



Tata Kelola Perusahaan

Good Corporate Governance

Bank berkomitmen untuk mengedepankan pelayanan yang lebih baik dengan melaksanakan prinsip-prinsip/asas tata kelola perusahaan yang baik dan prinsip kehati-hatian dalam setiap kegiatan usahanya.

The Bank is committed to putting forward better services by implementing the principles of good corporate governance and prudence in all of its business conducts.

BAB I PENDAHULUAN

CHAPTER I Foreword

Komitmen PT Bank JTrust Indonesia Tbk.

PT Bank JTrust Indonesia Tbk secara berkala/setiap tahun pada akhir tahun buku mempersiapkan dan menyampaikan Laporan Pelaksanaan Tata Kelola kepada pihak-pihak yang berkepentingan seperti Otoritas Jasa Keuangan (OJK) dan Pemegang Saham Bank termasuk laporan dipublikasikan pada Situs Web PT Bank JTrust Indonesia Tbk sesuai dengan ketentuan yang berlaku.

PT Bank JTrust Indonesia Tbk melalui jajaran anggota Dewan Komisaris, Direksi dan seluruh karyawan berkomitmen mengedepankan pelayanan yang lebih baik bagi nasabah (*customer*), pemegang saham (*shareholder*), serta pemangku kepentingan (*stakeholders*) lainnya, dengan melaksanakan prinsip-prinsip/asas penilaian faktor tata kelola perusahaan yang baik (*Good Corporate Governance*) dan prinsip kehati-hatian yang diterapkan dalam setiap kegiatan usaha dalam upaya membangun organisasi Bank yang kompetitif dengan mutu sumber daya manusia yang andal dalam menjalankan dan mengembangkan bisnis

The Commitment of PT Bank JTrust Indonesia Tbk.

PT Bank JTrust Indonesia Tbk regularly/annually in the end of the financial year prepares and delivers Governance Implementation Report to the interested parties such as Financial Service Authority (OJK) and the Bank's shareholders including the report that published in PT Bank JTrust Indonesia Tbk website in line with the prevailing regulations.

PT Bank JTrust Indonesia Tbk through its members of the Board of Commissioners, Directors and entire employees are committed to prioritizing better services for customers, shareholders, as well as stakeholders, and other parties, by carrying out principles/assessment principles on Good Corporate Governance factors and prudential principles that are implemented in every business activity in the effort to develop a competitive organization with reliable human resources in carrying out and developing Bank's better business. These are an effort to implement the Vision and Mission of PT Bank JTrust Indonesia Tbk



Bank yang lebih baik. Hal ini merupakan upaya dalam mengimplementasikan “Visi dan Misi” PT Bank JTrust Indonesia Tbk yang selama ini telah disosialisasikan secara menyeluruh melalui kegiatan operasional dan budaya perusahaan, sebagai berikut:

Visi

”Menjadi 10 Bank teratas di Indonesia dengan rasio keuntungan tertinggi terhadap aset yang memiliki inovasi teknologi keuangan yang unik untuk menyediakan pengalaman terbaik bagi nasabah, memberikan kontribusi bagi perkembangan ekonomi masyarakat Indonesia.”

Misi

- Terus meningkatkan pelayanan melalui pengembangan teknologi dan proses bisnis.
- Menyediakan layanan yang unik, inovatif dan tercepat yang dapat memuaskan pelanggan.
- Mendukung profesional yang memiliki kinerja tinggi yang akan terus dapat meningkatkan nilai *stakeholder*.

PT Bank JTrust Indonesia Tbk akan terus menciptakan lingkungan kerja yang mendukung orang-orang yang bermotivasi tinggi serta terus memberikan pengalaman perbankan yang baik melalui solusi yang ditujukan untuk masing-masing nasabah dengan *core value* **”SUPERNOVA TEAM”** sebagai perwujudan dari:

that insofar has been socialized entirely through corporate’s operation and culture, as follow:

Vision:

”Become the top-10 Bank in Indonesia with the highest profit to asset ratio that has a unique financial technology innovation in providing the best experience for the customers, provide contribution for Indonesia’s economic development.”

Mission

- Continuously improve the service through technological development and business process.
- Provide a unique, innovative, and fastest service that satisfy the consumers.
- Support professionals that has high performance that will continuously increase stakeholders’ value.

PT Bank JTrust Indonesia Tbk will contentiously creates working environment that support high motivated personnels as well as continuously provide better banking experience through solutions that dedicated for each customers with **”SUPERNOVA TEAM”** core value as the realization of:

SPEED

Speed

Selalu mempertimbangkan bagaimana memberikan 'kecepatan' dalam setiap aspek (layanan kepada pelanggan, hasil kerja, membalas e-mail, dll.), tidak perlu sempurna, kecepatan cukup lebih penting dibandingkan sempurna.

UNIQUENESS

Business Process, Value Added, Technology

- Menjadi unik di industri perbankan dengan memiliki nilai jual yang unik di dalam pekerjaan yang kita lakukan dan diri kita sendiri.
- Selalu memiliki gairah dalam pikiran anda untuk mengubah segala sesuatunya lebih baik dan selalu melihat cara yang lebih baik dalam melakukan pekerjaan anda dengan menambahkan nilai yang memberikan manfaat pada bisnis kita untuk mendukung eksistensi keunikan kita.
- Menyediakan teknologi keuangan terbaik yang memberikan solusi keuangan yang unik.

PROFESSIONALISM

Politeness, Efficiency, Punctual, Passion, Fairness

- Bersikaplah sopan mengenai apapun, jangan kasar/kecewa.
- Bersikap hormat satu sama lain.
- Jadilah efisien dalam apapun yang anda lakukan dalam pekerjaan anda.
- Waktu adalah uang, jadi, tepat waktu dalam segala hal dan jangan sia-siakan sumber daya berharga orang lain dan milik anda sendiri.

INNOVATION

Innovative

Selalu menjadi inovatif, jangan terpaku pada cara lama/kebiasaan lama, selalu mencoba untuk menciptakan metode baru untuk melewati situasi.

TEAM WORK

Teamwork, Transparent

- Kerjakan prioritas anda bersama dengan tim anda dan memaksimalkan hasilnya, jangan bergantung hanya pada diri anda sendiri.
- Jangan menyembunyikan/menghindari sesuatu dan jadilah transparan di dalam semua aspek.

Tujuan/Manfaat Penerapan Tata Kelola Bank

Penerapan Tata Kelola pada PT Bank JTrust Indonesia Tbk merupakan persyaratan utama yang bertujuan/bermanfaat untuk:

- Melindungi dan memperhatikan kepentingan semua pihak/pemangku kepentingan (*stakeholders*) serta melindungi Bank dari intervensi politik dan tuntutan hukum.
- Meningkatkan kesungguhan manajemen dalam menerapkan prinsip dasar tata kelola yang baik dan kehati-hatian dalam pengelolaan Bank.

SPEED

Speed

Continuously considers on how to provide 'speed' in each aspect (customer service, output, replying e-mail, etc), does not require perfectness, speed is more important than perfect.

UNIQUENESS

Business Process, Value Added, Technology

- Become unique in banking industry with owning a unique selling value in the work that we do and ourselves.
- Always has passion in your mind to change every aspect to become better and always find a better way in carrying out your work by adding value that provide benefit for our business to support the existence of our uniqueness.
- Provide the best financial technology that provide a unique financial solution.

PROFESSIONALISM

Politeness, Efficiency, Punctual, Passion, Fairness

- Act polite on anything, do not rude/disappointed.
- Respect each other.
- Efficient in anything that you do in your work
- Time is money, hence, punctual in every aspect and do not waste other people's precious resources and your own.

INNOVATION

Innovative

Always become innovative, do not trapped in old way/habit, always try to create new method to provide solution.

TEAM WORK

Teamwork, Transparent

- Carry out your priority with your team and maximise the result, do not rely only on your own.
- Do not hide/avoid something and become transparent in every aspect.

Objectives/Benefits of Implementing Good Corporate Governance

The Implementation of Good Corporate Governance in PT Bank JTrust Indonesia Tbk is a key requirement that aims/benefits to:

- Protect and take care the interests of all stakeholders and keep the Bank away from political intervention and lawsuit.
- Improve the seriousness of the Bank's management in applying the basic principles of good corporate governance and prudence in Bank management.

- Memperbaiki perilaku Kerja, meningkatkan daya saing/kinerja Bank, efisiensi dan pelayanan kepada pemangku kepentingan.
- Menarik minat, kepercayaan investor maupun mitra usaha lainnya.
- Memaksimalkan nilai tambah bagi *shareholder* (*maximizing shareholder values*) atau memenuhi kepentingan *shareholders* atas peningkatan *shareholder values* (nilai saham dan dividen).

Dasar Penerapan Tata Kelola Bank Umum

Penerapan Tata Kelola PT Bank JTrust Indonesia Tbk mengacu pada standar industri perbankan secara umum, dengan berpedoman pada berbagai ketentuan dan peraturan perundang-undangan meliputi:

- Undang-Undang Republik Indonesia Nomor 7 Tahun 1992 tentang Perbankan sebagaimana telah diubah dengan Undang-Undang Nomor 10 Tahun 1998.
- Undang-Undang Republik Indonesia Nomor 40 Tahun 2007 tentang Perseroan Terbatas.
- Peraturan Otoritas Jasa Keuangan Nomor 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola Bagi Bank Umum.
- Surat Edaran Otoritas Jasa Keuangan Nomor 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola Bagi Bank Umum.
- Peraturan Otoritas Jasa Keuangan Nomor 29/POJK.04/2016 tanggal 29 Juli 2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik.
- Surat Edaran Otoritas Jasa Keuangan Nomor 30/SEOJK.04/2016 tanggal 3 Agustus 2016 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.
- Peraturan Otoritas Jasa Keuangan Nomor 45/POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi Bagi Bank Umum.
- Surat Edaran Otoritas Jasa Keuangan Nomor 40/SEOJK.03/2016 tanggal 26 September 2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi Bagi Bank Umum.
- Peraturan Otoritas Jasa Keuangan Nomor 21/POJK.04/2015 tanggal 16 November 2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka.
- Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.04/2015 tanggal 17 November 2015 tentang Pedoman Tata Kelola Perusahaan Terbuka.
- Peraturan Otoritas Jasa Keuangan Nomor 6/POJK.03/2015 tanggal 31 Maret 2015 tentang Transparansi dan Publikasi Laporan Bank sebagaimana telah diubah dengan Peraturan Otoritas Jasa Keuangan Nomor 32/POJK.03/2016 tanggal 8 Agustus 2016.

- Improve working behavior, enhancing the Bank's competitiveness/performance, efficiency and service to stakeholders.
- Create interest, trust from investors and other business partners.
- Maximize shareholder values or meet the interests of shareholders on increasing shareholder values (share value and dividends).

Legal Basis for Implementation of Commercial Bank Governance

The implementation of PT Bank JTrust Indonesia Tbk governance refers to the banking industry standard in general, based on various laws and regulations including;

- Law on the Republic of Indonesia No. 7 of 1992 concerning Banking as amended by Law No. 10 of 1998.
- Law of the Republic of Indonesia No. 40 of 2007 on Limited Liability Company.
- Regulation of the Financial Services Authority 55/POJK.03/2016 dated December 7, 2016 concerning Good Corporate Governance Implementation for Commercial Banks.
- Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Good Corporate Governance for Commercial Banks.
- Regulation of the Financial Services Authority No. 29/POJK.04/2016 dated July 29, 2016 regarding the Issuer's Annual Report or Public Company.
- Circular Letter of the Financial Services Authority No. 30/SEOJK.04/2016 dated August 3, 2016 regarding Form and Content of Annual Report of Issuers or Public Companies.
- Regulation of the Financial Services Authority No. 45/POJK.03/2015 dated December 23, 2015 on the Application of Good Corporate Governance in the Provision of Remuneration for Commercial Banks.
- Circular Letter of the Financial Services Authority No. 40/SEOJK.03/2016 dated September 26, 2016 regarding the Implementation of Good Corporate Governance in the Provision of Remuneration for Commercial Banks.
- Regulation of the Financial Services Authority No. 21/POJK.04/2015 dated November 16, 2015 on the Implementation of Open Corporate Governance Guidelines.
- Circular Letter of the Financial Services Authority No. 32/SEOJK.04/2015 dated November 17, 2015 on the Open Corporate Governance Guidelines.
- Regulation of the Financial Services Authority No. 6/POJK.03/2015 dated March 31, 2015 on Transparency and Publication of Bank Reports as amended on the Regulation of the Financial Services Authority No. 32/POJK.03/2016 dated August 8, 2016.

- Surat Edaran Otoritas Jasa Keuangan Nomor 43/SEOJK.03/2016 tanggal 28 September 2016 tentang Transparansi dan Publikasi Laporan Bank Umum Konvensional.
- Peraturan Otoritas Jasa Keuangan Nomor 31/POJK.04/2015 tentang Keterbukaan atas Informasi atau Fakta Material oleh Emiten atau Perusahaan Publik.
- Anggaran Dasar PT Bank JTrust Indonesia Tbk beserta dengan perubahan-perubahannya.

Internalisasi dari berbagai peraturan perundang-undangan dan pedoman di atas kedalam kebijakan internal Bank merupakan komitmen dari Dewan Komisaris dan Direksi serta seluruh karyawan.

Prinsip-Prinsip/Asas Penilaian Faktor Tata Kelola

Pelaksanaan Tata Kelola di PT Bank JTrust Indonesia Tbk mencakup implementasi dari 5 (lima) prinsip dasar/asas penilaian faktor tata kelola yang dikenal dengan istilah "TARIF" yakni: Transparansi (*Transparency*), Akuntabilitas (*Accountability*), Pertanggungjawaban (*Responsibility*), Independensi (*Independency*), dan Kewajaran dan kesetaraan (*Fairness*), sebagai berikut:

1. Keterbukaan/Transparansi (*Transparency*)

Memiliki unsur pengungkapan (*disclosure*) dan penyediaan informasi secara tepat waktu, memadai, jelas, akurat, dan dapat diperbandingkan serta mudah diakses oleh pemegang saham dan pemangku kepentingan (*stakeholders*). Keterbukaan dalam mengemukakan informasi yang material dan relevan, serta keterbukaan dalam melaksanakan proses pengambilan keputusan dimana informasi harus disampaikan tepat waktu, memadai, jelas, akurat, dan dapat dibandingkan. Informasi tersebut juga harus mudah diakses *stakeholders* sesuai dengan haknya.

2. Akuntabilitas (*Accountability*)

Memiliki unsur kejelasan fungsi dalam organisasi dan cara mempertanggungjawabkannya. Untuk memastikan akuntabilitas, maka fungsi, tugas, dan wewenang berbagai fungsi di dalam organisasi, serta pertanggungjawabannya telah diatur dengan jelas sesuai dengan Pedoman Tata Kerja masing-masing fungsi sehingga kinerja semua bagian organisasi dapat dipertanggungjawabkan secara sehat/transparan dan terukur, serta memastikan ada tidaknya *check and balance* dalam pengelolaan Bank. Selain itu Bank juga harus memiliki ukuran kinerja dari semua jajarannya berdasarkan ukuran yang disepakati secara konsisten sesuai dengan nilai perusahaan (*corporate values*), sasaran usaha, dan strategi Bank, serta memiliki *reward and punishment system*.

- Circular Letter of the Financial Services Authority No. 43/SEOJK.03/2016 dated September 28, 2016 concerning the Transparency and Publication of Conventional Commercial Bank Reports.
- Regulation of the Financial Services Authority No. 31/POJK.04/2015 on Disclosure of Material Information or Facts by Issuers or Public Companies.
- The Articles of Association of PT Bank JTrust Indonesia Tbk and its amendments.

Internalization of other aforementioned provisions and guidelines in the Bank's internal policies is a commitment from the Board of Commissioners and Directors as well as entire employees.

Principles of Assessment of Governance Factors

The GCG implementation in PT Bank JTrust Indonesia Tbk. covers the implementation of 5 (five) basic principles, known as "TARIF" namely: Transparency, Accountability, Responsibility, Independency, and Fairness, which can be elaborated as follows:

1. Transparency

Having elements of disclosure and information provision in a timely, sufficient, clear, accurate, and comparable manners, as well as easily accessible by shareholders and stakeholders. Transparency in expressing material and relevant information, as well as transparency in implementing the decision making process in which the information must be submitted on time, clear, accurate, and can be compared. Such information should also be easily accessible to stakeholders in accordance with their rights.

2. Accountability

Maintain clarity in functions within the organizations and methods of accountabilities. In order to ensure the accountabilities, all relevant functions, duties, and authorities of various functions within the organization as well as accountabilities are clearly defined in line with the Guideline of each function. Therefore the performance of all departments within the organization are accountable in a transparent and measurable manner as well as ensuring the checks and balances in the management of the Bank. In addition, the Bank should having performance parameters for all ranks based on agreed standards that are consistent with the corporate values, business targets and Bank strategy, as well as having a reward and punishment system.

3. Pertanggungjawaban/ Responsibilitas (Responsibility)

Memiliki unsur kepatuhan terhadap peraturan perundang-undangan dan ketentuan internal bank serta bertanggung jawab. Dalam hal ini Bank harus memegang prinsip *prudential banking practices*. Prinsip tersebut dijalankan sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku agar tetap terjaga kelangsungan usahanya. Bank juga harus mampu bertindak sebagai *good corporate citizen* (perusahaan yang baik).

4. Independensi (Independency)

Memiliki unsur kemandirian dari dominasi pihak lain dan objektivitas dalam melaksanakan tugas dan kewajiban. Dalam hal ini pengelolaan Bank dilakukan secara profesional tanpa pengaruh/tekanan dari pihak manapun. Selain itu, Bank harus mampu menghindari terjadinya dominasi yang tidak wajar oleh *stakeholders*. Pengelola Bank tidak boleh terpengaruh oleh kepentingan sepihak dan harus menghindari segala bentuk benturan kepentingan (*conflict of interest*).

5. Kewajaran (Fairness)

Memiliki unsur perlakuan yang adil dan kesempatan yang sama sesuai dengan proporsinya. Bank harus memperhatikan kepentingan seluruh *stakeholders* berdasarkan asas kesetaraan dan kewajaran (*equal treatment*), serta memberikan kesempatan kepada *stakeholders* untuk memberikan masukan bagi kepentingan Bank, serta memiliki akses terhadap informasi sesuai dengan prinsip keterbukaan.

Dalam rangka memastikan penerapan 5 (lima) prinsip dasar Tata Kelola yang baik, Bank secara berkala/semesteran sesuai dengan periode penilaian Tingkat Kesehatan Bank melakukan penilaian sendiri (*self assessment*) penerapan Tata Kelola yang paling sedikit meliputi 11 (sebelas) faktor utama dalam penilaian penerapan tata kelola sebagai berikut:

1. Pelaksanaan tugas dan tanggung jawab Direksi;
2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris;
3. Kelengkapan dan pelaksanaan tugas Komite;
4. Penanganan benturan kepentingan;
5. Penerapan fungsi kepatuhan Bank;
6. Penerapan fungsi audit intern;
7. Penerapan fungsi audit ekstern;
8. Penerapan manajemen risiko termasuk sistem pengendalian intern;

3. Responsibility

Having elements of compliance toward the laws and regulations and the internal regulations of the bank as well as being accountable. In this case, the Bank should uphold the principles of prudential banking practices. The principles were implemented according to the applicable rules and regulations in order to maintain the continuity of the Bank's business. The Bank should also be able to act as a good corporate citizen.

4. Independency

Be independent form other parties and be objective in performing the duties and fulfilling the obligations. In this case, the Bank's management is done professionally without any influence/pressure from any party. In addition, the Bank should be able to avoid an unreasonable domination by stakeholders. The Bank's management should not be affected by the unilateral interests and shall avoid any conflicts of interest.

5. Fairness

Providing equal treatments and equal opportunities proportionately. The Bank should put the interests of all stakeholders into consideration, based on the principles of equal and fair treatment and provide opportunity for stakeholders to provide input for the benefit of the Bank, as well as to have access to information in accordance with the principle of Transparency.

In ensuring the implementation of these 5 (five) basic principles of GCG, periodically/each semester according to the assessment period of Bank's Health Level in conducting self assessment, the implementation of good governance at least cover 11 (eleven) main factors in the assessment of governance implementation as follow:

1. Implementation of Board of Director's duties and responsibilities;
2. Implementation of Board of Commissioners' duties and responsibilities;
3. Completeness and implementation of Committee's duties;
4. Resolution of conflict of interests;
5. Implementation of the Bank's compliance functions;
6. Implementation of internal audit;
7. Implementation of external audit;
8. Implementation of risk management including internal control system;

9. Penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large exposure*);
10. Transparansi kondisi keuangan dan non keuangan Bank, laporan pelaksanaan tata kelola dan pelaporan internal;
11. Rencana strategis Bank.

Pelaksanaan penilaian sendiri (*self assessment*) terhadap pemenuhan penerapan 5 (lima) prinsip dasar tata kelola Bank yang baik dilakukan secara komprehensif dan terstruktur serta dikelompokkan dalam *Governance System* yang meliputi 3 (tiga) aspek *Governance* sebagai suatu proses yang berkesinambungan, yaitu:

1. Governance Structure

Governance structure merupakan suatu sistem yang mengatur bagaimana PT Bank JTrust Indonesia Tbk diarahkan dan dikendalikan untuk meningkatkan kinerja bisnis secara *accountable* dan mewujudkan nilai pemegang saham dalam jangka panjang (*sustainable*), dengan tidak mengabaikan kepentingan *stakeholders* lainnya. Struktur tata kelola dimaksud adalah RUPS, Dewan Komisaris, Direksi, Komite-Komite dan satuan kerja pada Bank. Struktur tata kelola juga didukung kecukupan atau ketersediaan infrastruktur kebijakan dan prosedur yang senantiasa mengacu dan disesuaikan dengan peraturan perundang-undangan yang berlaku, sistem informasi manajemen, serta tugas pokok dan fungsi (tupoksi) masing-masing struktur organisasi.

2. Governance Process

Penerapan Tata Kelola Bank dilaksanakan dengan aturan main yang jelas dalam suatu bentuk mekanisme atau lazim disebut *governance process* yang dapat dipertanggungjawabkan dan sekaligus diperlukan dengan tujuan untuk menilai efektivitas proses pelaksanaan prinsip dasar tata kelola yang didukung oleh kecukupan struktur dan infrastruktur tata kelola PT Bank JTrust Indonesia Tbk sehingga menghasilkan *outcome* yang diharapkan. *Governance process* merupakan aktivitas-aktivitas yang dilakukan untuk melaksanakan aturan main, prosedur dan hubungan yang jelas antara pihak yang mengambil keputusan dengan pihak yang akan melakukan kontrol (pengawasan) terhadap *keputusan* tersebut. Hal ini demi menjamin dan/atau mengawasi berjalannya sebuah *governance system*, sehingga diharapkan aktivitas perusahaan dapat berjalan secara sehat dan efektif sesuai dengan arah yang telah ditetapkan dan/atau dapat meminimalisir terjadinya benturan kepentingan dan timbulnya risiko dari suatu kebijakan yang telah diputuskan.

9. Fund provision to the related parties and provision of substantial amount of funds (large exposures);
10. Transparency of the Bank's financial and non-financial conditions, GCG implementation report and internal reporting;
11. The Banks' strategic plan.

The implementation of self assessment toward the fulfilling the implementation of 5 (five) basic principle of the Bank's good corporate governance is carried out comprehensively and structurally as well as separated into Governance System that covers 3 (three) Governance aspect as a continuous process as follow:

1. Governance Structure

Governance structure is a system that arranges how PT Bank JTrust Indonesia Tbk. is directed and controlled to improve the business performance accountability and to bring about values for shareholders in a sustainable manner, taking into account the interests of other stakeholders. The governance structure in question is the GMS, the Board of Commissioners, Board of Directors, Committees and work units at the Bank. The governance structure also needs to be supported by adequacy or availability of infrastructure for policies and procedures that are constantly referring to and adapted to the legislation in force, management information systems, as well as the duties and functions (TOR), of each organizational structure.

2. Governance Process

The GCG implementation requires clear procedures in the form of mechanism that is normally referred as accountable-governance process, at the same time is also required for the purpose of assessing the effectiveness of implementation of GCG principles supported by the adequacy of structures and governance infrastructures of PT Bank JTrust Indonesia, Tbk., in order to produce outcome that match the expectations. The governance process covers the activities performed to implement the rules, procedures, as well as clear relationship between the decision makers and the controllers on such decisions. This is implemented in order to ensure and/or supervise the process of governance system, thus it is expected that the company activities can be ran in a sound and effective manners in line with the directions and/or is able to minimize conflict of interest. Additionally, it is expected that these activities will minimize the risks emerging from the policies made.

3. Governance Outcome

Terdapat 2 (dua) *outcomes* yang diharapkan dari penerapan tata kelola Bank, yaitu:

- Mampu meningkatkan kinerja perusahaan (*improved performance*).
- Mampu mengurangi konflik kepentingan dalam perusahaan (*reduced conflict of interest*).

Mengacu kepada ketentuan Otoritas Jasa Keuangan, *Governance Outcome* bertujuan untuk menilai kualitas *outcome* yang memenuhi harapan Pemangku Kepentingan PT Bank JTrust Indonesia Tbk yang merupakan hasil proses penerapan prinsip tata kelola yang baik yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank.

Sebagaimana tercantum dalam POJK Nomor 4/POJK.03/2016 tanggal 26 Januari 2016 dan SEOJK Nomor 14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Tingkat Kesehatan Bank Umum, Bank secara berkala/semesteran menyampaikan Laporan Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Bank berikut lampiran kertas kerjanya untuk penyusunan dan penyampaian Laporan Tingkat Kesehatan Bank Berdasarkan Tingkat Risiko (*Risk Based Bank Rating*) baik bank secara individual maupun konsolidasi kepada Otoritas Jasa Keuangan (OJK).

Proses Penerapan Tata Kelola Bank

Penerapan Tata Kelola PT Bank JTrust Indonesia Tbk senantiasa dijalankan secara konsisten dan berkelanjutan dengan didukung komitmen yang kuat dari organ perusahaan dan jajaran di bawahnya. Dalam melaksanakan komitmen atau proses penerapan tata kelola Bank selama ini antara lain:

1. Governance Commitment

- Memiliki rumusan visi dan misi yang jelas dan realistis, sebagaimana visi dan misi PT Bank JTrust Indonesia Tbk yang telah ditetapkan dan disosialisasikan.
- Memiliki Anggaran Dasar, *Good Corporate Governance Charter*.
- Memiliki nilai-nilai perusahaan (*Corporate Values*) yang menggambarkan sikap moral Bank yang baik dalam melaksanakan usaha.
- Memiliki rumusan etika bisnis dan pedoman perilaku perusahaan (*Code of Conduct/ Etika Korporasi*) yang penyusunannya dilakukan dengan melibatkan organ perusahaan dan jajaran di bawahnya. Etika bisnis dan pedoman perilaku dilaksanakan secara berkesinambungan dan konsisten sehingga membentuk budaya perusahaan yang merupakan manifestasi dari nilai-nilai perusahaan.

3. Governance Outcome

There are 2 (two) outcomes expected from the GCG implementation, namely:

- Ability to improve business performance.
- Ability to reduce conflict of interests within the company.

Referring to the regulations of Financial Services Authority, the purpose of governance outcome is to assess the outcome quality in conjunction with fulfilling the expectation of PT Bank JTrust Indonesia, Tbk. Stakeholders, which was the outcome of GCG principles implementation supported by adequate structure and infrastructure of the Bank's governance.

As stipulated in POJK Number 4/POJK/03/2016 dated 26 January 2016 and SEOJK Number 14/SEOJK.03/2017 dated March 17, 2017 on the Assessment on Commercial Bank's Health Level, the Bank periodically/every semester deliver Self Assessment Result Report on the Bank's Governance Implementation as well as the working paper as appendix to formulate and deliver Risk Based Bank Rating both bank as individual as well as consolidated to the Financial Services Authority (OJK).

The Bank's Process of GCG Implementation

The implementation of GCG at PT Bank JTrust Indonesia, Tbk. has been carried out in a consistent and sustainable manners supported by the strong commitment of the corporate organs and all ranks below them. The basic principle in performing the commitment throughout these times include:

1. Governance Commitment

- Having clear and realistic definition of the Bank's vision and missions, as defined and socialized by PT Bank JTrust Indonesia, Tbk.
- Having Articles of Association, Good Corporate Governance Charter.
- Having corporate values that reflects the good moral attitude of the Bank in running its business.
- Formulating the Bank's business ethics and Code of Conduct by involving the company organs and all ranks below them. Business ethics and code of conducts shall be applied continuously and consistently to forge the corporate culture as the manifestation of corporate values.

2. Governance Structure

- Memiliki pedoman tata kerja Dewan Komisaris dan tata kerja Direksi dalam menjalankan peran dan tugasnya, termasuk pemenuhan jumlah dan komposisi Dewan Komisaris, Direksi, Komite-komite di bawah Dewan Komisaris dan Direksi.
- Penguatan *Risk Management, Compliance* dan *Internal Control*.
- Penyempurnaan struktur organisasi untuk menjamin terlaksana *check and balance*.

3. Governance Mechanism

- Dalam fungsinya sebagai lembaga intermediasi dan sebagai bagian dari dunia bisnis peduli dan berperan aktif dalam menjaga kelestarian sumber daya alam dan lingkungan hidup.
- Penuangan Prinsip-prinsip Tata Kelola Bank dalam Kebijakan, dan Pedoman/Prosedur sebagai acuan dalam menjalankan usaha, serta senantiasa dievaluasi sesuai kebutuhan dan perkembangan ketentuan yang berlaku.
- Memiliki peraturan perusahaan atau perjanjian kerja bersama yang dapat menjamin kepastian hak dan kewajiban para pihak sehingga dapat mendukung suasana kerja yang kondusif.
- Penegakan *Reward and Punishment*.
- Transparansi kondisi keuangan dan non keuangan.
- Transparansi informasi Produk Bank dan penggunaan data pribadi nasabah.
- Transparansi tata cara pengaduan nasabah dan penyelesaian sengketa kepada nasabah.
- Penerapan Strategi *Anti Fraud* di antaranya mengimplementasikan *Whistleblowing System* yang berfungsi sebagai sarana untuk menerima laporan dan pengaduan indikasi *fraud* yang diketahui serta saran dan kritik dari pegawai dan pemangku kepentingan lainnya.

4. Sosialisasi dan Evaluasi

- Internalisasi *Corporate Values*.
- Sosialisasi inisiatif strategis, kebijakan, peraturan, dan lain-lain.
- Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Bank.
- Pelaporan Pelaksanaan Tata Kelola Bank.
- Penilaian/*Assessment* Penerapan Tata Kelola Bank oleh Pihak Independen.

2. Governance Structure

- Having guideline for the Board of Commissioners and Board of Directors in performing their roles and duties, including the fulfillment of the number and composition of the Board of Commissioners, the Board of Directors, the Committees under the Board of Commissioners and the Board of Directors.
- Strengthening the Risk Management Compliance and Internal Control.
- Improving organizational structure to ensure check and balance mechanism.

3. Governance Mechanism

- In assuming the functions as an intermediary institution and as part of the business world, the Bank concerns with and actively involves in preserving the sustainability of natural resources and environments.
- Inserting GCG Principles in the Policy, and Guidelines/Procedures, that serves as reference in conducting business, and is constantly being evaluated according to the needs and developments of prevailing regulations.
- Keeping company regulations or collective labor agreement, which ensure the certainty of rights and obligations of each parties involved, thus enable to support conducive working environment.
- Applying Reward and Punishment.
- Transparency of financial and non-financial conditions.
- Transparency of Bank Product information and use of personal data of customers.
- Transparency of financial and non-financial conditions.
- Adopting Anti Fraud Strategy including by implementing Whistleblowing System that serves as a means to receive reports and complaints of known fraud indications, as well as receiving suggestions and criticism from employees and other stakeholders.

4. Socialization and Evaluation

- Internalization of Corporate Values.
- Socialization of strategic initiatives, policies, regulations, and many more.
- Self-Assessment on GCG Implementation.
- Reporting on the Implementation of Good Corporate Governance.
- Assessment on the Implementation of Good Corporate Governance by Independent Parties.

BAB II RAPAT UMUM PEMEGANG SAHAM (RUPS), PELAKSANAAN TUGAS DEWAN KOMISARIS DAN DIREKSI

CHAPTER II General Meeting of Shareholders (GMS), Implementation of Board of Commissioners and Board of Directors Tasks

2.1 Rapat Umum Pemegang Saham (RUPS)

Rapat Umum Pemegang Saham (RUPS) merupakan hirarki/organ tertinggi dalam organisasi Perusahaan Terbuka yang mempunyai kewenangan yang tidak diberikan kepada Direksi atau Dewan Komisaris dalam batas-batas yang ditentukan dalam Undang-Undang RI Nomor 40 Tahun 2007 tentang Perseroan Terbatas, dan/atau Anggaran Dasar Perseroan.

RUPS adalah forum bagi pemegang saham untuk mengambil keputusan dan melaksanakan pengawasan terhadap kinerja Bank secara keseluruhan.

RUPS wajib diselenggarakan sesuai dengan Anggaran Dasar Perseroan dan Peraturan Perundang-undangan yang berlaku terdiri dari:

1. RUPS Tahunan
Wajib diselenggarakan dalam jangka waktu paling lambat 6 (enam) bulan setelah tahun buku berakhir.
2. RUPS Lainnya/RUPS Luar Biasa
Dapat diselenggarakan pada setiap waktu berdasarkan kebutuhan untuk kepentingan perusahaan.

Mengacu kepada POJK Nomor 32/POJK.04/2014 tanggal 8 Desember 2014 tentang Rencana dan Penyelenggaraan RUPS Perusahaan Terbuka, terdapat beberapa tahapan dalam pelaksanaan RUPS sebagai berikut:

- a. Perusahaan Terbuka wajib terlebih dahulu menyampaikan pemberitahuan mata acara rapat kepada OJK paling lambat 5 (lima) hari kerja sebelum pengumuman RUPS, dengan tidak memperhitungkan tanggal pengumuman RUPS. Dalam hal terdapat perubahan mata acara RUPS tersebut, Perusahaan Terbuka wajib menyampaikan perubahan mata acara yang dimaksud kepada OJK paling lambat pada saat pemanggilan RUPS.
- b. Perusahaan Terbuka wajib melakukan pengumuman RUPS kepada pemegang saham paling lambat 14 (empat belas) hari sebelum pemanggilan RUPS, dengan tidak memperhitungkan tanggal pengumuman dan tanggal pemanggilan.
- c. Dalam hal RUPS diselenggarakan atas permintaan pemegang saham kepada Direksi atau Dewan Komisaris, pengumuman RUPS harus memuat:

2.1. General Meeting of Shareholders (GMS)

General Meeting of Shareholders (GMS) is the highest hierarchy/organ in a Public Company organization, which has the authorities not granted to the Board of Directors and Board of Commissioners subject to limitations stipulated under the Laws of the Republic of Indonesia No. 40 of 2007 concerning Limited Liability Companies, and/or the Articles of Association.

The GMS is a forum for shareholders to exercise their rights to make decisions and to monitor the Bank's overall performance.

The General Meeting of Shareholders shall be held in accordance with the Company's Articles of Association and the prevailing laws and regulations consisting of:

1. Annual GMS
Must be held within 6 (six) months after the end of the book year.
2. Other GMS/Extraordinary GMS
Can be held at any time if deemed necessary for the benefit of the company.

Referring to Regulation of Financial Services Authority No. 32/POJK.04/2014 dated December 8, 2014 on the Planning and Organizing GMS for Public Company, there are several stages in the execution of GMS as follows:

- a. The Public Company is obliged to convey notification of the meeting agenda to the FSA no later than 5 (five) working days prior to the announcement of the GMS, excluding the date of the GMS announcement. In the event of any change in the agenda of the GMS, the Public Company must submit the agenda to the FSA, at the latest on the date of the GMS invitation.
- b. The Public Company should make the announcement of the GMS to the shareholders no later than 14 (fourteen) days prior to the summon of the GMS, excluding the date of the announcement and the date of the summons.
- c. In the event that the GMS is held upon the request of shareholders to the Board of Directors or Board of Commissioners, the announcement of the GMS should include:

- Ketentuan pemegang saham yang berhak hadir dalam RUPS.
- Ketentuan pemegang saham yang berhak mengusulkan mata acara rapat.
- Tanggal penyelenggaraan RUPS.
- Tanggal pemanggilan RUPS.
- Informasi bahwa Perusahaan Terbuka menyelenggarakan RUPS karena adanya permintaan dari pemegang saham.

