerintah	85,196,011	64,508,731	20,687,280	- <i>Government Bonds</i>
Penyertaan saham	829,763	-	-	829,763 <i>Equity investments</i>
	102,250,504	74,842,596	26,578,145	829,763
	116,428,520	78,954,201	36,644,556	829,763

Financial assets

Fair value through profit or loss
Marketable securities
Government Bonds
Derivative receivables
Equity investments

Fair value through other comprehensive income

Marketable securities
Government Bonds
Equity investments

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**53. NILAI WAJAR ASET DAN LIABILITAS
KEUANGAN (lanjutan)**

Tabel di bawah ini menunjukkan instrumen keuangan yang diukur pada nilai wajar yang dikelompokkan berdasarkan hirarki nilai wajar: (lanjutan)

**53. FAIR VALUE OF FINANCIAL ASSETS AND
LIABILITIES (continued)**

The table below show the financial instruments measured at fair value grouped according to the fair value hierarchy: (continued)

31 Desember/ December 2021									
Nilai wajar/Fair value									
Nilai tercatat/ Carrying value	Tingkat/ Level 1	Tingkat/ Level 2	Tingkat/ Level 3		Nilai tercatat/ Carrying value	Tingkat/ Level 1	Tingkat/ Level 2	Tingkat/ Level 3	
Liabilitas keuangan					Financial liabilities				
Nilai wajar melalui laporan laba rugi					Fair value through profit or loss				
Liabilitas derivatif	109,948	-	109,948	-	Derivatives payable				
	109,948	-	109,948	-					
31 Desember/ December 2020									
Nilai wajar/Fair value									
Nilai tercatat/ Carrying value	Tingkat/ Level 1	Tingkat/ Level 2	Tingkat/ Level 3		Nilai tercatat/ Carrying value	Tingkat/ Level 1	Tingkat/ Level 2	Tingkat/ Level 3	
Aset keuangan					Financial assets				
Nilai wajar melalui laporan laba rugi					Fair value through profit or loss				
Efek-efek	7,211,758	-	7,211,758	-	Marketable securities				
Obligasi Pemerintah	3,022,844	3,022,844	-	-	Government Bonds				
Tagihan derivatif	1,460,614	-	1,460,614	-	Derivative receivables				
Penyertaan saham	282,825	-	-	282,825	Equity investments				
	11,978,041	3,022,844	8,672,372	282,825					
Nilai wajar melalui penghasilan komprehensif lain					Fair value through other comprehensive income				
Efek-efek	15,414,343	-	15,414,343	-	Marketable securities				
Obligasi Pemerintah	58,672,320	8,949,483	49,722,837	-	Government Bonds				
Penyertaan saham	530,262	37,342	-	492,920	Equity investments				
	74,616,925	8,986,825	65,135,180	492,920					
Biaya perolehan diamortisasi					Amortized cost				
Efek-efek	7,060,496	7,062,796	-	-	Marketable securities				
Obligasi Pemerintah	28,965,957	31,379,083	-	-	Government Bonds				
	36,026,453	38,441,879	-	-					
Pinjaman yang diberikan	541,978,801	-	529,021,750	12,957,051	Loans				
Aset tetap	21,976,243	-	21,976,243	-	Fixed Assets				
	686,576,463	50,451,548	624,805,545	13,732,796					
Liabilitas keuangan					Financial liabilities				
Nilai wajar melalui laporan laba rugi					Fair value through profit or loss				
Liabilitas derivatif	414,280	-	414,280	-	Derivatives payable				
	414,280	-	414,280	-					

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**53. NILAI WAJAR ASET DAN LIABILITAS
KEUANGAN (lanjutan)**

Teknik penilaian dan input signifikan atas nilai wajar tingkat 3 untuk beberapa penyertaan saham adalah sebagai berikut:

**53. FAIR VALUE OF FINANCIAL ASSETS AND
LIABILITIES (continued)**

Valuation technique and significant input for fair value of level 3 for investments are as follows:

Akun	Teknik Penilaian/ Valuation Technique	Input Signifikan/Significant Input	%	Account
				Fair value through profit and loss
Nilai wajar melalui laba rugi penghasilan komprehensif lain				
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	Arus Kas yang Didiskontokan/ Discounted cashflow	Tingkat diskonto/Discount rate	16.03	PT Penyelesaian Transaksi Elektronik Nasional (PTEN)
		Tingkat bunga bebas risiko/Risk-free rate	7.15	
		Diskon Marketabilitas/Discount for lack of Marketability (DLOM)	35.00	
		Diskon Minoritas/Discount for Lack of Control (DLOC)	20.00	
PT Fintek Karya Nusantara	-Arus Kas yang Didiskontokan/Discounted Cashflow (60%) - Pembanding Perusahaan tercatat di Bursa Efek/Guideline Publicity Trade Company (40%)	Tingkat diskonto/Discount rate	7.87	PT Fintek Karya Nusantara
		Tingkat bunga bebas risiko/Risk-free rate	7.11	
		Diskon Marketabilitas/Discount for lack of Marketability (DLOM)	20.00	
		Diskon Minoritas/Discount for Lack of Control (DLOC)	10.00	

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hirarki nilai wajar.

There is no transfer between level 1 and level 2 of the fair value hierarchy.

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 kuotasi 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.

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.

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**53. 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 kuotasi yang serupa atau dinilai dengan menggunakan metode penilaian.

**53. 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, equity investments, acceptance receivables, securities purchases under agreements to resell 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.

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**53. 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)

Nilai tercatat dari kas dan setara kas, serta penempatan dengan suku bunga mengambang adalah perkiraan yang layak atas nilai wajar.

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, 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 *amortized 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.

**53. 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, equity investments, acceptance receivables, securities purchases under agreements to resell and other assets. (continued)

The carrying amount of cash and cash equivalents, as well as placements with floating rates are a reasonable approximation of fair value.

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 below one year, the carrying amounts of fixed rate placements, bills and other receivables, acceptance receivables, securities purchased under agreements to resell 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 amortized 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.

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KEUANGAN (lanjutan)**

- (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.

- (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.

54. 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.

**53. FAIR VALUE OF FINANCIAL ASSETS AND
LIABILITIES (continued)**

- (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.

- (iv) Marketable securities and Government Bonds

The fair value for amortized 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.

54. CAPITAL MANAGEMENT

The Bank's capital management objective is to maintain a strong capital position to support business growth and to sustain investor, depositor, customer and market confidence. In managing its capital, the Bank considers factors such as: providing optimal capital rate of return to shareholders and maintaining a balance between high return gearing ratio and safety provided by a sound capital position.

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54. MANAJEMEN MODAL (lanjutan)

Pada tanggal 31 Desember 2021 dan 2020, 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 dan Peraturan OJK No. 34/POJK.03/2016 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 2021 dan 2020 adalah sebagai berikut:

54. CAPITAL MANAGEMENT (continued)

As of 31 December 2021 and 2020, 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 and OJK Regulation No. 34/POJK.03/2016 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 Capital Bank.

The CAR of BNI (BNI only) as of 31 December 2021 and 2020 is as follows:

	2021	2020	
BNI - tanpa memperhitungkan risiko pasar			BNI - without considering market risk
Aset Tertimbang Menurut Risiko	547,219,967	528,899,296	Risk Weighted Assets
Total Modal	125,616,033	103,145,466	Total Capital
Rasio Liabilitas Penyediaan Modal Minimum BNI	22.96%	19.50%	Capital Adequacy Ratio
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Bank Indonesia	9.80%	9.95%	Minimum Capital Adequacy Ratio required by Bank Indonesia
BNI - dengan memperhitungkan risiko pasar dan kredit			BNI - considering market and credit risks
Aset Tertimbang Menurut Risiko	548,942,339	532,176,616	Risk Weighted Assets
Total Modal	125,616,033	103,145,466	Total Capital
Rasio Liabilitas Penyediaan Modal Minimum BNI	22.88%	19.38%	Capital Adequacy Ratio
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Bank Indonesia	9.80%	9.95%	Minimum Capital Adequacy Ratio required by Bank Indonesia

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54. MANAJEMEN MODAL (lanjutan)

54. CAPITAL MANAGEMENT (continued)

Rasio Liabilitas Penyediaan Modal Minimum
(lanjutan)

Capital Adequacy Ratio (continued)

	2021	2020	
BNI - dengan memperhitungkan risiko operasional, mulai berlaku sejak 1 Januari 2010			BNI - considering operational risk, effective since 1 January 2010
Aset Tertimbang Menurut Risiko	636,201,737	614,633,183	<i>Risk Weighted Assets</i>
Total Modal	125,616,033	103,145,466	<i>Total Capital</i>
Rasio Liabilitas Penyediaan Modal Minimum BNI	19.74%	16.78%	<i>Capital Adequacy Ratio</i>
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Bank Indonesia	9.80%	9.95%	<i>Minimum Capital Adequacy Ratio required by Bank Indonesia</i>

55. AKTIVITAS JASA LAINNYA

55. OTHER ACTIVITIES

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 Rp83.921 dan Rp79.687 untuk periode yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020.

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 Rp83,921 and Rp79,687 for period ended 31 December 2021 and 2020, respectively.

Kegiatan Jasa Kustodian

Custodian Services

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:

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:

- Penyimpanan (*safekeeping*) dan administrasi (*administration*) atas efek-efek maupun dokumen berharga lainnya;
- Penyelesaian transaksi (*settlement*) jual dan beli efek berbentuk warkat (*script*) maupun tanpa warkat (*scriptless*);
- Pengurusan hak-hak nasabah atas kepemilikan efek-efek yang disimpan sehingga hak tersebut efektif di rekening nasabah (*corporate action*);
- Perwakilan (*proxy*) pada Rapat Umum Pemegang Saham dan Rapat Umum Pemegang Obligasi;
- Penyampaian laporan (*reporting*) dan informasi (*information*) yang terkait dengan efek-efek dan/atau dokumen berharga milik nasabah yang disimpan dan diadministrasikan oleh Kustodian BNI.