Pengumuman RUPS bagi Perusahaan Terbuka yang sahamnya tercatat pada Bursa Efek dilakukan paling kurang melalui 1 (satu) surat kabar harian berbahasa Indonesia yang berperedaran nasional, situs *web* Bursa Efek, dan situs *web* Perusahaan Terbuka, dalam bahasa Indonesia dan bahasa asing, dengan ketentuan paling kurang bahasa Inggris. Bukti pengumuman RUPS tersebut wajib disampaikan kepada OJK paling lambat 2 (dua) hari kerja setelah pengumuman RUPS, disertai salinan surat permintaan penyelenggaraan RUPS.

- d. Perusahaan Terbuka wajib melakukan pemanggilan kepada pemegang saham paling lambat 21 (dua puluh satu) hari sebelum RUPS, dengan tidak memperhitungkan tanggal pemanggilan dan tanggal RUPS. Bagi Perusahaan Terbuka yang sahamnya tercatat dalam Bursa Efek, pemanggilan kepada pemegang saham paling kurang melalui 1 (satu) surat kabar harian berbahasa Indonesia yang berperedaran nasional, situs *web* Bursa Efek, dan situs *web* Perusahaan Terbuka, dalam bahasa Indonesia dan bahasa asing, dengan ketentuan paling kurang bahasa Inggris. Bukti pemanggilan RUPS dimaksud, wajib disampaikan kepada OJK paling lambat 2 (dua) hari kerja setelah pemanggilan RUPS.
- e. Bahan mata acara rapat bagi pemegang saham wajib disediakan oleh Perusahaan Terbuka sejak tanggal dilakukannya pemanggilan RUPS sampai dengan penyelenggaraan RUPS. Bahan mata acara rapat tersebut dapat berupa salinan dokumen fisik dan/atau salinan dokumen elektronik yang dapat diakses melalui situs *web* Perusahaan Terbuka.
- f. Perusahaan Terbuka wajib melakukan ralat pemanggilan RUPS jika terdapat perubahan informasi dalam pemanggilan RUPS yang telah dilakukan sebelumnya. Dalam hal ralat pemanggilan RUPS memuat informasi atas perubahan tanggal penyelenggaraan RUPS dan/atau penambahan mata acara RUPS, Perusahaan Terbuka wajib melakukan pemanggilan ulang RUPS dengan tata cara pemanggilan sesuai ketentuan yang telah dilakukan sebelumnya.

- Provisions on shareholders who are entitled to attend the GMS.
- Provisions on shareholders who are entitled to propose the agenda of the meeting.
- Date of the GMS.
- The date of the GMS invitation.
- Information that a Public Company conducts a GMS due to a request from a shareholder.

The announcement of GMS for Public Companies, whose shares are listed on the Stock Exchange, shall be conducted at least through 1 (one) Indonesian daily newspaper with national circulation, the Stock Exchange website, and the Public Company website, in Indonesian and foreign languages, at least English. Proof of the announcement of the GMS shall be submitted to the FSA, no later than 2 (two) working days after the announcement of the GMS, accompanied by a copy of the request letter for the holding of the GMS.

- d. Public Company is obligated to make a summon for shareholders no later than 21 (twenty one) days prior to the General Meeting of Shareholders, excluding the date of summon and date of the GMS. For Public Companies whose shares are listed in the Stock Exchange, the summoning to the shareholders is at least through 1 (one) Indonesian language daily newspaper with national circulation, the Stock Exchange website, and the Open Company website, in Indonesian and foreign languages, provided that at least in English. Evidence of the invitation of the GMS shall be submitted to OJK no later than 2 (two) working days after the invitation of the GMS.
- e. The agenda of the meeting for shareholders shall be provided by the Public Company, from the date of the invitation of the GMS to the holding of the GMS. The agenda of the meeting may be a copy of a physical document and/or a copy of an electronic document, accessible through the Public Company website.
- f. Public companies are obliged to conduct a GMS summon revision, should there be any change of information from the previous GMS summon. In the event that the GMS invitation contains information concerning the change of the GMS and/or the agenda of the GMS, the Public Company is obliged to redial the General Meeting of Shareholders with the procedure of summoning in accordance with the preceding provisions.

- g. Setelah pelaksanaan RUPS, Perusahaan Terbuka wajib membuat risalah RUPS dan ringkasan risalah RUPS dan ditandatangani oleh pimpinan rapat dan paling sedikit 1 (satu) orang pemegang saham yang ditunjuk dari dan oleh peserta RUPS. Tanda tangan dimaksud tidak disyaratkan apabila risalah RUPS tersebut dibuat oleh notaris dalam bentuk akta berita acara RUPS. Risalah RUPS tersebut wajib disampaikan kepada OJK paling lambat 30 (tiga puluh) hari setelah RUPS diselenggarakan.
- h. Ringkasan risalah RUPS bagi Perusahaan Terbuka yang sahamnya tercatat di Bursa Efek wajib diumumkan kepada masyarakat paling kurang melalui:
- 1 (satu) surat kabar harian berbahasa indonesia berperedaran nasional.
 - Situs *web* Bursa Efek.
 - Situs *web* Perusahaan Terbuka, dalam bahasa indonesia dan bahasa asing, dengan ketentuan paling kurang bahasa Inggris.
 - Pengumuman ringkasan risalah RUPS tersebut wajib diumumkan kepada masyarakat paling lambat 2 (dua) hari kerja setelah RUPS diselenggarakan.
 - Bukti pengumuman ringkasan risalah RUPS melalui 1 (satu) surat kabar harian berbahasa Indonesia berperedaran nasional wajib disampaikan kepada OJK paling lambat 2 (dua) hari kerja setelah diumumkan.

Wewenang RUPS

Berdasarkan Undang-Undang RI Nomor 40 Tahun 2007 tentang Perseroan Terbatas, RUPS berwenang untuk:

- Mengevaluasi kinerja Dewan Komisaris dan Direksi berkaitan dengan Laporan Tahunan Perseroan atau menyetujui Laporan Tahunan termasuk Laporan Keuangan dan Laporan Tugas Pengawasan Dewan Komisaris Perseroan serta memberikan pelunasan dan pembebasan tanggung jawab (*volledig acquit et decharge*) kepada anggota Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah dilakukannya masing-masing.
- Mengambil keputusan-keputusan yang menyangkut struktur organisasi, misalnya perubahan Anggaran Dasar, penggabungan, peleburan, pengambilalihan, pemisahan, pembubaran, dan likuidasi Perseroan.
- Mengangkat dan memberhentikan anggota Dewan Komisaris dan Direksi Perseroan.

- g. Following the GMS, the Public Company shall prepare the minutes of the GMS and a summary of the minutes of the GMS signed by the chairman of the meeting and at least 1 (one) shareholder appointed from and by the GMS. Such signature shall not be required if the minutes of the GMS are made by a notary in the form of a GMS deed. The minutes of the GMS shall be submitted to FSA no later than 30 (thirty) days after the General Meeting of Shareholders is held.
- h. Summary of minutes of GMS for Public Companies whose shares are listed on the Securities Exchange must be announced to the public at least through:
- 1 (one) Indonesian language daily newspaper with national circulation.
 - Stock Exchange website.
 - Public Company Website, in Indonesian and foreign languages, subject to the terms of at least in English.
 - Announcement of the summary of the minutes of the GMS shall be announced to the public within 2 (two) working days after the General Meeting of Shareholders is held.
 - Evidence of the announcement of the summary of the minutes of the GMS through 1 (one) national circulation daily newspaper must be submitted to OJK no later than 2 (two) working days after being announced.

Authority of the GMS

Based on Law No. 40 Year 2007 regarding Limited Liability Company, GMS is authorized to:

- Evaluate the performance of the Board of Commissioners and the Board of Directors in relation to the Company's Annual Report or approve the Annual Report including the Financial Statements and the Monitoring Report of the Board of Commissioners of the Company and grant release and discharge (*acquit et decharge*) to members of the Board of Directors and Board of Commissioners of the Company on their respective management and supervisory actions.
- Making decisions related to organizational structure, such as amendment of the Articles of Association, merger, amalgamation, acquisition, spin off, dissolution and liquidation of the Company.
- Appoint and dismiss members of the Board of Commissioners and Board of Directors of the Company.

- Menetapkan gaji atau honorarium dan tunjangan lain serta *tantiem* Direksi dan Dewan Komisaris Perseroan.
- Memberi kuasa dan kewenangan kepada Dewan Komisaris untuk menunjuk Kantor Akuntan Publik (KAP), Akuntan Publik yang terdaftar di Indonesia serta yang terafiliasi dengan salah satu dari KAP Internasional dan tercatat di Otoritas Jasa Keuangan (OJK) untuk mengaudit Laporan Keuangan Perseroan dan menetapkan jumlah honorariumnya.
- Determine the salary or remuneration and other allowances and *tantiem* of the Board of Directors and Board of Commissioners of the Company.
- Grant proxy and authorization to the Board of Commissioners to appoint the Public Accounting Firm, which is registered in Indonesia and affiliated with an international public accounting firm and certified by the Financial Services Authority (FSA) of the capital market to audit the Financial Statements of the Company and determine their fees.

Hak dan Wewenang Pemegang Saham Dalam RUPS

- Pemegang Saham memiliki hak atas saham yang dimilikinya sehingga hak pemegang saham dapat dilaksanakan sesuai dengan peraturan perundang-undangan dan Anggaran Dasar Bank.
- Pemegang saham baik sendiri maupun diwakili berdasarkan surat kuasa berhak menghadiri RUPS.
- Pemegang saham yang berhak hadir dalam RUPS adalah pemegang saham yang namanya tercatat dalam daftar pemegang saham Perusahaan Terbuka 1 (satu) hari kerja sebelum pemanggilan RUPS.
- Pada saat pelaksanaan RUPS, pemegang saham berhak memperoleh informasi mata acara rapat dan bahan terkait mata acara rapat sepanjang tidak bertentangan dengan kepentingan Perusahaan Terbuka.
- RUPS dalam mata acara lain-lain tidak berhak mengambil keputusan, kecuali semua pemegang saham hadir dan/atau diwakili dalam RUPS dan menyetujui penambahan mata acara rapat. Keputusan atas mata acara rapat yang ditambahkan harus disetujui dengan suara bulat.

Tanggung Jawab Pemegang Saham

1. Pemegang saham pengendali harus dapat:
 - a. Menaruh perhatian kepada kepentingan pemegang saham minoritas dan para pemangku kepentingan sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku.
 - b. Dalam hal terdapat dugaan terjadinya pelanggaran terhadap peraturan perundang-undangan atau diminta oleh otoritas terkait, maka nama-nama pemegang saham pengendali sampai pemilik individu (*ultimate shareholders*) wajib diungkapkan kepada instansi penegak hukum tentang pemegang saham pengendali yang sebenarnya (*ultimate shareholders*) atau dalam hal diminta oleh otoritas terkait.

Rights and Authority of Shareholders in the GMS

- Shareholders have the rights to their shares so that the rights of shareholders are protected and can be implemented in accordance with the laws and regulations and the Bank's Articles of Association.
- Shareholders on their own or represented based on procuration have the rights to attend GMS.
- Shareholders entitled to attend the GMS are shareholders whose name are recorded in the shareholders list of Public Company 1 (one) working day before GMS summon.
- In the GMS forum, shareholders are entitled to obtain information related to the agenda and materials of the meeting as long as they are not contrary to the interests of the Public Company.
- GMS on other agendas is not entitled to take any decisions, unless all shareholders are present and/or represented in the GMS and approve the addition of meeting agendas. The decision on the added agenda of the meeting shall be unanimously approved.

Shareholders' Responsibility

1. Controlling shareholders should be able to:
 - a. Attending to the interests of minority shareholders and other stakeholders, in accordance with applicable laws and regulations.
 - b. In the event of any alleged violation of statutory or requested by the relevant authorities, the names of the controlling shareholders up to the ultimate shareholders shall be disclosed to law enforcement agencies, concerning the ultimate shareholders, or in case requested by the relevant authorities.

2. Pemegang saham pengendali yang memiliki saham pada beberapa Perusahaan Terbuka, perlu adanya transparansi dalam hal akuntabilitas dan hubungan antar Perusahaan Terbuka.
3. Penggunaan hak dengan baik dari pemegang saham minoritas sesuai dengan Anggaran Dasar Perseroan dan peraturan perundang-undangan.
4. Pemegang saham harus dapat:
 - a. Melakukan pemisahan antara kepemilikan harta Perusahaan Terbuka dengan kepemilikan harta pribadi.
 - b. Melakukan pemisahan fungsi sebagai pemegang saham dan sebagai anggota Dewan Komisaris atau Direksi apabila pemegang saham menjabat pada salah satu dari kedua organ tersebut.

Penyelenggaraan RUPS Selama Tahun 2018

Selama tahun 2018, PT Bank JTrust Indonesia Tbk telah menyelenggarakan 2 (dua) kali RUPS yaitu:

- a. 1 (satu) kali RUPS Tahunan (RUPST) pada tanggal 28 Juni 2018
- b. 1 (satu) kali RUPS Luar Biasa (RUPSLB) pada tanggal 20 September 2018

(1) RUPS Tahunan (RUPST)

Tata Cara Pelaksanaan RUPST Tahun 2018 dilaksanakan sesuai dengan ketentuan dalam POJK Nomor 32/POJK.04/2014 tanggal 8 Desember 2014 tentang Rencana dan Penyelenggaraan RUPS Perusahaan Terbuka.

Pada tanggal 28 Juni 2018 telah diadakan RUPST, dengan jadwal pemberitahuan, pengumuman, pemanggilan, pelaksanaan dan penyampaian hasil RUPST sebagai berikut:

Pemberitahuan Notification	Pengumuman Announcement	Pemanggilan Summon	Pelaksanaan Implementation	Ringkasan Risalah RUPS Minutes of GMS
Tanggal 15 Mei 2018 Bank menyampaikan surat Pemberitahuan rencana RUPST ke OJK. On 15 May 2018 the Bank submitted notification of AGMS to OJK.	Tanggal 22 Mei 2018 Diumumkan melalui iklan di harian Media Indonesia, situs web Bursa Efek Indonesia (melalui e-Reporting) dan situs web www.jtrustbank.co.id on 22 May 2018 it was announced via advertisements on Media Indonesia daily, Indonesia Stock Exchange website (via e-reporting) and website www.jtrustbank.co.id	Tanggal 6 Juni 2018 Diumumkan melalui iklan di harian Media Indonesia, situs web Bursa Efek Indonesia (melalui e-Reporting) dan situs web www.jtrustbank.co.id On 6 June 2018 it was announced via advertisements on Media Indonesia daily, Indonesia Stock Exchange website (via e-reporting) and website www.jtrustbank.co.id	Tanggal 28 Juni 2018 RUPST dilaksanakan pada pkl. 09.00 WIB – selesai, bertempat di Puri Ratna Room, Hotel Grand Sahid Jaya Jl. Jend. Sudirman Kav. 86 Jakarta 10220. On 28 June 2018 AGMS was held at 9 am – finish at Puri Ratna Room, Hotel Grand Sahid Jaya Jl. Jend. Sudirman Kav. 86 Jakarta 10220.	Tanggal 2 Juli 2018 Diumumkan melalui iklan di harian Media Indonesia, situs web OJK dan BEI (melalui e-Reporting) dan situs web www.jtrustbank.co.id On 2 July 2018 it was announced via advertisements on Media Indonesia daily, Indonesia Stock Exchange website (via e-reporting) and website www.jtrustbank.co.id

2. Controlling shareholders, who own shares in several Public Companies, shall be transparent in terms of accountability and relationships among the said Public Companies.
3. Proper use of the rights of minority shareholders is conducted in accordance with the Company's Articles of Association and the laws and regulations.
4. Shareholders should be able to:
 - a. Separate the ownership of assets of public Company with ownership of his/her personal assets.
 - b. Separate functions as shareholders and as members of the Board of Commissioners or Board of Directors, if the said shareholders serve as member on one of the two organs.

General Meeting of Shareholders in 2018

In 2018, PT Bank JTrust Indonesia Tbk held 2 (two) GMS:

- a. 1 (one) Annual GMS (AGMS) on June 28, 2018
- b. 1 (one) Extraordinary GMS (EGMS) on September 20, 2018

(1) Annual GMS (AGMS)

Procedure for the implementation of the 2018 AGMS is in accordance with the provisions in POJK No. 32/the Financial Services Authority Regulation No.32/POJK.0.4/2014 dated December 8, 2014 on the Plan and Implementation of the GMS of Public Company.

The AGMS was held on June 28, 2018, and the notification, announcement, summons, execution and submission of AGMS Resolutions are as follows:

Seluruh hasil RUPST dan jalannya rapat tercantum dalam akta Berita Acara RUPST tanggal 28 Juni 2018 yang dibuat oleh Notaris telah tersedia dan dapat diakses pada situs web PT Bank JTrust Indonesia Tbk *via* www.jtrustbank.co.id.

All resolutions of the AGMS and the proceedings of the Meeting listed in the Minutes of the AGMS dated 28 June 2018 made by Notary are available and accessible on the website of PT Bank JTrust Indonesia Tbk *via* www.jtrustbank.co.id.

RUPST Tahun 2018 memiliki beberapa agenda dengan hasil Keputusan yang direalisasikan sebagai berikut:

The AGMS of 2018 has several agendas with the following resolutions that have been realized:

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Agenda Pertama: Persetujuan Laporan Tahunan Direksi mengenai keadaan dan jalannya Perseroan selama Tahun Buku 2017 termasuk Laporan Pelaksanaan Tugas Pengawasan Dewan Komisaris selama Tahun Buku 2017 dan Pengesahan Laporan Keuangan Perseroan Tahun Buku 2017 sekaligus pemberian pelunasan dan pembebasan tanggung jawab sepenuhnya (<i>volledig acquit et de charge</i>) kepada Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah dijalankan selama Tahun Buku 2017;</p> <ul style="list-style-type: none"> • Setuju: 973.031.816.469.731 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.040.585 saham atau sebesar 2,82% <p>First Agenda: Approval of the Annual Report of Directors on the condition and course of the Company in Fiscal year 2017 including the Report of Board of Commissioners' Supervisory Task Implementation in Fiscal Year 2017 and Validation of the Company's Financial Statements for Fiscal Year 2017 including release and discharge (<i>volledig acquit et de charge</i>) to the Board of Directors and Commissioners for the management and supervision performed in Fiscal Year 2017;</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with votes present in the meeting • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. Menyetujui dan menerima baik Laporan Tahunan Perseroan Tahun Buku 2017, termasuk laporan Tugas Pengawasan Dewan Komisaris Perseroan, dan mengesahkan Laporan Keuangan Perseroan Tahun Buku 2017 yang telah diaudit oleh Kantor Akuntan Publik Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Rekan (a member firm of Crowe Horwath International) dengan opini Audit Tanpa Modifikasi (dahulu "Wajar Tanpa Pengecualian") sebagaimana dinyatakan dalam laporannya tertanggal 26 Februari 2018. 2. Dengan disetujuinya Laporan Tahunan Perseroan Tahun Buku 2017 tersebut, maka memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya ("<i>Vollediq acquit et decharge</i>") kepada para anggota Direksi Perseroan atas tindakan kepengurusan yang telah mereka jalankan selama Tahun Buku 2017, serta Dewan Komisaris (termasuk anggota Dewan Komisaris yang telah mengundurkan diri dalam Tahun Buku 2017) atas tindakan pengawasan yang telah mereka jalankan selama Tahun Buku 2017 sejauh tindakan tersebut tercermin dalam Laporan Tahunan dan Laporan Keuangan Perseroan tahun buku yang berakhir pada tanggal 31 Desember 2017. <ol style="list-style-type: none"> 1. To approve and accept the Company's Annual Report for the fiscal year 2017, including the report of the Supervisory Duties of the Board of Commissioners, and to ratify the Company's Financial Report for the Fiscal Year 2017 audited by Public Accountant Firm Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Crowe Horwath International) with Unmodified Opinion (previously "Unqualified Opinion") as stated in its report of February 26, 2018. 2. Upon approval of the Company's 2017 Fiscal Year Report, release and discharge ("<i>Vollediq acquit et decharge</i>") is given to the members of the Board of Directors for the management actions they have exercised during Fiscal Year 2017, and members of the Board of Commissioners (including those who have resigned in Fiscal Year 2017) for supervisory duties which they have exercised during Fiscal Year 2017 as far as such actions are reflected in the Company's Annual Report and Financial Report of the year ending December 31, 2017. 	<p>Laporan Keuangan dan Laporan Tahunan Perseroan tahun buku 2017 telah disampaikan kepada Otoritas Jasa Keuangan (OJK) dan Bursa Efek Indonesia pada tanggal 30 April 2018.</p> <p>The Company's Financial Statements and Annual Report for fiscal year 2017 have been submitted to the Financial Services Authority (OJK) and the Indonesia Stock Exchange on April 30, 2018.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Agenda Kedua: Penetapan gaji/honorarium berikut fasilitas dan tunjangan Tahun Buku 2018 untuk anggota Direksi dan Dewan Komisaris;</p> <ul style="list-style-type: none"> • Setuju: 973.031.815.987,212 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.523,104 saham atau sebesar 2,82% <p>Second Agenda: Determining salary/honorarium including facilities and allowances for Fiscal Year 2018 for members of Board of Directors and Commissioners;</p> <ul style="list-style-type: none"> • In Favor: 973,031,815,987,212 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,523,104 shares or 2.82% 	<p>Menyetujui pemberian kuasa kepada Dewan Komisaris Perseroan untuk menetapkan besarnya gaji anggota Direksi, honorarium anggota Dewan Komisaris, tantiem serta penetapan benefit lainnya bagi segenap anggota Direksi dan anggota Dewan Komisaris Perseroan untuk Tahun Buku 2018 berdasarkan rekomendasi Komite Remunerasi dan Nominasi.</p> <p>Approving authorization to the Company's Board of Commissioners to set the salary for Directors, honorarium of Commissioners, tantiem and other benefits for members of Directors and Commissioners of the Company for Fiscal Year 2018 based on the recommendation of Remuneration and Nomination Committee.</p>	<p>Berdasarkan hasil keputusan RUPS yang memberi kuasa kepada Dewan Komisaris Perseroan melalui rekomendasi Komite Remunerasi dan Nominasi untuk menetapkan besarnya gaji anggota Direksi, honorarium anggota Dewan Komisaris, dan tantiem serta penetapan benefit lainnya untuk Tahun Buku 2018. Pada tanggal 20 Maret 2017 telah ditetapkan Kebijakan Kompensasi dan Fasilitas Komisaris, Direksi dan EVP (Executive Vice President) yang ditujukan kepada Direktur Utama untuk ditindaklanjuti pelaksanaannya.</p> <p>Based on GMS decision which gives authority to the Company's Board of Commissioners through the recommendation of Remuneration and Nomination Committee to set the salary of Directors, honorarium of Commissioners, and tantiem and other allowances for Fiscal Year 2018. On 20 March 2017 the Compensation Policy and Facility for Commissioners, Directors, and EVP (Executive Vice President) was set and designated to the President Director to follow up on the implementation.</p>
<p>Agenda Ketiga: Persetujuan penunjukan Kantor Akuntan Publik untuk mengaudit Laporan Keuangan Perseroan.</p> <ul style="list-style-type: none"> • Setuju: 973.031.816.469.731 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.040.585 saham atau sebesar 2,82% <p>Third Agenda: Approval of the appointment of Public Accounting Firm to audit the Company's Financial Statements.</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<p>Melimpahkan kewenangan RUPS kepada Dewan Komisaris untuk menetapkan KAP yang mengaudit laporan keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2018, termasuk menetapkan honorarium dan persyaratan lainnya bagi KAP tersebut, serta menetapkan KAP pengganti dalam hal KAP yang telah ditunjuk dan ditetapkan tersebut, karena sebab apapun tidak dapat menyelesaikan audit laporan keuangan Perseroan untuk tahun 2018.</p> <p>Delegating the authority of the GMS to the Board of Commissioners to determine the Firm that will audit the financial statements of the Company for the financial year ended on December 31, 2018, including the honorarium and other requirements for the said Firm, and determine the replacement of the KAP in case of the designated KAP, for any reason failed to complete the audit of the Company's financial statements for 2018.</p>	<p>Berdasarkan Surat Keputusan Dewan Komisaris No. 30.01/S-KOM/Jtrust/VIII/2017 tanggal 30 Agustus 2017 Dewan Komisaris dengan rekomendasi dari Komite Audit menunjuk kembali Kantor Akuntan Publik Kosasih, Nudiyaman, Mulyadi, Tjahjo & Rekan (member of Crowe Horwath International) untuk melakukan audit atas Laporan Keuangan Perseroan per 31 Desember 2018.</p> <p>Based on the Decision Letter of the Board of Commissioners No. 30.01/S-KOM/Jtrust/VIII/2017 dated August 30, 2017, the Board of Commissioners, with recommendations from the Audit Committee, re-appointed the Public Accounting Firm Kosasih, Nudiyaman, Mulyadi, Tjahjo & Associates to audit the Company's Financial Statements as of December 31, 2018.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Agenda Keempat: Perubahan susunan pengurus Perseroan;</p> <ul style="list-style-type: none"> • Setuju: 973.031.816.469.731 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.040.585 saham atau sebesar 2,82% <p>Fourth Agenda: Changes of the Company's management;</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. Menerima pengunduran diri Bapak Ahmad Fajar sebagai Komisaris efektif sejak tanggal 1 Mei 2018, dengan ini diberikan ucapan terima kasih atas kontribusi yang telah diberikan selama menjabat di Perseroan. 2. Dengan berakhirnya masa jabatan Bapak Benny Luhur sebagai Komisaris Independen setelah ditutupnya Rapat ini, dengan ini diberikan ucapan terima kasih atas kontribusi yang telah diberikan selama menjabat di Perseroan. 3. Dengan tidak terpenuhinya persyaratan pengangkatan sebagaimana keputusan Rapat Umum Pemegang Saham Luar Biasa tanggal 23 Desember 2016, maka pengangkatan Bapak Budi T. Halim sebagai Direktur tidak menjadi efektif. 4. Menerima pengunduran diri Bapak Yosuke Tanaka sebagai Direktur efektif sejak ditutupnya Rapat Umum Pemegang Saham Tahunan Perseroan tanggal 28 Juni 2018, dengan ini diberikan ucapan terima kasih atas kontribusi yang telah diberikan selama menjabat di Perseroan. 5. Dengan demikian, susunan anggota Dewan Komisaris Perseroan dan anggota Direksi Perseroan terhitung sejak ditutupnya Rapat menjadi sebagai berikut: DEWAN KOMISARIS: Komisaris Utama: Nobiru Adachi Komisaris: Shigeyoshi Asano Komisaris Independen: Mahdi Mahmudy Komisaris Independen: Kwik Ing Hie DIREKSI: Direktur Utama: Ritsuo Ando Direktur: Felix I. Hartadi Direktur: Helmi A. Hidayat Direktur: Haryanto B.Purnomo Direktur: Rio Lanasier 6. Memberikan kuasa dan wewenang kepada Direksi Perseroan untuk menyatakan perubahan Pengurus Perseroan dalam Akta Notaris tersendiri dan menyampaikan pemberitahuan perubahan data Perseroan kepada Kementerian Hukum dan Hak Azasi Manusia Republik Indonesia. <ol style="list-style-type: none"> 1. Accepting the resignation of Ahmad Fajar as Commissioner effective per 1 May 2018, with appreciation for his contribution while serving the Company. 2. With the ending of Benny Luhur's period as Independent Commissioner after the Meeting ended, here is the appreciation for his contribution while serving the Company. 3. With unfulfilled requirements on the appointment as decided in the Extraordinary General Meeting of Shareholders on 23 December 2016, then Budi T. Halim appointment as Director was not effective. 4. Accepting the resignation of Yosuke Tanaka as Director effective at the closing of Company's Annual General Meeting of Shareholders on June 28, 2018, here is appreciation for his contribution while serving the Company. 	<p>Perubahan susunan Pengurus Perseroan telah disahkan dalam Akta No. 64 tanggal 28 Juni 2018 yang dibuat di hadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta.</p> <p>Changes in the composition of the Company's management boards have been ratified in Deed Number 64 dated June 28, 2018, made before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
	<p>5. Therefore, the structure of members of the Board of Commissioners and Directors of the Company after the Meeting ended became: BOARD OF COMMISSIONERS:: President Commissioner: Nobiru Adachi Commissioner: Shigeyoshi Asano Independent Commissioner: Mahdi Mahmudy Independent Commissioner: Kwik Ing Hie BOARD OF DIRECTORS: President Director: Ritsuo Ando Director: Felix I. Hartadi Director: Helmi A. Hidayat Director: Haryanto B.Purnomo Director: Rio Lanasier</p> <p>6. Giving authority and power to the Company's Board of Directors to state the changes of Company's Management in separate Notary Act and notify the changes of Company's data to the Law and Human Rights Ministry of Indonesia.</p>	
<p>Agenda Kelima: Penggabungan nilai nominal (<i>reverse stock</i>) dari 100.000 saham menjadi 1 saham baik untuk saham Seri A maupun saham Seri B.</p> <ul style="list-style-type: none"> • Setuju: 973.031.815.987.212 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.523.104 saham atau sebesar 2,82% 	<ol style="list-style-type: none"> 1. Menyetujui pelaksanaan penggabungan Nilai Nominal Saham (<i>Reverse Stock</i>) dimana setiap 100.000 (seratus ribu) saham lama akan menjadi 1 (satu) saham baru untuk seluruh saham Perseroan baik untuk saham seri A dan saham seri B dengan memperhatikan peraturan dan ketentuan yang berlaku. 2. Menunjuk JTrust Co Ltd selaku pemegang saham utama Perseroan untuk bertindak selaku pembeli dan/atau penjual saham, atas saham-saham yang berpotensi pecahan milik pemegang saham lainnya dengan harga pasar wajar saham Perseroan, berdasarkan Laporan No. JK/SV/180427-001 tanggal 27 April 2018 tentang Penilaian Harga Pasar Wajar Saham PT Bank JTrust Indonesia Tbk, yang disusun oleh Kantor Jasa Penilaian ("KJPP") Jennywati, Kusnanto & Rekan ("JKR") sebagai pihak independen. 3. Bahwa terhadap proses pelaksanaan <i>Reverse Stock</i> berpotensi menimbulkan pecahan saham baik untuk Saham Seri A maupun Saham Seri B, oleh karena itu menyetujui untuk mengklasifikasikan pecahan saham hasil <i>Reverse Stock</i> yang tidak mencapai 1 (satu) lembar saham menjadi saham dengan klasifikasi yang dapat ditarik kembali, dengan demikian ditarik dari peredaran dalam rangka pengurangan modal ditempatkan dan disetor penuh. 4. Menyetujui penambahan ayat 11 pada Pasal 5 anggaran dasar Perseroan, sehubungan dengan keputusan nomor 3 di atas, sehingga Pasal 5 ayat 11 anggaran dasar Perseroan menjadi sebagai berikut: 5.11 Mengklasifikasikan pecahan saham hasil <i>Reverse Stock</i> yang tidak mencapai 1 (satu) lembar saham menjadi saham dengan klasifikasi yang dapat ditarik kembali. 5. Memberikan wewenang kepada Direksi Perseroan untuk melakukan segala tindakan yang diperlukan untuk melaksanakan Penggabungan Nilai Nominal Saham tersebut termasuk menetapkan tatacara, jadwal waktu serta persyaratan lainnya, serta 6. Melakukan penarikan saham pecahan akibat dari perubahan nilai nominal Saham Seri A maupun Saham Seri B, sebagaimana dimaksud dalam pasal 47 ayat 2 Undang-undang No.40/2007 tentang Perseroan Terbatas ("UUPT"), saham pecahan tersebut diklasifikasikan sebagai saham dengan klasifikasi yang akan ditarik kembali, dengan demikian ditarik dari peredaran dalam rangka pengurangan modal ditempatkan dan disetor penuh dengan jumlah sebanyak-banyaknya Rp6.008.730,- (enam juta delapan ribu tujuh ratus tiga puluh Rupiah) dengan memperhatikan peraturan perundang-undangan yang berlaku 	<p>Realisasi <i>Reverse Stock</i> telah dilaksanakan pada tanggal 5 Oktober 2018.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Fifth Agenda: Reverse stock from 100,000 shares to 1 share for both Series A and Series B shares.</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. Approving Reverse Stock in which every 100,000 (one hundred thousand) old shares will become 1 (one) new share for all of the Company's shares both for Series A and Series B shares by complying with existing regulations and provisions. 2. Appointing JTrust Co Ltd as the Company's main shareholder to act as buyer and/or stock seller, on potential share fractions owned by other shareholders with the Company's share fair market price, based on Report No. JK/SV/180427-001 dated 27 April 2018 on the Assessment of Fair Market Price of PT Bank JTrust Indonesia Tbk, designed by Appraisal Office (KJPP) Jennywati, Kusnanto & Rekan ("JKR) as an independent party. 3. That the implementation of Reverse Stock potentially created share fractions for both Series A and Series B shares, thereby approving to classify shares resulting from Reverse Stock which do not reach 1 (one) share to become share with classification, which can be withdrawn from circulation in reducing paid-in capital and issued capital. 4. Approving clause 11 on Article 5 of Company's articles of association, in line with the decision no 3, hence Article 5 Clause 11 of the Company's articles of association become: 5.11 Classifying share fractions of Reverse Stock that do not reach 1 (one) share can become share with classification that can be withdrawn. 5. Giving authority to the Company's Directors to make necessary actions to implement the Reverse Stock including procedure, timing, and other requirements as well as 6. Withdrawing share fractions due to reverse stock of Series A and Series B shares, as stated in the article 47 clause 2 on Law No. 40/2007 on Limited Liability (UUPT), the share fractions are classified as shares with classification that will be withdrawn, therefore being withdrawn from circulation in reducing issued and paid-up capital with the maximum amount Rp6,000,730 (six million eight thousand seven hundred thirty Rupiah) by heeding existing regulations 	<p>Reverse Stock has been realized on 5 October 2018.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Agenda Keenam: Perubahan pasal 4 Anggaran Dasar Perseroan.</p> <ul style="list-style-type: none"> • Setuju: 973.031.815.987.212 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.523.104 saham atau sebesar 2,82% 	<ol style="list-style-type: none"> 1. Setelah efektifnya penambahan ayat 11 pada Pasal 5 anggaran dasar, menyetujui untuk melakukan pengurangan modal ditempatkan dan disetor penuh sebanyak Rp6.008.730,- (enam juta delapan ribu tujuh ratus tiga puluh Rupiah) dengan cara penarikan kembali saham yang mempunyai klasifikasi dapat ditarik kembali 2. Menyetujui untuk mengubah pasal 4 anggaran dasar Perseroan menjadi berbunyi sebagai berikut: MODAL Pasal 4 1. Modal dasar Perseroan berjumlah Rp15.000.000.000.000,00 (lima belas triliun Rupiah) yang terbagi atas: <ol style="list-style-type: none"> (i) 12.000.003.000 (dua belas miliar tiga ribu) saham Seri A, dengan nilai nominal masing-masing saham Seri A sebesar Rp1.000 (seribu Rupiah), sehingga nilai nominal seluruhnya sebesar Rp12.000.003.000.000,00 (dua belas triliun tiga juta Rupiah), dan (ii) 384.615 (tiga ratus delapan puluh empat ribu enam ratus lima belas) saham Seri B, dengan nilai nominal masing-masing saham Seri B sebesar Rp7.800.000,00 (tujuh juta delapan ratus ribu Rupiah), sehingga nilai nominal seluruhnya sebesar Rp2.999.997.000.000,00 (dua triliun sembilan ratus sembilan puluh puluh tujuh juta Rupiah). 2. Dari modal dasar tersebut telah ditempatkan dan disetor sebesar Rp12.223.148.800.000,00 (dua belas triliun dua ratus dua puluh tiga milyar seratus empat puluh delapan juta delapan ratus ribu Rupiah) atau sejumlah <ol style="list-style-type: none"> (i) 10.011.841.000 (sepuluh miliar sebelas juta delapan ratus empat puluh satu ribu) saham Seri A, dengan nilai nominal masing-masing saham Seri A sebesar Rp1.000,00 (seribu Rupiah), sehingga nilai nominal seluruhnya sebesar Rp10.011.841.000.000,00 (sepuluh triliun sebelas milyar delapan ratus empat puluh satu juta Rupiah), dan (ii) 283.501 (dua ratus delapan puluh tiga ribu lima ratus satu) saham Seri B, dengan nilai nominal masing-masing saham Seri B sebesar Rp7.800.000,00 (tujuh juta delapan ratus ribu Rupiah), sehingga nilai nominal seluruhnya sebesar Rp2.211.307.800.000,00 (dua triliun dua ratus sebelas milyar tiga ratus tujuh juta delapan ratus ribu Rupiah), yang telah diambil bagian dan disetor penuh oleh para pemegang saham Perseroan dengan rincian serta nilai nominal saham yang disebutkan sebelum akhir akta ini. 3. Memberikan kuasa dan wewenang kepada Direksi Perseroan untuk melakukan segala tindakan yang diperlukan tanpa pengecualian untuk pelaksanaan perubahan Pasal 4 anggaran dasar Perseroan, termasuk untuk menyatakan perubahan Pasal 4 anggaran dasar Perseroan dalam Akta Notaris tersendiri dan mengurus sampai dengan diperolehnya persetujuan dan atau diterimanya pemberitahuan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia sesuai peraturan perundang-undangan yang berlaku. 	<p>Hasil keputusan ini telah dinyatakan dalam Akta Pernyataan Keputusan Rapat Umum Pemegang Saham Tahunan PT Bank JTrust Indonesia Tbk. Nomor 64 tanggal 28 Juni 2018 yang dibuat di hadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta dengan No. AHU-AH.01.03-0238379 dari Kementerian Hukum dan Hak Asasi Manusia R.I.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Sixth Agenda: Change of article 4 or the Company's Article of Association.</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. With the effectiveness of additional clause 11 on Article 5 of the articles of association, approving to reduce issued and paid-up capital of Rp6,008,730 (six million eight thousand seven hundred thirty Rupiah) by withdrawing shares that are classified can be withdrawn. 2. Approving to change article 4 of the Company's article of association to sound as follows: CAPITAL Article 4 <ol style="list-style-type: none"> 1. The Company's authorized capital amounting to Rp150,000,000,000,000.00 (fifteen trillion Rupiah) consisted of: <ol style="list-style-type: none"> (i) 12,000,003,000 (twelve billion three thousand) Series A shares, with nominal value of each Series A share at Rp1,000 (one thousand Rupiah), with a total of Rp12,000,003,000,000.00 (twelve trillion three million Rupiah), and (ii) 384,615 (three hundred eighty four thousand six hundred fifteen) Series B shares, with nominal value of each Series B share of Rp7,800,000.00 (seven million eight hundred thousand Rupiah), with a total of Rp2,999,997,000,000.00 (two trillion nine hundred ninety nine billion nine hundred ninety seven million Rupiah). 2. From the authorized capital, the amount of Rp12,223,148,800,000.00 (twelve trillion two hundred twenty three billion one hundred forty eight million eight hundred thousand Rupiah) has been placed and paid, or equals to <ol style="list-style-type: none"> (i) 10,011,841,000 (ten billion eleven million eight hundred forty one thousand) Series A shares, with nominal value of each Series A share of Rp1,000.00 (one thousand Rupiah), so that the total nominal value was Rp10,011,841,000,000.00 (ten trillion eleven billion eight hundred forty one million Rupiah), and (ii) 283,501 (two hundred eighty three thousand five hundred and one) Series B shares, with nominal value of each Series B share of Rp7,800,000.00 (seven million eight hundred thousand Rupiah), so that the total nominal value was Rp2,211,307,800,000.00 (two trillion two hundred eleven billion three hundred seven million eight hundred thousand), which has been taken part and fully paid by the shareholders of the Company with details and nominal value of the shares mentioned before the end of this deed. 3. Giving power and authority to the Board of Directors of the Company to take any necessary actions without exception for the implementation of amendments to Article 4 of the Company's articles of association, including to declare the amendments to Article 4 of the Company's articles of association in its own Notary Deed and to seek for approval and or receipt of notification from the Minister of Law and Human Rights of Indonesia in accordance with applicable laws and regulations. 	<p>Realization of this resolution has been declared in the Deed of Resolutions of the Annual General Meeting of Shareholders of PT Bank JTrust Indonesia Tbk. Number 64 dated June 28, 2018, made before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta with Letter No. AHU-AH.01.03-0238379 from the Ministry of Law and Human Rights of the Republic of Indonesia.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Agenda Ketujuh: Menyetujui Penambahan Modal Dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan No. 32/POJK.04/2015 tanggal 16 Desember 2015 tentang Penambahan Modal Perusahaan Terbuka Dengan Memberikan Hak Memesan Efek Terlebih Dahulu.</p> <ul style="list-style-type: none"> • Setuju: 973.031.815.987.212 saham atau sebesar 97,18% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: 28.158.265.523.104 saham atau sebesar 2,82% 	<ol style="list-style-type: none"> 1. Menyetujui Penambahan Modal Perseroan Dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD), sebagaimana dimaksud dengan Peraturan Otoritas Jasa Keuangan No. 32/POJK.04/2015 tanggal 16 Desember 2015 tentang Penambahan Modal Perusahaan Terbuka dengan Memberikan Hak Memesan Efek Terlebih Dahulu. Dengan demikian mengeluarkan saham baru dari portepel Perseroan dengan jumlah saham yang direncanakan untuk diterbitkan adalah sebanyak-banyaknya 100.000.000.000.000 (seratus triliun) saham Seri A dengan nilai nominal Rp0,01,- (satu sen) per saham dan/atau setelah pelaksanaan <i>reverse stock</i> dengan rasio 100.000 (seratus ribu) saham lama akan memperoleh 1 (satu) saham, maka jumlah saham yang akan diterbitkan menjadi 1.000.000.000 (satu miliar) Saham Seri A dengan nilai nominal Rp1.000,- (seribu Rupiah) yang akan ditawarkan melalui PMHMETD atau 9,99% (sembilan koma sembilan puluh sembilan persen) dari jumlah saham yang ditempatkan dan disetor penuh saat ini dalam Perseroan. 2. Memberikan wewenang dan kuasa kepada Direksi dengan hak substitusi untuk melakukan semua dan setiap tindakan yang diperlukan sehubungan dengan pelaksanaan PMHMETD dengan memperhatikan peraturan perundangan yang berlaku termasuk tetapi tidak terbatas: <ol style="list-style-type: none"> a) Menetapkan jumlah saham yang akan diterbitkan dalam PMHMETD. b) Menetapkan harga pelaksanaan penerbitan saham dalam PMHMETD. c) Menetapkan jadwal waktu pelaksanaan PMHMETD dan persyaratannya, melakukan segala tindakan yang diperlukan dalam rangka pelaksanaan PMHMETD. 3. Memberikan wewenang dan kuasa kepada Dewan Komisaris Perseroan untuk melakukan penyesuaian pasal 4 anggaran dasar Perseroan dan perubahan susunan pemegang saham terakhir setelah pelaksanaan PMHMETD, kuasa ini diberikan untuk jangka waktu 1 (satu) tahun terhitung sejak tanggal rapat ini. 	<p>Hasil keputusan ini telah dinyatakan dalam akta Pernyataan keputusan Perubahan Anggaran Dasar Perseroan No. 64 tanggal 28 Juni 2018 yang dibuat di hadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from AGMS	Realisasi Keputusan RUPST Realization of Resolutions from AGMS
<p>Seventh Agenda: Approving Capital Injection via Pre-emptive Rights (PMHMETD) as referred to in the Financial Services Authority Regulation No. 32/POJK.04/2015 dated 16 December 2015 on Capital Injection of Public Companies by Providing Pre-emptive Rights.</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. Approving Capital Injection to the Company by Providing Pre-emptive Rights (PMHMETD), as referred to in the Financial Services Authority Regulation No. 32/POJK.04/2015 dated 16 December 2015 concerning Capital Increase of Public Companies by Providing Pre-emptive Rights. Thus issuing new shares from the Company's portfolio with the number of shares planned to be issued is a maximum of 100,000,000,000,000,000 (one hundred trillion) Series A shares with a nominal value of Rp0.01 - (one cent) per share and/or after the implementation of a reverse stock with a ratio of 100,000 (one hundred thousand) old shares will obtain 1 (one) share, then the number of shares to be issued becomes 1,000,000,000 (one billion) Series A Shares with a nominal value of Rp1,000 (one thousand Rupiah) which will offered through PMHMETD or 9.99% (nine point ninety nine percent) of the current number of issued and fully paid shares in the Company. 2. Giving authority and power of attorney to the Board of Directors with substitution rights to carry out all and every action required in connection with the implementation of PMHMETD by taking into account the applicable laws and regulations including but not limited to: <ol style="list-style-type: none"> a) Determining the number of shares to be issued in the PMHMETD. b) Determining the price of carrying out the issuance of shares in PMHMETD. c) Determining the timetable for the implementation of the PMHMETD and its requirements, taking all necessary actions in the context of implementing the PMHMETD. 3. Providing authority and power to the Board of Commissioners of the Company to make adjustments to article 4 of the Company's articles of association and changes in the composition of the latest shareholders after the implementation of PMHMETD, this power of attorney is granted for a period of 1 (one) year from the date of this meeting. 	<p>The results of this decision have been stated in the deed Statement of Decree Amendment to the Company's Articles of Association No. 64 dated June 28, 2018, made before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta</p>

(2) RUPS Luar Biasa (RUPSLB)

Pada tanggal 20 September 2018 telah diadakan RUPSLB, dengan jadwal pemberitahuan, pengumuman, pemanggilan, pelaksanaan dan penyampaian hasil RUPSLB sebagai berikut:

(2) Extraordinary GMS (EGMS)

The EGMS was held on September 20, 2018, and the notification, announcement, summons, execution and submission of AGMS Resolutions are as follows:

Pemberitahuan Notification	Pengumuman Announcement	Pemanggilan Summon	Pelaksanaan Implementation	Ringkasan Risalah RUPSLB Minutes of GMS
<p>Tanggal 7 Agustus 2018 Bank menyampaikan surat Pemberitahuan rencana RUPSLB ke OJK.</p> <p>On August 7, 2018 the Bank submitted a Notification of EGMS plan to OJK.</p>	<p>Tanggal 14 Agustus 2018 diumumkan melalui iklan di harian Ekonomi Neraca, situs web Bursa Efek Indonesia (melalui <i>e-Reporting</i>) dan situs web www.jtrustbank.co.id</p> <p>On August 14, 2018, was announced through advertisements on Ekonomi Neraca daily, website of the Indonesia Stock Exchange (through <i>e-Reporting</i>) and website www.jtrustbank.co.id</p>	<p>Tanggal 29 Agustus 2018 diumumkan melalui iklan di harian Ekonomi Neraca, situs web Bursa Efek Indonesia (melalui <i>e-Reporting</i>) dan situs web www.jtrustbank.co.id</p> <p>On August 29, 2018, was announced through advertisements on Ekonomi Neraca daily, website of the Indonesia Stock Exchange (through <i>e-Reporting</i>) and website www.jtrustbank.co.id</p>	<p>Tanggal 20 September 2018 RUPSLB dilaksanakan pada pukul 14.00 WIB – selesai, bertempat di Puri Ratna Room, Hotel Grand Sahid Jaya Jl. Jend. Sudirman Kav. 86 Jakarta 10220.</p> <p>On September 20, 2018, EGMS was held at 2 pm – finish at Puri Ratna Room, Hotel Grand Sahid Jaya Jl. Jend. Sudirman Kav. 86 Jakarta 10220.</p>	<p>Tanggal 24 September 2018 Diumumkan melalui iklan di harian Ekonomi Neraca, situs web OJK dan BEI (melalui <i>e-Reporting</i>) dan situs web www.jtrustbank.co.id</p> <p>On September 24, 2018, was announced through advertisements on Ekonomi Neraca daily, website of the Indonesia Stock Exchange (through <i>e-Reporting</i>) and website www.jtrustbank.co.id</p>

Seluruh hasil RUPSLB dan jalannya rapat tercantum dalam akta Berita Acara RUPSLB tanggal 20 September 2018 yang dibuat oleh Notaris telah tersedia dan dapat diakses pada situs web PT Bank JTrust Indonesia Tbk *via* www.jtrustbank.co.id.

All the results of the EGMS and the proceedings are listed in the Minutes of EGMS of September 20, 2018, made by Notary that are available and accessible on the website of PT Bank JTrust Indonesia Tbk *via* www.jtrustbank.co.id.

RUPS Luar Biasa pada tanggal 20 September 2018 memiliki agenda dengan hasil Keputusan yang direalisasikan sebagai berikut:

Extraordinary GMS on September 20, 2018, had an agenda with realized Resolutions as follows:

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from the AGMS	Realisasi Keputusan RUPST Realization of Resolutions from the AGMS
<p>Agenda Pertama: Perubahan susunan pengurus Perseroan;</p> <ul style="list-style-type: none"> • Setuju: 973.031.791.090.816 saham atau sebesar 97,1853% dari seluruh saham dengan hak suara yang hadir dalam Rapat. • Abstain: Nihil atau sebesar 0% • Tidak Setuju: Nihil atau sebesar 0% 	<ol style="list-style-type: none"> 1. Menyetujui pengalihan tugas Bapak Shigeyoshi Asano yang semula menjabat sebagai Komisaris Perseroan menjadi sebagai Direktur Utama Perseroan, dan secara otomatis melepas jabatannya sebagai Komisaris Perseroan efektif sejak dinyatakan lulus uji kelayakan dan kepatutan oleh Otoritas Jasa Keuangan (OJK) sebagai Direktur Utama Perseroan, dengan masa jabatan sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) terhitung sejak dinyatakan lulus uji kelayakan dan kepatutan oleh Otoritas Jasa Keuangan (OJK) sebagai Direktur Utama Perseroan, dengan tidak mengurangi hak RUPS untuk memberhentikan anggota Dewan Komisaris Perseroan tersebut sewaktu-waktu sebelum masa jabatannya berakhir. 2. Menyetujui pengalihan tugas Bapak Ritsuo Ando yang semula menjabat sebagai Direktur Utama Perseroan menjadi sebagai Direktur Perseroan untuk sisa masa jabatannya selaku Direktur Utama, efektif sejak ditutupnya Rapat ini. 3. Mengangkat Bapak Nobuiku Chiba sebagai Komisaris Perseroan efektif sejak dinyatakan lulus uji kelayakan dan kepatutan oleh Otoritas Jasa Keuangan (OJK) dengan masa jabatan sampai dengan ditutupnya RUPS Tahunan yang ke-3 (tiga) terhitung sejak dinyatakan lulus uji kelayakan dan kepatutan oleh Otoritas Jasa Keuangan (OJK) dengan tidak mengurangi hak RUPS untuk memberhentikan anggota Dewan Komisaris Perseroan tersebut sewaktu-waktu sebelum masa jabatannya berakhir. <p>Dengan demikian, susunan anggota Dewan Komisaris dan anggota Direksi Perseroan terhitung sejak ditutupnya Rapat menjadi sebagai berikut:</p> <p>DEWAN KOMISARIS: Komisaris Utama: Nobiru Adachi Komisaris: Nobuiku Chiba Komisaris Independen: Mahdi Mahmudy Komisaris Independen: Kwik Ing Hie</p> <p>DIREKSI: Direktur Utama: Shigeyoshi Asano Direktur: Ritsuo Ando Direktur: Felix I. Hartadi Direktur: Helmi A. Hidayat Direktur: Haryanto B.Purnomo Direktur: Rio Lanasier</p> <ol style="list-style-type: none"> 4. Dengan ketentuan pengangkatan Bapak Shigeyoshi Asano sebagai Direktur Utama Perseroan dan Bapak Nobuiku Chiba sebagai Komisaris Perseroan berlaku efektif sejak dinyatakan lulus uji kelayakan dan kepatutan oleh Otoritas Jasa Keuangan (OJK) serta memenuhi peraturan perundang-undangan yang berlaku. 5. Memberikan kuasa dan wewenang kepada Direksi Perseroan untuk menyatakan perubahan Pengurus Perseroan dalam Akta Notaris tersendiri dan menyampaikan pemberitahuan perubahan data Perseroan kepada Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia 	<p>Hasil keputusan ini telah dinyatakan dalam Akta Pernyataan Keputusan Rapat Umum Pemegang Saham Luar Biasa PT Bank JTrust Indonesia Tbk. Nomor 43 tanggal 20 September 2018 yang dibuat di hadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta dengan No. AHU-AH.01.03-0254185 dari Kementerian Hukum dan Hak Asasi Manusia R.I.</p>

Agenda dan Jumlah Suara Agenda and Voting Number	Hasil Keputusan RUPST Resolutions from the AGMS	Realisasi Keputusan RUPST Realization of Resolutions from the AGMS
<p>First Agenda: Change of the Company's management structure;</p> <ul style="list-style-type: none"> • In Favour: 973,031,816,469,731 shares or 97.18% of all shares with voting rights present in the Meeting. • Abstain: Nil or 0% • Against: 28,158,265,040,585 shares or 2.82% 	<ol style="list-style-type: none"> 1. Approving the assignment of Shigeyoshi Asano who previously served as the Company's Commissioner to become President Director, and automatically dismissed his position as Commissioner effectively since he passed fit and proper test by the Financial Services Authority (OJK) as President Director, with term until the closing of the third Annual GMS since being declared passed the fit and proper test by the Financial Services Authority (OJK) as President Director, without reducing the right of the GMS to dismiss the member of the Company's Board of Commissioners at anytime before his term ended. 2. Approving the assignment of Ritsuo Ando who previously served as President Director of the Company to become a Director of the Company for the remainder of his term as President Director, effective from the closing of this Meeting. 3. Appointing Nobuiku Chiba as the Company's Commissioner to be effective since he was declared to have passed the fit and proper test by the Financial Services Authority (OJK) with a term of office until the closing of the 3rd (third) Annual GMS since being declared passing the fit and proper test by the Financial Services Authority (OJK), without reducing the right of the GMS to dismiss members of the Company's Board of Commissioners at any time before the term of office ends. <p>Therefore, the composition of members of the Board of Commissioners and Directors of the Company since the closing of the Meeting is as follows:</p> <p>BOARD OF COMMISSIONERS: President Commissioner: Nobiru Adachi Commissioner: Nobuiku Chiba Independent Commissioner: Mahdi Mahmudy Independent Commissioner: Kwik Ing Hie</p> <p>BOARD OF DIRECTORS: President Director: Shigeyoshi Asano Director: Ritsuo Ando Director: Felix I. Hartadi Director: Helmi A. Hidayat Director: Haryanto B.Purnomo Director: Rio Lanasier</p> <ol style="list-style-type: none"> 4. With conditions that the appointment of Shigeyoshi Asano as President Director of the Company and Nobuiku Chiba as Commissioner effective since being declared passed the fit and proper test by the Financial Services Authority (OJK) and fulfilled applicable laws and regulations. 5. Giving power and authority to the Company Board of Directors to state the change in Company's Management in separate Notary Act and submit the Company's data change to the Law and Human Rights Ministry of Indonesia. 	<p>The results of this decision have been stated in the Deed of Statement of the Extraordinary General Meeting of Shareholders of PT Bank JTrust Indonesia Tbk. No 43 on September 20, 2018, made before Jose Dima Satria, S.H., M.Kn., Notary in Jakarta with No. AHU-AH.01.03-0254185 from the Law and Human Rights Ministry of Indonesia.</p>

Informasi tentang keputusan RUPS dalam 1 (satu) tahun selama tahun 2018 meliputi:

- a. Keputusan RUPS yang direalisasikan
 1. RUPS Tahunan (RUPST)
 - Seluruh hasil keputusan dalam RUPS Tahunan pada tanggal 28 Juni 2018 umumnya sudah terealisasi.
 2. RUPS Luar Biasa (RUPSLB)
 - Seluruh hasil keputusan dalam RUPS Luar Biasa pada tanggal 20 September 2018 umumnya sudah terealisasi.
- b. Keputusan RUPS yang belum/tidak terealisasi
 1. RUPS Tahunan (RUPST)
 - Selama tahun 2018 seluruh keputusan RUPS telah terealisasi dan tidak ada keputusan yang belum/tidak terealisasi.
 2. RUPS Luar Biasa (RUPSLB)
 - Selama tahun 2018 tidak ada keputusan yang belum/tidak terealisasi.

Informasi tentang keputusan RUPS dalam 1 (satu) tahun selama tahun 2017 meliputi:

1. Keputusan RUPS yang direalisasikan RUPS Tahunan (RUPST)
 - Seluruh hasil keputusan dalam RUPS Tahunan selama tahun 2017 **sudah terealisasi**.
2. Keputusan RUPS yang belum/tidak terealisasi RUPS Tahunan (RUPST)
 - Selama tahun 2017 **tidak ada** keputusan yang belum terealisasi.

2.2. Kepemilikan Saham

Kepemilikan saham PT Bank JTrust Indonesia Tbk saat ini sesuai dengan yang tercantum dalam Akta Pernyataan Keputusan Rapat PT Bank JTrust Indonesia Tbk. Nomor 21 tertanggal 11 Februari 2019, maka kepemilikan saham perseroan menjadi sebagai berikut:

Information on GMS resolution in 1 (one) year during 2018 includes:

- a. GMS Resolutions that are realized
 1. Annual GMS (AGMS)
 - All resolutions in the Annual GMS on June 28, 2018 generally have been realized.
 2. Extraordinary GMS (EGMS)
 - All resolutions in the Extraordinary GMS on September 20, 2018 generally have been realized.
- b. GMS resolutions that have not been realized.
 1. Annual GMS (AGMS)
 - In 2018, all AGMS resolutions have been realized and there were no resolutions that have not been realized.
 2. Extraordinary GMS (EGMS)
 - In 2018, there were no resolutions that have not been realized.

Information on GMS Resolutions in 1 (one) year during 2017 includes:

1. GMS Resolutions realized Annual GMS (AGMS)
 - All resolutions in the Annual GMS in 2017 have been realized.
2. GMS Resolutions not realized Annual GMS (AGMS)
 - In 2017 there were no resolutions that have not been realized.

2.2. Share Ownership

The share ownership of PT Bank JTrust Indonesia Tbk currently is in accordance with the Deed of Meeting Decision Statement of PT Bank JTrust Indonesia Tbk. No. 21 dated February 11, 2019, then the share ownership are as follows:

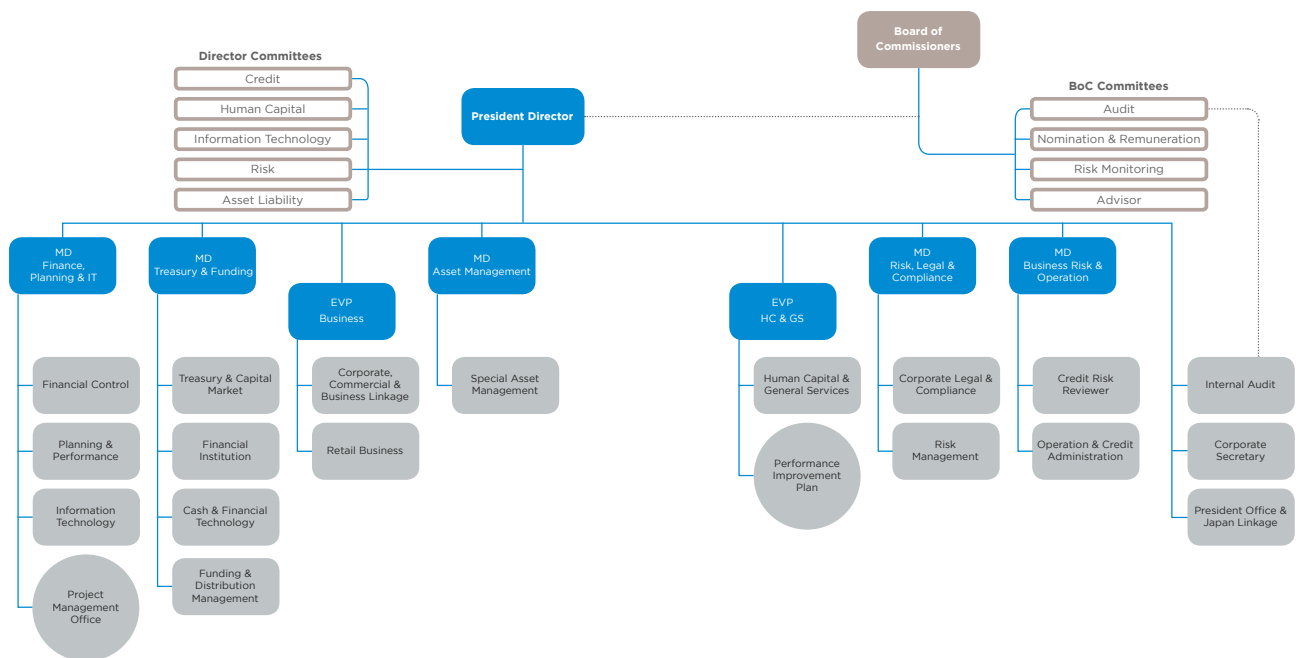
Keterangan Description	Jumlah Saham Number of Shares	Jumlah Total (Rp)	Persentase Percentage (%)
Saham Seri A (Rp 1.000 per saham) Series A Shares (Rp1,000 per share)			
1. J Trust Co., Ltd.	9.630.170.618	9.630.170.618.000	96.185
2. Group Lease Holdings Pte. Ltd.	281.549.137	281.549.137.000	2.812
3. PT JTrust Investments Indonesia	100.121.245	100.121.245.000	1.000
Subtotal	10.011.841.000	10.011.841.000.000	99.997
Saham Seri B (Rp 7.800.000 per saham) Series B Shares (Rp7,800 per share)			
1. J Trust Co., Ltd.	26.693	208.205.400.000	0
2. Masyarakat Public	256.808	2.003.102.400.000	0.003
Subtotal	283.501	2.211.307.800.000	0.003
Jumlah Modal Disetor Paid-In Capital	10.012.124.501	12.223.148.800.000	100.000

2.3. Struktur Organisasi PT Bank JTrust Indonesia Tbk

Dalam rangka menyesuaikan struktur organisasi Bank terhadap adanya perubahan peraturan yang berlaku dan menyesuaikan kondisi bisnis bank saat ini, maka Struktur Organisasi PT Bank JTrust Indonesia Tbk yang terakhir berlaku berdasarkan Surat Keputusan Direksi PT Bank JTrust Indonesia Tbk Nomor 24.04/S.Kep-Dir-HCD/JTRUST/X/2018 tertanggal 24 Oktober 2018 tentang Struktur Organisasi PT Bank JTrust Indonesia Tbk, adalah sebagai berikut:

2.3. Organizational Structure of PT Bank JTrust Indonesia Tbk.

In order to adjust the organizational structure of the Bank with the change of prevailing regulations and current business condition of the bank, then the latest Organizational Structure of PT Bank JTrust Indonesia Tbk was based on the Decision Letter of the Board of Directors of PT Bank JTrust Indonesia Tbk No 24.04/S.Kep-Dir-HCD/JTRUST/X/2018 dated October 24, 2018 on the Organizational Structure of PT Bank JTrust Indonesia Tbk, are as follows:



Susunan anggota Dewan Komisaris dan Direksi PT Bank JTrust Indonesia Tbk per 31 Desember 2018 berdasarkan hasil keputusan RUPSLB tanggal 20 September 2018 sebagai berikut:

Dewan Komisaris beranggotakan 4 (empat) orang terdiri dari:

- Komisaris Utama : Nobiru Adachi
- Komisaris : Nobuiku Chiba 〃
- Komisaris (Independen) : Mahdi Mahmudy
- Komisaris (Independen) : Kwik Ing Hie

The composition of members of the Board of Commissioners and Board of Directors of PT Bank JTrust Indonesia Tbk as of December 31, 2018, based on the decision of EGMS on September 20, 2018 are as follows:

The Board of Commissioners consists of 4 (four) members consisting of:

- President Commissioner : Nobiru Adachi
- Commissioner : Nobuiku Chiba 〃
- Commissioner (Independent) : Mahdi Mahmudy
- Commissioner (Independent) : Kwik Ing Hie

Direksi beranggotakan 6 (enam) orang terdiri dari:

Direktur Utama	: Shigeyoshi Asano **)
Direktur	: Ritsuo Ando ***)
Direktur	: Felix Istyono Hartadi Tiono
Direktur	: Helmi Arief Hidayat
Direktur	: Haryanto Budi Purnomo ***)
Direktur	: Rio Lanasier

*) Efektif lulus uji kemampuan dan kepatutan sesuai salinan keputusan Anggota Dewan Komisiner OJK No.KEP-46/D.03/ 2019 tanggal 12 Maret 2019.

***) Efektif lulus uji kemampuan dan kepatutan sesuai salinan keputusan Anggota Dewan Komisiner OJK No.KEP-31/D.03/2019 tanggal 21 Februari 2019.

***) Efektif sejak 1 Januari 2019 disetujui pemberhentian sementara Bapak Ritsuo Ando dan Bapak Haryanto Budi Purnomo berdasarkan Surat Keputusan Sirkuler Dewan Komisaris sebagai pengganti Rapat Dewan Komisaris, dan Hasil Keputusan RUPSLB tanggal 11 Februari 2019.

2.4 Dewan Komisaris

Dewan Komisaris PT Bank JTrust Indonesia Tbk memiliki peran dan tugas sangat penting dalam pelaksanaan tata kelola perusahaan yang baik, dengan tugas utama adalah mengawasi kebijakan dan keputusan oleh Direksi dalam menjalankan Perseroan, termasuk melaksanakan tugas-tugas lain sesuai dengan keputusan-keputusan yang telah diambil dalam RUPS dan tugas-tugas yang ditentukan di dalam Anggaran Dasar PT Bank JTrust Indonesia Tbk, Peraturan Bank Indonesia (PBI), Peraturan Otoritas Jasa Keuangan (POJK), Peraturan Bursa Efek Indonesia (BEI) dan peraturan-peraturan terkait lainnya.

(1) Tugas dan Tanggung Jawab Dewan Komisaris

Dewan Komisaris melaksanakan tugas dan tanggung jawab sebagai berikut:

1. Dewan Komisaris menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggung jawabnya secara optimal.
2. Dewan Komisaris memastikan terselenggaranya pelaksanaan tata kelola perusahaan yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi.
3. Dewan Komisaris melaksanakan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi, serta memberikan nasihat kepada Direksi.
4. Dalam melakukan pengawasan, Komisaris mengarahkan, memantau dan mengevaluasi pelaksanaan kebijakan strategis Bank.
5. Dalam melakukan pengawasan, Dewan Komisaris dilarang terlibat dalam pengambilan keputusan kegiatan operasional bank, kecuali:

The Board of Directors consists of 6 (six) members consisting of:

President Director	: Shigeyoshi Asano **)
Director	: Ritsuo Ando ***)
Director	: Felix Istyono Hartadi Tiono
Director	: Helmi Arief Hidayat
Director	: Haryanto Budi Purnomo ***)
Director	: Rio Lanasier

*) Effective passing the fit and proper test in accordance with the copy of decision of Members of the Board of Commissioners of OJK No. KEP-46/D.03/2019 dated March 12, 2019

***) Effective passing the fit and proper test in accordance with the copy of decision of Members of the Board of Commissioners of OJK No. KEP-31/D.03/2019 dated February 21, 2019

***) Effective since January 1, 2019 the temporary dismissal of Ritsuo Ando and Haryanto Budi Purnomo based on the Circular Letter of Board of Commissioners as a replacement of Board of Commissioners' Meeting, and Resolutions of EGMS dated February 11, 2019.

2.4 Board of Commissioners

The Board of Commissioners of PT Bank JTrust Indonesia Tbk's roles and duties are crucial for the implementation of Good Corporate Governance (GCG), with its main duty to oversee policy and its implementation by the Board of Directors in managing the Company, carrying out other duties in accordance with resolutions of the GMS and tasks specified in the Articles of Association of PT Bank JTrust Indonesia Tbk, Bank Indonesia Regulation (PBI), Regulation of the Financial Services Authority (OJK), Indonesian Stock Exchange regulations (IDX) and other relevant regulations.

(1) Duties and Responsibilities of the Board of Commissioners

The Board of Commissioners perform their duties and responsibilities as follows:

1. The Board of Commissioners must provide sufficient time to carry out their duties and responsibilities optimally.
2. The Board of Commissioners shall ensure the implementation of Good Corporate Governance in each business activity of the Bank at all levels of the organization.
3. The Board of Commissioners shall supervise the performance of duties and responsibilities, as well as advising the Board of Directors.
4. In conducting supervision, Commissioners direct, monitor, and evaluate the Bank's strategic policy implementations.
5. In conducting supervision, the Board of Commissioners is not allowed to be involved in the decision-making of bank operations, except for:

- a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan (OJK)/Bank Indonesia tentang Batas Maksimum Pemberian Kredit Bank Umum; dan
 - b. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan yang berlaku.
 6. Pengambilan keputusan oleh Dewan Komisaris sebagaimana dimaksud di atas tidak meniadakan tanggung jawab Direksi atas pelaksanaan pengurusan Bank.
 7. Dewan Komisaris memastikan bahwa Direksi telah menindaklanjuti semua audit dan rekomendasi dari satuan kerja audit intern bank, auditor eksternal, hasil pengawasan Otoritas Jasa Keuangan (OJK)/Bank Indonesia dan/atau hasil pengawasan otoritas lain.
 8. Dewan Komisaris memberitahukan kepada Otoritas Jasa Keuangan (OJK)/Bank Indonesia paling lambat 7 (tujuh) hari kerja sejak ditemukannya:
 - a. Pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan; dan
 - b. Keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank.
 9. Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawabnya, Dewan Komisaris membentuk paling kurang:
 - a. Komite Audit;
 - b. Komite Pemantau Risiko;
 - c. Komite Nominasi dan Remunerasi.
 10. Pengangkatan anggota Komite dilakukan oleh Direksi berdasarkan keputusan rapat Dewan Komisaris.
 11. Dewan Komisaris memastikan bahwa Komite yang telah dibentuk menjalankan tugasnya secara efektif.
 12. Dewan Komisaris memiliki pedoman dan tata tertib kerja yang bersifat mengikat bagi setiap anggota Dewan Komisaris, paling kurang mencantumkan pengaturan etika kerja, waktu kerja dan pengaturan rapat.
 13. Memimpin Rapat Umum Pemegang Saham (RUPS).
 14. Menetapkan sistem Remunerasi dan Evaluasi Kinerja Direksi dan Komisaris.
 15. Dewan Komisaris menjalankan tugas dan tanggung jawab secara independen.
- a. Provision of funds to related parties as stipulated in the provisions of the Financial Services Authority (OJK)/Bank Indonesia on Legal Lending Limit for Commercial Banks; and
 - b. Other matters specified in the Articles of Association of the Bank or the prevailing regulations.
 6. Decision-making by the Board of Commissioners as mentioned above does not negate the responsibility of the Board of Directors on the implementation of the bank management.
 7. The Board of Commissioners shall ensure that the Board of Directors has followed up all audit and the recommendations of the internal audit unit of the bank, external auditors, monitoring reports from the Financial Services Authority (OJK)/Bank Indonesia and/or other authorities supervisory result.
 8. The Board of Commissioners shall inform the Financial Services Authority (OJK)/Bank Indonesia no later than 7 (seven) days as of the discovery of the following matters:
 - a. Infringement of finance and banking regulation; and
 - b. Circumstances or prediction of circumstances that may jeopardize the business of the Bank.
 9. In order to support the effectiveness of the execution of its duties and responsibilities, the Board of Commissioners must establish, at least:
 - a. Audit Committee;
 - b. Risk Monitoring Committee;
 - c. Nomination and Remuneration Committee.
 10. Appointment of members of the Committee is carried out by the Board of Directors based on the resolutions of the Board of Commissioners Meeting.
 11. The Board of Commissioners shall ensure that the established Committee performs their duties effectively.
 12. The Board of Commissioners is required to own work guidelines and code of conduct that are binding every member of the Board of Commissioners which, at the least, governs the work ethics, work time and meeting arrangements.
 13. To chair the General Meeting of Shareholders (GMS).
 14. To establish a system of Remuneration and Performance Evaluation of Board of Directors and Board of Commissioners.
 15. The Board of Commissioners must perform its duties and responsibilities independently.

(2) Piagam Dewan Komisaris (BOC Charter)

Piagam Dewan Komisaris (BOC Charter) dituangkan dalam bentuk "Pedoman Tata Tertib Dewan Komisaris PT Bank J Trust Indonesia Tbk" yang telah disetujui oleh Direksi pada tanggal 12 Desember 2018. Selanjutnya "Pedoman Tata Tertib Dewan Komisaris tersebut di atas, akan ditinjau secara berkala apabila dianggap perlu dengan memperhatikan ketentuan perundangan yang berlaku.

(3) Pengangkatan dan Masa Jabatan

- 1) Setiap usulan pengangkatan dan/atau penggantian anggota Dewan Komisaris telah memperhatikan rekomendasi dari Komite Nominasi dan Remunerasi serta telah disetujui oleh pemegang saham melalui Rapat Umum Pemegang Saham (RUPS) sejalan dengan kriteria utama dengan mempertimbangkan integritas, kompetensi, profesionalisme dan reputasi keuangan yang memadai sesuai dengan persyaratan penilaian uji kemampuan dan kepatutan (*Fit and Proper Test*) yang telah ditetapkan oleh Otoritas Jasa Keuangan (OJK).
- 2) Masa jabatan seorang anggota Dewan Komisaris sesuai Anggaran Dasar adalah efektif sejak tanggal yang ditentukan dalam RUPS dan berakhir pada saat RUPS Tahunan ke-3 (ketiga) setelah tanggal pengangkatan tersebut.
- 3) Anggota Dewan Komisaris yang telah habis masa jabatannya dapat diangkat kembali oleh RUPS.
Sesuai dengan Hasil Keputusan RUPST tanggal 30 Maret 2017 yang menyetujui tentang penetapan/pengangkatan kembali masa jabatan seorang anggota Komisaris, maka masa jabatan anggota Dewan Komisaris PT Bank JTrust Indonesia Tbk tidak ada yang lebih dari 2 (dua) periode berturut-turut yang diperhitungkan sejak pengangkatan pada RUPSLB tahun 2014.