- Safekeeping and administration of marketable securities and other valuable assets;
- Settlement and handling services for script and scriptless trading transactions;
- Corporate action services related to the rights of the marketable securities;
- Proxy services for its customers' shareholder meetings and bond holder meetings;
- Generate reports and information regarding customers' marketable securities which are kept and administered by BNI's custodian department.

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55. AKTIVITAS JASA LAINNYA (lanjutan)

Kegiatan Jasa Kustodian (lanjutan)

Untuk memenuhi kebutuhan investor dalam melakukan investasi pada berbagai instrumen efek-efek, Kustodian BNI memfasilitasinya dengan menyediakan beragam layanan:

- Kustodian umum untuk melayani investor yang melakukan investasi pada instrumen pasar modal dan pasar uang di Indonesia;
- 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);
- Kustodian reksadana (*mutual fund*) dan kontrak pengelolaan dana (*discretionary fund*) yang diterbitkan dan dikelola oleh manajer investasi;
- 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*.

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:

- Jasa Wali Amanat untuk obligasi dan *medium-term notes* (MTN)
- Jasa Agen Pengelola Rekening Penampungan
- Jasa Agen Pembayaran
- Jasa Penampungan Dana IPO
- Jasa Agen Penjaminan

BNI selaku Wali Amanat telah mengelola 64 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp35.329.019 pada tanggal 31 Desember 2021 dan 78 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp40.526.414 pada tanggal 31 Desember 2020 (tidak diaudit).

55. OTHER ACTIVITIES (continued)

Custodian Services (continued)

In order to fulfill the investors' needs in investing in various marketable securities and instruments, BNI's Custodian Operations facilitates various services as follows:

- General custodian which provides services to investors investing in capital markets or money markets in Indonesia;*
- Sub-Registry service provider for settlement of Government Debenture Debt (SUN - either Government Bonds or Surat Perbendaharaan Negara) and SBI transactions;*
- Custodian for mutual funds and discretionary funds issued and managed by investment manager;*
- 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.*

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:

- Trustee for bond and medium-term notes (MTN)*
- Escrow Account Agent*
- Paying Agent*
- Initial Public Offering / IPO Receiving Bank*
- Security Agent*

BNI as a Trustee, has 64 bonds and MTN issued amounting to Rp35,329,019 as of 31 December 2021 and 78 trusteeship arrangements with the total value of bonds and MTN issued amounting to Rp40,526,414 as of 31 December 2020 (unaudited).

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56. RENCANA BARANG MODAL

BNI memiliki komitmen barang modal terkait dengan pembangunan gedung kantor cabang serta pengadaan perlengkapan komputer dan ATM adalah sebesar Rp1.902.089 dan Rp4.445.453 masing-masing pada tanggal-tanggal 31 Desember 2021 dan 2020 (tidak diaudit).

56. CAPITAL EXPENDITURE COMMITMENTS

BNI has capital expenditure plans in relation to the construction of branch offices and procurement of computer equipment and ATMs amounting to Rp1,902,089 and Rp4,445,453 as of 31 December 2021 and 2020 (unaudited), respectively.

57. 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.

57. CHANNELING 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 recognized 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.

Jumlah kredit yang dikelola oleh BNI atas nama Pemerintah tersebut pada tanggal-tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

Following is the outstanding loans balance administered by BNI on behalf of the Government as of 31 December 2021 and 2020:

	2021	2020	
Sektor			Sektor
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	2,271	2,271	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	9,413	9,418	Others
Total	26,092	26,097	Total

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58. TAMBAHAN INFORMASI ARUS KAS

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas konsolidasian adalah sebagai berikut:

	1 Januari/ January 2021	Arus kas/ Cash flow	Lain-lain/ Others	31 Desember / December 2021	
Pinjaman yang diterima	44,114,314	(12,102,103)	445,725	32,457,936	Borrowings
Efek-efek yang dijual dengan janji dibeli kembali	2,590,268	(541,791)	(219,825)	1,828,652	Securities sold under agreements to repurchase
Efek-efek subordinasi	99,975	15,664,702	5	15,764,682	Subordinated securities
Saham tresuri	(79,449)	(128,026)	-	(207,475)	Treasury shares
Pembayaran dividen	-	(820,101)	-	(820,101)	Payment of dividend
Pembayaran liabilitas sewa	1,270,076	(353,980)	365,481	1,281,577	Payment of lease liabilities
	47,995,184	1,718,701	591,386	50,305,271	

	1 Januari/ January 2020	Arus kas/ Cash flow	Lain-lain/ Others	31 Desember/ December 2020	
Pinjaman yang diterima	57,235,500	(13,530,558)	409,372	44,114,314	Borrowings
Efek-efek yang dijual dengan janji dibeli kembali	2,183,403	507,305	(100,440)	2,590,268	Securities sold under agreements to repurchase
Efek-efek subordinasi	99,965	-	10	99,975	Subordinated securities
Saham tresuri	-	(79,449)	-	(79,449)	Treasury shares
Pembayaran liabilitas sewa	1,226,719	(190,348)	233,705	1,270,076	Payment of lease liabilities
	60,745,587	(13,293,050)	542,647	47,995,184	

58. SUPPLEMENTARY CASH FLOW INFORMATION

Changes in liabilities arising from financing activities in the consolidated cash flow statement are as follows:

59. STANDAR AKUNTANSI KEUANGAN BARU YANG TELAH DISAHKAN NAMUN BELUM BERLAKU EFEKTIF

Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia ("DSAK-IAI") telah menerbitkan standar baru, amandemen dan interpretasi berikut, namun belum berlaku efektif untuk tahun buku yang dimulai pada 1 Januari 2021 adalah sebagai berikut:

- Amendemen PSAK 22: "Kombinasi bisnis tentang referensi ke kerangka konseptual";
- Amendemen PSAK 57: "Provisi, liabilitas kontinjensi, dan aset kontinjensi tentang kontrak memberatkan - Biaya memenuhi kontrak";
- Penyesuaian tahunan PSAK 71: "Instrumen keuangan"; dan
- Penyesuaian tahunan PSAK 73: "Sewa".

Standar tersebut akan berlaku efektif pada 1 Januari 2022 dan penerapan dini diperbolehkan.

- Amendemen PSAK 1: "Penyajian Laporan Keuangan" tentang pengungkapan kebijakan akuntansi yang mengubah istilah "signifikan" menjadi "material" dan memberi penjelasan mengenai kebijakan akuntansi material";
- Amendemen PSAK 1: "Penyajian Laporan Keuangan" tentang klasifikasi liabilitas;
- Amendemen PSAK 25: "Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, dan Kesalahan" tentang definisi "estimasi akuntansi" dan penjelasannya;

59. NEW FINANCIAL ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE

Financial Accounting Standard Board of Indonesian Institute of Accountants ("DSAK-IAI") has issued the following new standards, amendments and interpretations, but not yet effective for the financial year beginning 1 January 2021 are as follows:

- Amendment of SFAS 22: "Business combination for reference to conceptual framework";
- Amendment of SFAS 57: "Provision, contingent liabilities, and contingent assets related to onerous contracts - Cost of fulfilling the contracts";
- Annual improvement SFAS 71: "Financial instruments"; and
- Annual improvement SFAS 73: "Leases".

The above standards will be effective on 1 January 2022 and early adoption is permitted.

- Amendment of SFAS 1: "Presentation of Financial Statements" regarding disclosure of accounting policies that change the term "significant" to "material" and provide explanations of material accounting policies";
- Amendment of SFAS 1: "Presentation of Financial Statements" regarding classification of liabilities;
- Amendment of SFAS 25: "Accounting Policies, Changes in Accounting Estimates, and Errors" regarding the definition of "accounting estimates" and their explanations;

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**59. STANDAR AKUNTANSI KEUANGAN BARU
YANG TELAH DISAHKAN NAMUN BELUM
BERLAKU EFEKTIF (lanjutan)**

- Amendemen PSAK 16: "Aset Tetap" tentang hasil sebelum penggunaan yang diintensikan;
- Amendemen PSAK 46: "Pajak Penghasilan" tentang Pajak Tangguhan terkait Aset dan Liabilitas yang timbul dari Transaksi Tunggal yang diadopsi dari Amendemen IAS 12 *Income Taxes tentang Deferred Tax related to Assets and Liabilities arising from a Single Transaction*; dan
- Amendemen PSAK 107: "Akuntansi Ijarah".

Standar tersebut akan berlaku efektif pada 1 Januari 2023 dan penerapan dini diperbolehkan.

- PSAK 74: "Kontrak Asuransi"; dan
- Amendemen PSAK 74: "Kontrak Asuransi" terkait Penerapan Awal PSAK 74 dan PSAK 71 - Informasi Komparatif.

Standar tersebut akan berlaku efektif pada 1 Januari 2025.

Pada saat penerbitan laporan keuangan konsolidasian, Grup masih mempelajari dampak yang mungkin timbul dari penerapan standar baru dan revisi tersebut serta pengaruhnya pada laporan keuangan konsolidasian Grup.

**59. NEW FINANCIAL ACCOUNTING STANDARDS
ISSUED BUT NOT YET EFFECTIVE (continued)**

- Amendment of SFAS 16: "Fixed Assets" regarding proceeds before intended use;
- Amendment of SFAS 46: "Income Tax" on Deferred Tax related to Assets and Liabilities arising from a Single Transaction which adopted from Amended IAS 12 *Income Taxes on Deferred Tax related to Assets and Liabilities arising from a Single Transaction*; and
- Amendment of SFAS 107: "Ijarah Accounting".

The above standards will be effective on 1 January 2023 and early adoption is permitted.

- SFAS 74: "Insurance Contract"; and
- Amendment of SFAS 74: "Insurance Contract" regarding Initial Application of SFAS 74 and SFAS 71 - Comparative Information.

The above standards will be effective on 1 January 2025.

As at the authorisation date of these consolidated financial statements, the Group is still evaluating the potential impact of these new and revised standards to the Group's consolidated financial statements.

60. 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 di estimasi pada saat pengakuan awal eksposur (jika relevan, disesuaikan dengan perubahan ekspektasi pembayaran dimuka).

60. 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).

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60. ANALISIS KUALITAS KREDIT (lanjutan)

**Pengukuran Kerugian Kredit Ekspektasian
(lanjutan)**

**Peningkatan Risiko Kredit Secara Signifikan
(lanjutan)**

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 pinjaman.

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, estimasi kondisi ekonomi.

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.

60. CREDIT QUALITY ANALYSIS (continued)

**Measurement of Expected Credit Losses
(continued)**

Significant Increase in Credit Risk (continued)

Bank use these criteria for determining whether there has been a significant increase in credit :

- quantitative test based on movement in 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, estimates of economic conditions.

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 assessors is also used.



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60. ANALISIS KUALITAS KREDIT (lanjutan)

60. CREDIT QUALITY ANALYSIS (continued)

**Pengukuran Kerugian Kredit Ekspektasian
(lanjutan)**

**Measurement of Expected Credit Losses
(continued)**

**Penentuan Struktur Probability of Default
(lanjutan)**

**Determination of the Probability of Default
Structure (continued)**

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.

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.

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.

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.

**Penentuan Terjadinya Peningkatan Risiko
Kredit Secara Signifikan**

**Determination of Significant Increase in Credit
Risk**

Bank mempergunakan sejumlah kriteria untuk menentukan telah terjadi peningkatan risiko kredit secara signifikan.

Bank uses several criteria for determining that credit risk has increased significantly.

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.

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.

Bank dimungkinkan menggunakan penilaian dari analisis 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.

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.

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60. ANALISIS KUALITAS KREDIT (lanjutan)

**Pengukuran Kerugian Kredit Ekspektasian
(lanjutan)**

**Penentuan Terjadinya Peningkatan Risiko
Kredit Secara Signifikan (lanjutan)**

Bank menentukan bahwa peningkatan resiko 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 efektifitas 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 apa pun kepada Grup.

60. 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 remainder 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.*

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60. 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 analisis 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)

60. 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)*

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60. 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 berawasan 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.

60. 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 modeling 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.*



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**61. PERISTIWA SETELAH TANGGAL PERIODE
PELAPORAN**

Sampai dengan laporan keuangan konsolidasian ini, telah dilakukan penandatanganan Perjanjian Pengambilan Bagian Saham Bersyarat antara BNI dengan PT Mayora Inti Utama ("MIU") dan PT Bank Mayora ("Bank Mayora") pada tanggal 22 Desember 2021 sehubungan dengan rencana pengambilalihan yang akan dilakukan oleh BNI atas Bank Mayora, dimana BNI akan melakukan pengambilalihan melalui pengambilan bagian atas saham baru yang diterbitkan oleh Bank Mayora yang tunduk pada persyaratan dan ketentuan dalam Perjanjian Pengambilan Bagian Saham Bersyarat tersebut. Selain itu BNI juga akan membeli seluruh saham lama yang dimiliki oleh International Finance Corporation dengan melakukan penandatanganan Perjanjian Pembelian Saham Bersyarat.

Beberapa persyaratan masih harus dipenuhi oleh masing-masing pihak, antara lain persetujuan rancangan pengambilalihan dari pemegang saham, izin pengambilalihan dari Otoritas Jasa Keuangan dan hal-hal lainnya yang dipersyaratkan dalam Perjanjian Pengambilan Bagian Saham Bersyarat tersebut.

Setelah efektifnya pengambilalihan dan penyertaan modal pada Bank Mayora oleh BNI, BNI akan menjadi Pemegang Saham Pengendali dan pemegang saham mayoritas Bank Mayora. Kedepannya Laporan Keuangan Bank Mayora akan dikonsolidasikan oleh BNI.

61. SUBSEQUENT EVENT

Up to the date of these consolidated financial statements, a Conditional Shares Subscription Agreement was signed between BNI and PT Mayora Inti Utama ("MIU") and PT Bank Mayora ("Bank Mayora") on 22 December 2021 in relation to the proposed acquisition by BNI on Bank Mayora, where BNI will carry out an acquisition by taking part in the new shares issued by Bank Mayora subject to the terms and conditions in the Conditional Share Subscription Agreement. In addition, BNI will also buy all of the existing shares owned by the International Finance Corporation by signing the Conditional Share Purchase Agreement.

Several requirements still have to be met by each party, including approval of the acquisition plan from the shareholders, acquisition permit from the Financial Services Authority and other matters required in the Conditional Share Subscription Agreement.

After the effective acquisition and direct participation in Bank Mayora by BNI, BNI will become the Controlling Shareholder and majority shareholder of Bank Mayora. In the future, Bank Mayora's Financial Statements will be consolidated by BNI.

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITYLAPORAN POSISI KEUANGAN
31 DESEMBER 2021 DAN 2020(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2021 AND 2020(Expressed in millions of Rupiah,
unless otherwise stated)

	2021	2020	
ASET			ASSETS
Kas	13,644,153	16,878,580	Cash
Giro pada Bank Indonesia	48,682,431	33,549,946	Current accounts with Bank Indonesia
Giro pada bank lain	19,384,300	15,566,049	Current accounts with other banks
Dikurangi: Cadangan kerugian penurunan nilai	(6)	(9)	Less: Allowance for impairment losses
	19,384,294	15,566,040	
Penempatan pada bank lain dan Bank Indonesia	91,498,032	55,089,096	Placements with other banks and Bank Indonesia
Dikurangi: Cadangan kerugian penurunan nilai	(110)	(173)	Less: Allowance for impairment losses
	91,497,922	55,088,923	
Efek-efek	17,555,778	15,788,354	Marketable securities
Dikurangi: Cadangan kerugian penurunan nilai	(250,048)	(255,389)	Less: Allowance for impairment losses
	17,305,730	15,532,965	
Efek-efek yang dibeli dengan janji dijual kembali	22,010,968	8,666,091	Securities purchased under agreements to resell
Wesel ekspor dan tagihan lainnya	19,965,936	18,016,435	Bills and other receivables
Dikurangi: Cadangan kerugian penurunan nilai	(402,618)	(122,901)	Less: Allowance for impairment losses
	19,563,318	17,893,534	
Tagihan akseptasi	21,557,440	21,697,586	Acceptance receivables
Dikurangi: Cadangan kerugian penurunan nilai	(1,014,673)	(1,198,591)	Less: Allowance for impairment losses
	20,542,767	20,498,995	
Tagihan derivatif	494,183	1,460,614	Derivative receivables
Pinjaman yang diberikan	581,497,289	551,786,774	Loans
Dikurangi: Cadangan kerugian penurunan nilai	(50,213,082)	(42,809,275)	Less: Allowance for impairment losses
	531,284,207	508,977,499	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	100,262,221	73,605,934	Government Bonds adjusted for amortization of discount and premium
Dikurangi: Cadangan kerugian penurunan nilai	(1,649)	(1,803)	Less: Allowance for impairment losses
	100,260,572	73,604,131	
Pajak dibayar di muka	1,048,889	1,048,889	Prepaid taxes
Beban dibayar dimuka	3,069,462	2,674,001	Prepaid expenses
Investasi pada entitas asosiasi	8,688,406	-	Investment in associates
Penyertaan saham - bersih	1,140,701	4,343,360	Equity investments - net
Aset lain-lain - bersih	9,943,232	12,001,830	Other assets - net
Aset tetap	39,057,068	36,776,351	Fixed assets
Dikurangi: Akumulasi penyusutan	(12,569,584)	(10,892,153)	Less: Accumulated depreciation
	26,487,484	25,884,198	
Aset pajak tangguhan - bersih	6,162,409	4,558,072	Deferred tax assets - net
TOTAL ASET	941,211,128	818,227,668	TOTAL ASSETS

Lampiran – 1/1 – Schedule

**INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION****PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITY****LAPORAN POSISI KEUANGAN
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(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)**STATEMENTS OF FINANCIAL POSITION
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	2021	2020	
LIABILITAS DAN EKUITAS			LIABILITIES AND EQUITY
LIABILITAS			LIABILITIES
Liabilitas segera	4,553,735	5,507,692	Obligations due immediately
Simpanan nasabah	729,547,155	632,212,286	Deposits from customers
Simpanan dari bank lain	14,377,009	9,244,539	Deposits from other banks
Liabilitas derivatif	109,948	414,280	Derivative payables
Efek-efek yang dijual dengan janji dibeli kembali	1,828,652	2,590,268	Securities sold under agreements to repurchase
Liabilitas akseptasi	5,588,069	5,422,906	Acceptance payables
Beban yang masih harus dibayar	1,126,840	1,040,810	Accrued expenses
Utang pajak			Taxes payable
- Pajak penghasilan badan	1,203,405	917,428	Corporate income tax -
- Pajak lainnya	61,175	112,852	Other taxes -
Total utang pajak	1,264,580	1,030,280	Total taxes payable
Imbalan kerja	5,901,892	5,429,681	Employee benefits
Penyisihan	2,276,397	1,420,831	Provision
Liabilitas lain-lain	4,743,886	4,224,804	Other liabilities
Efek-efek yang diterbitkan	2,999,839	2,999,553	Securities issued
Pinjaman yang diterima	31,676,848	42,974,006	Borrowings
Efek-efek subordinasi	15,764,682	99,975	Subordinated Securities
TOTAL LIABILITAS	821,759,532	714,611,911	TOTAL LIABILITIES