(4) Kriteria Dewan Komisaris

Kriteria dalam pemilihan anggota Dewan Komisaris antara lain adalah:

- 1) Memenuhi persyaratan dimaksud dalam POJK Nomor 33/POJK.04/2014 tanggal 8 Desember 2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, yaitu:
 - a. Mempunyai akhlak, moral, dan integritas yang baik.
 - b. Cakap melakukan perbuatan hukum.
 - c. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:

(2) Charter of the Board of Commissioners (BOC Charter)

Charter of the Board of Commissioners is stipulated in the "Guidelines for Code of Conduct of the Board of Commissioners of PT Bank J Trust Indonesia Tbk" approved by the Board of Directors on December 12, 2018. Further, the Guidelines for Code of Conduct of the Board of Commissioners will be reviewed periodically where deemed necessary by observing the applicable laws and regulations.

(3) Appointment and Term of Office

- 1) Any proposal for the appointment and/or replacement of members of the Board of Commissioners has taken into consideration the recommendations from the Nomination and Remuneration Committee and must be approved by the shareholders through the General Meeting of Shareholders (GMS) in line with the main criteria by considering the integrity, competence, professionalism and adequate financial reputation in accordance with the requirements of the Fit and Proper Test that have been stipulated by the Financial Services Authority (OJK).
- 2) The term of office for member of the Board of Commissioners according to the Articles of Association shall be effective from the date specified in the GMS and ending at the 3rd (third) Annual General Meeting of Shareholders after the date of the appointment.
- 3) Member of the Board of Commissioners whose term of office has expired may be re-appointed by the GMS.
In accordance with the Resolutions of the AGMS on March 30, 2017 which approved the reappointment of the term of office of member of the Board of Commissioners, the Board of Commissioners of PT Bank JTrust Indonesia Tbk has never been more than 2 (two) consecutive periods since the date of appointment at the EGMS 2014.

(4) Criteria of the Board of Commissioners

Criteria for the appointment of members of the Board of Commissioners are as follows:

- 1) Meeting the requirements referred to in Regulation of Financial Services Authority No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, namely:
 - a. Having good moral and integrity.
 - b. Proficient in performing legal actions.
 - c. Within 5 (five) years before appointment and during the term of office:

- a) Tidak pernah dinyatakan pailit.
- b) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit.
- c) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; dan
- d) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang selama menjabat:
- (a) Pernah tidak menyelenggarakan RUPS tahunan;
- (b) Pertanggungjawabannya sebagai anggota Direksi dan/atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada RUPS; dan
- (c) Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan laporan tahunan dan/atau laporan keuangan kepada Otoritas Jasa Keuangan.
- d. Memiliki komitmen untuk mematuhi peraturan perundang-undangan.
- e. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan perusahaan.
- 2) Memenuhi persyaratan integritas, reputasi keuangan dan kompetensi yang dimaksud dalam POJK Nomor 27/POJK.03/2016 tanggal 22 Juli 2016 tentang Penilaian Kemampuan dan Kepatutan Bagi Pihak Utama Lembaga Jasa Keuangan, dan SEOJK Nomor 39/SEOJK.03/2016 tanggal 13 September 2016 tentang Penilaian Kemampuan dan Kepatutan Bagi calon Pemegang Saham Pengendali, Calon Anggota Direksi, dan Calon Anggota Dewan Komisaris Bank.

Persyaratan Integritas meliputi:

- a. cakap melakukan perbuatan hukum.
- b. Memiliki akhlak dan moral yang baik, paling sedikit ditunjukkan dengan sikap mematuhi ketentuan yang berlaku, termasuk tidak pernah dihukum karena

- a) Never been declared bankrupt.
- b) Never become member of the Board of Directors and/or of the Board of Commissioners who is found guilty of causing a company to be declared bankrupt.
- c) Never been punished for committing a criminal offense that is detrimental to state finances and/or relating to the financial sector; and
- d) Never been a member of the Board of Directors and/or members of the Board of Commissioners who, during their term of office:
- (a) Never held an annual GMS;
- (b) His/her accountability as member of the Board of Directors and/or the Board of Commissioners was not accepted by the GMS or has not provide accountability as a member of the Board of Directors and/or members of the Board of Commissioners to the General Meeting of Shareholders; and
- (c) Never cause a company which obtaining permit, approval or registration from the Financial Services Authority to be failed to comply with the obligation to submit annual reports and/or financial statements to the Financial Services Authority.
- d. Have a commitment to comply with laws and regulations.
- e. Having knowledge and/or expertise in the field required by the company.
- 2) Meeting the requirements of integrity, financial reputation and competence as referred to in the Regulation of Financial Services Authority No. 27/POJK.03/2016 dated July 22, 2016 regarding the Assessment of Ability and Payables of Major Financial Institutions, and Circular Letter of the Financial Services Authority No. 39/SEOJK.03/2016 dated September 13, 2016 on Capacity and Compliance Assessment for candidate of Controlling Shareholder, Member of Board of Directors, and Member of Board of Commissioners of Bank.

Integrity requirements include:

- a. Proficient in conducting legal action.
- b. Having good character and morals, at least indicated by attitudes in compliance with applicable provisions, including never being convicted of a criminal offense

terbukti melakukan tindak pidana dalam jangka waktu 20 (dua puluh) tahun terakhir sebelum dicalonkan.

- c. Memiliki komitmen untuk mematuhi peraturan perundang-undangan dan mendukung kebijakan OJK.
- d. Memiliki komitmen terhadap pengembangan Bank yang sehat; dan
- e. Tidak termasuk sebagai pihak yang dilarang untuk menjadi Pihak Utama.

Persyaratan reputasi keuangan meliputi:

- a. Tidak memiliki kredit dan/atau pembiayaan macet; dan
- b. Tidak pernah dinyatakan pailit dan/atau tidak pernah menjadi pemegang saham, Pengendali Perusahaan Perasuransian yang bukan merupakan pemegang saham, anggota Direksi, atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perseroan dinyatakan pailit dalam waktu 5 (lima) tahun terakhir sebelum dicalonkan.

Persyaratan kompetensi paling sedikit meliputi pengetahuan dan/atau pengalaman yang mendukung pengelolaan Bank.

(5) Kriteria Komisaris Independen

Kriteria Komisaris Independen PT Bank JTrust Indonesia Tbk telah sesuai dengan definisi POJK Nomor 55/POJK.03/2016 tentang Penerapan Tata Kelola Bagi Bank Umum dan POJK Nomor 33/POJK.04/2014 tanggal 8 Desember 2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik Pasal 21, sebagai berikut:

- a. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank tersebut dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen pada periode berikutnya.
- b. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank.
- c. Tidak mempunyai hubungan afiliasi dengan Bank anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham Utama Bank.
- d. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank.

within the last 20 (twenty) years before being nominated.

- c. Having a commitment to comply with laws and regulations and support OJK policy.
- d. Committed to the development of a sound Bank; and
- e. Not included as a party prohibited to become a Principal Party.

Financial reputation requirements include:

- a. Does not have credit and/or non-performing financing; and
- b. Has never been declared bankrupt and/or has never been a shareholder, Insurance Company Controller who is not a shareholder, member of the Board of Directors or member of the Board of Commissioners found guilty of causing a company to be declared bankrupt within the last 5 (five) years before being nominated.

Competence requirements at least include knowledge and/or experience that support the Bank's management.

(5) Criteria of Independent Commissioners

Criteria for Independent Commissioner of PT Bank JTrust Indonesia Tbk has been in conformity with the definition stipulated in the Regulation of Financial Services Authority No. 55/POJK.03/2016 on the Implementation of Good Corporate Governance for Commercial Banks and Regulation of Financial Services Authority No. 33/POJK.04/2014 dated December 8, 2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies Article 21, as follows:

- a. Not a person who is employed or has the authority and responsibility to plan, lead, control or supervise the Bank's activities within the last 6 (six) months, except for re-appointment as an Independent Commissioner in the following period.
- b. Has no shares either directly or indirectly at the Bank.
- c. Has no affiliation with the Bank, member of the Board of Commissioners, member of the Board of Directors, or the Principal Shareholder of the Bank.
- d. Has no direct or indirect business relationship related to the Bank's business activities.

**Pernyataan tentang Independensi Komisaris
Independen****Statement on Independency of Independent
Commissioner**

Aspek Independensi Aspect of Independency	Mahdi Mahmudy	Kwik Ing Hie
Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan atau mengawasi kegiatan PT Bank JTrust Indonesia Tbk dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen PT Bank JTrust Indonesia Tbk pada periode berikutnya. Not a person who is employed or has the authority and responsibility to plan, lead, control or supervise the activities of PT Bank JTrust Indonesia Tbk within the last 6 (six) months, except for re-appointment as Independent Commissioner of PT Bank JTrust Indonesia Tbk in the following period.	√	√
Tidak mempunyai saham baik langsung maupun tidak langsung pada PT Bank JTrust Indonesia Tbk. Has no shares, directly or indirectly, at PT Bank JTrust Indonesia Tbk	√	√
Tidak mempunyai hubungan Afiliasi dengan PT Bank JTrust Indonesia Tbk, anggota Dewan Komisaris, Direksi atau pemegang saham utama PT Bank JTrust Indonesia Tbk. Not affiliated with PT Bank JTrust Indonesia Tbk, member of the Board of Commissioners, Board of Directors or major shareholder of PT Bank JTrust Indonesia Tbk	√	√
Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha PT Bank JTrust Indonesia Tbk. Has no direct or indirect business relationship relating to the activities of PT Bank JTrust Indonesia Tbk.	√	√

Sebagai bagian dalam melakukan proses uji kemampuan dan kepatutan (*Fit and Proper Test*) di Otoritas Jasa Keuangan (OJK), anggota Komisaris Independen telah membuat dan menandatangani Surat Pernyataan Independensi serta telah disampaikan kepada Otoritas Jasa Keuangan (OJK).

As a part of the fit and proper test process at the Financial Services Authority (OJK), member of Independent Commissioners has prepared a Statement of Independency for submission to OJK.

(6) Jumlah dan Komposisi Dewan Komisaris

Mengacu kepada Peraturan Otoritas Jasa Keuangan (POJK) Nomor 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola Bagi Bank Umum:

- Jumlah anggota Dewan Komisaris sekurang-kurangnya 3 (tiga) orang dan paling banyak sama dengan jumlah anggota Direksi.
- Sekurang-kurangnya 1 (satu) anggota Dewan Komisaris berdomisili di Indonesia.
- Dewan Komisaris wajib dipimpin oleh Presiden Komisaris atau Komisaris Utama.
- Dewan Komisaris wajib terdiri dari Komisaris Independen dan Komisaris Non Independen, paling kurang 50% (lima puluh persen) dari jumlah anggota Dewan Komisaris adalah Komisaris Independen.

(6) Total members and composition of the Board of Commissioners

In reference to the Regulation of the Financial Services Authority (FSA) No. 55/POJK.03/2016 dated December 7, 2016 concerning Governance Implementation for Commercial Banks:

- Members of the Board of Commissioners is at least 3 (three) persons and shall not exceed the number of members of the Board of Directors.
- At least one (1) person of the Board of Commissioners is domiciled in Indonesia.
- The President Commissioner shall chair the Board of Commissioners.
- The Board of Commissioners shall consist of Independent and non-Independent Commissioners, at least 50% (fifty percent) of the total number of Board of Commissioners is Independent Commissioner.

Berdasarkan hasil keputusan RUPSLB tanggal 20 September 2018, jumlah dan komposisi Dewan Komisaris PT Bank JTrust Indonesia Tbk telah sesuai kriteria POJK di atas, sebagai berikut:

- Anggota Dewan Komisaris sebanyak 4 (empat) orang, termasuk 2 (dua) orang Komisaris Independen, 1 (satu) orang Komisaris, dan 1 (satu) orang Komisaris Utama, sedangkan anggota Direksi sebanyak 6 (enam) orang.
- Anggota Dewan Komisaris yang berkewarganegaraan dan berdomisili di Indonesia sebanyak 2 (dua) orang, serta 2 (dua) orang berkewarganegaraan Jepang dan berdomisili di Indonesia.
- Jumlah Komisaris Independen sebanyak 50% dari jumlah anggota Dewan Komisaris.

Jumlah dan susunan anggota Dewan Komisaris tersebut adalah:

No	Nama Name	Jabatan Position	Warganegara/ Domisili Citizenship/ Domicile	Tanggal Pengangkatan & Persetujuan Date of Appointment & Approval		Tanggal Pengangkatan Kembali Date of Reappointment RUPS GMS
				RUPS GMS	BI/OJK BI/FSA	RUPS
1.	Nobiru Adachi	Komisaris Utama President Commissioner	Jepang/Jepang Japanese/Japan	- RUPSLB tgl. 20 November 2014 - RUPSLB tgl. 30 Desember 2014 - EGMS on 20 November 2014 - EGMS on 30 December 2014	14 April 2015 April 14, 2015	- RUPS Tahunan tgl. 30 Maret 2017 - Annual GMS on March 30, 2017
2.	Nobuiku Chiba	Komisaris Commissioner	Jepang/Jepang Japanese/Japan	- RUPSLB tgl. 20 September 2018 - EGMS on 20 September 2018	12 Maret 2016 March 12, 2016	
3.	Mahdi Mahmudy	Komisaris Independen Independent Commissioner	Indonesia	- RUPS Tahunan tgl. 30 Juni 2016 - Annual GMS on 30 June 2016	23 November 2017 November 23, 2017	
4.	Kwik Ing Hie	Komisaris Independen Independent Commissioner	Indonesia	- RUPS Tahunan tgl. 30 Juni 2016 - Annual GMS on 30 June 2016	24 Agustus 2015 August 24, 2015	

Adapun ringkasan profil anggota Dewan Komisaris sebagai berikut:

1. Komisaris Utama : **Nobiru Adachi**
Warga Negara Jepang, 60 tahun. Ditetapkan/diangkat kembali sebagai Komisaris Utama J Trust Bank berdasarkan hasil keputusan RUPST tanggal 30 Maret 2017. Sebelumnya diangkat sebagai Komisaris Utama J Trust Bank sejak 30 Desember 2014 yang pada saat itu dikenal sebagai Bank Mutiara. Memiliki pengalaman 26 tahun di kementerian keuangan Jepang. Pada April 1980, bergabung dengan Departemen Keuangan Jepang dan mengemban berbagai jabatan

Based on EGMS resolutions on 20 September 2018, the number and composition of the Board of Commissioners of PT Bank JTrust Indonesia Tbk is in accordance with the above criteria, as follows:

- Members of the Board of Commissioners are 4 (four) persons, including 2 (two) Independent Commissioners, 1 (one) Commissioner and 1 (one) President Commissioner, while members of the Board of Directors are 6 (six) persons.
- Members of the Board of Commissioners who are Indonesian citizens and domiciled in Indonesia are 2 (two) persons, and 2 (two) are Japanese citizens but domiciled in Indonesia.
- The number of Independent Commissioners is 50% of the total members of the Board of Commissioners.

The number and composition of the Board of Commissioners are as follow:

The summarized profile of the Board of Commissioners are as follows:

1. PRESIDENT COMMISSIONER: **Nobiru Adachi**
Japanese Citizen, 60 years old. Appointed/reappointed as President Commissioner of J Trust Bank based on AGMS on March 30, 2017. Previously was appointed as President Commissioner of J Trust Bank since December 30, 2014, at that time was known as Bank Mutiara. He has more than 26 years of working experience at the Japan's Ministry of Finance. He joined the Japan's Ministry of Finance in April 1980, where he held various strategic positions such as Director of

strategis, yaitu Direktur Kantor Pelayanan Pajak Onomichi pada Juli 1986, Direktur Wakil Menteri Keuangan untuk Urusan Internasional, bagian Sekretariat Menteri pada Juni 1997, Penasehat Hukum di Biro Anggaran, Direktur pada Divisi Riset Biro Internasional pada Juni 2002, Direktur Institut Riset Kebijakan Departemen Keuangan pada Juni 2004, Direktur Jenderal Bea Cukai di Hakodate pada Juni 2005. Pada April 2006, ditunjuk sebagai Officer di Jasdaq Securities Exchange, Inc, dipromosikan menjadi Executive Officer pada Juni 2006 dan pada Oktober 2008, menjadi Country Head untuk Jepang di ETF Securities Ltd, sebelum menjabat sebagai Chairman dan CEO di M & A Solution Japan Co, Ltd pada Oktober 2011. Bergabung dengan J Trust Co., Ltd. pada April 2013 sebagai Advisor. Kemudian menjabat sebagai Managing Director pada Juni 2013. Posisi selanjutnya adalah Direktur Perwakilan dan Senior Managing Director yang bertanggungjawab atas Corporate Management Dept. dan pada November 2014 bergabung dengan J Trust Bank sebagai Komisaris sebelum ditunjuk sebagai Komisaris Utama. Menyelesaikan pendidikan Sarjana di Universitas Tokyo, Fakultas Hukum, tahun 1980; Case Western University, Fakultas Ekonomi, tahun 1983.

2. Komisaris : **Nobuiku Chiba**
Warga Negara Jepang, 45 Tahun. Komisaris J Trust Bank diangkat melalui RUPSLB tanggal 20 September 2018. Pengalaman bekerja terakhir sebagai Komisaris Utama PT JTrust Olympindo Multi Finance, Komisaris Utama pada PT JTrust Investments Indonesia, Representative Director di J Trust Co., Ltd., Representative Director di JT Capital Co.,Ltd. Director JT Saving Bank Co.,Ltd, memiliki pengalaman Kerja selama 26 tahun di industri investasi dan bisnis. Beliau memulai karir di Hikari Tsushin, Inc Japan pada tahun 1992. Menyelesaikan pendidikan di Koshigaya-Minami Senior High School Japan pada tahun 1991.
3. Komisaris Independen : **Mahdi Mahmudy**
Warga Negara Indonesia, 61 Tahun. Komisaris Independen J Trust Bank diangkat melalui RUPST tanggal 30 Juni 2016. Pengalaman bekerja terakhir sebagai Executive Director pada Bank Indonesia di Departemen Regional Area Kalimantan. Memiliki pengalaman 30 tahun di industri perbankan. Beliau memulai karir di Bank Indonesia pada tahun 1986. Beliau meraih gelar Sarjana Sosial di bidang Manajemen Finansial dari Universitas Indonesia pada tahun 1984. Kemudian beliau meraih gelar Master di bidang Kebijakan Moneter dari University of Illinois pada tahun 1992 dan gelar Doktor di bidang Manajemen Strategik dari Universitas Indonesia pada tahun 2011.

the Tax Office in Onomichi in July 1986, Director of Deputy Finance Minister for International Affairs, Secretariat of the Minister in June 1997; Legal Counselor of the Budgeting Bureau, Director of International Bureau's Research Division in June 2002; Director of Policy Research Institute of the Ministry of Finance in June 2004; Director General of Customs in Hakodate in June 2005. He was appointed as Officer in Jasdaq Securities Exchange, Inc. in April 2006, then promoted as Executive Officer in June 2006 and Country Head for Japan in ETF Securities Ltd in October 2008. Then he served as Chairman and CEO in M & A Solution Japan Co., Ltd. in October 2011. He joined J Trust Co., Ltd. in April 2013, serving as Advisor before became Managing Director in June 2013. The next position was the Director of Representative and Senior Managing Director in charge of Corporate Management Department, followed by joining J Trust Bank as Commissioner in November 2014, prior to his appointment as President Commissioner. He obtained his Bachelor degree from Faculty of Law University of Tokyo in 1980 and from Faculty of Economics Case Western University in 1983.

2. Commissioner : **Nobuiku Chiba**
Japanese Citizen, 45 years old. Appointed as Commissioner of J Trust Bank based on EGMS on September 20, 2018. Last work as President Commissioner of PT JTrust Olympindo Multi Finance, President Commissioner of PT JTrust Investments Indonesia, Representative Director of J Trust Co., Ltd., Representative Director in JT Capital Co., Ltd. Director in JT Saving Bank Co., Ltd, having 26 years work experience in investment and business. He started his career in Hikari Tsuhshin, Inc Japan in 1992. Finishing his education in Kosighaya-Minami Senior High School in 1991.
3. Independent Commissioner: **Mahdi Mahmudy**
Indonesian Citizen, 61 years old. Independent Commissioner J Trust Bank appointed through AGMS on 30 June 2016. Last worked as Executive Director at Regional Department of Kalimantan Area. He has more than 30 years of working experience in the banking industry. He started his career in 1986 at Bank Indonesia. He obtained his Bachelor of Arts degree in Financial Management from the University of Indonesia in 1984, then Masters degree in Monetary Policy from the University of Illinois in 1992, and Doctorate degree in Management Strategic from the University of Indonesia in 2011.

4. **Komisaris Independen : Kwik Ing Hie**
 Warga Negara Indonesia, 56 tahun. Komisaris Independen J Trust Bank diangkat melalui RUPST tanggal 30 Juni 2016. Memiliki pengalaman 28 tahun di industri keuangan dan konsultasi. Saat ini menjabat sebagai Managing Partner di Sternbridge Partner sejak 2015. Kwik Ing Hie sebelumnya menjabat sebagai Komisaris MPM sejak 2010, dan juga menjabat sebagai anggota Komite GCG serta Ketua Komite Nominasi dan Remunerasi (KNR) MPM sejak 2013. Beliau pernah menjabat sebagai Presiden Direktur PT Affinity Equity Partners Indonesia dari Oktober 2009 hingga Juni 2014 dan sebagai Presiden Direktur PT Morgan Stanley Asia Indonesia dari 2006 hingga 2009. Sejak 1999 hingga 2006, beliau memimpin perusahaan investasi miliknya yang fokus kepada merger, akuisisi, dan investasi pinjaman darurat. Beliau meraih gelar Master of Business Administration dari Stanford University pada 1991, dan gelar Bachelor of Science in Computer Engineering dari Syracuse University pada tahun 1986.

(7) Rangkap Jabatan

Sesuai ketentuan dalam POJK tentang Penerapan Tata Kelola Bagi Bank Umum, Anggota Dewan Komisaris dilarang melakukan rangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif pada lembaga keuangan/perusahaan keuangan baik Bank maupun bukan Bank, juga pada > 1 (satu) lembaga bukan keuangan atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri, kecuali:

- Merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif pada 1 (satu) lembaga/perusahaan bukan lembaga keuangan, atau
- Merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) perusahaan anak bukan Bank yang dikendalikan oleh Bank.
- Komisaris Non Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank, dan/atau
- Anggota Dewan Komisaris menduduki jabatan pada organisasi/lembaga nirlaba.

Pada periode tahun 2018, rangkap jabatan anggota Dewan Komisaris sebagai berikut:

4. **Independent Commissioner : Kwik Ing Hie**
 Indonesian Citizen, 56 years old. Independent commissioner of J Trust Bank appointed via AGMS on 30 June 2016. Has 28 years of experience in the financial industry and consultancy. Currently he serves as Managing Partner in Sternbridge Partner since 2015. Previously he became as Commissioner of MPM since 2010 and as members of the GCG Committee and Chairman of the Nomination and Remuneration Committee of MPM since 2013. He was the President Director of PT Affinity Equity Partners Indonesia from October 2009 to June 2014 and President Director of PT Morgan Stanley Asia Indonesia from 2006 to 2009. Between 1999 and 2006, he led his investment firm focusing on merger, acquisition, and emergency loan investment. He received Master of Business Administration degree from Stanford University in 1991, and Bachelor of Science in Computer Engineering from Syracuse University in 1986

(7) Concurrent Position

In accordance with the OJK provisions on the Implementation of Good Corporate Governance for Commercial Banks, members of the Board of Commissioners are prohibited from assuming concurrent positions as members of the Board of Directors, Board of Commissioners or Executive Officers of financial institutions/financial companies, whether Bank or non-Bank, and on > 1 (one) non-financial institution or non-financial firm, located at home or abroad, except:

- To concurrently serve as a member of the Board of Directors, members of the Board of Commissioners or Executive Officers at 1 (one) non-financial institution/company, or
- To concurrently serve as a member of Board of Directors, Board of Commissioners or Executive Officer performing supervisory functions on 1 (one) non-bank subsidiary which was controlled by the Bank.
- Non-Independent Commissioner shall perform functional duties of the Bank's Shareholders which has a legal entity in the Bank's business group, and/or
- Member of the Board of Commissioners holding position at non-profit organizations/institutions.

In 2018, the dual position of the Board of Commissioners is as follows:

No	Nama Name	Jabatan Position	Jabatan Lain Other Position
1.	Nobiru Adachi	Komisaris Utama President Commissioner	Representative Director and Senior Managing Director in charge of Corporate Management Dept. of J Trust Co., Ltd.
2.	Nobuiku Chiba	Komisaris Commissioner	<ul style="list-style-type: none"> Executive Senior JTrust Co.,Ltd. Executive Director JTrust Capital Co.,Ltd. Director JT Chinae Saving Bank Co.,Ltd. Representative Director (incumbent) JTrust Co.,Ltd. President Commissioner (incumbent) PT JTrust Investment Indonesia. President Commissioner (incumbent) PT JTrust Olympindo Multi Finance (JTrust Olympindo Finance).
3.	Mahdi Mahmudy	Komisaris Independen Independent Commissioner	Tidak ada None
4.	Kwik Ing Hie	Komisaris Independen Independent Commissioner	Tidak ada None

Rangkap jabatan oleh anggota Dewan Komisaris J Trust Bank telah sesuai dengan ketentuan POJK dimaksud, yaitu anggota Komisaris Non Independen melakukan rangkap jabatan untuk menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank.

Dual positions by members of the Board of Commissioners of J Trust Bank are in line with the POJK regulations: members of Non-Independent Commissioners hold dual positions to implement functional task from Bank Shareholders in form of legal institutions in Bank business group.

(8) Hubungan Afiliasi

Anggota Dewan Komisaris PT Bank JTrust Indonesia Tbk telah membuat dan menandatangani surat pernyataan terkait beberapa hal sebagai berikut:

- Anggota Dewan Komisaris memiliki saham yang mencapai $\geq 5\%$ (lima persen) dari modal disetor pada Bank yang bersangkutan, Bank Lain, Lembaga keuangan bukan Bank, dan perusahaan lain yang berkedudukan baik di dalam maupun di luar negeri.

(8) Affiliation

Members of the Board of Commissioners of PT Bank JTrust Indonesia Tbk has issued and signed a statement letter related to the following matters:

- Members of the Board of Commissioners have shares that reached $\geq 5\%$ (five percent) of the paid up capital of the respective Bank, other banks, non-bank financial institutions, and other firms both in domestic and overseas.

Transparansi Kepemilikan Saham Anggota Dewan Komisaris yang Mencapai 5% atau Lebih dari Modal Disetor

Transparency of Share Ownership of Members of the Board of Commissioners Achieving 5% or More of Paid-in Capital

No	Nama Name	J Trust Bank	Bank Lain Other Bank	Lembaga Keuangan Bukan Bank Non Bank Financial Institution	Perusahaan Lain Other Company	%
1.	Nobiru Adachi	-	-	-	-	-
2.	Nobuiku Chiba	-	-	-	-	-
3.	Mahdi Mahmudy	-	-	-	-	-
4.	Kwik Ing Hie	-	-	-	-	-

- Hubungan Keuangan dan Hubungan Keluarga Anggota Dewan Komisaris dengan Anggota Dewan Komisaris Lainnya, Direksi dan/atau Pemegang Saham Pengendali Bank

- Financial Relationships and Family Relationships of Members of the Board of Commissioners with Other Members of Boards of Commissioners, Directors and/or Controlling Shareholder of the Bank

Transparansi Hubungan Keuangan

Financial Relation Transparency

No	Nama Name	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Pengendali Controlling Shareholders	
		Ya Yes	Tidak No	Ya Yes	Tidak No	Ya Yes	Tidak No
1.	Nobiru Adachi		√		√		√
2.	Nobuiku Chiba		√		√		√
3.	Mahdi Mahmudy		√		√		√
4.	Kwik Ing Hie		√		√		√

Transparansi Hubungan Keluarga

Family Relationship Transparency

No	Nama Name	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Pengendali Controlling Shareholders	
		Ya Yes	Tidak No	Ya Yes	Tidak No	Ya Yes	Tidak No
1.	Nobiru Adachi		√		√		√
2.	Nobuiku Chiba		√		√		√
3.	Mahdi Mahmudy		√		√		√
4.	Kwik Ing Hie		√		√		√

(9) Kebijakan dan Pelaksanaan Rapat Dewan Komisaris

- 1) Kebijakan Rapat Dewan Komisaris
 1. Dewan Komisaris wajib mengadakan rapat Dewan Komisaris paling kurang 1(satu) kali dalam 2 (dua) bulan dan rapat bersama Direksi paling kurang 1 (satu) kali dalam 4 (empat) bulan.
 2. Dewan Komisaris harus menjadwalkan rapat untuk tahun berikutnya sebelum berakhirnya tahun buku.
 3. Pada rapat yang telah dijadwalkan, bahan rapat disampaikan kepada peserta paling lambat 5 (lima) hari sebelum rapat diselenggarakan. Dalam hal terdapat rapat yang diselenggarakan di luar jadwal yang telah disusun, bahan rapat disampaikan kepada peserta rapat paling lambat sebelum rapat diselenggarakan.
 4. Dewan Komisaris wajib menghadiri setidaknya 2 (dua) kali rapat, baik secara fisik atau melalui *video conference*.
 5. Pengambilan keputusan rapat Dewan Komisaris telah dilakukan berdasarkan musyawarah untuk mufakat, dan/atau suara terbanyak dalam hal tidak terjadi keputusan musyawarah untuk mufakat.
 6. Hasil rapat Dewan Komisaris wajib dituangkan dalam risalah rapat/notulen, ditandatangani oleh anggota Dewan Komisaris yang hadir, disampaikan kepada seluruh anggota Dewan Komisaris dan didokumentasikan dengan baik, termasuk pencantuman *dissenting opinions* (apabila ada).

(9) Policy and Implementation of the Board of Commissioners Meeting

- 1) Board of Commissioners' Meeting Policy
 1. The Board of Commissioners shall hold a meeting of the Board of Commissioners at least once in 2 (two) months and meetings with the Board of Directors at least once in 4 (four) months.
 2. The Board of Commissioners shall schedule meetings for the following year before the end of the fiscal year.
 3. At the scheduled meeting, the material for the meeting shall be submitted to the participants no later than 5 (five) days prior to the meeting. In the event that the meeting is held out of the schedule, then the meeting material shall be submitted to the participants at least before the meeting is held.
 4. The Board of Commissioners shall attend at least 2 (two) meetings, either physically or through video conference.
 5. The decision of the Board of Commissioners' shall be made based on deliberation for consensus, and/or through voting in the event that no decision based on deliberation for consensus had been reached.
 6. The results of the Board of Commissioners' meetings shall be set forth in minutes of meetings, signed by members of the Board of Commissioners attending the meeting, distributed to all members of the Board of Commissioners and properly documented, including inclusion of dissenting opinions (if any).

2) Selama periode tahun 2018, Dewan Komisaris telah menyelenggarakan rapat dengan frekuensi rapat dan tingkat kehadiran anggota Dewan Komisaris sebagai berikut:

a. Rapat Bersama anggota Dewan Komisaris dengan anggota Direksi selama tahun 2018 sebanyak 6 (enam) kali, dimana jumlah kehadiran rapat dihadiri secara fisik oleh seluruh anggota Dewan Komisaris yang telah lulus uji kemampuan dan kepatutan (*Fit and Proper Test*) oleh OJK berdasarkan 'periode menjabat' adalah:

2) In 2018, the Board of Commissioners has held meetings with the frequency of meetings and attendance of members of the Board of Commissioners as follows:

a. Joint Meeting of the Board of Commissioners with the Board of Directors in 2017 for 6 (six) times, in which the number of physical attendance by all members of the Board of Commissioners who have passed the Fit and Proper Test by OJK, based on the terms of office is as follow:

Nama Name	Periode Menjabat (Sejak Lulus F & P) Serving Period (After passing the F & P)	Jumlah Kehadiran Attendance	% Kehadiran % Attendance
Rapat Bersama Dewan Komisaris dengan Direksi Board of Commissioners - Board of Directors Meeting			
Nobiru Adachi Komisaris Utama President Commissioner	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	2	33%
Shigeyoshi Asano Komisaris Commissioner ¹⁾	1 Januari s/d 20 September 2018 January 1 until September 20, 2018	2	33%
Ahmad Fajar Komisaris Commissioner ²⁾	1 Januari s/d 30 April 2018 January 1 until April 30, 2018	1	17%
Nobuiku Chiba Komisaris Commissioner ³⁾	12 Maret 2019 March 12, 2019	-	-
Benny Luhur Komisaris Independen Independent Commissioner ⁴⁾	1 Januari s/d 28 Juni 2018 January 1 until June 28, 2018	2	33%
Mahdi Mahmudy Komisaris Independen Independent Commissioner	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	6	100%
Kwik Ing Hie Komisaris Independen Independent Commissioner	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	6	100%

¹⁾ Pengalihan tugas sebagai Direktur Utama berdasarkan hasil keputusan RUPSLB tanggal 20 September 2018, dan efektif tanggal 21 Februari 2019 sebagai Direktur Utama sejak lulus fit and proper test oleh OJK

²⁾ Efektif tanggal 23 November 2017 sejak lulus fit and proper test oleh OJK, kemudian mengundurkan diri efektif per tanggal 1 Mei 2018.

³⁾ Ditunjuk sebagai Komisaris berdasarkan hasil keputusan RUPSLB tanggal 20 September 2018, dan efektif tanggal 12 Maret 2019 sebagai Komisaris sejak lulus fit and proper test oleh OJK

⁴⁾ Berakhirnya masa jabatan berdasarkan hasil keputusan RUPST tanggal 28 Juni 2018

¹⁾ Transfer of duties as President Director based on the resolutions of the EGMS on September 20, 2018, and effective on February 21, 2019 as President Director since passing the fit and proper test by OJK

²⁾ Effective November 23, 2017 after passing the fit and proper test by the OJK, then resigning effectively as of May 1, 2018.

³⁾ Appointed as a Commissioner based on the resolutions of the EGMS on September 20, 2018, and effective on March 12, 2019 as a Commissioner after passing the fit and proper test by OJK

⁴⁾ The expiration of the term of office is based on the resolutions of the AGMS dated June 28, 2018

Tabel kehadiran rapat untuk masing-masing anggota Dewan Komisaris adalah:

The table of meeting attendance of each member of the Board of Commissioners is as follow:

Nama Komisaris Commissioners Name	1	2	3	4	5	6	Σ Jumlah Kehadiran Attendance
	Tgl Date 14/2/18	Tgl Date 24/5/18	Tgl Date 30/8/18	Tgl Date 25/10/18	Tgl Date 22/11/18	Tgl Date 13/12/18	
Nobiru Adachi	x	√	x	x	√	x	2
Shigeyoshi Asano	x	√	√	-	-	-	2
Ahmad Fajar	√	-	-	-	-	-	1
Nobuiku Chiba				-	-	-	-
Benny Luhur	√	√	-	-	-	-	2
Mahdi Mahmudy	√	√	√	√	√	√	6
Kwik Ing Hie	√	√	√	√	√	√	6

Keterangan | Note:

√: Hadir | Present

X: Absen | Absent

-: Belum efektif | Not effective in position

b. Agenda Rapat Bersama Dewan Komisaris dengan Direksi (Radirkom)

b. Agenda of Joint Meeting of the Board of Commissioners with the Board of Directors (Radirkom)

Tanggal Date	Jenis Rapat Types of Meeting	Agenda Rapat Meeting Agenda
14 Februari 2018 14 February 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> Presentasi tentang struktur organisasi Bank yang terkini. Presentasi tentang hasil migrasi <i>Core Banking System</i> Bank dan hasil <i>Post Implementation Review</i> dan tindak lanjutnya, serta program kerja untuk pemenuhan implementasi sistem/aplikasi lainnya yang ditargetkan di Triwulan I 2018. Presentasi kinerja Bank per 31 Desember 2017. Lain-lain. <ol style="list-style-type: none"> Presentation of the Bank's current organizational structure. Presentation on the results of the Bank Core Banking System migration and the results of the Post Implementation Review and its follow-up, as well as work programs to fulfill the implementation of other systems/applications targeted in the first Quarter of 2018 Bank performance presentation as of December 31, 2017. Others.
24 Mei 2018 24 May 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> Struktur Organisasi Bank – tanggapan atas hal yang menjadi perhatian OJK serta usulannya. Tindak lanjut Direksi dalam memastikan akuntabilitas dan validitas laporan keuangan, serta <i>progress</i> status dari komitmen Bank kepada OJK. Tindak lanjut Direksi atas kelanjutan pengembangan CBS guna mendukung pertumbuhan <i>lending</i> dan <i>funding</i> Bank; serta terhadap kewajiban untuk memenuhi standar akuntansi yang berlaku. Pengelolaan likuiditas dan <i>funding</i> – tanggapan atas hal yang menjadi perhatian OJK; serta upaya untuk memitigasi pengenaan denda oleh regulator Kinerja keuangan Bank per 30 April 2018. <ol style="list-style-type: none"> Bank Organizational Structure - response to matters of concern to the OJK and its proposals. Follow-up actions of the Directors in ensuring the accountability and validity of financial statements, as well as progress status from the Bank's commitment to the FSA. Follow-up of the Board of Directors regarding the continued development of CBS to support the growth of lending and funding of the Bank; and the obligation to meet applicable accounting standards. Management of liquidity and funding - responses to matters of concern to the FSA; and efforts to mitigate the imposition of fines by regulators Bank financial performance as of April 30, 2018.

Tanggal Date	Jenis Rapat Types of Meeting	Agenda Rapat Meeting Agenda
30 Agustus 2018 30 August 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> 1. Kinerja keuangan Bank per 31 Juli 2018 dengan perbandingan terhadap RBB dan posisi keuangan per 30 Juni dan 31 Mei 2018. 2. Tindak lanjut manajemen di sisa periode tahun 2018 guna memperbaiki kinerja Bank di area: <ul style="list-style-type: none"> - Kredit - <i>Funding</i> - Likuiditas - Rentabilitas - Modal - Rasio Keuangan 3. Lain-lain <ol style="list-style-type: none"> 1. The Bank's financial performance as of July 31, 2018 with a comparison of the RBB and financial position per June 30 and May 31, 2018. 2. Management's follow-up in the remaining 2018 period to improve the Bank's performance in the area: <ul style="list-style-type: none"> - Credit - Funding - Liquidity - Rentability - Capital - Financial Ratio 3. Others
25 Oktober 2018 25 October 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> 1. <i>Progress</i> pemenuhan <i>action plan</i> Bank sebagaimana komitmen Bank kepada OJK untuk menjawab permasalahan berikut, termasuk penjelasan tentang langkah-langkah yang akan diambil Bank <ul style="list-style-type: none"> - Permodalan <i>Progress</i> pemenuhan <i>action plan</i> atas permodalan guna mengantisipasi memburuknya kualitas kredit, perkembangan atas kasus-kasus hukum yang sedang berjalan, dan untuk mendukung pertumbuhan kredit di tahun 2018 sesuai dengan RBB 2018. - Perkreditan Proses pemenuhan <i>action plan</i> atas perkreditan Bank guna menurunkan rasio NPL menjadi di bawah 4%; pengalihan kredit bermasalah kepada JTII, melakukan <i>review</i> atas pinjaman-pinjaman yang memburuk menjadi NPL dalam 1 (satu) tahun sejak pinjaman dicairkan dan tindakan mitigasinya, serta untuk menangani pelanggaran BMPK an. PT Sinar Central Sandang. - Likuiditas/<i>Liquidity</i> Proses pemenuhan <i>action plan</i> untuk mengurangi/meminimalkan ketergantungan Bank terhadap Pasar Uang Antar Bank (PUAB) - Lain-lain 2. Strategi Treasury Bank guna memitigasi dampak dari pelemahan Rupiah terhadap mata uang asing lainnya terhadap kinerja Bank, likuiditas Bank, serta strategi <i>treasury</i> untuk meningkatkan pendapatan Bank ketika kredit dinyatakan <i>stop</i>. 3. Kinerja keuangan Bank per 30 September 2018 4. Lain-lain <ol style="list-style-type: none"> 1. Progress in fulfilling the Bank's action plan as the Bank's commitment to the OJK to answer the following problems, including an explanation of the steps the Bank will take <ul style="list-style-type: none"> - Capital Progress fulfillment of action plans on capital to anticipate deteriorating credit quality, developments in ongoing legal cases, and to support credit growth in 2018 in accordance with the 2018 RBB. - Credit The process of fulfilling the action plan of Bank credit to reduce the NPL ratio to below 4%; transfer of non-performing loans to JTII, conduct a review of loans that have deteriorated into NPLs within 1 (one) year since the loan was disbursed and its mitigation actions, as well as to deal with exceeding the LLL PT Sinar Central Sandang. - Liquidity The process of fulfilling an action plan to reduce/minimize the Bank's dependence on the Interbank Money Market (PUAB) - Etc 2. The Bank's Treasury Strategy to mitigate the impact of the weakening of the Rupiah against other foreign currencies on the Bank's performance, Bank liquidity, and treasury strategies to increase the Bank's income when the credit is declared stop. 3. Bank financial performance as of September 30, 2018 4. Others

Tanggal Date	Jenis Rapat Types of Meeting	Agenda Rapat Meeting Agenda
22 November 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> Rencana Bisnis Bank 2019 yang harus disampaikan kepada OJK selambat-lambatnya pada tanggal 30 November 2018. Progress pemenuhan <i>action plan</i> Bank sebagai komitmen Bank terhadap OJK dalam bidang: <ul style="list-style-type: none"> Permodalan Perkreditan Likuiditas Lain-lain Kinerja keuangan Bank per 31 Oktober 2018. Lain-lain <ol style="list-style-type: none"> 2019 Bank Business Plan that must be submitted to OJK no later than November 30, 2018. Progress in fulfilling the Bank's action plan as the Bank's commitment to OJK in the fields of: <ul style="list-style-type: none"> Capital Credit Liquidity Etc Bank financial performance as of 31 October 2018. Others
13 Desember 2018 13 December 2018	Radirkom Meeting of BOD and BOC	<ol style="list-style-type: none"> Status perkembangan <i>action plan</i> Bank kepada OJK hingga 30 November 2018 dan prognosanya hingga 31 Desember 2018, khususnya atas: <ul style="list-style-type: none"> Likuiditas Permodalan Penyelesaian kredit bermasalah <i>Credit governance</i> Kinerja keuangan Bank per 30 November 2018; beserta prognosa hingga 31 Desember 2018. Lain-lain. <ol style="list-style-type: none"> Status of the Bank's action plan development to the FSA up to 30 November 2018 and its prognosis until 31 December 2018, especially for: <ul style="list-style-type: none"> Liquidity Capital Settlement of problem loans Credit governance Bank financial performance as of 30 November 2018; along with the prognosis until 31 December 2018. Others.

(10) Penilaian (Assessment) Kinerja Dewan Komisaris

- **Pihak yang melakukan penilaian**
PT Bank JTrust Indonesia Tbk melaksanakan proses evaluasi kinerja Dewan Komisaris untuk menilai efektivitas pelaksanaan tugas Dewan Komisaris.
- **Prosedur pelaksanaan penilaian Kinerja**
Pelaksanaan penilaian kinerja Dewan Komisaris dilakukan melalui *self assessment* penerapan tata kelola Bank dimana Dewan Komisaris mengisi Kertas Kerja *Self Assessment* untuk faktor penilaian pelaksanaan tugas dan tanggung jawab Dewan Komisaris yang disampaikan Bank kepada OJK dengan menyampaikan Laporan hasil *self assessment* penerapan tata kelola Bank sebagaimana

(10) Assessment of the performance of the Board of Commissioners

- **The party conducting the assessment**
PT Bank JTrust Indonesia Tbk conducts an evaluation on the performance of the Board of Commissioners in order to assess the effectiveness of the implementation of duties of the Board of Commissioners.
- **Performance appraisal procedures**
The evaluation on the performance of the Board of Commissioners is conducted through self assessment on the implementation of the Bank's governance whereby the Board of Commissioners shall fill out the Self Assessment Working Paper for 49 actors of assessment on the implementation of the duties and responsibilities of the Board of Commissioners to be submitted by the Bank

diatur pada Surat Edaran Otoritas Jasa Keuangan Nomor 13/SEOJK.03/2017 tanggal 17 Maret 2017 Tentang Penerapan Tata Kelola Bagi Bank Umum.

- **Kriteria yang digunakan**

Kriteria/Indikator yang digunakan mencakup 3 (tiga) aspek *Governance*:

- a. *Penilaian Governance Structure*
Menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses penerapan prinsip Tata Kelola yang baik menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
- b. *Penilaian Governance Process*
Menilai efektivitas proses penerapan prinsip Tata Kelola yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
- c. *Penilaian Governance Outcome*
Menilai kualitas *outcome* yang memenuhi harapan Pemangku Kepentingan Bank yang merupakan hasil proses penerapan prinsip Tata Kelola yang baik yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank.

Penilaian kinerja Dewan Komisaris juga dilakukan pada saat pertanggungjawaban laporan tahunan Bank dalam RUPS Tahunan kepada pemegang saham (*shareholder*) mayoritas, yaitu J Trust Co., Ltd., dimana RUPS Tahunan di tahun 2019 ini akan diselenggarakan dalam jangka waktu paling lambat 6 (enam) bulan setelah tahun buku 2018 berakhir. Sebagai gambaran untuk pelaksanaan RUPS pertanggungjawaban laporan tahun buku 2017 termasuk laporan Tugas Pengawasan Dewan Komisaris Perusahaan merupakan laporan tahunan perusahaan tahun buku 2017 yang menerangkan tentang keadaan jalannya perusahaan dan hasil yang telah dicapai selama tahun 2017. Selanjutnya menyatakan serta memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya (*vollediq acquit et decharge*) kepada anggota Dewan Komisaris atas tindakan pengawasan yang telah mereka jalankan selama tahun buku 2017.

to FSA, by submitting the self assessment report on the implementation of the Bank's governance as stipulated in the Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Good Corporate Governance for Commercial Banks.

- **Criteria**

The criteria/Indicator used for the assessment include 3 (three) aspects of Governance:

- a. *Governance Structure Assessment*
Assessing the adequacy of the Bank's governance structure and infrastructure so that the process of applying the Good Governance principles results in an outcome that is consistent with the expectations of the Bank's Stakeholders.
- b. *Governance Process Assessment*
Assessing the effectiveness of the process in applying the GCG principles which was supported by the adequacy of Bank Governance structure and infrastructure so as to produce an outcome that is in line with the expectations of the Bank's Stakeholders.
- c. *Assessment on the Governance Outcome*
Assessing the quality of the outcome that meet the expectations of the Bank's Stakeholders as the result of the process in applying the Good Governance principles, which is supported by the adequacy of the Bank's structure and infrastructure.

The assessment on the performance of the Board of Commissioners was also conducted during the accountability of the annual report of the Bank in the Annual General Meeting of Shareholders to the majority shareholder, namely J Trust Co., Ltd., whereby the AGMS in 2019 will be held within no later than 6 (six) months after the end of fiscal year 2018. As an illustration for the implementation of the GMS for the accountability of the 2017 fiscal year report, including the Supervisory report of the Board of Commissioners is the annual report of the company for the fiscal year 2017 explaining the state of the company and the results achieved during 2017. Furthermore, declared and granted full *vollediq acquit et decharge* to the members of the Board of Commissioners for the supervisory actions they have exercised during the fiscal year 2017.

(11) Program Pelatihan Anggota Dewan Komisaris

Untuk meningkatkan kompetensi dan penyelarasan dengan perkembangan dunia usaha dalam mendukung pelaksanaan tugas dan tanggung jawabnya, selama tahun 2018 anggota Dewan Komisaris PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pelatihan, *workshop*, konferensi, seminar, antara lain:

Nama Name	Periode Menjabat (Sejak Lulus F & P) Serving Period (After Passing the F & P)	Pelatihan, Workshop, Konferensi, Seminar Training, Workshop, Conference, Seminar	Penyelenggara Organizer	Tempat & Waktu Venue & Time
Mahdi Mahmudy Komisaris Independen Independent Commissioner	01 Januari s/d 31 Desember 2018 January 1 to December 31, 2018	Diklat Executive Risk Management Refreshment Program Education & Training on Executive Risk Management Refreshment Program	Lembaga Pendidikan Perbankan Indonesia (LPPI) Banking Education Institution (LPPI)	Dusseldorf - Frankfurt, Germany 02 s/d 09 Juli 2018 02 s/d 09 July 2018

(12) Pengawasan dan Rekomendasi Dewan Komisaris

Dewan Komisaris berperan aktif dalam melakukan fungsi pengawasan, memberikan masukan dan rekomendasi melalui pembahasan pada Rapat Dewan Komisaris dan Direksi maupun pembahasan dalam Komite-Komite di bawah Dewan Komisaris yang membantu kelancaran tugas dan fungsi oleh Dewan Komisaris. Adapun topik-topik pembahasan pada Rapat Dewan Komisaris dan Direksi yang menjadi pengawasan dan rekomendasi Dewan Komisaris selama tahun 2018 antara lain:

- Evaluasi atas Rencana Bisnis Bank (RBB) 2017-2019 beserta revisinya serta realisasi RBB setiap triwulannya.
- Evaluasi atas Strategi Bank ke depan.
- Evaluasi atas kinerja keuangan Bank serta pencapaiannya jika dibandingkan target dan upaya Bank dalam menanggapi deviasi yang ada.
- Evaluasi atas Tingkat Kesehatan Bank serta upaya Bank untuk mempertahankan peringkat yang ada.
- Evaluasi atas *progress* perkembangan proyek migrasi *corebanking system* Bank.
- Pembahasan tentang pemberitaan negatif maupun kasus-kasus hukum yang sedang berjalan serta tindak lanjut Bank.
- Evaluasi atas tanggapan serta komitmen Bank kepada regulator terkait dengan surat-surat pembinaan maupun terkait tindak lanjut hasil pemeriksaan tahunan regulator atas Bank.

(11) Training Program for Members of the Board of Commissioners

To improve the competence and to align with the development of the business world in support of the implementation of duties and responsibilities, in 2018, members of the Board of Commissioners of PT Bank JTrust Indonesia Tbk attended various training programs, workshops, conferences, seminars, among others:

(12) Supervision and Recommendation from the Board of Commissioners

The Board of Commissioners played active role in providing inputs and recommendations through discussions at Meetings of the Board of Commissioners and Board of Directors as well as the discussion in the Committees under the Board of Commissioners, which supports in facilitating the monitoring duties of the Board of Commissioners. The topics of discussion at the Board of Commissioners and Board of Directors meetings and recommendations of the Board of Commissioners in 2018 included:

- Evaluation on the Bank Business Plan (RBB) 2017-2019 along with its revision and realization of RBB on quarterly basis.
- Evaluation on the Bank's Strategy for the future.
- Evaluation on the Bank's financial performance as well as its achievement when compared to the Bank's targets and its efforts in responding the existing deviation.
- Evaluation of the Bank's Soundness and its efforts to maintain existing ratings.
- Evaluation on the progress of the Bank's corebanking migration project.
- Discussion on negative reporting as well as ongoing legal cases, along with the Bank's follow-up action.
- Evaluate the response and commitment of the Bank to the regulator regarding the letters or related to the follow-up of the results from the regulator's annual audit of the Bank.

- h. Pembahasan tentang Rencana Bisnis Bank (RBB) 2018-2020.
- i. Pembahasan tentang Strategi Bank 2018-2020

(13) Kebijakan Remunerasi dan Fasilitas Bagi Dewan Komisaris

RUPS menyetujui pemberian kuasa kepada Dewan Komisaris Perseroan untuk menetapkan besarnya Remunerasi (honorarium, tantiem serta penetapan fasilitas/benefit/tunjangan lainnya) bagi anggota Dewan Komisaris Perseroan berdasarkan rekomendasi dari Komite Remunerasi dan Nominasi.

Prosedur Penetapan Remunerasi Dewan Komisaris

- Tahap 1
Komite Remunerasi dan Nominasi menyusun dan mengusulkan rekomendasi remunerasi Direksi dan Dewan Komisaris kepada Dewan Komisaris.
- Tahap 2
Dewan Komisaris mengkaji usulan Komite Remunerasi dan Nominasi serta mengusulkan kepada RUPS untuk menetapkan remunerasi Dewan Komisaris berdasarkan rekomendasi Komite Remunerasi dan Nominasi.
- Tahap 3
RUPS yang bertindak mewakili pemegang saham mayoritas menyetujui pemberian kuasa kepada Dewan Komisaris Perseroan untuk menetapkan besarnya Remunerasi bagi anggota Dewan Komisaris Perseroan berdasarkan rekomendasi dari Komite Remunerasi dan Nominasi.

Struktur Remunerasi dan Fasilitas Bagi Dewan Komisaris

No	Jenis Penghasilan Type of Income	Ketentuan Terms
1	Honorarium/Gaji Honorarium/Salary	Sesuai kebijakan kompensasi, benefit & fasilitas BOC, BOD & EVP As compensation policies, benefits and facilities BOC, BOD & EVP
2	Tunjangan Rutin Routine Allowance	Sesuai kebijakan kompensasi, benefit & fasilitas BOC, BOD & EVP As compensation policies, benefits and facilities BOC, BOD & EVP

Besarnya Remunerasi Masing-Masing Anggota Dewan Komisaris

Rincian pemberian remunerasi Dewan Komisaris pada tanggal 31 Desember 2018 yaitu:

- h. Discussion on the Bank Business Plan (RBB) 2018-2020.
- i. Discussion on the Bank's Strategy 2018-2020

(13) Remuneration Policy and Facilities for the Board of Commissioners

The GMS approved to grant the authority to the Board of Commissioners to determine the amount of Remuneration (honorarium, tantiem and establishment of facilities/benefits/other benefits) for the members of the Board of Commissioners based on the recommendation of the Remuneration and Nomination Committee.

Procedure for the Determination of the Remuneration of the Board of Commissioners

- Stage 1
The Remuneration and Nomination Committee prepares and recommends the remuneration of the Board of Directors and Board of Commissioners to the Board of Commissioners.
- Stage 2
The Board of Commissioners reviews the proposals submitted by the Remuneration and Nomination Committee and proposes to the GMS to determine the remuneration of BOC based on the recommendations of the Remuneration and Nomination Committee.
- Stage 3
The GMS acts on behalf of the majority shareholders in approving the grant of power to BOC to determine the amount of Remuneration for the members of BOC based on the recommendation of the Remuneration and Nomination Committee.

Structure of Remuneration and Facilities for the BOC

The Amount of Remuneration of Each Member of the Board of Commissioners

Details of remuneration of the Board of Commissioners as of December 31, 2018 are as follows:

Nama Name	Honorarium Honararium	Tunjangan Rutin ^{*)} Routine Allowance	Tantiem	Santunan Benefits	Jumlah Remunerasi Per Orang Per Tahun Total Remuneration Per Person per Year	
					> Rp2 miliar > Rp2 billion	≤ Rp2 miliar ≤ Rp2 billion
Nobiru Adachi	-	-	-	-	-	-
Shigeyoshi Asano	-	-	-	-	-	-
Ahmad Fajar	√	√	-	-	-	√
Benny Luhur	√	√	-	-	-	√
Mahdi Mahmudy	√	√	-	-	-	√
Kwik Ing Hie	√	√	-	-	-	√
Total (dalam jutaan Rp)	Rp2.770	Rp2.903	-	-	-	-

*) Tunjangan Rutin meliputi: Fasilitas Kendaraan, Tunjangan BBM & Supir, Tunjangan *Handphone*, Tunjangan Hari Raya (THR), Tunjangan Cuti, Tunjangan Pajak PPh 21
Routine Allowance covers: Vehicle Facilities, Fuel Support & Drivers, Mobile Benefits, Holiday Allowances (THR), Leave Allowances, Income Tax Benefit 21

2.5 Direksi

Direksi adalah Organ Bank yang bertanggung jawab penuh terhadap kegiatan operasional, pengembangan bisnis dan pengelolaan risiko Bank secara profesional dengan mengedepankan prinsip kehati-hatian Bank (*prudential banking principle*) untuk meningkatkan *shareholders value*, mewakili Bank baik di dalam maupun di luar pengadilan sesuai dengan ketentuan Anggaran Dasar serta senantiasa berpedoman pada peraturan perundang-undangan dan ketentuan yang berlaku, baik yang diterbitkan oleh Regulator perbankan seperti Otoritas Jasa Keuangan (OJK), Bank Indonesia, Bursa Efek Indonesia (BEI), Lembaga Penjamin Simpanan (LPS) dan/atau otoritas berwenang lainnya. Direksi mempertanggungjawabkan tindakan mereka dalam memimpin Bank kepada pemegang Saham di dalam RUPS. Pemegang Saham/Pemilik Modal tidak diperkenankan mencampuri kegiatan operasional Bank yang menjadi tanggung jawab Direksi sesuai dengan Anggaran Dasar Bank dan Peraturan Perundang-undangan yang berlaku.

Dalam menjalankan kegiatan usaha Bank, Direksi dapat menggunakan jasa penasehat profesional dan atau membentuk komite-komite sesuai dengan prosedur yang digunakan.

(1) Tugas dan Tanggung Jawab Direksi

Pada periode per 31 Desember 2018 jumlah anggota Direksi terdiri dari 6 (enam) orang yang di antara salah satunya sebagai Direktur Utama dan 1 (satu) orang sebagai Direktur Kepatuhan, yang secara bersama-sama melaksanakan tugas dan tanggung jawab kepada Bank sebagai berikut:

2.5 Board of Directors

The Board of Directors is the Bank Organ responsible for the Bank's operational activities, business development and risk management in a professional manner by upholding prudential banking principles in order to enhance shareholders value, representing the Bank inside and outside of the court of justice, in accordance with the provisions of the Articles of Association, always guided by the prevailing laws and regulations issued by regulators such as the Financial Services Authority (OJK), Bank Indonesia, the Indonesia Stock Exchange (IDX), the Deposit Insurance Corporation (LPS) and/or other authorities. The Board of Directors is accountable to Shareholders in the GMS for their actions in leading the Bank. Shareholders/Capital Owners are not permitted to interfere with the operations of the Bank which is the responsibility of the Board of Directors in accordance with the Bank's Articles of Association and the prevailing laws and regulations.

In conducting the Bank's business activities, the Board of Directors may use independent professional advisory services and/or establish committees in accordance with the procedures used.

(1) Duties and Responsibilities of the Board of Directors

As of December 31, 2018, member of the Board of Directors consisted of 6 (six) persons, including President Director and 1 (one) person as Compliance Director, jointly carrying out the duties and responsibilities as follows:

1. Direksi bertanggung jawab penuh dalam melaksanakan tugasnya untuk kepentingan Perseroan dalam mencapai maksud dan tujuannya;
 2. Direksi memiliki itikad baik dan sesuai dengan kewenangan dan tanggung jawabnya menjalankan tugas sebagaimana diatur dalam Anggaran Dasar Perseroan dengan mengindahkan peraturan perundang-undangan yang berlaku;
 3. Direksi telah menjalankan prinsip-prinsip/asas Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi;
 4. Direksi telah menindaklanjuti temuan audit dan rekomendasi dari Satuan Kerja Audit Intern (SKAI), auditor eksternal, hasil pengawasan Otoritas Jasa Keuangan (OJK), Bank Indonesia, dan/atau hasil pengawasan otoritas lainnya;
 5. Dalam rangka melaksanakan prinsip-prinsip/asas Tata Kelola yang baik, Direksi telah membentuk komite di bawahnya seperti ALCO, Komite Manajemen Risiko, Komite Kredit, Komite Pengarah Teknologi Informasi, Komite Human Capital, dan Komite Produk & Aktivitas Baru;
 6. Direksi mempertanggungjawabkan pelaksanaan tugasnya kepada pemegang saham melalui RUPS Tahunan;
 7. Direksi telah mengungkapkan kepada pegawai tentang kebijakan Bank yang bersifat strategis di bidang kepegawaian;
 8. Direksi menyediakan data dan informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris, pemegang saham dan pihak regulator;
 9. Direksi memiliki pedoman dan tata tertib kerja yang bersifat mengikat bagi setiap anggota Direksi, paling kurang mencantumkan pengaturan etika kerja, waktu kerja dan pengaturan rapat;
 10. Direksi telah menyusun rencana strategis dalam bentuk rencana korporasi (*corporate plan*) dan rencana bisnis (*business plan*). Penyampaian rencana korporasi dan penyusunan/penyampaian rencana bisnis berpedoman pada ketentuan Otoritas Jasa Keuangan (OJK);
 11. Direksi menyelenggarakan RUPS berdasarkan permintaan pemegang saham yang mempunyai hak suara yang sah;
 12. Direksi membuat dan memelihara daftar Pemegang Saham dan Daftar khusus yang berisi Daftar Kepemilikan Saham yang dimiliki oleh Direksi dan Komisaris termasuk keluarga mereka dalam Bank dan di perusahaan lain (bila ada);
1. The Board of Directors is fully responsible in performing their duties for the interest of the Company in achieving its objectives and goals;
 2. The Board of Directors shall have good faith and act in accordance with their authority and responsibility in performing their duties as stipulated in the Company's Articles of Association in accordance with the prevailing laws and regulations;
 3. The Board of Directors is obligated to implement the principles of Good Governance in every Bank's business activities at all levels of the organization;
 4. The Board of Directors is obligated to follow up the audit findings and recommendations from the Internal Audit Unit (SKAI), external auditors, the results of supervision by the Financial Services Authority (OJK), Bank Indonesia and/or other authorities;
 5. In order to implement the principles of Good Governance, the Board of Directors shall establish committees, such as ALCO, Risk Management Committee, Credit Committee, Information Technology Steering Committee, Human Capital Committee, New Product & Activity Committee, and Internal Control Committee;
 6. The Board of Directors is responsible for carrying out its duties to shareholders through the Annual GMS;
 7. The Board of Directors is obliged to disclose the Bank's strategic employment policies to the employee;
 8. The Board of Directors shall provide accurate, relevant and timely data and information to the Board of Commissioners, shareholders and regulators;
 9. The Board of Directors is obliged to have binding guidelines and work rules for each member of the Board of Directors, at least stipulating the work ethic, working time and meeting arrangements;
 10. The Board of Directors shall formulate a strategic plan in the form of corporate and business plan. Submission of corporate plan and the preparation/submission of business plans shall be referred to the provisions of the Financial Services Authority (FSA);
 11. The Board of Directors shall convene the General Meeting of Shareholders upon request by shareholders with valid voting rights;
 12. The Board of Directors is obliged to create and maintain a list of Shareholders and a Special Register containing the Share Ownership List owned by the Board of Directors and Commissioners including their families within the Bank and in other companies (if any);

13. Menetapkan Visi, Misi dan Nilai-nilai Budaya Kerja Bank;
14. Membuat rencana kerja dan anggaran tahunan serta rencana lain yang berhubungan dengan usaha Bank. Rencana tersebut disampaikan kepada Komisaris dan Pemegang Saham untuk disahkan dalam RUPS dan dikomunikasikan kepada segenap pegawai Bank.

Tugas dan tanggung jawab dari masing-masing anggota Direksi (sesuai *job description* dalam Struktur Organisasi Bank), sebagai berikut:

1) Direktur Utama (*President Director*)

1. Memimpin dan mengkoordinasikan pelaksanaan pengurusan Perseroan sebagaimana ditetapkan dalam Anggaran Dasar dan keputusan RUPS Perseroan dengan berdasarkan ketentuan yang berlaku.
2. Memimpin, mengkoordinasikan, mengarahkan dan mensupervisi Direktorat-Direktorat dan Divisi-Divisi di bawah supervisi langsung *President Director* sesuai bidangnya masing-masing dalam mencapai tujuan Perseroan, termasuk memastikan dilaksanakannya rencana strategis (Rencana Bisnis Bank) dan pencapaian target kinerjanya, pelaksanaan kepatuhan pada regulasi, peraturan perundangan-undangan, dan ketentuan internal Perseroan.
3. Mengarahkan proses-proses perubahan yang diperlukan di seluruh bidang untuk mencapai tujuan dan kelangsungan usaha Perseroan.
4. Mengembangkan dan memperkuat *image* Perseroan dan membangun *relationship* dengan bank-bank koresponden, lembaga keuangan, nasabah, institusi-institusi bisnis, otoritas keuangan, dan seluruh *stakeholder* Perseroan.
5. Mengambil tindakan untuk dan atas nama Direksi serta mewakili Perseroan, dan untuk perbuatan tertentu atas tanggung jawabnya sendiri, untuk mengangkat seorang atau lebih sebagai wakil atau kuasanya, dengan memberikan kepadanya atau kepada mereka kekuasaan untuk perbuatan tertentu tersebut yang diatur dalam surat kuasa.
6. Memimpin dan mengkoordinasikan pelaksanaan kegiatan Direktur-Direktur Bidang (Direktorat-Direktorat) dalam mengarahkan dan membina jaringan distribusi (*Branch*) dalam pencapaian target kinerja Perseroan.

13. Establish the Bank's Vision, Mission and Values of Work;
14. Create work plans and annual budgets and other plans related to the Bank's business. The plan shall be given to the Board of Commissioners and Shareholders for ratification in the GMS and shall be communicated to all Bank employees.

The duties and responsibilities of each member of BOD (according to the job description in the Bank Organization Structure), as follows:

1. President Director

1. To lead and coordinate the implementation of the Company's management as stipulated in the Articles of Association and resolutions of the General Meeting of Shareholders of the Company based on applicable regulations.
2. To lead, coordinate, direct and supervise the Directorates and Divisions in their respective fields under direct supervision from the President Director in order to achieve the Company's objectives, including ensuring the implementation of the Bank's business plan and the achievement of its performance targets, compliance to rules, legislation and internal regulations of the Company.
3. Directing change processes deemed necessary across the field to achieve the objectives and business viability of the Company.
4. Develop and strengthen the image of the Company and build relationships with correspondent banks, financial institutions, clients, business institutions, financial authorities and all stakeholders of the Company.
5. To take action for and on behalf of the Board of Directors and to represent the Company, and for certain acts of its own responsibility, to appoint one or more as representative or proxy, by granting them power for certain acts as governed by the power of attorney.
6. To lead and coordinate the implementation of the activities of the Directors in directing and fostering the distribution network (Regional and Branch Offices) in achieving the Company's performance targets.

7. Memastikan pengembangan dan penerapan strategi Perseroan yang memadai di seluruh bidang kerja sesuai dengan tujuan Perseroan, dan memastikan tercapainya aliansi lintas bidang Direktorat dan pemanfaatan seluruh sumber daya Perseroan.
 8. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja pada bidang langsung di bawah *President Director (Internal Audit, Corporate Secretary, dan President Office & Japan Linkage)*.
 9. Melaksanakan supervisi dan koordinasi Direktorat-Direktorat dalam menerapkan pembinaan dan pengembangan sumber daya Perseroan dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai (*performance management system dan value based management*) yang efektif.
 10. Memimpin dan mengarahkan Direktorat-Direktorat dalam kebijakan pengembangan dan pembinaan Sumber Daya Manusia (SDM).
 11. Sebagai Ketua BCC (*Business Command Center*)
 - a. Menetapkan Bank dalam kondisi krisis likuiditas dan mengaktifkan fungsi BCC serta menyusun strategi penanganan yang segera, sistematis, pragmatis dan terintegrasi.
 - b. Memutuskan strategi penanggulangan kesulitan atau krisis likuiditas, antara lain menetapkan metode, jumlah dan *pricing* atas pendanaan yang diperlukan, serta hal-hal terkait lainnya.
 - c. Memastikan kemungkinan bantuan yang dapat diperoleh dari Bank Indonesia.
 - d. Menugaskan Direktur dan atau Kepala divisi tertentu untuk menjalankan tugas sebagai upaya pencegahan dan penanggulangan kondisi krisis atau kesulitan likuiditas.
 - e. Menetapkan Bank telah kembali berada dalam kondisi normal, dan team BCC.
7. Ensure the development and implementation of an adequate strategy in all areas of work in accordance with the objectives of the Company, and to ensure the achievement of cross-sectoral alliances of Directorate and utilization of all Company's resources.
 8. Lead and direct the preparation and supervise the implementation of work plans in sectors directly under the President Director (Internal Audit, Corporate Secretary, and President Office & Japan Linkage).
 9. To supervise and coordinate the Directorates in implementing the development of the Company's resources and to ensure efficient implementation of effective competence-based employee development, performance management system and value based management.
 10. To lead and direct the Directorates regarding the policy and Human Resources
 11. As Head of BCC (Business Command Center)
 - a. Determine that the Bank is in a liquidity crisis and activate the function of BCC and develop an immediate, systematic, pragmatic and integrated management strategy.
 - b. Decide the strategy to overcome the adversity or liquidity crisis, among others by determining the method, amount and pricing of the required funding, as well as other related matters.
 - c. Ensure any possible assistance that can be obtained from Bank Indonesia.
 - d. Assigns the Director and/or the Head of a particular division to perform the duties as an effort to prevent and overcome the conditions of crisis or liquidity difficulties.
 - e. Determine that the Bank has returned to normal condition.

2) Direktur Risiko, Hukum & Kepatuhan (*Risk, Legal & Compliance Director*)

1. Kebijakan dan Strategi
 - a. Memastikan pengembangan dan penerapan strategi yang memadai dalam bidang *Risk, Legal & Compliance* sesuai dengan tujuan Perseroan dan memanfaatkan seluruh sumber daya Perseroan.
 - b. Memimpin dan mengarahkan penyusunan dan penerapan kebijakan pada seluruh bidang di bawah Direktorat *Risk, Legal, & Compliance* sesuai dengan rencana dan tujuan Perseroan.
 - c. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja Direktorat *Risk, Legal, & Compliance* dan seluruh bidang di bawahnya dalam mendukung pelaksanaan fungsi, tugas dan tanggung jawab Direktur Utama dan Direktorat-Direktorat bisnis, dengan menjaga standar kepatuhan, *good corporate governance*, meminimalkan risiko-risiko terkait hukum, kebijakan risiko operasional dan tersedianya sumber daya manusia yang kompeten dan produktif.
 - d. Melaksanakan pembinaan dan pengembangan sumber daya Perseroan di seluruh unit kerja di bawah Direktorat *Risk, Legal, & Compliance*, dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai (*performance management system* dan *value based management*) yang efektif.
2. Kegiatan Operasional
 - a. Memimpin, mengarahkan, dan melaksanakan koordinasi serta supervisi penerapan kebijakan dan strategi yang berhubungan dengan kegiatan bidang *Risk, Legal, & Compliance* untuk mendukung Direktorat-Direktorat bisnis menghasilkan *benefit* bagi Perseroan, dan memastikan Perseroan tetap menjaga kepatuhan dan memenuhi seluruh peraturan, regulasi, dan undang-undang yang berlaku, kedudukan hukum yang kuat, dan penyediaan sumber daya manusia yang memadai serta pelaksanaan kebijakan risiko.

2. Risk, Legal & Compliance Director

1. Policy and Strategy
 - a. Ensure the development and implementation of appropriate strategies in the areas of Risk, Legal, & Compliance in accordance with the objectives of the Company and utilize all of the Company's resources.
 - b. To lead and direct the preparation and implementation of policies in all areas under the Directorate of Risk Legal, & Compliance in accordance with the Company's plans and objectives.
 - c. To lead, direct the preparation and supervision of the implementation of the work plan of the Risk, Legal, & Compliance Directorate and all sectors under his control in order to support the implementation of the functions, duties and responsibilities of the President Director and the Business Directorates, by maintaining compliance standards, good corporate governance, minimizing legal risks, operational risk policies and the availability of competent and productive human resources.
 - d. Carry out the development of the Company's resources in all work units under the Risk, Legal, & Compliance Directorate, and ensure an effective implementation of competency-based employee development, performance management system and value based management.
2. Operational Activities
 - a. To lead, direct, coordinate and supervise the implementation of policies and strategies related to the activities of Risk, Legal, & Compliance fields to support the Business Directorates to generate benefits for the Company, and to ensure the Company maintaining compliance with all applicable rules, regulations, and law, strong legal standing, and the provision of adequate human resources and the implementation of risk policies.