Lampiran – 1/2 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

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kecuali dinyatakan lain)STATEMENTS OF FINANCIAL POSITION
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	2021	2020	
EKUITAS			EQUITY
Modal saham:			Share capital:
- Seri A Dwiwarna - nilai nominal Rp7.500 per saham (dalam Rupiah penuh)			Class A Dwiwarna - Rp7,500 par value per share - (in full Rupiah amount)
- Seri B - nilai nominal Rp7.500 per saham (dalam Rupiah penuh)			Class B - Rp7,500 - par value per share (in full Rupiah amount)
- Seri C - nilai nominal Rp375 per saham (dalam Rupiah penuh)			Class C - Rp375 - par value per share (in full Rupiah amount)
Modal dasar:			Share capital - Authorized:
- Seri A Dwiwarna - 1 saham			Class A Dwiwarna - 1 share -
- Seri B - 289.341.866 saham			Class B - 289,341,866 shares -
- Seri C - 34.213.162.660 saham			Class C - 34,213,162,660 shares -
Modal ditempatkan dan disetor penuh:			Issued and fully paid:
- Seri A Dwiwarna - 1 saham			Class A Dwiwarna - 1 share -
- Seri B - 289.341.866 saham			Class B - 289,341,866 shares -
- Seri C - 18.359.314.591 saham	9,054,807	9,054,807	Class C - 18,359,314,591 shares -
Tambahan modal disetor	19,633,584	14,568,468	Additional paid-in capital
Cadangan revaluasi aset	15,383,157	14,470,301	Asset revaluation reserve
Rugi yang belum direalisasi atas efek-efek dan Obligasi Pemerintah dalam kelompok tersedia untuk dijual, setelah pajak	1,888,401	2,410,284	Unrealized losses on available- for-sale marketable securities and Government Bonds, net of tax
Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing	(16,875)	23,542	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	70,937,585	60,389,392	Unappropriated
	73,715,997	63,167,804	
Saham treasuri	(207,475)	(79,449)	Treasury shares
TOTAL EKUITAS	119,451,596	103,615,757	TOTAL EQUITY
TOTAL LIABILITAS DAN EKUITAS	941,211,128	818,227,668	TOTAL LIABILITIES AND EQUITY

Lampiran – 1/3 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk ENTITAS INDUK/PARENT ENTITY

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2021 DAN 2020 (Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2021 AND 2020 (Expressed in millions of Rupiah, unless otherwise stated)

	2021	2020	
PENDAPATAN BUNGA	49,487,666	51,899,056	INTEREST INCOME
BEBAN BUNGA	(11,627,462)	(18,006,553)	INTEREST EXPENSE
PENDAPATAN BUNGA - BERSIH	37,860,204	33,892,503	INTEREST INCOME - NET
PENDAPATAN OPERASIONAL LAINNYA			OTHER OPERATING INCOME
Provisi dan komisi lainnya	9,423,984	8,781,010	Other fee and commission
Laba dari entitas asosiasi	698,341	-	Income from investment in associates
Penerimaan kembali aset yang telah dihapusbukkan	2,580,871	1,548,562	Recovery of assets written off
(Kerugian)/keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi	(5,446)	10,402	Unrealized (loss)/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	1,679,483	1,389,743	Gain on sale of financial assets at fair value through comprehensive income and fair value through profit or loss
Laba selisih kurs - bersih	1,324,814	1,093,860	Foreign exchange gains - net
Lain-lain	423,297	557,696	Others
TOTAL PENDAPATAN OPERASIONAL LAINNYA	16,125,344	13,381,273	TOTAL OTHER OPERATING INCOME
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI	(18,246,216)	(22,031,089)	ALLOWANCE FOR IMPAIRMENT LOSSES
BEBAN OPERASIONAL LAINNYA			OTHER OPERATING EXPENSES
Gaji dan tunjangan	(10,493,379)	(7,988,936)	Salaries and employees' benefits
Umum dan administrasi	(8,341,354)	(8,081,674)	General and administrative
Beban promosi	(887,320)	(930,566)	Promotion expense
Premi penjaminan	(1,293,463)	(1,188,620)	Guarantee premium
Lain-lain	(2,374,312)	(2,688,797)	Others
TOTAL BEBAN OPERASIONAL LAINNYA	(23,389,828)	(20,878,593)	TOTAL OTHER OPERATING EXPENSES
LABA OPERASIONAL	12,349,504	4,364,094	OPERATING INCOME
BEBAN BUKAN OPERASIONAL - BERSIH	(117,521)	(13,410)	NON-OPERATING EXPENSES - NET
LABA SEBELUM BEBAN PAJAK	12,231,983	4,350,684	INCOME BEFORE TAX EXPENSE
BEBAN PAJAK			TAX EXPENSE
Kini	(3,239,975)	(2,008,644)	Current
Tangguhan	1,694,366	413,155	Deferred
TOTAL BEBAN PAJAK	(1,545,609)	(1,595,489)	TOTAL TAX EXPENSE
LABA TAHUN BERJALAN	10,686,374	2,755,195	INCOME FOR THE YEAR

Lampiran – 2/1 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITYLAPORAN LABA RUGI DAN PENGHASILAN
KOMPREHENSIF LAIN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)STATEMENTS OF PROFIT OR LOSS AND OTHER
COMPREHENSIVE INCOME
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah,
unless otherwise stated)

	2021	2020	
LABA TAHUN BERJALAN	10,686,374	2,755,195	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 yang berasal dari revaluasi aset tetap	912,856	-	Gain from revaluation of fixed assets
Pengukuran kembali liabilitas imbalan kerja	824,567	(2,332,816)	Remeasurement of post employment benefit
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	(140,176)	400,277	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	(40,417)	(20,367)	Translation adjustment of foreign currency financial statements
(Kerugian)/keuntungan dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain	(628,775)	2,562,326	(Losses)/gains on changes in fair value of financial assets at fair value through other comprehensive income
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	106,892	(415,343)	Income tax relating to components of other comprehensive income
LABA KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK	1,034,947	194,077	OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAXES
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN	11,721,321	2,949,272	TOTAL COMPREHENSIVE INCOME FOR THE YEAR

Lampiran – 2/2 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITY

LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah, unless otherwise stated)

		Rugi yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui	penghasilan komprehensif lain selain pajak Unrealized losses on marketable securities and Government Bonds, at fair value through other comprehensive income - net of tax	Selisih kurs karena penjabaran keuangan dalam mata uang asing/ Exchange difference translation of foreign currency financial statements	Cadangan revaluasi aset/ Asset valuation reserve	Dicadangkan/ Appropriated	Saldo laba/Retained earnings		
	Modal ditempatkan dan disetor penuh/ Issued and fully paid-up capital	Tambahan modal disetor/ Additional/ paid-in capital					Cadangan dan wajib/ and legal reserves	Tidak dicadangkan/ Unappropriated ^{*)}	Saham treasuri/ Treasury shares
									Total ekuitas/ Total equity
						</			

^{*)} 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.

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION
PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITY

LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah, unless otherwise stated)

	Rugi yang bertanggungjawab dan efektif dalam kelompok Pemerintah	Selisih kurs karena perubahan nilai tukar untuk dilai- neto setelah pajak/ Unrealized foreign exchange losses/gains on available- for-sale securities and Government bonds net of tax	Cadangan revaluasi aset/ revaluation reserve	Cadangan umum dan wajib/ General reserves	Tidak diklasifikasi/ Unappropriated ⁷⁾	Saham treasury/ Treasury shares	Total ekuitas/ Total equity
Modal diplastikan dan disetor penuh/ fully paid-up capital	9,054,807	14,568,468					
Saldo pada tanggal 31 Desember 2019	9,054,807	14,568,468	14,804,885	2,778,412	75,304,661	-	116,884,206
Dampak transisi penerapan Pernyataan Standar Akuntansi (PSAK) 71	-	541,412	-	-	(12,847,565)	-	(12,306,153)
Saldo pada tanggal 1 Januari 2020 setelah penerapan PSAK 71	9,054,807	14,568,468	14,804,885	2,778,412	63,057,096	-	104,592,053
Labai komprehensif tahun berjalan	-	2,125,779	18,552	-	825,309	-	2,949,272
Saham treasuri	-	-	-	-	-	(79,449)	(79,449)
Pelepasan tanah/bangunan yang telah direvaluasi	-	-	(353,106)	-	353,106	-	-
Pembagian dividen tunai	-	-	-	-	(3,846,119)	-	(3,846,119)
Saldo pada tanggal 31 Desember 2020	9,054,807	14,568,468	14,470,301	2,778,412	60,389,392	(79,449)	103,615,757

⁷⁾ Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

⁷⁾ Included in unappropriated retained earnings is the remeasurement of post employment benefit.

Lampiran – 3/2 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITYLAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah,
unless otherwise stated)

	2021	2020	
ARUS KAS DARI AKTIVITAS OPERASI			CASH FLOWS FROM OPERATING ACTIVITIES
Pendapatan bunga	49,107,232	52,051,069	Interest income
Beban bunga	(11,510,857)	(18,386,725)	Interest expenses
Pendapatan operasional lainnya	17,589,480	11,046,094	Other operating income
Beban operasional lainnya	(21,202,961)	(15,760,452)	Other operating expenses
Beban bukan operasional - bersih	(117,521)	(13,411)	Non-operating expense - net
Pembayaran pajak penghasilan	(2,953,999)	(1,329,967)	Payment of income tax
Arus kas sebelum perubahan dalam aset dan liabilitas operasi	30,911,374	27,606,608	Cash flows before changes in operating assets and liabilities
Perubahan dalam aset dan liabilitas operasi: (Kenaikan)/penurunan aset operasi:			Changes in operating assets and liabilities: (Increase)/decrease in operating assets:
Penempatan pada Bank Indonesia dan Bank lain	(10,192)	31,952,915	Placements with Bank Indonesia and other banks
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laporan laba rugi	(1,621,448)	(458,778)	Marketable securities and Government Bonds at fair value through profit or loss
Wesel ekspor dan tagihan lainnya	(1,949,501)	(8,254,649)	Bills and other receivables
Efek-efek yang dibeli dengan janji dijual kembali	(13,344,877)	1,333,246	Securities purchased under agreements to resell
Pinjaman yang diberikan	(39,216,196)	(38,806,223)	Loans
Tagihan akseptasi	140,146	(2,579,311)	Acceptance receivables
Biaya dibayar di muka	(395,461)	(304,350)	Prepaid expenses
Aset lain-lain	2,439,032	(1,696,286)	Other assets
Kenaikan/(penurunan) liabilitas operasi:			Increase/(decrease) in operating liabilities:
Liabilitas segera	(953,957)	283,946	Obligations due immediately
Simpanan nasabah	97,334,869	61,136,589	Deposits from customers
Simpanan dari bank lain	5,132,470	(2,580,802)	Deposits from other banks
Beban yang masih harus dibayar	86,030	217,648	Accrued expenses
Imbalan kerja	(936,846)	(1,057,477)	Employee benefits
Liabilitas akseptasi	165,163	81,466	Acceptance payables
Utang pajak	(51,677)	(92,242)	Taxes payable
Liabilitas lain-lain	506,719	(377,302)	Other liabilities
Kas bersih diperoleh dari aktivitas operasi	78,235,648	66,404,998	Net cash provided from operating activities
ARUS KAS DARI AKTIVITAS INVESTASI			CASH FLOWS FROM INVESTING ACTIVITIES
Penempatan/(pembelian) efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi - bersih	(1,901,869)	4,485,354	Proceed/(placement) of marketable securities measured at fair value through other comprehensive income and amortized cost - net
Pembelian Obligasi Pemerintah - bersih	(25,422,277)	(5,713,136)	Placement of Government Bonds - net
Pembelian aset tetap	(1,760,010)	(1,111,431)	Acquisition of fixed assets
Hasil penjualan aset tetap	314,489	17,191	Proceeds from sale of fixed assets
Kas bersih digunakan untuk aktivitas investasi	(28,769,667)	(2,322,022)	Net cash used in investing activities

Lampiran – 4/1 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITYLAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah,
unless otherwise stated)

	2021	2020	
ARUS KAS DARI AKTIVITAS PENDANAAN			CASH FLOWS FROM FINANCING ACTIVITIES
Pembayaran kembali pinjaman yang diterima	(11,742,883)	(13,449,785)	Repayment of borrowing
(Penurunan)/kenaikan efek-efek yang dijual dengan janji dibeli kembali	(541,791)	507,304	(Decrease)/increase in securities sold under agreements to repurchase
Saham treasury	(128,026)	(79,449)	Treasury shares
Penerimaan surat berharga subordinasi	15,664,703	-	Receipt of subordinated securities
Pembayaran liabilitas sewa	(288,166)	(125,588)	Payment of lease liability
Pembayaran dividen	(820,101)	(3,846,119)	Payment of dividends
Kas bersih diperoleh dari/ (digunakan untuk) aktivitas pendanaan	2,143,736	(16,993,637)	Net cash provided from/(used in) financing activities
KENAIKAN BERSIH KAS DAN SETARA KAS	51,609,717	47,089,339	NET INCREASE IN CASH AND CASH EQUIVALENTS
KAS DAN SETARA KAS PADA AWAL TAHUN	120,789,792	73,089,572	CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR
Pengaruh perubahan kurs mata uang asing	505,337	610,881	Effect of foreign currency exchange rate changes
KAS DAN SETARA KAS PADA AKHIR TAHUN	172,904,846	120,789,792	CASH AND CASH EQUIVALENTS AT END OF YEAR
KOMPONEN KAS DAN SETARA KAS:			COMPONENTS OF CASH AND CASH EQUIVALENTS:
Kas	13,644,153	16,878,580	Cash
Giro pada Bank Indonesia	48,682,431	33,549,946	Current accounts with Bank Indonesia
Giro pada bank lain	19,384,300	15,566,049	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan	91,193,962	54,795,217	Placement with Bank Indonesia and other banks - maturing within three months of acquisition date
Total kas dan setara kas	172,904,846	120,789,792	Total cash and cash equivalents

Lampiran – 4/2 – Schedule

INFORMASI KEUANGAN TAMBAHAN/SUPPLEMENTARY FINANCIAL INFORMATION

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/PARENT ENTITYCATATAN ATAS LAPORAN KEUANGAN
UNTUK TAHUN YANG BERAKHIR PADA TANGGAL
31 DESEMBER 2021 DAN 2020
(Disajikan dalam jutaan Rupiah,
kecuali dinyatakan lain)NOTES TO THE FINANCIAL STATEMENTS
AND FOR THE YEAR THEN ENDED
31 DECEMBER 2021 AND 2020
(Expressed in millions of Rupiah,
unless otherwise stated)

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 2021	Arus kas/ Cash flow	Lain-lain/ Others	31 Desember/ December 2021	
Pinjaman yang diterima	42,974,006	(11,742,883)	445,725	31,676,848	Borrowings
Efek-efek yang dijual dengan janji dibeli kembali	2,590,268	(541,791)	(219,825)	1,828,652	Securities sold under agreements to repurchase
Efek-efek subordinasi	99,975	15,664,703	5	15,764,683	Subordinated securities
Saham treasuri	(79,449)	(128,026)	-	(207,475)	Treasury shares
Pembayaran dividen	-	(820,101)	-	(820,101)	Payment of dividend
Liabilitas sewa	1,184,229	(288,166)	347,633	1,243,696	Lease liabilities
	46,769,029	2,143,736	573,538	49,486,303	
	1 Januari/ January 2020	Arus kas/ Cash flow	Lain-lain/ Others	31 Desember/ December 2020	
Pinjaman yang diterima	56,014,420	(13,449,785)	409,371	42,974,006	Borrowings
Efek-efek yang dijual dengan janji dibeli kembali	2,183,403	507,305	(100,440)	2,590,268	Securities sold under agreements to repurchase
Efek-efek subordinasi	99,965	-	10	99,975	Subordinated securities
Saham treasuri	-	(79,449)	-	(79,449)	Treasury shares
Liabilitas sewa	1,125,661	(125,588)	184,156	1,184,229	Lease liabilities
	59,423,449	(13,147,517)	493,097	46,769,029	

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") 4 (revisi 2013), "Laporan Keuangan Tersendiri".

PSAK 4 (Revisi 2013) 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.

2. Penyertaan Saham

Informasi mengenai entitas anak yang dimiliki Bank diungkapkan pada Catatan 1i atas laporan keuangan konsolidasian.

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") 4 (revised 2013), "Separate Financial Statements".

SFAS 4 (Revised 2013) 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. Equity Investment

Information pertaining to Subsidiaries of the Bank is disclosed in Note 1i to the consolidated financial statements.

Lampiran – 5 – Schedule

Attachment of Republic of Indonesia Financial Services Authority Circular Letter No. 9/SEOJK.03/2020 Concerning Transparency and Publication of Conventional Commercial Bank Reports

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a. Financial Highlights presents financial information in a comparative format for 2 (two) fiscal years, or since the Bank began its business for banks that have been in business for less than 2 (two) years. At the very least, financial highlights covers:	18-23
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vi) Net income per share;	20
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xi) Third party funds;	31
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xiii) CAR;	21
xiv) Return on Asset (ROA);	21
xv) Return on Equity (ROE);	21
xvi) Profit margin (profit/loss to income ratio);	21
xvii) Rasio Beban Operating Expenses to Operating Income Ratio (BOPO);	22
xviii) Cost to Income Ratio (CIR);	22
xix) Percentage of Violation and Exceedance of Legal lending Limit (LLL);	22
xx) Mandatory Minimum Reserves (GWM) Ratio;	22
xxi) Net Open Position (NOP) Ratio; and	22
xxii) Other information and ratios relevant to the banking industry.	21-22
b. Bank Profile	90-203
Bank profile covers at the very least:	
i) Name of Bank, including if any, changes of name, reasons for the change, and effective date of name changes in the fiscal year;	90
ii) Access to the Bank, including branch or representative offices, whereby the general public may obtain information on the Issuer or Public Company, including:	90
iii) Address;	√
iv) Telephone number;	√
v) E-mail address; and	√
vi) Website address;	√
vii) Brief profile of the Bank;	91-92



DESCRIPTION	PAGE
viii) Vision and Mission of the Bank;	104-106
ix) Line(s) of business according to the latest articles of association, business activities performed in the fiscal year, and types of products and/or services provided;	94-99
x) Organization structure of the Bank, at the very least to 1 (one) level below the Board of Directors, with names and positions;	102-103
xi) Shareholder structure and composition, with names of shareholders and percentage of share ownership, including:	112-135; 151-153
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• Members of the Board of Directors and Board of Commissioners that own Bank shares;	112-135
• Public shareholders, hold less than 5% (five percent) of Bank shares;	152
• 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;	158
xii) Name of subsidiary entities, associated companies or joint venture companies where the Bank exercise a joint control with the entity, with the percentage of share ownership, lines of business, total assets, and operating status of the entity (if any);	154-157
xiii) For subsidiary entities, include information on address of such subsidiary entities;	179
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• Composition of the Board of Directors and the Board of Commissioners, with the position and brief resume of the respective members;	√
• Names and position according to the duties and responsibilities;	√
• Latest photograph;	√
• Age;	√
• Nationality;	√
• Education background;	√
• Work history, including information on:	√
» Legal basis of appointment as member of the Board of Directors and Board of Commissioner of the Bank	√
» Concurrent position(s), as a member of the Board of Directors, Board of Commissioners, and/or committees and other position (if any); and	√
» Work history, with period of service, with or without the Bank;	√
» Education and/or training attended by members of the Board of Directors and Board of Commissioners for competence development during the fiscal year (if any); and	√
» Affiliated relationships with other members of the Board of Directors, Board of Commissioners, or the majority shareholder (if any), disclosing the name of affiliated party.	√
xv) In the event of changes in the membership composition of the Board of Directors and/or the Board of Commissioners occurring subsequent to the end of the Fiscal 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);	√
xvi) Brief profiles of executive officers, with structure, position and summary curriculum vitae;	136-145
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xviii) Domestic and international awards and/or certifications received by the Bank in the last Fiscal Year (if any), which covers:	173-178
• Name of award and/or certification;	√
• Issuing institution or agency; and	√
• Validity period of such award and/or certification (if any).	√