- b. Memimpin dan mengarahkan proses-proses perubahan yang diperlukan, serta memastikan seluruh kegiatan bidang *Risk, Legal, & Compliance* mengimplementasikan dan memenuhi kaidah-kaidah, regulasi, peraturan perundang-undangan, dan standar *best practice* terkini, termasuk ketentuan internal Perseroan.
- c. Memimpin dan mengarahkan pengembangan dan penerapan kebijakan sistem perekrutan, penempatan, rotasi dan pengembangan pegawai.
- d. Memastikan ketersediaan manajemen *human capital* yang memadai (antara lain standar jabatan, kalibrasi *job grading*, sistem remunerasi dan kompensasi) dan menerapkan standar *best practice* yang sesuai dengan kondisi Perseroan.
- e. Communication Function
- Merumuskan materi komunikasi yang relevan yang harus disampaikan kepada pihak-pihak internal dan eksternal, termasuk *timing*, modus komunikasi dan dampak yang diharapkan.
 - Melaksanakan rencana komunikasi yang telah dipersiapkan secara matang kepada pihak internal dan eksternal. Dimana pihak internal terdiri dari manajemen dan pegawai, sedangkan pihak eksternal terdiri dari regulator (otoritas jasa keuangan), antarbank dan media massa.
 - Menentukan alur komunikasi internal dan eksternal, dimana alur komunikasi kepada pihak internal maupun eksternal akan dilakukan oleh *Corporate Secretary Division*.
 - Melakukan kajian atas informasi dan opini publik yang dapat berdampak negatif terhadap kondisi likuiditas Bank.
 - Melaksanakan tindakan-tindakan yang telah diputuskan oleh Ketua BCC maupun ketua *Team Support*.
 - Melaksanakan tugas-tugas lain yang diberikan oleh Direktur Utama & Pemegang Saham Perseroan, sepanjang tidak bertentangan dengan Anggaran Dasar, ketentuan internal, regulasi dan undang-undang yang berlaku.
- b. To lead and direct the necessary change processes, and to ensure that all Risk, Legal, & Compliance field activities implement and comply with the latest principles, regulations, laws and best practice standards, including the internal requirements of the Company.
- c. To lead and direct the development and implementation of policies for recruitment, placement, rotation and staff development systems.
- d. Ensure the availability of adequate human capital management (including standard position, job grading calibration, remuneration system and compensation) and applying best practice standards in accordance with the conditions of the Company.
- e. Communication Function
- Formulate relevant communication materials that must be communicated to internal and external parties, including timings, communication modes and expected results.
 - Implement a well-prepared communication plan to internal and external parties. Where the internal party consists of management and employees, while the external party consists of regulators (financial services authorities), interbank and mass media.
 - Determine the flow of internal and external communications, where the flow of communication to internal and external parties will be conducted by the Corporate Secretary Division.
 - Reviewing public information and opinion that may adversely affect the Bank's liquidity condition.
 - Implement actions that have been decided by the Chairman of BCC and the Supporting Team.
 - Carries out other duties granted by the President Director & Shareholders of the Company, as long as they are not contradictory to the Articles of Association, internal regulations, regulations and applicable laws.

3. Sumber Daya Manusia
Memimpin, mengkoordinasikan dan mengarahkan kebijakan dan pembinaan Sumber Daya Manusia (SDM) di bawah koordinasi dan supervisi Direktorat *Risk, Legal, & Compliance* serta Direktorat-Direktorat lainnya, termasuk mengusulkan dan mengambil bagian (sebagai anggota *Human Capital Committee* dan *Board of Directors*) dalam keputusan dan kebijakan rekrutmen, promosi, demosi, rotasi, pembinaan dan pelatihan.

3) Direktur Bisnis Risk & Operasi (*Business Risk & Operation Director*)

1. Kebijakan dan Strategi
 - a. Memimpin pengembangan inisiatif baru untuk produk-produk dan jasa perbankan yang belum ada di bank baik di bidang *lending, funding* maupun *transactional based business (Cards, Fee Based Income)*, sesuai dengan tujuan Perseroan dalam rangka mencapai tujuan pemenuhan bisnis seperti yang digariskan di Rencana Bisnis Bank.
 - b. Mengembangkan *Bisnis Treasury & International* melalui aliansi strategik dengan pihak lain dengan tujuan untuk pengembangan bisnis perseroan khususnya yang berkaitan dengan pengembangan pendapatan bunga kredit, *fee based income*/pendapatan di luar bunga kredit dalam rangka mencapai tujuan pemenuhan bisnis perseroan.
 - c. Memformulasikan serta mengimplementasikan strategi pada bidang *Business* yang diharapkan bisa menjadi salah satu mesin utama pertumbuhan bisnis masa depan perseroan, khususnya di bidang perkreditan.
 - d. Menginisiasikan *Japan Business* dengan tujuan menjalin aliansi dan menggali potensi bisnis yang terkait dengan perusahaan-perusahaan Jepang yang ada di Indonesia dan jaringan bisnisnya.
 - e. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja Direktorat Bisnis serta bidang di bawahnya.

3. Human Resources
To lead, coordinate and direct the policies and development of Human Resources under the coordination and supervision of the Directorate of Risk, Legal, & Compliance as well as other Directorates, including proposing and taking part (as a member of the Human Capital Committee and Board of Directors) in decisions and policies of recruitment, promotion, demotion, rotation, coaching and training.

3) Business Risk & Operation Director

1. Policy and Strategy
 - a. To lead the development of new initiatives for banking products and services that do not yet exist in banks in the areas of lending, funding and transactional based business (*Cards, Fee Based Income*), in accordance with the objectives of the Company in order to achieve the objectives of business fulfillment as outlined in the Bank's Business Plan.
 - b. Developing the *Treasury & International Business* through strategic alliances with other parties with the aim of developing the business of the Company, especially those related to the development of interest-based income, fee based income in the framework of achieving the Company's business fulfillment objectives.
 - c. Formulating and implementing strategies in the field of *Business* is expected to be one of the main engines of future business growth of the Company, especially in the field of credit.
 - d. Initiate *Japan Business* with the aim of forging alliances and exploring the business potential associated with Japanese companies in Indonesia and its business network.
 - e. To lead, direct the preparation and supervision of the implementation of the Business Directorate work plan, and the sectors under its control (*Business Development, Micro & Retail, Corporate Business and Treasury*).

- f. Memimpin, mengarahkan dan melaksanakan supervisi pelaksanaan rencana kerja dan target-target bersama yang terkait Direktorat lainnya untuk kepentingan dan tujuan Perseroan dalam memanfaatkan kompetensi sumber daya Direktorat Bisnis Risk & Operation.
- g. Melaksanakan pembinaan dan pengembangan sumber daya Perseroan di seluruh unit kerja di bawah Direktorat Bisnis Risk & Operation dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai, yang efektif dan efisien.
2. Kegiatan Operasional
- a. Memimpin, melaksanakan koordinasi dan supervisi penerapan kebijakan dan strategi yang berhubungan dengan kegiatan operasional Direktorat Bisnis Risk & Operation dan bidang-bidang di bawahnya.
- b. Memimpin, mengarahkan dan mengkoordinasikan pelaksanaan fungsi, tugas dan tanggung jawab seluruh bidang di bawah Direktorat dalam mendukung fungsi, tugas, tanggung jawab Direktur Bisnis Risk & Operation, dan memastikan Perseroan mencapai standar *best practices* layanan yang berkualitas.
- c. Memimpin dan mengarahkan proses-proses perubahan yang diperlukan, serta memastikan seluruh kegiatan operasional bidang di bawah Direktorat Bisnis Risk & Operation mengimplementasikan seluruh rencana strategis yang ditetapkan secara tepat guna dan tepat sasaran.
- d. Melaksanakan supervisi dan memastikan seluruh unit di bawah Direktorat Bisnis Risk & Operation mematuhi ketentuan regulasi, kebijakan dan ketentuan internal Perseroan.
- e. Memimpin, mengarahkan dan melaksanakan pengelolaan hubungan nasabah khususnya di *Business Development* yang terkait dengan cakupan tugas dan tanggung jawab Direktorat Bisnis Risk & Operation dan unit kerja di bawahnya.
- f. To lead, direct and supervise the implementation of the work plan and shared targets related to other Directorates for the interests and objectives of the Company in utilizing the competence of the Business Risk & Operation Directorate's resources.
- g. Carry out the development of the Company's resources in all work units under the Business Risk & Operation Directorate and to ensure an efficient and effective implementation of competency-based human resource development, performance management system, and value based management.
2. Operational Activities
- a. To lead, coordinate and supervise the implementation of policies and strategies related to the operational activities of the Directorate of Business Risk & Operation and the areas under it.
- b. To lead, direct and coordinate the implementation of the functions, duties and responsibilities of all fields under the Business Directorate (Business Development, Micro & Retail, Corporate Business and Treasury) in supporting the functions, duties, responsibilities of the Business Risk & Operation Director, and ensuring the Company achieves best practices standards quality.
- c. To lead and direct the necessary change processes, and to ensure that all operational activities of the field under the Directorate of Business Risk & Operation implement all strategic plans that are appropriately and right on target.
- d. Carry out supervision and ensure all units under the Business Risk & Operation Directorate complying with the Company's regulatory requirements, internal policies and regulations.
- e. To lead, directing and executing customer relationship management especially in Business Development, Micro & Retail, Corporate Business and Treasury related to the scope of duties and responsibilities of the Business Risk & Operation Directorate and its subordinate work units.

f. Melaksanakan tugas-tugas lain yang diberikan oleh Direktur Utama, Dewan Komisaris serta Pemegang Saham Perseroan, sepanjang tidak bertentangan dengan Anggaran Dasar, ketentuan internal, regulasi dan peraturan perundang-undangan yang berlaku.

3. Sumber Daya Manusia

Memimpin dan mengarahkan kebijakan dan pembinaan Sumber Daya Manusia (SDM) di bawah koordinasi dan supervisi Direktorat (sebagai anggota *Human Capital Committee* dan *Board of Directors*) dalam keputusan dan kebijakan perekrutan, promosi, demosi, rotasi, pembinaan dan pelatihan dengan koordinasi *Managing Director Risk, Legal & Compliance* yang membidangi *Human Capital*.

4) Direktur Finance, Planning & Information Technology

1. Kebijakan dan Strategi Finance, Planning & Information Technology

- a. Memimpin, mengarahkan, dan melaksanakan koordinasi serta supervisi penerapan kebijakan yang berhubungan dengan kegiatan Planning & Information Technology untuk mendukung Direktorat-Direktorat bisnis menghasilkan *benefit* bagi Perseroan melalui perencanaan, sistem manajemen kinerja, pengendalian keuangan dan sistem operasional yang memadai.
- b. Memimpin dan mengarahkan proses-proses perubahan yang diperlukan, serta memastikan kegiatan bidang di bawah Direktorat Planning & Information Technology mengimplementasikan standar *best practice* terkini sesuai dengan kemampuan maksimum sumberdaya Perseroan.
- c. Melaksanakan supervisi dan memastikan seluruh unit kerja di bawah Direktorat Planning & Information Technology mematuhi ketentuan regulasi, kebijakan dan ketentuan internal Perseroan.
- d. Melaksanakan tugas-tugas lain yang diberikan oleh Direktur Utama dan Pemegang Saham Perseroan, sepanjang tidak bertentangan dengan Anggaran Dasar, ketentuan internal, regulasi dan undang-undang yang berlaku.

f. Carries out other duties granted by the President Director, the Board of Commissioners and the Shareholders of the Company, as long as they are not contradictory to the Articles of Association, the internal regulations, regulations and prevailing laws and regulations.

3. Human Resources

Leading and directing human resource policies and development under the coordination and supervision of the Directorate (as a member of the Human Capital Committee and Board of Directors) in decisions and policies on recruitment, promotion, demotion, rotation, coaching and training, in coordination with the Managing Director of Risk, Legal & Compliance who is in charge of Human Capital.

4) Director of Finance, Planning & Information Technology

1. Policy and Strategy for Finance, Planning & Information Technology

- a. To lead, direct, and coordinate as well as supervise the implementation of policies relating to Planning & Information Technology activities to support business directorates generate benefits for the Company through adequate planning, performance management systems, financial controls and operational systems.
- b. To Lead and direct the necessary change processes, as well as ensure that field activities under the Directorate of Planning & Information Technology implement the latest best practice standards in line with the maximum capability of the Company's resources.
- c. Carry out supervision and ensure all work units under the Directorate of Planning & Information Technology comply with the regulations, policies and internal regulations of the Company.
- d. Carry out other tasks given by the President Director and Shareholders of the Company, insofar as they do not conflict with the Articles of Association, internal regulations, applicable laws and regulations.

2. Kebijakan dan Strategi Information Technology

- a. Memastikan pengembangan dan penerapan strategi pemanfaatan teknologi informasi yang memadai sesuai dengan tujuan dan memanfaatkannya dalam operasional Perseroan.
- b. Memimpin dan mengarahkan penyusunan dan penerapan kebijakan pada seluruh bidang di bawah Direktorat Planning & Information Technology sesuai dengan rencana dan tujuan Perseroan.
- c. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja *Planning & Information Technology* dan seluruh bidang di bawahnya dalam mendukung pelaksanaan fungsi, tugas dan tanggung jawab Direktur Utama dan Direktorat-Direktorat bisnis.
- d. Melaksanakan pembinaan dan pengembangan sumber daya Perseroan di seluruh unit kerja di bawah Direktorat Planning & Information Technology, dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai (*performance management system* dan *value based management*) yang efektif.

5) Direktur Treasury & Pendanaan (*Treasury & Funding Director*)

- a. Melaksanakan strategi yang telah ditetapkan Direksi melalui Rencana Bisnis Bank (RBB).
- b. Berkoordinasi dengan Direksi mengenai pengembangan dan pelaksanaan di bidang *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management*.
- c. Memastikan pengembangan dan penerapan strategi *treasury management, treasury related trading, marketing* dan *sales treasury transactional product* dan *institutional relationship/correspondent* yang memadai sesuai dengan tujuan Perseroan dan memanfaatkan seluruh sumber daya Perseroan.

2. Policy and Strategy of Information Technology

- a. Ensure the development and implementation of appropriate information technology in line with the objectives and utilize them for the operations of the Company.
- b. To lead and direct the preparation and implementation of policies in all fields under the Directorate of Planning & Information Technology in accordance with the plans and objectives of the Company.
- c. To lead, to direct the preparation and supervision of the implementation of the Information Technology & Operation work plan and all the fields under its supervision in support of the implementation of the functions, duties and responsibilities of the President Director and the Business Directorates.
- d. Carry out the development of the Company's resources in all work units under the Directorate of Planning & Information Technology, and ensure effective the implementation of competency-based HR development, performance management system and value based management.

5. Treasury & Funding Director

- a. Implement the strategy established by the Board of Directors through the Bank Business Plan (RBB).
- b. Coordinate with the Board of Directors regarding the development and implementation of *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management*.
- c. Ensure the development and implementation of treasury management strategy, treasury related trading, marketing and sales of treasury transactional product and institutional relationship/correspondent in accordance with the objectives of the Company and utilize all of the Company's resources.

- d. Memimpin dan mengarahkan penyusunan dan penerapan kebijakan pada seluruh bidang di bawah Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management*.
 - e. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja Direktorat *Treasury* dan seluruh bidang di bawahnya *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* dan transaksional lainnya, pencapaian bisnis dari *Regional Offices* dalam mendukung pelaksanaan fungsi, tugas dan tanggung jawab Direktur Utama.
 - f. Memimpin, mengarahkan dan melaksanakan supervisi pelaksanaan rencana kerja dan target-target bersama yang terkait Direktorat lainnya untuk kepentingan dan tujuan Perseroan dalam memanfaatkan seluruh jaringan distribusi di bawah Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* khususnya pengembangan bisnis dan turunannya.
 - g. Melaksanakan pembinaan dan pengembangan sumber daya Perseroan di seluruh unit kerja di bawah Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai (*performance management system* dan *value based management* yang efektif).
 - h. Memimpin, melaksanakan koordinasi dan supervisi penerapan kebijakan dan strategi yang berhubungan dengan kegiatan operasional *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management*.
 - i. Memimpin, mengarahkan dan melaksanakan koordinasi dan supervisi fungsi *marketing* dan *sales* seluruh produk Bank (pendanaan, perkreditan, dan transaksional) dan pelaksanaan aliansi strategis internal yang menghasilkan *benefit* optimum bagi Perseroan.
- d. To lead and direct the preparation and implementation of policies in all fields under the Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management.
 - e. To lead, to direct the preparation and supervision of the implementation of the work plan of the Treasury Directorate and all the fields under Treasury, & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management and other transactional, business achievement from Regional Offices in supporting implementation functions, duties and responsibilities of the President Director.
 - f. To lead, direct and supervise the implementation of the work plan and shared targets of other Directorates for the interest and objectives of the Company in utilizing the entire distribution network under Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, especially business development and derivatives.
 - g. Carry out the development of the Company's resources in all work units under Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, and ensure the effective implementation of competency-based employee development, performance management system and value-based effective management.
 - h. To lead, coordinate and supervise the implementation of policies and strategies related to the operational activities of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management.
 - i. To lead, direct and coordinate and supervise the marketing and sales functions of all Bank products (funding, credit and transactional) and the implementation of internal strategic alliances that generate optimum benefits for the Company.

- j. Mengarahkan dan mengkoordinasikan pelaksanaan fungsi, tugas dan tanggung jawab *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* dalam meningkatkan daya saing di bidang pendanaan (produk, *marketing* dan *sales*) dan kualitas layanan seluruh jaringan distribusi.
- k. Memimpin dan mengarahkan proses-proses perubahan yang diperlukan, serta memastikan seluruh kegiatan operasional bidang di bawah Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* mengimplementasikan seluruh rencana strategis yang ditetapkan.
- l. Melaksanakan supervisi dan memastikan seluruh unit di bawah Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* mematuhi ketentuan regulasi, kebijakan dan ketentuan internal Perseroan.
- m. Memimpin, mengarahkan dan melaksanakan pengelolaan hubungan nasabah yang terkait dengan cakupan tugas dan tanggung jawab Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* dan unit-unit kerja di bawahnya.
- n. Sebagai Wakil Ketua BCC (*Business Command Center*)
- Melaksanakan fungsi sebagai Ketua apabila Ketua BCC berhalangan.
 - Menetapkan Bank dalam kondisi krisis likuiditas dan mengaktifkan fungsi BCC serta menyusun strategi penanganan yang segera, sistimatis, pragmatis dan terintegrasi.
 - Memastikan kemungkinan bantuan yang dapat diperoleh dari Bank Indonesia.
 - Menugaskan Direktur dan atau Kepala divisi tertentu untuk menjalankan tugas sebagai upaya pencegahan dan penanggulangan kondisi krisis atau kesulitan likuiditas.
 - Melaporkan hasil pelaksanaan strategi penanggulangan yang telah ditetapkan dalam menghadapi krisis atau kesulitan likuiditas kepada ketua BCC.
- j. To direct and coordinate the implementation of functions, duties and responsibilities of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, in enhancing the competitiveness in the field of financing (product, marketing and sales) and the quality of services throughout the distribution network.
- k. To lead and directing the necessary change processes, as well as ensuring all operational activities of the fields under the Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, implement all the defined strategic plans.
- l. Carry out supervision and ensure that all units under the Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, comply with the regulations, policies and internal regulations of the Company.
- m. To lead, direct and manage customer relationships related to the scope of duties and responsibilities of Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management, and subordinate units).
- n. Vice Chairman of BCC (Business Command Center)
- Carry out the functions as Chairman in case the Chairman of BCC is unavailable.
 - Declare the Bank is under liquidity crisis and activate the function of BCC and develop an immediate, systematic, pragmatic and integrated management strategy.
 - Ensure the possibility to gain assistance from Bank Indonesia.
 - Assign the Director and/or Head of a particular division to carry out the tasks as an effort to prevent and overcome the conditions of crisis or liquidity difficulties.
 - Reporting the results of implementation of the mitigation strategy that has been set in coping with the crisis or liquidity difficulties to the BCC chairman.

- o. Melaksanakan tugas-tugas lain yang diberikan oleh Direktur Utama & Pemegang Saham Perseroan, sepanjang tidak bertentangan dengan Anggaran Dasar, ketentuan internal, regulasi dan undang-undang yang berlaku.

Sumber Daya Manusia

Merekomendasikan mengenai kebijakan dan pembinaan Sumber Daya Manusia (SDM) di bawah koordinasi dan supervisi Direktorat *Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management* termasuk mengusulkan kebijakan rekrutmen, promosi, demosi, rotasi, pembinaan dan pelatihan, dengan koordinasi *Managing Director Compliance & Legal* yang membidangi *Human Capital Division*.

6) Direktur Asset Management

1. Kebijakan dan Strategi
 - a. Memastikan pengembangan dan penerapan strategi dalam bidang *Asset Management*, sesuai dengan tujuan Perseroan dan memanfaatkan seluruh sumber daya Perseroan.
 - b. Memimpin dan mengarahkan penyusunan dan penerapan kebijakan pada bidang di bawah Direktorat *Asset Management*.
 - c. Memimpin, mengarahkan penyusunan dan melakukan supervisi pelaksanaan rencana kerja Direktorat *Asset Management* khususnya dibidang pengembangan kredit dan *transactional business*.
 - d. Memimpin, mengarahkan dan melaksanakan supervisi pelaksanaan rencana kerja dan target-target bersama yang terkait Direktorat lainnya untuk kepentingan dan tujuan Perseroan dalam memanfaatkan kompetensi sumber daya Direktorat *Asset Management*.
 - e. Melaksanakan pembinaan dan pengembangan sumberdaya Perseroan di seluruh unit kerja di bawah Direktorat *Asset Management* dan memastikan penerapan pengembangan pegawai berbasis kompetensi, sistem manajemen kinerja dan manajemen berbasis nilai (*performance management system* dan *value based management*) yang efektif.

- o. Carry out other duties given by the President Director & Shareholders of the Company, to the extent not contradict the Articles of Association, internal regulations, regulations and applicable laws.

Human Resources

To lead and direct Human Resources policies and development under the coordination and supervision of the Directorate of Treasury & Capital Market, Financial Institution, Cash & Financial Technology, Funding & Distribution Management in making decision and policy of recruitment, promotion, demotion, rotation, coaching and training, with the coordination of Managing Director of Compliance & Legal in Human Capital.

6) Director of Asset Management

1. Policy and Strategy
 - a. Ensure the Company's development, planning and implementation of the Company's strategy, in Asset Management in accordance with the objectives of the Company and utilize all of the Company's resources.
 - b. To lead and direct the preparation and implementation of policies in all areas under Directorate of Asset Management
 - c. To lead, direct the preparation and conduct supervision on the implementation of the work plan of Asset Management, especially credit development and transactional business.
 - d. To lead and directing the necessary change processes, and ensuring the field activities under the Directorate of Finance implements the latest best practice standards in line with the Company's maximum resource capabilities.
 - e. Carry out the development of the Company's resources in all work units under Directorate of Asset Management and ensure the effective implementation of competency-based employee development, performance management system and value-based effective management.

2. Kegiatan Operasional

- a. Memimpin, melaksanakan koordinasi dan supervisi penerapan kebijakan dan strategi yang berhubungan dengan kegiatan dibidang *Asset Management* operasional dan bidang-bidang di bawahnya.
- b. Memimpin, mengarahkan dan mengkoordinasikan pelaksanaan fungsi, tugas dan tanggung jawab seluruh bidang di bawah Direktorat *Asset Management* dalam mendukung fungsi, tugas, tanggung jawab Direktur Utama, dan memastikan Perseroan mencapai standar *best practice* layanan.
- c. Memimpin dan mengarahkan proses-proses perubahan yang diperlukan, serta memastikan seluruh kegiatan operasional bidang di bawah Direktorat *Asset Management* mengimplementasikan seluruh rencana strategis yang ditetapkan.
- d. Melaksanakan supervisi dan memastikan seluruh unit di bawah Direktorat *Asset Management* mematuhi ketentuan regulasi, kebijakan dan ketentuan internal Perseroan.
- e. Memimpin, mengarahkan dan melaksanakan pengelolaan hubungan dengan internal, dengan cakupan tugas dan tanggung jawab Direktorat *Asset Management* dan unit kerja di bawahnya.
- f. Melaksanakan tugas-tugas lain yang diberikan oleh Direktur Utama & Pemegang Saham Perseroan, sepanjang tidak bertentangan dengan Anggaran Dasar, ketentuan internal, regulasi dan undang-undang yang berlaku.

3. Sumber Daya Manusia

Memimpin dan mengarahkan kebijakan dan pembinaan Sumber Daya Manusia (SDM) di bawah koordinasi dan supervisi Direktorat dalam memberikan masukan dalam kebijakan perekrutan, promosi, demosi, rotasi, pembinaan dan pelatihan, dengan koordinasi *Managing Director Risk, Legal & Compliance* yang membidangi *Human Capital*.

(2) Piagam Direksi (BOD Charter)

Piagam Direksi (BOD Charter) dituangkan dalam bentuk "Pedoman Tata Tertib Direksi PT Bank J Trust Indonesia Tbk" yang telah disetujui oleh Direksi pada tanggal 12 Desember 2018.

2. Operational Activities

- a. To lead, direct, and coordinate and supervise the implementation of policies related to Asset Management
- b. To lead and directing the necessary change processes, and ensuring the field activities under the Directorate of Asset Management in supporting the functions, duties, responsibilities of the President Director, and ensuring that the Company reaches service best practice standards.
- c. To Lead and direct the necessary change processes, and ensuring all operational activities under the Directorate of Asset Management implement all the strategic plans that have been set.
- d. Supervise and ensure all units under the Asset Management Directorate comply with the Company's regulations, policies and internal provisions.
- e. To lead, direct and implement management of internal relations, with the scope of duties and responsibilities of the Asset Management Directorate and the work units below.
- f. Carry out other tasks given by the President Director & Shareholders of the Company, insofar as they do not conflict with the Articles of Association, internal regulations, applicable regulations and laws..

3. Human Resources

To lead and direct the policies and guidance of Human Resources (HR) under the coordination and supervision of the Directorate in providing input in recruitment, promotion, demotion, rotation, coaching and training policies, with the coordination of the Managing Director of Risk, Legal & Compliance in charge of Human Capital.

(2) Charter of the Board of Directors (BOD Charter)

The Board of Directors Charter (BOD Charter) is set forth in the form of "PT Bank J Trust Indonesia Tbk Board of Directors Regulations" which have been approved by the Board of Directors on

Selanjutnya "Pedoman Tata Tertib Direksi tersebut di atas, akan ditinjau secara berkala apabila dianggap perlu dengan memperhatikan ketentuan perundangan yang berlaku.

(3) Pengangkatan dan Masa Jabatan

- 1) Calon yang memenuhi syarat akan diajukan oleh Pemegang Saham yang dalam praktiknya pemilihan dilakukan oleh Komite Nominasi dan Remunerasi.
- 2) Komite Nominasi dan Remunerasi harus mempertimbangkan baik calon dari Internal maupun Eksternal.
- 3) Calon dari Internal maupun Eksternal harus memenuhi kriteria pemilihan, seperti yang ditetapkan oleh Komite Nominasi dan Remunerasi, dimana terdapat syarat-syarat khusus yang harus diambil.
- 4) Mayoritas Anggota Direksi telah memiliki pengalaman paling sedikit 5 (lima) tahun di bidang Operasional dan paling rendah sebagai Pejabat Eksekutif Bank.
- 5) Setiap usulan pengangkatan dan/atau penggantian anggota Direksi telah memperhatikan rekomendasi dari Komite Nominasi dan Remunerasi serta telah disetujui oleh pemegang saham melalui Rapat Umum Pemegang Saham (RUPS) yang mempertimbangkan integritas, kompetensi, profesionalisme dan reputasi keuangan yang memadai sesuai dengan persyaratan penilaian uji kemampuan dan kepatutan (*Fit and Proper Test*) yang telah ditetapkan oleh Otoritas Jasa Keuangan (OJK).
- 6) Komite Nominasi dan Remunerasi akan merekomendasikan 2 (dua) calon untuk setiap posisi kepada Dewan Komisaris untuk diajukan kepada Otoritas Jasa Keuangan dan Pemegang Saham.
- 7) Bank akan merekomendasikan kepada Otoritas Jasa Keuangan selanjutnya Otoritas Jasa Keuangan akan melakukan penilaian kemampuan dan kepatutan (*fit and proper test*) bagi para calon.
- 8) Masa jabatan seorang anggota Direksi sesuai Anggaran Dasar adalah efektif sejak tanggal yang ditentukan dalam RUPS dan berakhir pada saat RUPS Tahunan ke-3 (ketiga) setelah tanggal pengangkatan tersebut.
- 9) Anggota Direksi yang telah habis masa jabatannya dapat diangkat kembali oleh RUPS.

Sesuai dengan Hasil Keputusan RUPST tanggal 30 Maret 2017 yang menyetujui tentang penetapan/pengangkatan kembali masa jabatan seorang anggota Direksi, maka masa jabatan anggota

December 12, 2018. Furthermore "the Board of Directors' Rules of Conduct above, will be reviewed periodically if deemed necessary by observing the prevailing laws and regulations.

(3) Appointment and Term of Office

- 1) Eligible candidates will be proposed by Shareholders who in practice are elected by the Nomination and Remuneration Committee.
- 2) The Nomination and Remuneration Committee should consider both Internal and External candidates.
- 3) Internal as well as External Candidates must meet the criteria stipulated by the Nomination and Remuneration Committee, which include some special requirements that should be met.
- 4) Majority of members of the Board of Directors have at least 5 (five) years of experience in the Operational field and the lowest position was Executive Officer of the Bank.
- 5) Any proposal for appointment and/or replacement of members of the Board of Directors should be taken into consideration the recommendations from the Nomination and Remuneration Committee and must be approved by the shareholders through the General Meeting of Shareholders (AGM) in line with the main criteria such as integrity, competence, professionalism and financial reputation in accordance with the requirements of the Fit and Proper Test as decided by the Financial Services Authority (FSA).
- 6) The Nomination and Remuneration Committee shall elect 2 (two) candidates for each position, all candidates shall be submitted to the Financial Services Authority and Shareholders.
- 7) The Bank will submit its recommendation to Financial Services Authority then the later will conduct a fit and proper test for candidates.
- 8) The term of office of a member of the Board of Directors in accordance with the Articles of Association is effective from the date specified in the GMS and ends at the 3rd (third) Annual General Meeting of Shareholders after the date of the appointment.
- 9) Member of the Board of Directors whose term of office has expired may be re-appointed by the GMS.

In accordance with the Resolutions of the AGMS on March 30, 2017 which agreed the reappointment of member of the Board of Directors, none of the term of office of the Board of Directors of PT Bank JTrust

Direksi PT Bank JTrust Indonesia Tbk tidak ada yang lebih dari 2 (dua) periode berturut-turut yang diperhitungkan sejak pengangkatan pada RUPSLB tahun 2014.

(4) Kriteria Direksi

Kriteria dalam pemilihan anggota Direksi antara lain adalah:

1. Memenuhi persyaratan dimaksud dalam POJK Nomor 33/POJK.04/2014 tanggal 8 Desember 2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, yaitu:
 - a. Mempunyai akhlak, moral, dan integritas yang baik.
 - b. Cakap melakukan perbuatan hukum.
 - c. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
 - a) Tidak pernah dinyatakan pailit.
 - b) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit.
 - c) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; dan
 - d) Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang selama menjabat:
 - (a) Pernah tidak menyelenggarakan RUPS tahunan;
 - (b) Pertanggungjawabannya sebagai anggota Direksi dan/atau anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada RUPS; dan
 - (c) Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan laporan tahunan dan/atau laporan keuangan kepada Otoritas Jasa Keuangan.
 - d. Memiliki komitmen untuk mematuhi peraturan perundang-undangan.
 - e. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan perusahaan.

Indonesia Tbk exceeded 2 (two) consecutive periods since the appointment at EGM 2014.

(4) Criteria of the Board of Directors

Criteria for the selection of members of the Board of Directors are:

1. Meet the requirements referred to in Regulation of Financial Services Authority No. 33/POJK.04/2014 dated December 8, 2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies, namely:
 - a. Have good morals, and integrity.
 - b. Proficient in performing legal actions.
 - c. Within 5 (five) years prior to the appointment and during the term of office:
 - a) Never been declared bankrupt.
 - b) Never become a member of the Board of Directors and/or a member of the Board of Commissioners who is found guilty of causing a company to be declared bankrupt.
 - c). Never been punished for committing a criminal offense that is detrimental to state finances and/or relating to the financial sector; and
 - d) Never been a member of the Board of Directors and/or members of the Board of Commissioners who, during their term of office:
 - (a) Never held an annual GMS;
 - (b) His/Accountability as a member of the Board of Directors and/or a member of the Board of Commissioners once was not accepted by the GMS or never been accountable as a member of the Board of Directors and/or members of the Board of Commissioners to the General Meeting of Shareholders; and
 - (c) Never cause a company, which obtaining permit, approval or registration from the Financial Services Authority, fail to comply with the obligation to submit annual reports and/or financial statements to the Financial Services Authority.
 - d. Have a commitment to comply with laws and regulations.
 - e. Possessing knowledge and/or expertise in the field required by the Company.

2. Memenuhi persyaratan integritas, reputasi keuangan dan kompetensi yang dimaksud dalam POJK Nomor 27/POJK.03/2016 tanggal 22 Juli 2016 tentang Penilaian Kemampuan dan Kepatutan Bagi Pihak Utama Lembaga Jasa Keuangan, dan SEOJK Nomor 39/SEOJK.03/2016 tanggal 13 September 2016 tentang Penilaian Kemampuan dan Kepatutan Bagi calon Pemegang Saham Pengendali, Calon Anggota Direksi, dan Calon Anggota Dewan Komisaris Bank.

Persyaratan Integritas meliputi:

- a. Cakap melakukan perbuatan hukum.
- b. Memiliki akhlak dan moral yang baik, paling sedikit ditunjukkan dengan sikap mematuhi ketentuan yang berlaku, termasuk tidak pernah dihukum karena terbukti melakukan tindak pidana dalam jangka waktu 20 (dua puluh) tahun terakhir sebelum dicalonkan.
- c. Memiliki komitmen untuk mematuhi peraturan perundang-undangan dan mendukung kebijakan OJK.
- d. Memiliki komitmen terhadap pengembangan Bank yang sehat; dan
- e. Tidak termasuk sebagai pihak yang dilarang untuk menjadi Pihak Utama.

Persyaratan reputasi keuangan meliputi:

- a. Tidak memiliki kredit dan/atau pembiayaan macet; dan
- b. Tidak pernah dinyatakan pailit dan/atau tidak pernah menjadi pemegang saham, Pengendali Perusahaan Perasuransian yang bukan merupakan pemegang saham, anggota Direksi, atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perseroan dinyatakan pailit dalam waktu 5 (lima) tahun terakhir sebelum dicalonkan.

Persyaratan kompetensi paling sedikit meliputi pengetahuan dan/atau pengalaman yang mendukung pengelolaan Bank.

(5) Status Independensi Direksi

- 1) Seluruh anggota Direksi PT Bank JTrust Indonesia Tbk merupakan Direksi Independen, artinya tidak saling memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Direksi dan/atau dengan anggota Dewan Komisaris dan/atau Pemegang Saham Pengendali Bank yang dapat mempengaruhi kemampuannya untuk bertindak tidak independen.

2. Meet the requirements of integrity, financial reputation and competence referred to in the Regulation of Financial Services Authority No. 27/POJK.03/2016 dated July 22, 2016 on the Assessment of Ability and Fit for Main Parties of Financial Services Institutions, and Circular Letter of the Financial Services Authority Number 39/SEOJK.03/2016 dated September 13, 2016 on Capacity and Compliance Assessment for Potential Controlling Shareholder, Candidate Member of Board of Directors, and Candidate Member of Board of Commissioners of Bank.

Integrity requirements include:

- a. Proficient in performing legal actions.
- b. Having good character and morals, at least as indicated by complying applicable provisions, including never being convicted for criminal offense within the last 20 (twenty) years prior being nominated.
- c. Having commitment to comply with laws and regulations and support FSA policy.
- d. Committed to the development of a sound Bank; and
- e. Not included as a party that is prohibited to become a Principal Party.

Financial reputation requirements include:

- a. Does not have credit and/or non-performing financing; and
- b. Never been declared bankrupt and/or never become a shareholder or Controller of Insurance Company who is not a shareholder, member of the Board of Directors or a member of the Board of Commissioners found guilty of causing a company to be declared bankrupt within the last 5 (five) years before being nominated.

Competence requirements at least include knowledge and/or experience that support the management of the Bank.

(5) Independency of BOC

- 1) All members of the Board of Directors of PT Bank JTrust Indonesia Tbk are independent, meaning that they have no financial, management, share ownership and/or family relationship up to the second degree with other members of the Board of Directors and/or with members of the Board of Commissioners and/or Controlling Shareholders Banks that may affect their ability to act are not independent.

- 2) Anggota Direksi baik secara sendiri-sendiri atau bersama-sama tidak memiliki saham melebihi 25% (dua puluh lima persen) dari modal disetor pada perusahaan lain.
- 3) Anggota Direksi tidak memberikan kuasa umum kepada pihak lain yang mengakibatkan pengalihan tugas dan fungsi Direksi.

(6) Jumlah dan Komposisi Direksi

Mengacu kepada Peraturan Otoritas Jasa Keuangan (POJK) Nomor 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola Bagi Bank Umum:

- Jumlah anggota Direksi paling sedikit 3 (tiga) orang.
- Seluruh anggota Direksi sebagaimana dimaksud, wajib berdomisili di Indonesia.
- Anggota Direksi wajib dipimpin oleh Presiden Direktur atau Direktur Utama dan 1 (satu) orang menjabat sebagai Direktur Kepatuhan.

Berdasarkan hasil keputusan RUPSLB tanggal 20 September 2018, jumlah dan komposisi Direksi PT Bank JTrust Indonesia Tbk telah sesuai kriteria POJK di atas, sebagai berikut:

- Anggota Direksi sebanyak 6 (enam) orang, termasuk 1 (satu) orang Direktur Utama, 1 (satu) orang Direktur Kepatuhan, dan 4 (empat) orang Direktur.
- Seluruh anggota Direksi telah berdomisili di Indonesia, dengan telah dibuktikan bagi anggota Direksi yang berkewarganegaraan asing telah memiliki KITAS (Kartu Izin Tinggal Terbatas) & IMTA (izin Memperkerjakan Tenaga Kerja Asing) dari lembaga terkait.

Jumlah dan susunan anggota Direksi tersebut adalah:

No	Nama Name	Jabatan Position	Warganegara/ Domisili Citizenship/ Domiciled	Tanggal Pengangkatan & Persetujuan Date of Appointment & Approval		Tanggal Pengangkatan Kembali Date of Reappointment RUPS GMS
				RUPS GMS	BI/OJK BI/FSA	
1.	Shigeyoshi Asano	Komisaris Commissioner Direktur Utama President Director	Jepang/Indonesia Japanese/ Indonesia	- RUPST tgl. 30 Juni 2016 - RUPSLB tgl. 20 September 2018 - AGMS on 30 June 2016 - EGMS on 20 September 2018	27 Oktober 2016 21 Februari 2019 October 27, 2016 February 21, 2019	-

- 2) Members of the Board of Directors, either individually or jointly, do not own shares exceeding 25% (twenty five percent) of paid up capital in other companies
- 3) Members of the Board of Directors do not grant the general authority to any other party resulting in the transfer of duties and functions of the Board of Directors.

(6) Number and Composition of the Board of Directors

Referring to the Regulation of Financial Services Authority No. 55/POJK.03/2016 dated December 7, 2016 on the Implementation of Good Corporate Governance for Commercial Banks:

- Members of the Board of Directors shall be at least 3 (three) persons.
- All members of the Board of Directors shall be domiciled in Indonesia
- The Board of Directors shall be chaired by the President Director and one serving as Director of Compliance.

Based on the resolutions of the EGMS on September 20, 2018, the number and composition of the Board of Directors of PT Bank JTrust Indonesia Tbk has been in accordance with the above POJK criteria, as follows:

- Members of the Board of Directors are 6 (six) persons, including 1 (one) President Director, 1 (one) Director of Compliance, and 4 (four) Directors.
- All members of the Board of Directors are domiciled in Indonesia, proven by members of BOD who hold KITAS (Limited Stay Permit Card) & IMTA (permission to Hire Foreign Workers) from relevant institutions.

The number and composition of the members of the Board of Directors are as follows:

No	Nama Name	Jabatan Position	Warganegara/ Domisili Citizenship/ Domiciled	Tanggal Pengangkatan & Persetujuan Date of Appointment & Approval		Tanggal Pengangkatan Kembali Date of Reappointment RUPS GMS
				RUPS GMS	BI/OJK BI/FSA	
2.	Ritsuo Ando *)	Direktur Director Direktur Utama President Director Direktur Director	Jepang/Indonesia Japanese/ Indonesia	- RUPSLB tgl. 28 Desember 2015 - RUPSLB tgl. 23 Desember 2016 - EGMS on 28 December 2015 - EGMS on 23 December 216	26 Februari 2016 26 Oktober 2017 26 February 2016 26 October 2017	- RUPSLB tgl. 20 September 2018 EGMS on 20 September 2018
3.	Felix Istyono Hartadi Tiono	Direktur Director	Indonesia	- RUPSLB LPS tgl. 26 Februari 2014 - EGMS LPS on 26 February 2014	22 April 2014 April 22, 2014	- RUPST tgl. 30 Maret 2017 AGMS on 30 March 2017
4.	Helmi Arief Hidayat	Direktur Director	Indonesia	- RUPST tgl. 30 Juni 2016 AGMS on June 30, 2016	5 September 2016 September 5, 2016	-
5	Rio Lanasier	Direktur Director	Indonesia	- RUPSLB tgl. 23 Desember 2016 EGMS on December 23, 2016	3 Oktober 2017 October 3, 2017	-
6.	Haryanto Budi Purnomo *)	Direktur Director	Indonesia	- RUPSLB tgl. 23 Desember 2016 AGMS on December 23, 2016	24 November 2017 November 24, 2017	-

*) Efektif sejak 1 Januari 2019 disetujui pemberhentian sementara Bapak Ritsuo Ando dan Bapak Haryanto Budi Purnomo berdasarkan Surat Keputusan Sirkuler Dewan Komisaris sebagai pengganti Rapat Dewan Komisaris, dan Hasil Keputusan RUPSLB tanggal 11 Februari 2019. Effective since 1 January 2019 the temporary dismissal of Ritsuo Ando and Haryanto Budi Purnomo was approved based on the Circular Letter of Board of Commissioners as replacement of Board of Commissioners Meeting, and EGMS Resolutions on 11 February 2019.

Adapun ringkasan profil anggota Direksi sebagai berikut:

a. Direktur Utama : **Shigeyoshi Asano**

Warga Negara Jepang, 49 Tahun. Direktur Utama J Trust Bank diangkat melalui RUPSLB tanggal 20 September 2018. Sebelumnya diangkat sebagai Komisaris J Trust Bank sejak 30 Juni 2016. Pengalaman bekerja terakhir sebagai Komisaris pada PT JTrust Investments Indonesia, Direktur dan Pejabat Eksekutif di J Trust Co., Ltd., Komisaris di PT Group Lease Finance Indonesia, serta Direktur di J Trust Asia PTE. LTD. Memiliki pengalaman 22 tahun di industri investasi dan bisnis. Beliau memulai karir di Tokyo Gas Co., Ltd. pada tahun 1994. Beliau meraih gelar Sarjana Teknik dari Institut Teknologi Tokyo pada tahun 1992. Kemudian beliau meraih gelar Master Teknik dari Institut Teknologi Tokyo pada tahun 1994.

The profiles of members of the Board of Directors are as follows:

a. President Director : **Shigeyoshi Asano**

Japanese Citizen, 49 years old. Appointed as President Director of J Trust Bank based on EGMS on September 20, 2018. Previously he was Member of the Board of Commissioners of J Trust Bank since 2016. His last position was Commissioner of JTrust Investments Indonesia, Director and Executive Officers in J Trust Co., Ltd. Commissioner of PT Group Lease Finance Indonesia, and Director of J Trust Asia PTE. LTD. He has 22 years of experience in the investment industry and business strategy. He started his career in Tokyo Gas Co., Ltd. in 1994. He obtained his Bachelor of Engineering degree from the Tokyo Institute of Technology in 1992 and Master of Engineering from the Tokyo Institute of Technology in 1994.

- b. **Direktur : Ritsuo Ando**
Warga Negara Jepang, 62 Tahun. Pengalihan tugas sebagai Direktur J Trust Bank melalui RUPSLB tanggal 20 September 2018. Sebelumnya diangkat sebagai Direktur Utama J Trust Bank melalui RUPSLB tanggal 23 Desember 2016 dan sebagai Direktur J Trust Bank berdasarkan RUPSLB tanggal 28 Desember 2015. Beliau memiliki pengalaman 37 tahun di bidang perbankan dan finansial. Memulai karir di The Daiwa Bank, Limited, Osaka sebagai Banking Officer pada 1979 hingga pertama kali menduduki posisi Eksekutif sebagai Presiden Direktur di PT Daiwa Lippo Finance pada 2001. Setelahnya, beliau menjabat Presiden Direktur di Resona Indonesia Finance pada 2003, Penasihat di Resona Bank, Ltd. pada 2005, General Manager di ACOM Co., Ltd. pada 2007, Wakil Presiden Direktur di PT Bank Nusantara Parahyangan, Tbk. (BNP) pada 2008, dan terakhir sebagai Presiden Direktur BNP sejak 2009 sebelum menjadi Direktur J Trust Bank. Menyelesaikan pendidikan dari Osaka University of Foreign Language, Faculty of Language, Indonesia Study tahun 1975.
- c. **Direktur Kepatuhan : Felix Istyono Hartadi Tiono**
Warga Negara Indonesia, 60 tahun. Berdasarkan hasil keputusan RUPST tanggal 30 Maret 2017 yang menyetujui penetapan/pengangkatan kembali sebagai Direktur Perseroan. Sebelumnya diangkat sebagai Direktur Kepatuhan J Trust Bank berdasarkan RUPSLB tanggal 26 Februari 2014 yang saat itu dikenal sebagai Bank Mutiara. Memiliki pengalaman 30 tahun di bidang legal - kepatuhan dan industri perbankan. Memulai karir sebagai legal officer di PT Wellwood Sejahtera Ekapratama pada 1986, dan melanjutkan karirnya di Rabobank sejak 1990 dengan jabatan terakhir Direktur Kepatuhan sebelum bergabung dengan Bank DBS Indonesia pada 2006 sebagai Direktur Kepatuhan, dan terakhir sebagai Direktur Kepatuhan Bank HSBC Indonesia sejak tahun 2009 sebelum bergabung dengan J Trust Bank. Beliau meraih gelar Sarjana Hukum Perdata di Universitas Katholik Parahyangan Bandung pada tahun 1986, dan gelar S2 di Institut Pengembangan Manajemen Indonesia, Jakarta di tahun 2006.
- d. **Direktur : Helmi Arief Hidayat**
Warga Negara Indonesia, 61 tahun. Diangkat menjadi Direktur J Trust Bank melalui RUPST tanggal 30 Juni 2016. Pengalaman bekerja terakhir sebagai Executive Vice President J Trust Bank sejak 2012 yang saat itu dikenal sebagai Bank Mutiara. Memiliki pengalaman 30 tahun di industri perbankan. Beliau memulai karir perbankan di Bank Umum Nasional pada tahun 1987. Beliau pernah bekerja di BPPN dan beberapa bank seperti Bank Dana Asia, Bank Akita, Barclays
- b. **Director : Ritsuo Ando**
Japanese Citizen, 62 years old, resides in Jakarta. Appointed as Director of J Trust Bank based on EGMS on September 20, 2018. Previously, he was Director for J Trust Bank based on EGMS on December 23, 2016 and Director of J Trust Bank based on EGMS on December 28, 2015. He has 37 years working experience in financial and banking business. He started his career at The Daiwa Bank, Limited, Osaka as a Banking Officer in 1979 until first position as Executive as President Director of PT Daiwa Lippo Finance in 2001. Afterwards, he served as President Director at Resona Indonesia Finance in 2003, Advisor at Resona Bank, Ltd. in 2005, the General Manager at ACOM Co., Ltd. in 2007, Deputy President Director at PT Bank Nusantara Parahyangan, Tbk. (BNP) in 2008, and most recently as President Director of BNP since 2009 before joining J Trust Bank as Director. He obtained his degree from Osaka University of Foreign Language, Faculty of Language, Indonesian Study in 1975.
- c. **Compliance Director : Felix Istyono Hartadi Tiono**
Indonesian Citizen, 60 years old. Based on the results of the AGMS's decision dated March 30, 2017 which approved the determination/reappointment as Director of the Company. Previously he served as Compliance Director of J Trust Bank based on the EGMS on February 26, 2014 which was then known as Bank Mutiara. Has 30 years experience in the legal - compliance and banking industry. He started his career as a legal officer at PT Wellwood Sejahtera Ekapratama in 1986, and continued his career at Rabobank since 1990 with his last position as Compliance Director before joining Bank DBS Indonesia in 2006 as Compliance Director, and most recently as Compliance Director of Bank HSBC Indonesia since 2009 before joining with J Trust Bank. He graduated from the Faculty of Law at Parahyangan Catholic University, Bandung, in 1986, and obtained his Masters degree from the Institut Pengembangan Manajemen Indonesia, Jakarta, in 2006.
- d. **Director : Helmi Arief Hidayat**
Indonesian citizen, 61 years old. Appointed as Director of J Trust Bank through the AGMS on June 30, 2016. Previously, he was Executive Vice President of J Trust Bank since 2012, at that time was known as Bank Mutiara. He has 30 years of experience in the banking industry. He started his banking career in 1987 with Bank Umum Nasional in 1987. He has worked in the Indonesia Bank Restructuring Agency and several banks such as Bank Dana Asia, Bank Akita, Barclays Indonesia Bank, and Nobu Bank. He obtained his

Bank Indonesia dan Nobu Bank. Beliau meraih gelar sarjana jurusan Elektro dari UDS 45 pada tahun 1987, kemudian menyelesaikan program pasca sarjana dari Universitas Krisnadwipayana (UNKRIS) tahun 1993.

e. **Direktur : Rio Lanasier**

Warga Negara Indonesia, 43 tahun. Diangkat sebagai Direktur J Trust Bank melalui RUPSLB tanggal 23 Desember 2016. Sebelumnya menjabat sebagai Executive Vice President J Trust Bank sejak 2015. Memiliki pengalaman 15 tahun di perbankan. Beliau memulai karirnya di Officer Development Program Bank Mandiri pada 2002. Beliau terus berkarir di Bank Mandiri hingga menjadi Assistant Vice President Treasury - Chief Dealer sebelum bergabung dengan Bank Chinatrust Indonesia sebagai Assistant Vice President Treasury - Head of Interbank pada 2007, dan kemudian VP Treasury Interbank - Global Financial Market dari DBS Indonesia pada tahun 2008. Beliau meraih gelar Sarjana Teknik Sipil dari Universitas Parahyangan pada tahun 1998 dan Master of Engineering Science di University of New South Wales pada tahun 2000.

f. **Direktur : Haryanto Budi Purnomo**

Warga Negara Indonesia, 54 Tahun. Diangkat sebagai Direktur J Trust Bank melalui RUPSLB tanggal 23 Desember 2016. Sebelumnya menjabat sebagai Executive Vice President J Trust Bank sejak 2016. Beliau memiliki pengalaman 26 tahun di bidang perbankan dan memulai karir sebagai management trainee di Bank Universal pada 1991. Beliau selanjutnya terus berkarir dengan jabatan terakhir sebagai Midsized Business Operation Support Group Head Bank Universal sebelum bergabung dengan Bank Mega Syariah pada 2003 sebagai Direktur Human Resource Management, Compliance and Risk Management. Jabatan terakhir beliau di Bank Mega Syariah adalah Direktur Operation, Technology Information, General Services, Corporate Strategy and Planning, Collection & Recover, Product Development and Service Quality Management sebelum bergabung dengan J Trust Bank. Beliau meraih gelar sarjana Hukum dari Universitas Indonesia pada tahun 1990.

(7) Rangkap Jabatan

Sesuai ketentuan dalam POJK tentang Penerapan Tata Kelola Bagi Bank Umum, Anggota Direksi dilarang merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada Bank, perusahaan, dan/atau lembaga lain, kecuali Direksi yang bertanggung jawab terhadap pengawasan atas penyertaan Bank pada perusahaan anak, menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada

Bachelor degree in Electrical Engineering from UDS 45 in 1987 and Masters degree from Universitas Krisnadwipayana (UNKRIS) in 1993.

e. **Director : Rio Lanasier**

Indonesian Citizen, 43 years old. Appointed as Director of J Trust Bank based on EGMS on December 23, 2016. Previously, he was Executive Vice President of J Trust Bank since 2015. He has more than 15 years of experience in the banking industry. He started his career in the Officer Development Program of Bank Mandiri in 2002. His last position at Bank Mandiri was Assistant Vice President Treasury - Chief Dealer, before joining as Assistant Vice President Treasury - Head of Interbank of Bank Chinatrust Indonesia in 2007 and VP Treasury Interbank - Global Financial Market of DBS Indonesia in 2008. He obtained his Bachelor degree in Civil Engineering from Parahyangan University, Bandung in 1998 and Master of Engineering Science degree from the University of New South Wales in 2000.

f. **Director : Haryanto Budi Purnomo**

Indonesian Citizen, 54 years old. Appointed as Director of J Trust Bank based on EGMS on December 23, 2016. Previously, he was Executive Vice President of J Trust Bank since 2016. He has 26 years of working experience in banking industry and started his career in Bank Universal as management trainee in 1991. He held key positions in several banks such as Midsized Business Operation Support Group Head of Bank Universal, before joining Bank Mega Syariah in 2003 as Director of Human Resource Management, Compliance and Risk Management. His last position in Bank Mega Syariah is Director of Operation, Technology Information, General Services, Corporate Strategy and Planning, Collection & Recover, Product Development and Service Quality Management before joining J Trust Bank. He holds a Bachelor degree in Civil Law from University of Indonesia in 1990.

(7) Concurrent Position

To comply with the provisions from the Regulation of Financial Services Authority on the Implementation of Good Corporate Governance for Commercial Banks, the members of BOD are prohibited from serving concurrently as members of the BOD, or BOC, or Executive Officers at Banks, companies and/or other institutions, except as member of BOD responsible for supervising the Bank's participation in a subsidiary company,

perusahaan anak bukan Bank yang dikendalikan oleh Bank, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Direksi Bank.

Pada periode tahun 2018 seluruh anggota Direksi PT Bank JTrust Indonesia Tbk tidak merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi atau Pejabat Eksekutif pada perusahaan pemegang saham pengendali, bank lain, perusahaan dan/atau lembaga lain. Selain itu anggota Direksi tidak ada yang menjadi anggota Komite-komite Di bawah Dewan Komisaris.

(8) Hubungan Afiliasi

Anggota Direksi telah membuat dan menandatangani surat pernyataan terkait hal-hal meliputi:

- Kepemilikan saham anggota Direksi baik secara sendiri-sendiri maupun bersama-sama yang tidak melebihi 25% (dua puluh lima persen) dari modal disetor pada perusahaan lain.
- Kepemilikan saham anggota Direksi yang mencapai $\geq 5\%$ (lima persen) dari modal disetor, baik pada PT Bank JTrust Indonesia Tbk maupun pada Bank dan Perusahaan Lain, yang berkedudukan di dalam dan di luar negeri.

Transparansi Kepemilikan Saham Anggota Direksi yang Mencapai $\geq 5\%$ dari Modal Disetor

No	Nama Name	J Trust Bank	Bank Lain Other Bank	Lembaga Keuangan Bukan Bank Non Bank Financial Institution	Perusahaan Lain Other Company	%
1.	Shigeyoshi Asano	-	-	-	-	-
2.	Ritsuo Ando	-	-	-	J-Net Travel	5,00
3.	Felix Istyono Hartadi Tiono	-	-	-	-	-
4.	Helmi Arief Hidayat	-	-	-	-	-
5.	Rio Lanasier	-	-	-	-	-
6.	Haryanto Budi Purnomo	-	-	-	-	-

- Hubungan Keuangan dan Hubungan Keluarga Anggota Direksi dengan Anggota Direksi Lain, Anggota Dewan Komisaris dan/atau Pemegang Saham Pengendali Bank.

performing functional duties as member of BOC of a non-Bank subsidiary controlled by the Bank, so long as it does not result in neglecting of the implementation of duties and responsibilities as a member of BOD of the Bank.

In 2018, none of members of the Board of Directors of PT Bank JTrust Indonesia Tbk hold concurrent positions as members of BOC, BOD or Executive Officers in controlling shareholder companies, other banks, companies and/or other institutions. In addition, none of BOD members serves as member of the Committees Under BOC.

(8) Affiliation

Members of the Board of Directors have made and signed a statement letter relating to the matters mentioned below:

- Members of the Board of Directors, either individually or jointly, do not own shares exceeding 25% (twenty five percent) of paid up capital in other companies.
- Member of the Board of Directors who hold shares of $\geq 5\%$ (five percent) of paid up capital, either on PT Bank JTrust Indonesia Tbk or at Banks and Other Companies, in and outside the country.

Transparency of Directors Share Ownership up to $\geq 5\%$ of Paid-in Capital

- Financial and Family Relationships of Members of the Board of Directors with other Members of Board of Directors, Members of the Board of Commissioners and/or Controlling Shareholders of the Bank.

Transparansi Hubungan Keuangan**Transparency of Financial Relationship**

No	Nama Name	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Pengendali Controlling Shareholders	
		Ya Yes	Tidak No	Ya Yes	Tidak No	Ya Yes	Tidak No
1.	Shigeyoshi Asano		√		√		√
2.	Ritsuo Ando		√		√		√
3.	Felix Istyono Hartadi Tiono		√		√		√
4.	Helmi Arief Hidayat		√		√		√
5.	Rio Lanasier		√		√		√
6.	Haryanto Budi Purnomo		√		√		√

Transparansi Hubungan Keluarga**Transparency of Family Relationship**

No	Nama Name	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Pemegang Saham Pengendali Controlling Shareholders	
		Ya Yes	Tidak No	Ya Yes	Tidak No	Ya Yes	Tidak No
1.	Shigeyoshi Asano		√		√		√
2.	Ritsuo Ando		√		√		√
3.	Felix Istyono Hartadi Tiono		√		√		√
4.	Helmi Arief Hidayat		√		√		√
5.	Rio Lanasier		√		√		√
6.	Haryanto Budi Purnomo		√		√		√

(9) Kebijakan dan Pelaksanaan Rapat Direksi

- 1) Kebijakan Rapat Direksi
 - a. Rapat Direksi dapat diadakan setiap waktu bilamana dipandang perlu atas permintaan Direktur Utama atau oleh seorang atau lebih anggota Direksi atas permintaan tertulis dari seorang atau lebih anggota Komisaris atau pemegang saham yang memiliki sedikitnya 1/10 (satu persepuluh) bagian dari jumlah seluruh saham dengan hak suara yang sah.
 - b. Pemanggilan Rapat Direksi dilakukan oleh Direktur Utama, dan apabila Direktur Utama berhalangan dilakukan oleh Direksi yang ditunjuk oleh Direktur Utama.
 - c. Pemanggilan Rapat Direksi harus disampaikan langsung kepada setiap anggota Direksi dengan sarana media komunikasi internal Bank yang berlaku, sekurang-kurangnya 3 (tiga) hari sebelum Rapat diadakan.
 - d. Direksi wajib mengadakan rapat Direksi paling kurang 1(satu) kali dalam 1 (satu) bulan dan rapat bersama Dewan Komisaris

(9) Policies and Implementation of the Board of Directors Meeting

- 1) Board of Directors' Meeting Policy
 - a. Meetings of the Board of Directors may be held at any time whenever deemed necessary upon request of the President Director or by one or more members of the Board of Directors on the written request of one or more members of the Board of Commissioners or shareholders holding at least 1/10 (one tenth) part of the total number of shares with valid voting rights.
 - b. The summon of the Board of Directors' Meeting shall be conducted by the President Director, and in the absent of the President Director, by the Board of Directors appointed by the President Director.
 - c. The summons of the Meeting of the Board of Directors shall be submitted by registered mail or by letter submitted directly to each member of the Board of Directors and get receipt from at least 3 (three) days before the Meeting is held, excluding the date of summon and date of the Meeting.
 - d. The Board of Directors shall hold Board of Directors meeting at least once every 1 (one) month and meeting with the Board

- paling kurang 1 (satu) kali dalam 4 (empat) bulan. Rapat harus mencantumkan acara, tanggal, waktu dan tempat Rapat.
- e. Rapat Direksi diadakan di tempat kedudukan Perseroan atau tempat kegiatan usaha utama Perseroan. Apabila semua anggota Direksi hadir dan/atau diwakili, pemanggilan terlebih dahulu tersebut tidak disyaratkan dan Rapat Direksi dapat diadakan dimanapun juga dan berhak mengambil keputusan yang sah dan mengikat.
 - f. Rapat dipimpin oleh Direktur Utama, dan dalam hal Direktur Utama berhalangan atau tidak hadir, Rapat Direksi akan dipimpin oleh salah seorang Direksi lainnya yang dipilih dari anggota Direksi yang hadir.
 - g. Setiap kebijakan dan keputusan strategis wajib diputuskan melalui rapat Direksi.
 - h. Pengambilan keputusan rapat Direksi telah dilakukan berdasarkan musyawarah untuk mufakat, dan/atau suara terbanyak dalam hal tidak terjadi keputusan musyawarah untuk mufakat.
 - i. Semua keputusan Direksi yang diambil sesuai dengan Anggaran Dasar Bank dan Panduan Pelaksanaan Tugas Direksi dan Komisararis yang mengikat dan menjadi tanggung jawab seluruh anggota Direksi.
 - j. Hasil rapat Direksi wajib dituangkan dalam risalah rapat/notulen, ditandatangani oleh anggota Direksi yang hadir, disampaikan kepada seluruh anggota Direksi dan didokumentasikan dengan baik, termasuk pencantuman *dissenting opinions* (apabila ada).
- 2) Selama tahun 2018 telah diselenggarakan 43 (empat puluh tiga) kali rapat yang dilaksanakan oleh anggota Direksi, baik rapat Direksi maupun rapat Direksi dengan Kepala Divisi, dan unit kerja lainnya, dalam membahas segenap persoalan dan/atau strategi pengelolaan Perseroan..
- a. Frekuensi tingkat kehadiran rapat anggota Direksi pada tahun 2018 berdasarkan 'periode menjabat' adalah sebagai berikut:
 - e. Meetings of the Board of Directors should be held in the domicile of the Company or the principal business activities of the Company. If all members of the Board of Directors are present and/or represented, summon is not required and the Board of Directors' Meeting may be held elsewhere and shall have the right to make informed and binding decisions.
 - f. The Meeting shall be chaired by the President Director, and in the event the President Director is unavailable or absent, then the Meeting of the Board of Directors shall be chaired by one of the other Directors elected from the members of the Board of Directors present.
 - g. Every strategic policy and decision must be decided through the Board of Directors meeting.
 - h. Decision-making of the Board of Directors meeting has been conducted based on deliberations for consensus, and/or majority vote in the event that no consensus decision was made.
 - i. All decisions of the Board of Directors are taken in accordance with the Bank's Articles of Association and the Implementation Guidelines of the Board of Directors and Commissioners which are binding and are the responsibility of all members of the Board of Directors.
 - j. The results of the Board of Directors' meeting shall be set forth in minutes of meeting, signed by members of the Board of Directors attended the meeting, submitted to all members of the Board of Directors and properly documented, including inclusion of dissenting opinions (if any).
- of Commissioners at least once in 4 (four) months. The minutes of meeting must put the event, date, time and place of the Meeting.
- 2) In 2018, 43 (forty-three) meetings were held by the Board of Directors, both Board of Directors meetings and Board of Directors meetings with Division Heads and other work units, in discussing all issues and/or management strategies of the Company.
- a. The frequency of attendance of members of the Board of Directors meeting in 2018 based on 'term of office' is as follows:

No	Nama Direksi Name of Directors	Periode Menjabat (Sejak Lulus F & P) Terms of Office (After Passing F&P Test)	Jumlah Kehadiran Attendance	% Kehadiran % Attendance
1.	Shigeyoshi Asano (Direktur Utama) President Director) ¹⁾	• 21 Februari 2019 s/d saat ini. February 21, 2019 until now.	-	-
2.	Ritsuo Ando (Direktur Director)	• 1 Januari s/d 19 September 2018 (Direktur Utama) • 20 September s/d 31 Desember 2018 (Direktur) • January 1 to September 19, 2018 (President Director) • September 20, to December 31, 2018 (Director)	27 kali (Direktur utama) 10 kali (Direktur)	87% (Direktur utama) 83% (Direktur)
3.	Felix Istyono Hartadi Tiono (Direktur Director)	1 Januari s/d 31 Desember 2018 January 1 to December 31, 2018	41 kali	95%
4.	Helmi Arief Hidayat (Direktur Director)	1 Januari s/d 31 Desember 2018 January 1 to December 31, 2018	37 kali	86%
5.	Yosuke Tanaka (Direktur Director) ²⁾	1 Januari s/d 28 Juni 2018 January 1 to June 28, 2018	16 kali	80%
6.	Rio Lanasier (Direktur Director)	1 Januari s/d 31 Desember 2018 January 1 to December 31, 2018	37 kali	86%
7.	Haryanto Budi Purnomo (Direktur Director)	1 Januari s/d 31 Desember 2018 January 1 to December 31, 2018	38 kali	88%

¹⁾ Ditunjuk sebagai Direktur Utama, efektif lulus fit and proper test oleh OJK tanggal 21 Februari 2019.

²⁾ Mengundurkan diri berdasarkan hasil keputusan RUPST tanggal 28 Juni 2018

¹⁾ Appointed as President Director, effective passed the fit and proper test of OJK on February 21, 2019

²⁾ Resigned based on AGMS on June 28, 2018

Tabel kehadiran rapat untuk masing-masing anggota Direksi adalah:

The table of meeting attendance of each member of the Board of Directors is as follow:

Nama Direksi Name of BOD	1	2	3	4	5	6	7	8	9	10	11	12
	Tgl Date 8/1/18	Tgl Date 15/1/18	Tgl Date 29/1/18	Tgl Date 13/2/18	Tgl Date 19/2/18	Tgl Date 5/3/18	Tgl Date 12/3/18	Tgl Date 19/3/18	Tgl Date 26/3/18	Tgl Date 2/4/18	Tgl Date 9/4/18	Tgl Date 16/4/18
Shigeyoshi Asano												
Ritsuo Ando	√	√	√	√	√	√	√	√	√	√	√	√
Felix Istyono Hartadi Tiono	√	√	√	√	√	√	√	√	√	√	√	√
Helmi Arief Hidayat	√	√	√	√	√	√	√	√	√	√	√	√
Yosuke Tanaka	√	√	√	√	√	√	√	√	X	√	√	√
Rio Lanasier	√	√	√	√	√	√	√	√	X	X	√	√
Haryanto Budi Purnomo	√	√	√	√	√	√	√	√	√	X	√	√

Keterangan | Note:

√: Hadir | Present

X: Absen | Absent

-: Belum efektif | Not effective in position

Nama Direksi Name of BOD	13	14	15	16	17	18	19	20	21	22	23	24
	Tgl Date 23/4/18	Tgl Date 30/4/18	Tgl Date 7/5/18	Tgl Date 14/5/18	Tgl Date 21/5/18	Tgl Date 28/5/18	Tgl Date 4/6/18	Tgl Date 25/6/18	Tgl Date 11/7/18	Tgl Date 18/7/18	Tgl Date 23/7/18	Tgl Date 6/8/18
Shigeyoshi Asano												
Ritsuo Ando	√	√	√	√	√	√	√	√	√	√	√	X
Felix Istyono Hartadi Tiono	√	√	√	√	√	√	√	√	√	√	√	√
Helmi Arief Hidayat	√	√	√	√	√	√	X	√	X	√	√	√
Yosuke Tanaka	√	√	√	√	X	X	X	√				
Rio Lanasier	√	√	√	√	√	√	√	√	√	√	√	X
Haryanto Budi Purnomo	√	√	√	√	√	X	√	√	√	√	√	√

Keterangan | Note:

√: Hadir | Present

X: Absen | Absent

-: Belum efektif | Not effective in position

Nama Direksi Name of BOD	25	26	27	28	29	30	31	32	33	34
	Tgl Date 13/8/18	Tgl Date 20/8/18	Tgl Date 27/8/18	Tgl Date 3/9/18	Tgl Date 10/9/18	Tgl Date 12/9/18	Tgl Date 17/9/18	Tgl Date 1/10/18	Tgl Date 15/10/18	Tgl Date 22/10/18
Shigeyoshi Asano								-	-	-
Ritsuo Ando	√	√	√	√	X	X	X	X	√	√
Felix Istyono Hartadi Tiono	√	X	√	√	√	√	√	X	√	√
Helmi Arief Hidayat	√	√	√	√	√	√	√	√	√	X
Yosuke Tanaka										
Rio Lanasier	X	X	X	√	√	√	√	√	√	√
Haryanto Budi Purnomo	√	√	√	X	√	√	√	√	√	√

Keterangan | Note:

√: Hadir | Present

X: Absen | Absent

-: Belum efektif | Not effective in position

Nama Direksi Name of BOD	35	36	37	38	39	40	41	42	43
	Tgl Date 29/10/18	Tgl Date 5/11/18	Tgl Date 12/11/18	Tgl Date 19/11/18	Tgl Date 28/11/18	Tgl Date 3/12/18	Tgl Date 10/12/18	Tgl Date 17/12/18	Tgl Date 26/12/18
Shigeyoshi Asano	-	-	-	-	-	-	-	-	-
Ritsuo Ando	√	√	√	√	√	√	√	√	X
Felix Istyono Hartadi Tiono	√	√	√	√	√	√	√	√	√
Helmi Arief Hidayat	√	√	√	√	√	X	X	X	X
Yosuke Tanaka									
Rio Lanasier	√	√	√	√	√	√	√	√	√
Haryanto Budi Purnomo	√	√	√	√	√	√	X	√	√

Keterangan | Note:

√: Hadir | Present

X: Absen | Absent

-: Belum efektif | Not effective in position

b. Agenda Rapat Direksi (Radir)

b. Agenda of the Meeting of BOD

Tanggal Date	Jenis Rapat Type of Meeting	Agenda Rapat Meeting Agenda	
8 Jan 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Pembahasan debitur Pembahasan Logo J Trust Bank Pembahasan Kasus Legal Pembahasan biaya Lawyer 	<ul style="list-style-type: none"> Discussion on debtors Discussion on J Trust Bank Logo Discussion on Legal Cases Discussion on Lawyers' fees
15 Jan 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Persetujuan perubahan struktur organisasi <i>Bankwide</i> yang baru Pembahasan pengelolaan Funding Pembahasan Corporate Action Plan 2018 Pembahasan Prognosa Januari 2018 	<ul style="list-style-type: none"> Approval on changes of new Bankwide organizational structure Discussion on Funding management Discussion on Corporate Action Plan 2018 Discussion on January 2018 Prognosis
29 Jan 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Struktur Organisasi PT Bank J Trust Indonesia Tbk 	<ul style="list-style-type: none"> Organizational Structure of PT Bank J Trust Indonesia Tbk.
13 Feb 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Pembahasan perkembangan Kasus Legal dan kasus lainnya 	<ul style="list-style-type: none"> Discussion on the development of Legal Cases and other cases
19 Feb 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Pemaparan persiapan Corporate Action 2018 Pembahasan pajak Lain-lain 	<ul style="list-style-type: none"> Explanation on preparation of Corporate Action 2018 Discussion on taxes Others
5 Mar 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> <i>Update</i> verifikasi dan validasi internal Penunjukan Steering Committee Task Force Lain-lain 	<ul style="list-style-type: none"> Update verification and internal validation Appointment of Steering Committee Task Force Others
12 Mar 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> <i>Update</i> verifikasi dan validasi internal Presentasi strategi Risk Management 2018 Penjelasan informasi <i>update</i> dari Human Capital Division Usulan perhitungan pembagian bonus BOD & BOC 	<ul style="list-style-type: none"> Update verification and internal validation Presentation on Risk Management 2018 strategy Explanation on information update from Human Capital Division Proposal on calculation of bonus for BOD & BOC
19 Mar 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> <i>Update Core Banking system</i> <i>Update</i> Kasus legal <i>Update</i> Pajak <i>Update</i> verifikasi dan validasi internal 	<ul style="list-style-type: none"> Update on Core Banking system Update on Legal cases Update on Taxations Update verification and internal validation
26 Mar 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Pembahasan Prognosa Maret 2018 <i>Update</i> verifikasi dan validasi internal Lain-lain 	<ul style="list-style-type: none"> Update on March 2018 Prognosis Update verification and internal validation Others
2 Apr 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> <i>Update</i> verifikasi dan validasi internal Lain-lain 	<ul style="list-style-type: none"> Update verification and internal validation Others
9 Apr 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Presentasi status laporan keuangan per 31 Maret 2018 <i>Update</i> verifikasi dan validasi internal <i>Update</i> surat Action Plan ke OJK dan GWM Lain-lain 	<ul style="list-style-type: none"> Presentation on financial statement status per 31 March 2018 Update verification and internal validation Update on Action Plan letter to OJK and GWM Others
16 Apr 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Presentasi strategi KKR - Kredit Kualitas Rendah Pembahasan CAR dan rencana permodalan <i>Update</i> verifikasi dan validasi internal <i>Update</i> GWM Lain-lain berupa: SOP Rapat Direksi, Agenda RUPS, dan Laporan Direksi untuk Annual Report 2017 	<ul style="list-style-type: none"> Presentation on strategy of KKR & Low Quality Credit Discussion on CAR and capital plan Update verification and internal validation Update GWM Others in form of: BOD Meeting SOP, GMS Agenda, and BOD Report for Annual Report 2017
23 Apr 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> <i>Update</i> status debitur Lain-lain 	<ul style="list-style-type: none"> Update on debtors status Others
30 Apr 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Perpindahan <i>Corporate Secretary</i> Prognosa bulan April 2018 <i>Update</i> LOS 	<ul style="list-style-type: none"> Change of Corporate Secretary April 2018 Prognosis Update LOS
07 Mei 2018	Rapat Direksi BOD Meeting	<ul style="list-style-type: none"> Trade finance Snapshot Kinerja Bulan April 2018 Arahan terkait corporate action 	<ul style="list-style-type: none"> Trade Finance Snapshot of April 2018 Performance Guidance related to corporate action
14 Mei 2018	Rapat Koordinasi Direksi dan Divisi	<ul style="list-style-type: none"> <i>Update</i> setiap divisi Pembahasan jam operasional dalam bulan puasa Loan monitoring debitur lancar 	<ul style="list-style-type: none"> Update on every division Discussion on operational hours in fasting month Loan monitoring of good debtors