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a. Report of the Board of Directors	70-83
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i) Strategy and policies of the Bank's management, including for the Sharia Business Unit (UUS) for banks that have an UUS;	73-74
ii) Comparison between achievement and targets;	76-77
iii) Constraints faced by the Bank;	77
iv) Overview of business prospects;	77-78
v) Implementation of Bank Governance;	81-82
vi) Changes in the composition of the Board of Directors and reason for such changes (if any);	83
vii) Organization structure;	102-103
viii) Primary activities;	94-95
ix) Information Technology;	390-397
x) Types of products and services, including lending to debtors in the micro, small and medium business sectors;	96-99
xi) Interest rates on deposits and loans;	76; 329
xii) Developments in the economy and target market;	206-213
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xiv) Number, types and location of offices;	100-101
xv) Ownership by the Board of Directors, Board of Commissioners and shareholders in the Bank business group;	112-135; 151-153
xvi) Significant changes in the Bank or the Bank business group in the reporting year;	8-53; 206-544
xvii) Prediction of significant future issues; and	339-340
xviii) Human resources, covering number of employees as well as education, training, and development programs for human resources.	146-147; 379-389
b. Report of the Board of Commissioners	56-67
The report of the Board of Commissioners covers at least:	
i) Structure of the Board of Commissioners, with position and summary curriculum vitae;	112-122
ii) Assessment of the performance of the Board of Directors in the management of the Bank;	60-61
iii) Supervision of the implementation of Bank's strategies;	59
iv) Opinion on the business prospects as prepared by the Board of Directors;	62-63
v) Changes in the composition of the Board of Commissioners and reason for such changes (if any); and	66-67
vi) Frequency and mechanism for advising members of the Board of Directors;	60-61
c. Management Discussion & Analysis	206-413
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 Fiscal Year, which at least includes:	
i) Review of operations by business segment, including for UUS, at least of:	218-289
• Income; and	√
• Profitability;	√
ii) Review of financial performance, comprising a comparison of the financial performance for the current year with the previous year, as well as explanation on the cause of changes and impact of such changes, covering at least:	290-322
• Investment of funds (investments and disbursement of loans/financing) and total assets;	291-302
• Third party funds and other sources of funding;	303-310
• Equity;	310-311
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Risk and capital exposures includes annual period risk and capital exposure reports as stipulated in Part II of the risk and capital exposure publication report.	416-544
4. Governance Information	
In the event that the Bank combines the governance implementation report in the Financial Publication and Financial Performance Information Annual Report, the scope and guidelines for filling out refer to the POJK concerning governance implementation for commercial banks.	548-955
5. Sustainability Report	
a. As regulated in the relevant POJK, a Sustainability Report covers the implementation of sustainable finance 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.	958-1009
b. Report on the implementation of social and environmental responsibility as regulated in the relevant laws and regulations on social and environmental responsibility for limited liability companies.	
i) Information on the implementation of social and environmental responsibility covers the management policy, types of programs and costs expended, on aspects of:	
• Environment;	977-985
• Employment practices;	986-992
• Sound institutional practices;	961-976
• Consumer; and	993-996
• Community development.	997-1009
ii) In the event that the Bank presents information on social and environmental responsibility as referred to in number 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.	√
6. Annual Financial Statements	
The annual financial statements that have been audited by a Public Accountant and Public Accountant Firm registered with OJK.	1.022-1.297
7. Information on the Business Group of the Bank	
a. A Bank that is part of a business group and/or has a Subsidiary, shall additionally report on:	158;701
i) Structure of the Bank business group, covering:	
• The structure of the business group, comprising the Bank, Subsidiary Entities, related (sister) companies, Parent Entity, and up to the ultimate shareholder;	158
• The structure of management inter-relationship of entities in the business group; and	158
• 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;	151-153; 158
ii) Transactions between the Bank and related parties in the Bank's business group, with consideration of the following:	355-366
• Information on transactions with related parties, whether conducted by the Bank or by any entity in the Bank business group in the financial sector;	√
• Related parties are parties defined as such in relevant financial accounting standards;	√

DESCRIPTION	PAGE
• Types of transaction with related parties, including:	√
» Cross shareholding;	√
» Transactions by a business group performed in the interest of another business group	√
» Short-term liquidity management in the business group;	√
» Funding provided to, or received by, another entity in a business group;	√
» Exposure to a majority shareholder in the form of loans, commitments and contingencies; and	√
» Transactions for the purchase, sale and/or rental of assets with another entity in the business group, including transactions with repurchase agreements (repo);	√
iii) Transactions with related parties conducted by each entity in the Bank business group in the financial sector;	355-366
iv) 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	366
v) 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;	366
8. Additional Information for Banks that are also an Issuer and/or Public Company	
Banks that are Issuers and/or Public Companies should include information as stipulated in the provisions concerning the form and content of the annual report of Issuers or Public Companies	√

Cross-Reference No. 16/SEOJK.04/2021: Format and Completing the Annual Report of Issuers or Public Companies

DESCRIPTION	PAGE
I. General Terms	
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 Publicly-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:	
i) 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	√
ii) 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:	
i) 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	√
ii) 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:	
i) 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	√
ii) 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.	√
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.	√
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.	√
Annual Reports that are prepared regularly and informatively can provide convenience for investors or shareholders and stakeholders in obtaining the required information.	√

DESCRIPTION	PAGE
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. Report Format	
1. The Annual Report is presented in the form of printed and electronic documents.	√
2. The Annual Report is presented in the form of a printed document, printed on light colored paper, of good quality, A4 size, bound, and can be reproduced with 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 the form of an electronic document is the Annual Report converted into a portable document format (PDF).	√
III. Annual Report Contents	
1. The Annual Report shall at least contain:	
a. Overview of important financial data;	18-41
b. Stock information (if any);	34-37
c. Report of the Board of Directors;	71-83
d. Report of the Board of Commissioners;	57-67
e. Profile of the Issuer or Public Company;	90-203
f. Management analysis and discussion;	206-412
g. Governance of Issuers or Public Companies;	548-955
h. Social and environmental responsibility of the Issuer or Public Company;	958-1.009
i. Audited annual financial report; and	1.024-1.297
j. Statement letter of members of the Board of Directors and members of the Board of Commissioners regarding their responsibility for the Annual Report.	86-87
2. Description of Annual Report Contents	
a. Summary of Important Financial Data Summary of important financial data containing financial information that is presented in the form of a comparison for 3 (three) fiscal years or since starting its business if the Issuer or Public Company has carried out its business activities for less than 3 (three) years, at least containing:	18-23
i) Income/sales;	19
ii) Gross profit;	20
iii) Profit (loss);	20
iv) The amount of profit (loss) attributable to owners of the parent entity and non-controlling interests;	20
v) Total comprehensive profit (loss);	20
vi) Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests;	20
vii) Earning (loss) per share;	20
viii) Total assets;	18
ix) Total liabilities;	19
x) Total equity;	19
xi) Ratio of profit (loss) to total assets;	21
xii) Ratio of profit (loss) to equity;	21
xiii) Ratio of profit (loss) to revenue/sales;	21
xiv) Current ratio;	21
xv) Ratio of liabilities to equity;	21
xvi) Ratio of liabilities to total assets; and	21
xvii) Other information and financial ratios relevant to the Issuer or Public Company and the type of industry.	21-22
b. Stock Information Stock information for a Public Company shall at least contain:	34-37

DESCRIPTION	PAGE
i) Shares that have been issued for each quarterly period presented in the form of a comparison for the last 2 (two) fiscal years, at least containing:	
• Number of shares outstanding;	34
• Market capitalization based on the price on the stock exchange where the shares are listed;	34
• The highest, lowest, and closing share prices based on prices on the stock exchange where the shares are listed; and	34
• Trading volume on the stock exchange where the shares are listed.	34
ii) Information in letter b), letter c) and letter d) is only disclosed if the shares are listed on a stock exchange;	√
• In the event of a corporate actions that causes changes in shares, such as stock splits, reverse stock, stock dividends, bonus shares, changes in the nominal value of shares, issuance of conversion securities, as well as capital additions and deductions, stock information as referred to in number 1) shall be added with at least an explanation regarding:	35-36
• The date of implementation of the corporate action;	35-36
• The ratio of stock splits, reverse stock, stock dividends, bonus shares, the number of convertible securities issued, and changes in the nominal value of shares;	35-36
• The number of outstanding shares before and after the corporate action;	35-36
• The number of convertible securities exercised (if any); and	35-36
• The share price before and after the corporate action;	35-36
iii) In the event of a temporary suspension of share trading (suspension) and/or delisting of shares in the fiscal year, the reasons for the suspension and/or delisting of shares shall be explained; and	37
iv) In the event that the temporary suspension of share trading as referred to in number 3) and/or the delisting process is still ongoing until the end of the Annual Report period, it explains the actions taken to resolve the temporary suspension of share trading and/or cancellation of the share listing (delisting).	37
c. Board of Directors' Report	71-83
The Board of Directors' report shall at least contain a brief description of:	
i) Performance of the Issuer or Public Company, at least containing:	
• Strategy and strategic policies of the Issuer or Public Company;	73-74
• Role of the Board of Directors in formulating strategies and strategic policies of Issuers or Public Companies;	71-83
• Process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy;	71-83
• Comparison between the results achieved and those targeted by the Issuer or Public Company; and	76-77
• Obstacles faced by Issuers or Public Companies;	77
ii) Description of the business prospects of the Issuer or Public Company; and	77-78
iii) Implementation of the governance of Issuers or Public Companies.	81-82
d. Board of Commissioners' Report	57-67
The Board of Commissioners' report shall at least contain a brief description of:	
i) Evaluation of the performance of the Board of Directors regarding the management of Issuers or Public Companies, including the supervision of the Board of Commissioners in the formulation and implementation of strategies for Issuers or Public Companies carried out by the Board of Directors;	58-59
ii) Views on the business prospects of the Issuer or Public Company prepared by the Board of Directors; and	59-60
iii) Views on the implementation of governance of the Issuer or Public Company.	62-63
e. Issuer or Public Company Profile	90-203
The profile of the Issuer or Public Company contains at least the following information:	
i) Name of the Issuer or Public Company, including if there is a change in name, the reason for the change, and the effective date of the name change in the fiscal year;	90

DESCRIPTION	PAGE
ii) Access to Issuers or Public Companies including branch offices or representative offices that enable the public to obtain information about Issuers or Public Companies, including:	90
• Address;	√
• Telephone number;	√
• E-mail address; and	√
• Website address;	√
iii) Brief history of the Issuer or Public Company;	91-92
iv) Vision and mission of the Issuer or Public Company as well as the corporate culture or corporate values;	104-106
v) Business activities according to the latest articles of association, business activities carried out in the fiscal year, as well as types of goods and/or services produced;	94-99
vi) Operational area of the Issuer or Public Company; operational area is the area or area for the implementation of operational activities or the range of the company's operational activities.	100-101
vii) Organizational structure of the Issuer or Public Company in the form of a chart, at least up to the structure of 1 (one) level below the Board of Directors including committees under the Board of Directors (if any) and committees under the Board of Commissioners, accompanied by names and positions;	102-103
viii) List of industry association memberships both on a national and international scale related to the implementation of sustainable finance;	111
ix) Directors' profile, at least containing:	124-135
• Name and position in accordance with the duties and responsibilities;	√
• Recent photograph;	√
• Age;	√
• Nationality;	√
• Education history and/or certification;	√
• Position history, including information on:	√
» The legal basis for appointment as a member of the Board of Directors of the Issuer or Public Company concerned;	√
» Concurrent positions, either as a member of the Board of Directors, member of the Board of Commissioners, and/or committee member as well as other positions both inside and outside the Issuer or Public Company. In the event that a member of the Board of Directors does not have concurrent positions, then this is disclosed; and	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• 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	√
• 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;	√
x) Profile of the Board of Commissioners, at least containing:	112-122
• Name and position;	√
• Recent photograph;	√
• Age;	√
• Nationality;	√
• Education history and/or certification;	√
• History, including information on:	√
» Legal basis for appointment as member of the Board of Commissioners;	√
» Legal basis for the first appointment as a member of the Board of Commissioners who is an independent commissioner of the Issuer or Public Company concerned;	√



DESCRIPTION	PAGE
» Concurrent positions, either as a member of the Board of Commissioners, member of the Board of Directors, and/or committee member as well as other positions both inside and outside the Issuer or Public Company. In the event that a member of the Board of Commissioners does not have concurrent positions, then this is disclosed; and	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• 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;	√
• Statement of independence of the Independent Commissioner in the event that the Independent Commissioner has served more than 2 (two) terms; and	√
• 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;	√
xi) In the event that there is a change in the composition of the members of the Board of Directors and/or members of the Board of Commissioners that occurs after the fiscal year ends up to the deadline for submitting the Annual Report, the composition included in the Annual Report is the last and previous composition of the members of the Board of Directors and/or members of the Board of Commissioners;	√
xii) 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.	146-147
xiii) Names of shareholders and percentage of ownership at the beginning and end of the fiscal year, which consists of information regarding:	151-153
• Shareholders who own 5% (five percent) or more shares of the Issuer or Public Company;	152
• Members of the Board of Directors and members of the Board of Commissioners who own shares of the Issuer or Public Company. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not own shares, then this matter is disclosed; and	112-135
• Community shareholder group, namely the group of shareholders who each own less than 5% (five percent) of the shares of the Issuer or Public Company;	152
The above information can be presented in tabular form.	√
xiv) 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;	112-135, 151-152
In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not have indirect ownership of the shares of the Issuer or Public Company, this matter shall be disclosed.	√
xv) Number of shareholders and percentage of ownership at the end of the fiscal year based on classification:	51-153
• Ownership in local institutions;	√
• Ownership in foreign institutions;	√
• Local individual ownership; and	√
• Foreign individual ownership;	√
xvi) Information regarding the majority and controlling shareholders of the Issuer or Public Company, either directly or indirectly, up to the individual owner, which is presented in the form of a schematic or chart;	153
xvii) The name of the subsidiary, associate, joint venture company where the Issuer or Public Company has joint control of the entity (if any), along with the percentage of share ownership, line of business, total assets, and operating status of the subsidiary, associated company, joint venture company;	154-157
For a subsidiary, information about the address of the subsidiary is added.	

DESCRIPTION	PAGE
xviii) Chronology of share listing, number of shares, nominal value, and offering price from the beginning of listing to the end of the fiscal year as well as the name of the stock exchange where the shares of the Issuer or Public Company are listed, including stock splits, reverse stock, dividends shares, bonus shares, and changes in the nominal value of shares, implementation of conversion effects, implementation of capital additions and subtractions (if any);	159-165
xix) 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);	166-170
xx) Information on the use of a Public Accountant (AP) and a Public Accounting firm (KAP) services and their networks/associations/alliances include:	171-172
• Name and address;	√
• Assignment period;	√
• Information on audit and/or non-audit services provided;	√
• Audit and/or non-audit fees for each assignment given during the fiscal year; and	√
• 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	√
Disclosure of information on the use of AP and KAP services and their networks/associations/alliances can be presented in tabular form.	√
xxi) Name and address of capital market supporting institutions and/or professionals other than AP and KAP	171-172
f. Management Analysis and Discussion	206-412
Management analysis and discussion contains analysis and discussion of financial statements and other important information with an emphasis on material changes that occurred in the fiscal year, which at least contains:	
i) A review of operations per business segment according to the type of industry of the Issuer or Public Company, at least regarding:	218-259
• Production, which includes the process, capacity, and development;	√
• Income/sales; and	√
• Profitability;	√
ii) Comprehensive financial performance which includes a comparison of financial performance in the last 2 (two) fiscal years, an explanation of the causes of the changes and the impact of these changes, at least regarding:	290-321
• Current assets, non-current assets, and total assets;	291-302
• Current liabilities, long term liabilities, and total liabilities;	303-310
• Equity;	310-311
• Income/sales, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss); and	312-320
• Cash flows;	321-322
iii) Ability to pay debts or obligations by presenting the relevant ratio calculations;	330
iv) Collectibility level of the Issuer's or Public Company's receivables by presenting the relevant ratio calculations;	331-332
v) Capital structure and management policies on the capital structure with the basis for determining the said policy;	333-334
vi) Discussion of material ties for capital goods investment with an explanation that at least contains:	334
• The purpose of the bond;	√
• The expected source of funds to fulfill the commitment;	√
• The currency in which it is denominated; and	√
• Steps that are planned by the Issuer or Public Company to protect the risk from the related foreign currency position;	
vii) Discussion of capital goods investments realized in the last fiscal year, at least contains:	334-335



DESCRIPTION	PAGE
• Type of capital goods investment;	√
• The purpose of capital goods investment; and	√
• The total of capital goods investments;	√
viii) Information and material facts occurring after the date of the accountant's report (if any);	340
ix) The business prospects of the Issuer or Public Company are related to the conditions of the industry, the general economy and the international market accompanied by quantitative supporting data from reliable data sources;	79; 339-340
x) Comparison between the target/projection at the beginning of the fiscal year with the results achieved (realization), regarding:	335-339
• Income/sales;	√
• Profit (loss);	√
• Capital structure; or	√
• Other matters deemed important to the Issuer or Public Company;	√
xi) Targets/projections to be achieved by the Issuer or Public Company for the next 1 (one) year, regarding:	339-340
• Income/sales;	√
• Profit (loss);	√
• Capital structure; or	√
• Other matters deemed important to the Issuer or Public Company;	√
• Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik;	√
xii) Marketing aspects of the goods and/or services of the Issuer or Public Company, at least regarding the marketing strategy and market share;	284-289
xiii) Description of dividends for the last 2 (two) fiscal years, at least:	340-342
• Dividend policy, which includes information on the percentage of dividends distributed to net income;	340-341
• Date of payment of cash dividends and/or date of distribution of non-cash dividends;	341-342
• The amount of dividends per share (cash and/or non-cash); and	341-342
• The amount of dividends paid annually;	342
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.	√
xiv) Realization of the use of proceeds from the public offering, provided that:	347-353
• In the event that during the fiscal year, the Issuer has an obligation to submit a report on the realization of the use of funds, then the realization of the cumulative use of the proceeds from the public offering shall be disclosed until the end of the fiscal year; and	√
• In the event that there is a change in the use of funds as regulated in the Financial Services Authority Regulation regarding the report on the realization of the use of the proceeds from the public offering, the Issuer shall explain the change;	√
xv) Material information (if any), regarding investment, expansion, divestment, business merger/consolidation, acquisition, debt/capital restructuring, material transactions, affiliated transactions, and conflict of interest transactions, which occurred during the fiscal year, at least containing:	354-366
• Date, value, and object of the transaction;	√
• Name of the party conducting the transaction;	√
• Nature of the affiliation relationship (if any);	√
• Explanation of the fairness of the transaction;	√
• Compliance with related provisions; and	√
• 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:	√

DESCRIPTION	PAGE
» 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	365
» 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;	365
• 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;	355-357
In the event that the affiliated transactions or material transactions referred to have been disclosed in the annual financial statements, additional information regarding the disclosure reference in the annual financial statements is added.	√
• 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;	365
In the event that there is no affiliated transaction and/or conflict of interest transaction, then this shall be disclosed;	√
xvi) Changes in the provisions of laws and regulations that have a significant effect on Issuers or Public Companies and their impact on financial statements (if any); and	366-371
xvii) Changes in accounting policies, reasons and impact on financial statements (if any).	372
g. Issuer or Public Company Governance	548-955
The governance of the Issuer or Public Company shall at least contain a brief description of:	
i) GMS, at least contains:	564-581
• Information regarding the resolutions of the GMS in the fiscal year and 1 (one) year prior to the fiscal year include:	569-581
» Resolutions of the GMS in the fiscal year and 1 (one) year before the fiscal year realized in the fiscal year; and	√
» 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;	√
• 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;	564-569
ii) The Board of Directors, at least contains:	602-620
• Duties and responsibilities of each member of the Board of Directors; Information regarding the duties and responsibilities of each member of the Board of Directors is described and can be presented in tabular form.	602-603
• A statement that the Board of Directors has guidelines or charter for the Board of Directors;	602
• 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;	662-676; 677-681; 682; 683-696; 697-698
• Training and/or competency development of members of the Board of Directors:	184-197; 618
» 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	610-611
» Training and/or competency improvement attended by members of the Board of Directors in the fiscal year (if any);	185-197; 618
• 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:	619
» Performance appraisal procedures; and	√

DESCRIPTION	PAGE
» The criteria used are performance achievements during the fiscal year, are competence and attendance at meetings; and	√
• 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.	√
iii) The Board of Commissioners, at least contains:	582-601
• Duties and responsibilities of the Board of Commissioners;	582-583
• A statement that the Board of Commissioners has guidelines or charter for the Board of Commissioners;	582
• 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;	662-676; 677-681; 682
Information on the level of attendance of members of the Board of Commissioners at the meeting of the Board of Commissioners, the meeting of the Board of Commissioners with the Board of Directors, or the GMS can be presented in tabular form.	
• Training and/or competency improvement of members of the Board of Commissioners:	184-185; 595
» 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	√
» Competency training and/or development attended by members of the Board of Commissioners in the fiscal year (if any);	√
• Performance appraisal of the Board of Directors and the Board of Commissioners as well as each member of the Board of Directors and the Board of Commissioners, at least containing:	620
» Procedures for implementing performance appraisals;	√
» Criteria used are performance achievements during the fiscal year, competency and attendance at meetings; and	√
» Party conducting the assessment; and	√
• 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:	597-598
» Performance appraisal procedures; and	√
» The criteria used are performance achievements during the fiscal year, competency and attendance at meetings;	√
iv) The nomination and remuneration of the Board of Directors and the Board of Commissioners shall at least contain:	646-661
• 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	646
• Procedures and implementation of remuneration for the Board of Directors and the Board of Commissioners, among others:	646
» Procedures for determining remuneration for the Board of Directors and the Board of Commissioners;	√
» The remuneration structure of the Board of Directors and the Board of Commissioners such as salary, allowances, tantiem/bonus and others; and	√
» The amount of remuneration for each member of the Board of Directors and member of the Board of Commissioners; Disclosure of information can be presented in tabular form.	√
v) The sharia supervisory board, for Issuers or Public Companies that carry out business activities based on sharia principles as stated in the articles of association, shall at least contain:	N.A.
• Name;	
• Legal basis for the appointment of the sharia supervisory board;	
• Period of assignment of the sharia supervisory board;	
• Duties and responsibilities of the sharia supervisory board; and	
• Frequency and method of providing advice and suggestions as well as supervising the fulfillment of sharia principles in the capital market to Issuers or Public Companies;	

DESCRIPTION	PAGE
vi) The audit committee, at least contains:	706-718
• Name and position in committee membership;	709-710
• Age;	710
• Nationality;	710
• Educational history;	710
• Position history, including information on:	709-710
» Legal basis for appointment as committee member;	√
» Concurrent positions, either as a member of the Board of Commissioners, member of the Board of Directors, and/or member of the committee as well as other positions (if any); and	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• Period and term of office of the audit committee members;	708
• Statement of independence of the audit committee;	711-712
• Training and/or competency improvement that have been followed in the fiscal year (if any);	184-185; 197; 718
• Policies and implementation of the frequency of audit committee meetings and the level of attendance of audit committee members in those meetings; and	712-715
• The implementation of the audit committee's activities for the fiscal year in accordance with the guidelines or charter of the audit committee;	715-718
vii) The nomination and remuneration committee or function of the Issuer or Public Company, at least containing:	719-733
• Name and position in committee membership;	720-722
• Age;	721-722
• Nationality;	721-722
• Educational history;	721-722
• Position history, including information on:	721-722
» Legal basis for appointment as committee member;	√
» 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	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• Period and term of office of the committee members;	724
• Statement of committee independence;	725
• Training and/or competency improvement that have been followed in the fiscal year (if any);	733
• Description of duties and responsibilities;	725-726
• A statement that it has a guideline or charter;	719
• Policies and implementation of the frequency of meetings and the level of attendance of members at the meeting;	726-731
• Brief description of the implementation of activities in the fiscal year; and	732
• 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:	√
» Reasons for not forming the committee; and	√
» The party carrying out the nomination and remuneration function;	√
viii) Other committees owned by Issuers or Public Companies in order to support the functions and duties of the Board of Directors (if any) and/or committees that support the functions and duties of the Board of Commissioners, at least containing:	734-761
• Name and position in committee membership;	735-737; 748-750
• Age;	736-737; 748-750
• Nationality;	736-737; 748-750
• Educational history;	736-737; 751-754
• Position history, including information on:	735-737; 748-750



DESCRIPTION	PAGE
» Legal basis for appointment as committee member;	√
» 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	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• Period and term of office of the committee members;	739; 747-748
• Statement of committee independence;	740; 754-755
• Training and/or competency improvement that have been followed in the fiscal year (if any); and	745; 759-761
• Description of duties and responsibilities;	740-741; 747
• A statement that the committee has had guidelines or charters;	734; 746
• Policies and implementation of the frequency of committee meetings and the level of attendance of committee members at the meeting; and	741-744; 755-757
• A brief description of the committee's activities for the fiscal year;	744-745; 758
ix) Corporate Secretary, at least contains:	762-769
• Name;	764
• Domicile	764
• Position history, including:	764
» Legal basis for appointment as company secretary; and	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• Educational history;	764
• Training and/or competency improvement followed during the fiscal year; and	765
• A brief description of the implementation of the duties of the Corporate Secretary for the fiscal year;	766-769
x) Internal audit unit, at least contains:	780-793
• Name of the head of the internal audit unit;	781
• Position history, including:	781
» Legal basis for the appointment as head of the internal audit unit; and	√
» Work experience and period of time both inside and outside the Issuer or Public Company;	√
• Qualification or certification as an internal audit profession (if any);	789-790
• Training and/or competency improvement to be followed during the fiscal year;	788-789
• Structure and position of the internal audit unit;	781
• Description of duties and responsibilities;	782-783
• A statement that the internal audit unit has had guidelines or charters; and	782
• A brief description of the implementation of the internal audit unit's duties for the fiscal year including the policy and implementation of the frequency of meetings with the Board of Directors, Board of Commissioners, and/or audit committee;	786-787
xi) A description of the internal control system implemented by the Issuer or Public Company, at least containing:	847-853
• Financial and operational control, as well as compliance with other laws and regulations;	847-849
• Review of the effectiveness of the internal control system; and	852
• Statement of the Board of Directors and/or Board of Commissioners on the adequacy of the internal control system;	853
xii) The risk management system implemented by the Issuer or Public Company, at least contains:	819-846
• General description of the risk management system of the Issuer or Public Company;	√
• Types of risks and how to manage them;	√
• Review of the effectiveness of the Issuer's or Public Company's risk management system; and	√
• 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
xiii) 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:	854-862
• Subject matter/claim;	√
• Status of settlement of cases/claims; and	√
• Effect on the condition of the Issuer or Public Company;	√
xiv) Information on administrative sanctions/sanctions imposed on Issuers or Public Companies, members of the Board of Commissioners and members of the Board of Directors, by the Financial Services Authority and other authorities for the fiscal year (if any);	863
xv) Information regarding the code of ethics of the Issuer or Public Company includes:	880
• Main points of the code of ethics;	√
• Form of socialization of the code of ethics and its enforcement efforts; and	√
• A statement that the code of ethics applies to members of the Board of Directors, members of the Board of Commissioners, and employees of Issuers or Public Companies;	√
xvi) 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);	346-347
In terms of providing compensation in the form of a management stock ownership program (MSOP) and/or an employee stock ownership program (ESOP), the information disclosed must at least contain:	
• Number of shares and/or options;	√
• Implementation period;	√
• Requirements for eligible employees and/or management; and	√
• Exercise price or determination of exercise price;	√
xvii) A brief description of the information disclosure policy regarding:	653-661
• 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	√
• Implementation of the policy;	√
xviii) A description of the whistleblowing system at the Issuer or Public Company, at least containing:	887-889
• Method of submitting a violation report;	√
• Protection for whistleblowers;	√
• Complaint handling;	√
• Party managing the complaint; and	√
• Result of complaint handling, at least:	
» Number of complaints received and processed in the fiscal year; and	√
» Follow-up on complaints;	√
In the event that the Issuer or Public Company does not have a whistleblowing system, this matter is disclosed.	√
xix) A description of the anti-corruption policy of the Issuer or Public Company, at least containing:	883-886
• Programs and procedures implemented in overcoming corrupt practices, kickbacks, fraud, bribery and/or gratification in Issuers or Public Companies; and	√
• Anti-corruption training/socialization to employees of Issuers or Public Companies;	√
In the event that the Issuer or Public Company does not have an anti-corruption policy, the reasons for not having the said policy are explained.	√
xx) Implementation of the Public Company governance guidelines for Issuers issuing equity securities or Public Companies, including:	932-943
• A statement regarding the recommendations that have been implemented; and/or	√
• Explanation of recommendations that have not been implemented, along with reasons and alternative implementations (if any).	√
Disclosure of information can be presented in tabular form.	√

DESCRIPTION	PAGE
h. Social and Environmental Responsibility of Issuers or Public Companies	956-1.009
i) 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 least includes:	
• Explanation of the sustainability strategy;	√
• Overview of sustainability aspects (economic, social, and environmental);	√
• Brief profile of the Issuer or Public Company;	√
• Explanation of the Board of Directors;	√
• Sustainability governance;	√
• Sustainability performance;	√
• Written verification from an independent party, if any;	√
• Feedback sheet for readers, if any; and	√
• The response of the Issuer or Public Company to the previous year's report feedback;	√
ii) 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;	√
iii) Information on the Sustainability Report in number 1) can:	√
• 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	√
• 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;	√
iv) 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;	√
v) In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:	√
• Contains all the information as referred to in number 1); and	√
• 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;	√
vi) 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	√
vii) 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 Report	1.024-1.297
The annual financial reports contained in the Annual Report are prepared in accordance with financial accounting standards in Indonesia and have been audited by a public accountant registered with the Financial Services Authority. The said annual financial report contains a statement regarding the accountability for financial statements as regulated in the Financial Services Authority Regulation regarding the Board of Directors' responsibility for financial reports or the laws and regulations in the capital market sector which regulates the periodic reports of securities companies in the event that the Issuer is a securities company.	1.028-1.297
j. Statement Letters of Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibilities for the Annual Report Statements of members of the Board of Directors and members of the Board of Commissioners regarding the responsibilities of the Annual Report are prepared in accordance with the format of Statement Letters of Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibilities for the Annual Report as contained in the Appendix I which is an integral part of this Financial Services Authority Circular Letter.	86-87; 1.025

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