Tanggal Date	Jenis Rapat Type of Meeting	Agenda Rapat Meeting Agenda	
21 Mei 2018	Rapat Direksi	<ul style="list-style-type: none"> Progress dari core banking Finacle Opics dan FinTr 	<ul style="list-style-type: none"> Progress from core banking Finacle Opics and FinTr
28 Mei 2018	Rapat Koordinasi Direksi dan Divisi	<ul style="list-style-type: none"> Mobile banking dan internet banking progress Prognosa bulan May 2018 	<ul style="list-style-type: none"> Mobile banking and internet banking progress May 2018 Prognosis
4 Jun 2018	Rapat Direksi	<ul style="list-style-type: none"> Perbandingan NII antara target dan realisasi Proyeksi recovery 2018 Rencana aksi korporasi 2018 	<ul style="list-style-type: none"> Comparison of NII between target and realization Projection of 2018 recovery 2018 corporate action plan
25 Jun 2018	Rapat Direksi	<ul style="list-style-type: none"> Perisapan RUPS tahunan 28 Juni 2018 Paparan publik/Public expose kinerja bank tahun 2017 Lain - lain 	<ul style="list-style-type: none"> Preparation for annual GMS on 28 June 2018 Public expose of the bank's 2017 performance Others
11 Jul 2018	Rapat Direksi	<ul style="list-style-type: none"> Pembahasan likuiditas dan cost of fund Update seputar Finacle Lain lain terkait dengan pembuatan Q&A untuk antisipasi publikasi keuangan 20 Juli 2018 	<ul style="list-style-type: none"> Discussion on liquidity and cost of fund Update on Finacle Others related to the making of Q&A to anticipate financial publication on 20 July 2018
18 Jul 2018	Rapat Direksi	<ul style="list-style-type: none"> Tindaklanjut terkait 8 strategi baru Pembahasan terkait kasus Antaboga Surabaya Prognosa Bulan Juli 2018 	<ul style="list-style-type: none"> Follow-up related to 8 new strategies Discussion on Antaboga Surabaya case July 2018 Prognosis
23 Jul 2018	Rapat Direksi	<ul style="list-style-type: none"> Pembahasan likuiditas dan pendanaan masing-masing cabang Tindaklanjut permasalahan cabang Surabaya terkait gedung 	<ul style="list-style-type: none"> Discussion on liquidity and funding of each branch Follow-up on problems of Surabaya branch related to building
6 Agt 2018	Rapat Direksi	<ul style="list-style-type: none"> Pembahasan terkait masalah-masalah bank, dan identifikasi penyebabnya 	<ul style="list-style-type: none"> Discussion on bank problems, and their identifications
13 Agt 2018	Rapat Direksi	<ul style="list-style-type: none"> Kondisi pendanaan Relokasi kantor Surabaya terkait kasus 	<ul style="list-style-type: none"> Funding conditions Relocation of Surabaya branch related to case
20 Agt 2018	Rapat Direksi	<ul style="list-style-type: none"> Terkait hasil pertemuan dengan OJK Revisit Debtor Perkembangan asset recovery 	<ul style="list-style-type: none"> Related to meeting with OJK Revisit Debtors Asset recovery progress
27 Agt 2018	Rapat Direksi	<ul style="list-style-type: none"> Penggunaan dan persetujuan proses di Garoon Rencana penjualan kredit 	<ul style="list-style-type: none"> Use and approval of process in Garoon Credit sales plan
03 Sep 2018	Rapat Direksi	<ul style="list-style-type: none"> Terkait 2(dua) debitur bermasalah Pemulihan asset bermasalah 	<ul style="list-style-type: none"> Related to 2 (two) bad debtors Bad assets recovery
10 Sep 2018	Rapat Direksi	<ul style="list-style-type: none"> Pembahasan portofolio kredit kedepan 	<ul style="list-style-type: none"> Discussion on future credit portfolio
12 Sep 2018	Rapat Direksi	<ul style="list-style-type: none"> Perubahan struktur Organisasi 	<ul style="list-style-type: none"> Change of Organizational structure
17 Sep 2018	Rapat Direksi	<ul style="list-style-type: none"> Pembahasan terkait arahan OJK Arah kredit multifinance Pembahasan action plan 	<ul style="list-style-type: none"> Discussion on OJK guidance Multifinance credit direction Discussion on action plan
1 Okt 2018	Rapat Direksi	<ul style="list-style-type: none"> Evaluasi dan remapping jaringan kantor 	<ul style="list-style-type: none"> Evaluation and remapping of office network
15 Okt 2018	Rapat Direksi	<ul style="list-style-type: none"> Antaboga case consultant update Struktur organisasi baru 	<ul style="list-style-type: none"> Antaboga case consultant update New organizational structure
22 Okt 2019	Rapat Direksi dan Divisi	<ul style="list-style-type: none"> Pemaparan Rencana Strategis 	<ul style="list-style-type: none"> Strategic Planning Elaboration
29 Okt 2018	Rapat Direksi	<ul style="list-style-type: none"> Presentasi reward and punishment Prognosis of October 2018 	<ul style="list-style-type: none"> Presentation on reward and punishment October 2018 Prognosis
5 Nov 2018	Rapat Direksi	<ul style="list-style-type: none"> Monitoring RIM Pembahasan pencairan kredit Komersial Pembahasan terkait saldo rekening Saikyo 	<ul style="list-style-type: none"> Monitoring RIM Discussion on Commercial loan disbursement Discussion on the balance of Saikyo account
12 Nov 2018	Rapat Direksi	<ul style="list-style-type: none"> NPL transfer October financial performance 	<ul style="list-style-type: none"> NPL transfer October financial performance
19 Nov 2018	Rapat Direksi	<ul style="list-style-type: none"> Business process terutama pembahasan terkait proses dan administrasi penyaluran kredit ke JTO Perkembangan terkini, NPL transfer list 	<ul style="list-style-type: none"> Business process especially related to the discussion on process and administration of credit disbursement to JTO Latest update on NPL transfer list

Tanggal Date	Jenis Rapat Type of Meeting	Agenda Rapat Meeting Agenda
28 Nov 2018	Rapat Direksi	<ul style="list-style-type: none"> Update kemungkinan Financing scheme dengan Cipta Dana Prognosis November 2018
03 Des 2018	Rapat Direksi	<ul style="list-style-type: none"> Update loan financing Ciptadana Pembahasan isi RBB sebelum pembahasan dengan OJK Hasil test dari kredit staff
10 Des 2018	Rapat Direksi	<ul style="list-style-type: none"> Risk Management Committee OJK exit meeting Update from Dec 2018 Prognosis
17 Des 2018	Rapat Direksi	<ul style="list-style-type: none"> KPMG - Review credit process Proposal Corebanking Other - Updated
26 Des 2018	Rapat Direksi	<ul style="list-style-type: none"> NPL transfer dengan skema Sinarmas Jadwal RUPSLB Otomasi proses dari pelaporan ke regulator Presentation

(10) Penilaian (Assessment) Kinerja Direksi

PT Bank JTrust Indonesia Tbk melaksanakan proses evaluasi kinerja Direksi terkait rencana dan strategi Bank yang telah ditentukan sebelumnya. Pelaksanaan penilaian dilakukan dengan cara sebagai berikut:

1) Penilaian Kinerja Direksi dengan *Self Assessment*

- Penilaian individual untuk tiap anggota Direksi akan dilakukan oleh Direktur Utama.
- Penilaian kelompok dan kinerja Direktur Utama akan dilakukan oleh RUPS.
- Hasil-hasil dari penilaian kinerja akan diberikan pada RUPS untuk ditelaah dan dipertimbangkan.

a. Pihak yang melakukan penilaian

Penilaian kinerja Direksi oleh Dewan Komisaris dan kemudian disetujui oleh pemegang saham (*shareholder*).

b. Prosedur pelaksanaan penilaian Kinerja

- Tahap 1
Rencana Kerja Anggaran Perusahaan (RKAP) yang telah disahkan melalui RUPS
- Tahap 2
Menyusun *Draft Key Performance Indicator (KPI)*
- Tahap 3
KPI di-*review* oleh Dewan Komisaris dan Komite Nominasi dan Remunerasi
- Tahap 4
Draft KPI diusulkan kepada Pemegang Saham Mayoritas (J Trust Co., Ltd.)

(10) Assessment on the Performance of the Board of Directors

PT Bank JTrust Indonesia Tbk conducts evaluation on the performance of the Board of Directors regarding the Bank's predetermined plans and strategies. The assessment is conducted in the following manner:

1) Performance Appraisal of BODs using Self Assessment

- The individual ratings for each member of the Board of Directors shall be conducted by the President Director.
- The Group's assessment and performance of the President Director will be conducted by the GMS.
- The results of the performance appraisal will be submitted to the GMS for review and consideration.

a. The party conducting the assessment

Assessment on the performance of the Board of Directors conducted by the Board of Commissioners and subsequently approved by the shareholders.

b. Performance appraisal procedures

- Stage 1
Corporate Budget Work Plan (RKAP) which ratified by the GMS
- Stage 2
Drafting the Key Performance Indicator (KPI)
- Stage 3
KPI is reviewed by the Board of Commissioners and the Nomination and Remuneration Committee
- Stage 4
The draft of KPI is proposed to Majority Shareholders (J Trust Co., Ltd.)

- Tahap 5
Pembahasan KPI antara Tim Teknis PT Bank JTrust Indonesia Tbk dan Tim Teknis Pemegang Saham
- Tahap 6
Penandatanganan bersama KPI antara PT Bank JTrust Indonesia Tbk dengan Pemegang Saham

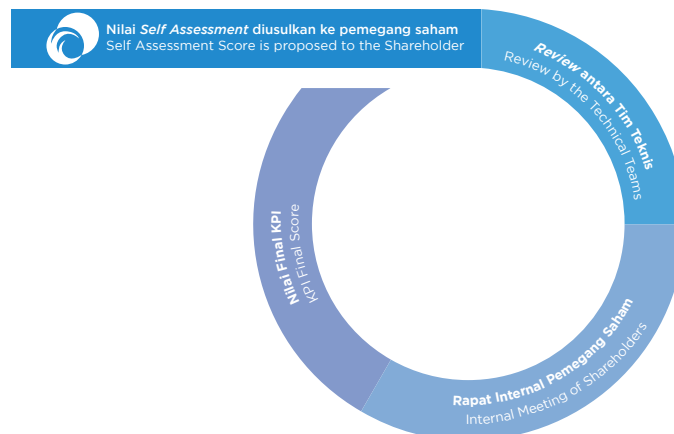
c. Kriteria yang digunakan

- Proses penyusunan *Key Performance Indicator* (KPI) Direksi PT Bank JTrust Indonesia Tbk menerapkan metode *Management By Objective* (MBO).
- Dengan menerapkan metode MBO ini yang diukur bukan hanya target keuangan tetapi juga proses. PT Bank JTrust Indonesia Tbk meyakini bahwa dengan metode MBO ini dapat memperjelas dan menerjemahkan visi dan strategi serta dapat mengkomunikasikan dan mengaitkan berbagai tujuan dan ukuran strategis.
- Setelah KPI secara *bankwide*/direktorat ditandatangani, setiap bulannya PT Bank JTrust Indonesia Tbk selalu memonitor pencapaian kinerja terhadap target sesuai KPI.
- Setiap akhir tahun buku KPI tersebut akan dievaluasi oleh Pemegang Saham untuk mengukur kinerja Direksi. Adapun tahapan dalam mengevaluasi nilai KPI pada akhir tahun adalah sebagai berikut:

- Stage 5
Technical Team of PT Bank JTrust Indonesia Tbk and Technical Team of Shareholders Discussing KPI.
- Stage 6
Signing of KPI by PT Bank JTrust Indonesia Tbk together with Shareholders.

c. Criteria

- The process of drafting the Key Performance Indicator (KPI) of the Board of Directors of PT Bank JTrust Indonesia Tbk is based on the Management by Objective (MBO) method.
- By applying the MBO method that is measured not only financial targets but also processes. PT Bank JTrust Indonesia Tbk believes that the MBO method can clarify and translate the vision and strategy and can communicate and link strategic objectives and measures.
- After KPI is signed bankwide/per directorate, PT Bank JTrust Indonesia Tbk always monitor the achievement of the target performance according to KPI on a monthly basis.
- At the end of each fiscal year, the KPI will be evaluated by the Shareholders to measure the performance of the BOD. The stages in evaluating the value of KPI at the end of the year are as follows:



2) Penilaian Melalui Self Assessment Penerapan Tata Kelola Bank

Penilaian kinerja Direksi dilakukan juga melalui *self assessment* penerapan tata kelola Bank dimana Direksi melalui Corporate Secretary Division mengisi Kertas Kerja *Self Assessment* untuk faktor penilaian pelaksanaan tugas dan tanggung jawab Direksi serta Bank menyampaikan laporan hasil *self assessment* penerapan tata kelola Bank kepada OJK sebagaimana diatur pada Surat Edaran Otoritas Jasa Keuangan Nomor 13/SEOJK.03/2017 tanggal 17 Maret 2017 Tentang Penerapan Tata Kelola Bagi Bank Umum.

Kriteria/Indikator yang digunakan mencakup 3 (tiga) aspek *Governance*:

1. Penilaian *Governance Structure*
Menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses penerapan prinsip Tata Kelola yang baik menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
2. Penilaian *Governance Process*
Menilai efektivitas proses penerapan prinsip Tata Kelola yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
3. Penilaian *Governance Outcome*
Menilai kualitas *outcome* yang memenuhi harapan Pemangku Kepentingan Bank yang merupakan hasil proses penerapan prinsip Tata Kelola yang baik yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank.

3) Penilaian kinerja Direksi juga dilakukan pada saat pertanggungjawaban laporan tahunan Bank dalam RUPS Tahunan, dimana RUPS Tahunan di tahun 2019 ini akan diselenggarakan dalam jangka waktu paling lambat 6 (enam) bulan setelah tahun buku 2018 berakhir. Sebagai gambaran untuk pelaksanaan RUPS pertanggung-jawaban laporan tahun buku 2017 pada tanggal 28 Juni 2018 merupakan laporan tahunan perusahaan tahun buku 2017 yang menerangkan tentang keadaan jalannya perusahaan dan hasil yang telah dicapai selama tahun 2017. Selanjutnya menyatakan serta memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya (*vollediq acquit et decharge*) kepada para anggota Direksi atas tindakan kepengurusan yang telah mereka jalankan selama tahun buku 2017.

2) Self Assessment on the Implementation of Good Corporate Governance

Assessment of BOD performance is also conducted through self assessment on the Bank's governance implementation whereby BOD through Corporate Secretary Division fills the Self Assessment Working Paper to assess the performance of the duties and responsibilities of BOD and the Bank submits the self assessment report on the implementation of the Bank's governance to FSA as stipulated in the Circular Letter Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 on Implementation of Good Corporate Governance for Commercial Banks.

Criteria/Indicator used include 3 (three) aspects of *Governance*:

1. Governance Structure Assessment
Assessing the adequacy of Bank's governance structure and infrastructure so that the process of applying the Good Governance principles results in an outcome that is in line with the expectations of the Bank's Stakeholders.
2. Governance Process Assessment
Assessing the effectiveness of the process of applying the GCG principles supported by the adequacy of Bank Governance structure and infrastructure so as to produce an outcome that is in line with the expectations of the Bank's Stakeholders.
3. Governance Outcome Assessment
Assess the quality of outcomes that meet the expectations of the Bank's Stakeholders as a result of the process of applying the Good Governance principles supported by the adequacy of Bank Governance structure and infrastructure.

3) The performance evaluation of the Board of Directors shall also be made at the time of accountability of the Bank's annual report in the Annual General Meeting of Shareholders, where the Annual General Meeting of Shareholders in 2019 will be held within 6 (six) months after the end of fiscal year 2018. As an illustration for the implementation of the General Meeting of Shareholders' General Meeting of Shareholders of the 2017 fiscal year report on June 28, 2018 is the Company's annual report of for the fiscal year 2017 explaining the state of the Company's progress and the results achieved in 2017. Subsequently granting full acquittal and release (*vollediq acquit et decharge*) to all members of the Board of Directors for the management actions undertaken in the fiscal year 2017.

(11) Program Pelatihan Anggota Direksi

Untuk menunjang pelaksanaan tugas dan tanggung jawab Direksi, selama tahun 2018 beberapa anggota Direksi PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pelatihan, *workshop*, konferensi, seminar, antara lain:

(11) Training Program for Members of the Board of Directors

To support the duties and responsibilities of the Board of Directors, in 2018 several members of the Board of Directors of PT Bank JTrust Indonesia Tbk have attended various training programs, workshops, conferences, seminars, among others:

No.	Nama Name	Periode Menjabat (Sejak Lulus F & P) Serving Period (After Passing the F & P)	Pelatihan, Workshop, Konferensi, Seminar Training, Workshop, Conference, Seminar	Penyelenggara Organizer	Tempat & Waktu Venue & Time
1	Shigeyoshi Asano (Direktur Utama President Director)	21 Februari 2019 21 February 2019	Uji Kompetensi Bidang Manajemen Level 5 Competence Test In Management Level 5	LSPP	Jakarta, 6 Oktober 2018 Jakarta, 6 October 2018
2	Ritsuo Ando (Direktur Director)	<ul style="list-style-type: none"> 1 Januari s/d 19 September 2018 (Direktur Utama) 20 September 2018 s/d 31 Desember 2018 (Direktur) 1 January to 19 September 2018 (President Director) 20 September 2018 to 31 December 2018 (Director) 	<ul style="list-style-type: none"> a. Workshop Direktorat Business 2018 b. Workshop Group Lending 	<ul style="list-style-type: none"> Internal Internal 	<ul style="list-style-type: none"> Hotel Merylin Park Jakarta, 19 Januari 2018 Sahid Sudirman Center R. Ayame Lt. 35 - Jakarta, 17 Mei 2018 Hotel Merylin Park Jakarta, 19 January 2018 Sahid Sudirman Center R. Ayame Lt. 35 - Jakarta, 17 May 2018
3	Haryanto Budi Purnomo (Direktur Director)	1 Januari s/d 31 Desember 2018 1 January to 31 December 2018	Workshop Direktorat Business 2018	Internal	Hotel Merylin Park Jakarta, 19 Januari 2018 Hotel Merylin Park Jakarta, 19 January 2018
4	Felix Istyono Hartadi Tiono (Direktur Director)	1 Januari s/d 31 Desember 2018 1 January to 31 December 2018	<ul style="list-style-type: none"> a. Workshop Direktorat Business 2018 b. Digital Seminar 	<ul style="list-style-type: none"> Internal KPMG Japan Desk 	<ul style="list-style-type: none"> Hotel Merylin Park Jakarta, 19 Januari 2018 Hotel Merylin Park Jakarta, 3 Mei 2018 Hotel Merylin Park Jakarta, 19 January 2018 Hotel Merylin Park Jakarta, 3 May 2018
5	Rio Lanasier (Direktur Director)	1 Januari s/d 31 Desember 2018 1 January to 31 December 2018	<ul style="list-style-type: none"> a. Workshop Direktorat Business 2018 b. Seminar Nasional Quo Vadis Ekonomi Digital Indonesia c. Digital Seminar 	<ul style="list-style-type: none"> Internal Sekretariat Alumni Kolese Kanisius Angkatan 84 KPMG Japan Desk 	<ul style="list-style-type: none"> Hotel Merylin Park Jakarta, 19 Januari 2018 Hotel Merylin Park Jakarta, 21 Februari 2018 Hotel Merylin Park Jakarta, 19 January 2018 Hotel Merylin Park Jakarta, 21 February 2018 Jakarta, 3 Mei 2018 Jakarta, 3 May 2018
6	Helmi Arief Hidayat (Direktur Director)	1 Januari s/d 31 Desember 2018 1 January to 31 December 2018	<ul style="list-style-type: none"> a. Workshop Direktorat Business 2018 b. APU PPT c. Workshop Group Lending 	<ul style="list-style-type: none"> Internal Internal Internal 	<ul style="list-style-type: none"> Hotel Merylin Park Jakarta, 19 Januari 2018 Sahid Sudirman Center Jakarta, 1 Maret 2018 Sahid Sudirman Center R. Ayame Lt. 35 - Jakarta, 17 Mei 2018 Hotel Merylin Park Jakarta, 19 January 2018 Sahid Sudirman Center Jakarta, 1 March 2018 Sahid Sudirman Center R. Ayame Fl. 35th - Jakarta, 17 May 2018

(12) Kebijakan Remunerasi dan Fasilitas Bagi Direksi

RUPS menyetujui pemberian kuasa kepada Dewan Komisaris Perseroan untuk menetapkan besarnya Remunerasi (gaji, tantiem serta penetapan fasilitas/benefit/ tunjangan lainnya) bagi anggota Direksi Perseroan berdasarkan rekomendasi dari Komite Remunerasi dan Nominasi.

Prosedur Penetapan Remunerasi Direksi

- Tahap 1
Komite Remunerasi dan Nominasi menyusun dan mengusulkan rekomendasi remunerasi Direksi dan Dewan Komisaris kepada Dewan Komisaris.
- Tahap 2
Dewan Komisaris mengkaji usulan Komite Remunerasi dan Nominasi serta mengusulkan kepada RUPS untuk menetapkan remunerasi Direksi berdasarkan rekomendasi Komite Remunerasi dan Nominasi.
- Tahap 3
RUPS yang bertindak mewakili pemegang saham mayoritas menyetujui pemberian kuasa kepada Dewan Komisaris Perseroan untuk menetapkan besarnya Remunerasi bagi anggota Direksi Perseroan berdasarkan rekomendasi dari Komite Remunerasi dan Nominasi.

(12) Remuneration Policy and Facilities for Directors

The General Meeting of Shareholders approved to grant power to the Board of Commissioners to determine the amount of Remuneration (salary, tantiem and establishment of facilities/benefits/other benefits) for the members of the Board of Directors of the Company based on the recommendations of the Remuneration and Nomination Committee.

Procedure for BOD Remuneration Determination

- Stage 1
The Remuneration and Nomination Committee prepares and recommends the remuneration of the Board of Directors and Board of Commissioners to the Board of Commissioners.
- Stage 2
The Board of Commissioners reviews the proposals of the Remuneration and Nomination Committee and proposes to the GMS to determine the remuneration of the Board of Directors based on the recommendations of the Remuneration and Nomination Committee.
- Stage 3
The GMS acting on behalf of the majority shareholders approved to grant power to the Board of Commissioners to determine the amount of Remuneration for members of the Board of Directors based on the recommendations of the Remuneration and Nomination Committee.

Struktur Remunerasi dan Fasilitas Bagi Direksi

No	Jenis Penghasilan Type of Income	Ketentuan Terms
1	Gaji Salary	Sesuai kebijakan kompensasi, benefit & fasilitas BOC, BOD & EVP As compensation policies, benefits and facilities BOC, BOD & EVP
2	Tunjangan rutin Routine Allowance	Sesuai kebijakan kompensasi, benefit & fasilitas BOC, BOD & EVP As compensation policies, benefits and facilities BOC, BOD & EVP

Remuneration Structure and Facilities for BOD

Besarnya Remunerasi Masing-Masing Anggota Direksi

Rincian pemberian remunerasi Direksi pada tanggal 31 Desember 2018 yaitu:

Nama Name	Gaji Salary	Tunjangan Rutin ^{*)} Routine Allowance	Tantiem	Santunan Benefits	Jumlah Remunerasi Per Orang Per Tahun Total Remuneration Per Person per Year	
					> Rp2 miliar > Rp2 billion	≤ Rp2 miliar ≤ Rp2 billion
Shigeyoshi Asano ^{*)}	√	√	-	-	-	√
Ritsuo Ando	√	√	-	-	√	-
Felix Istyono Hartadi Tiono	√	√	-	-	√	-
Yosuke Tanaka	√	√	-	-	-	√

The Amount of Remuneration of Each Member of the Board of Directors

Details of remuneration for BOD as of December 31, 2018 are as follows:

Nama Name	Gaji Salary	Tunjangan Rutin ^{*)} Routine Allowance	Tantiem	Santunan Benefits	Jumlah Remunerasi Per Orang Per Tahun Total Remuneration Per Person per Year	
					> Rp2 miliar > Rp2 billion	≤ Rp2 miliar ≤ Rp2 billion
Helmi Arief Hidayat	√	√	-	-	√	-
Haryanto Budi Purnomo	√	√	-	-	√	-
Rio Lanasier	√	√	-	-	√	-
Total (dalam jutaan Rp/ Rp million)	Rp11.432	Rp10.109	-	-	-	-

*) Tunjangan Rutin meliputi: Fasilitas Kendaraan, Tunjangan BBM & Supir, Tunjangan Handphone, Tunjangan Hari Raya (THR), Tunjangan Cuti, Tunjangan Pajak PPh 21

***) Efektif menerima pembayaran remunerasi Oktober 2018

*) Routine Benefits include: Vehicle Facilities, Gas & Driver Allowances, Mobile Allowance, Holiday Allowance (THR), Leave Allowance, Income Tax Allowance

***) Effective in receiving remuneration payments in October 2018

2.6 Informasi mengenai Kebijakan Remunerasi

Berdasarkan Peraturan Otoritas Jasa Keuangan Nomor 45/POJK.03/2015 tanggal 28 Desember 2015 dan Surat Edaran Otoritas Jasa Keuangan Nomor 40/SEOJK.03/2016 tanggal 26 September 2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum, maka Bank wajib mengungkapkan informasi mengenai kebijakan remunerasi dalam Laporan Pelaksanaan Tata Kelola, sebagai berikut:

A. Komite Remunerasi dan Nominasi, meliputi:

a. Nama anggota, komposisi, tugas dan tanggung jawab

Nama Name	Jabatan Position
Mahdi Mahmudy	Ketua, Anggota (Komisaris Independen) Chairman, Member (Independent Commissioner)
Shigeyoshi Asano	Anggota (Komisaris) Member (Commissioner)
N. Krisbiyanto	Anggota (Kepala Divisi Human Capital) Member (Human Capital Division Head)

Tugas dan tanggung jawab Komite Remunerasi dan Nominasi sebagai berikut:

- Terkait Remunerasi
 - i. Melakukan evaluasi terhadap kebijakan remunerasi, menyusun sistem penggajian, dan memberikan tunjangan serta rekomendasi kepada pemegang saham tentang:
 - Penilaian terhadap sistem tersebut;

2.6 Information on the Remuneration Policy

Under the Regulation of the Financial Services Authority Number 45/POJK.03/2015 dated December 28, 2015 and Circular Letter of the Financial Services Authority Number 40/SEOJK.03/2016 dated September 26, 2016 on the Implementation of Good Corporate Governance in Remuneration for Commercial Banks, the Bank shall disclose information regarding remuneration policy in the Governance Implementation Report, as follows:

A. Remuneration and Nomination Committee, include:

a. Members' name, composition, duties and responsibilities

Duties and responsibilities of the Remuneration and Nomination Committee as follows:

- Related to Remuneration
 - i. Evaluating the remuneration policy, preparing the payroll system, and provide benefits and recommendation to shareholders concerning:
 - Assessment of the system;

- Opsi yang diberikan, antara lain opsi atas saham;
 - Sistem pensiun; dan
 - Sistem kompensasi serta manfaat lainnya.
- ii. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi bagi anggota Dewan Komisaris dan Direksi untuk disampaikan kepada RUPS.
- iii. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi bagi pejabat eksekutif dan karyawan secara keseluruhan untuk disampaikan kepada Direksi.
- iv. Melaporkan hasil pelaksanaan tugasnya termasuk memberikan rekomendasi kepada Dewan Komisaris.
- b. Jumlah Rapat Komite Remunerasi dan Nominasi yang dilakukan di Tahun 2018 yaitu:

- Options granted, among other options on the shares;
 - Pension systems; and
 - The system of compensation and other benefits.
- ii. Provide recommendations to the Board of Commissioners regarding the remuneration policy for members of the Board of Commissioners and Board of Directors to be submitted to the GMS.
- iii. Provide recommendations to the Board regarding the remuneration policy for executive officers and employees to be submitted to the Board of Directors.
- iv. Report the results of the implementation of the tasks including providing recommendations to the Board of Commissioners.
- b. Number of Meetings of the Remuneration and Nomination Committee conducted in 2018, namely:

No	Nama Name	Jabatan Position	Jumlah Rapat Total Meeting	Jumlah Kehadiran Attendance	% Kehadiran % Attendance
1.	Mahdi Mahmudy	Ketua, Anggota (Komisaris Independen) Chairman, Member (Independent Commissioner)	3	3	100%
2.	Shigeyoshi Asano	Anggota (Komisaris) Member (Commissioner)	3	3	100%
3.	N. Krisbiyanto	Anggota (Kepala Divisi Human Capital) Member (Human Capital Division Head)	3	3	100%

No	Tanggal & Waktu Date & Venue	Agenda Rapat Meeting Agenda
1	24 Mei 2018 - Spirit Room	Pengusulan anggota BOD dan BOC PT Bank JTrust Indonesia Tbk. Proposal of BOD and BOC members of PT Bank JTrust Indonesia Tbk.
2	30 Agustus 2018 - Spirit Room	a. Perubahan susunan pengurus BOD & BOC PT Bank JTrust Indonesia Tbk. Changes in BOD and BOC membership composition of PT Bank JTrust Indonesia Tbk b. Penyesuaian remunerasi untuk Direksi dan EVP berdasarkan persetujuan dari JTrust Co. tanggal 16 April 2018. Remuneration adjustment for BOD and EVP based on approval of JTrust Co. on April 16, 2018.
3	10 September 2018 - Spirit Room	Penyesuaian remunerasi untuk Direksi dan EVP berdasarkan pertimbangan dan masukan dari JTrust Co. dan KRN. Remuneration adjustment for BOD and EVP based on consideration and input from JTrust Co. and Remuneration and Nomination Committee (KRN)

- c. Remunerasi yang telah dibayarkan kepada anggota Komite Remunerasi dan Nominasi selama 1 (satu) tahun yaitu:
- c. Remuneration paid to Remuneration and Nomination Committee members for 1 (one) year, namely:

Jenis Remunerasi dan Fasilitas lain Tahun 2018 Type of Remuneration and Other Facilities in 2018	Jumlah Diterima dalam 1 Tahun ^{*)} Amount Received in 1 Year ^{*)}	
	Anggota Komite Remunerasi dan Nominasi Member of Remuneration and Nomination Committee	
	Orang Person	Rupiah
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non-natura) Remuneration (salary, bonus, routine allowance, tantiem, and other non-natura facilities)	4 **)	6.400.582.310
Fasilitas lain dalam bentuk natura (perumahan, transportasi, asuransi kesehatan dan sebagainya) Other facilities in the form of benefits in kind (housing, transportation, health insurance and so on)	3 **)	558.600.000
- Dapat dimiliki (purna jabatan) - Tidak dapat dimiliki (asuransi D & O, Kendaraan) - Can be owned (retired) - Can not be owned (D & O insurance, Vehicle)		
Total	3	6.959.182.310

Keterangan | Notes:

*) Remunerasi yang diterima sudah termasuk pajak

**) 4 orang Komisaris (Penerima honor hanya 2 Komisaris): 1 Direktur Utama dan 1 Kepala Divisi Human Capital. Untuk 1 orang Komisaris hanya dihitung sampai dengan bulan April 2018

*) Remuneration received includes tax

**) 4 Commissioners (Honorarium only for 2 Commissioners): 1 President Director and 1 Head of Human Capital Division. For 1 Commissioner only calculated until the end of April 2018

B. Proses penyusunan kebijakan remunerasi, meliputi:

1.1 Latar Belakang Kebijakan Remunerasi:

- a. Dalam rangka mendukung pencapaian visi Bank dan upaya meningkatkan *competitive advantages* diperlukan pengelolaan sumber daya manusia (SDM) yang mampu menciptakan nilai tambah pada setiap fungsi Utama.
- b. Pencapaian target ROI kepada pemegang saham yang harus dicapai tanpa harus mengurangi biaya-biaya kompensasi dan *benefit*.
- c. Menjaga semangat kerja di organisasi dengan menciptakan praktik kesetaraan yang adil secara internal dan kompetitif dengan harga pasar serta memberlakukan kesamaan penerapan sistem kompensasi dan remunerasi di perusahaan.

1.2. Tujuan Kebijakan Remunerasi:

Tujuan kebijakan dari remunerasi adalah menyediakan imbalan kompetitif yang menarik, mempertahankan dan memotivasi eksekutif tinggi yang dibutuhkan untuk memimpin perusahaan sambil memastikan imbalan tetap yang tepat dan proporsional, baik bila dibandingkan dengan praktik pasar dan pengaturan remunerasi bagi karyawan lainnya di perusahaan.

B. The process of preparing the remuneration policy, including:

1.1. Background of Remuneration Policy:

- a. In order to support the achievement of the Bank's vision and effort, as well as increase the competitive advantages necessary to manage the human resources (HR), which able to create added value on of the main functions.
- b. Achievement of the ROI target to shareholders should be achieved without having to reduce the costs of compensation and benefit.
- c. Maintaining the spirit in the organization by creating equality practices, which are internally fair and competitive with market prices, as well as impose similarities on the application of compensation and remuneration system in the Company.

1.2. Remuneration Policy Objectives:

The purpose of the remuneration policy is to provide competitive rewards to attract, maintain and motivate high executives that are needed to lead the company while ensuring remuneration remains appropriate and proportionate, both when compared with market practices and remuneration arrangements for other employees in the company

- 1.3 Pelaksanaan kaji ulang atas Kebijakan Remunerasi pada tahun sebelumnya, beserta perbaikannya:
- Bank telah melakukan kenaikan gaji berdasarkan inflasi yang sesuai PKB perusahaan.
 - Upaya kajian remunerasi dari tahun sebelumnya berdasarkan struktur skala gaji berdasarkan *market* pada industri yang sama.

Tahap yang telah dilakukan antara lain:

- Analisa jabatan
- Pengumpulan data jabatan
- Evaluasi jabatan dan pembobotan
- Grading* dan penyusunan struktur gaji baru berdasarkan *salary survey* yang sudah dilaksanakan bulan April 2018.

- 1.4. Mekanisme untuk memastikan bahwa Remunerasi bagi Pegawai di unit kontrol bersifat independen dari unit kerja yang diawasinya:

Bank telah memastikan pegawai di unit kontrol bersifat independen dari unit kerja yang diawasi yaitu pejabat yang terlibat dalam pengawasan kredit tidak mendapat pengaruh, tekanan, tujuan oleh Direktur Bisnis (Direktur Kredit). Fungsi-fungsi pejabat yang mewakili *four eyes principle and three lines of defence* untuk remunerasinya ditentukan oleh Direktur Utama dan Direktur Bidang terkait dengan mempertimbangkan fungsi *Human Capital*.

- C. Cakupan kebijakan Remunerasi dan implementasinya per unit bisnis, per wilayah, dan pada perusahaan anak atau kantor cabang yang berlokasi di luar negeri.

Perusahaan telah memiliki cakupan kebijakan remunerasi dan implementasinya yang berdasarkan wilayah (Regional) dengan melihat aspek demografi dan daya beli masyarakat, sedangkan per unit bisnis dan pada perusahaan anak atau kantor cabang yang berlokasi di luar negeri belum ada.

- D Remunerasi dikaitkan dengan risiko, meliputi:
- Jenis risiko Utama (*key risk*) yang digunakan dalam menerapkan remunerasi, meliputi risiko kredit, risiko pasar, risiko operasional, risiko kepatuhan, risiko reputasi, dan risiko hukum.

- 1.3. Implementation of the Remuneration Policy review in the previous year, and improvements:

- The Bank has conducted a raise based on inflation that consistent with the Company's CLA.
- Efforts to review the remuneration from the previous year based on the structure of the salary scale on the market in the same industry.

Stages that have been made include:

- Position analysis
- Data collection on occupation
- Job evaluation and weighting
- Grading and preparation of a new salary structure based on the salary survey that will be held in April 2018.

- 1.4. Mechanisms to ensure that the Remuneration for Employees in the control unit is independent from the work unit that supervises:

The Bank has confirmed that the employee in the control unit is independent from the unit that he or she supervises, namely an official involved in the supervision of credit is not under the influence, pressure, goal by the Business Director (Director of Credit). The functions of officials representing the four eyes principle and three lines of defense for the remuneration are determined by the President Director and Director related with the function of Human Capital.

- C. Scope of remuneration policy and its implementation by business unit, by region, and in the subsidiaries or branches located abroad.

The Company already has coverage of remuneration policy and its implementation per region by considering the demographic factor and purchasing power. Meanwhile, per business unit and subsidiary companies or branches located abroad are not available yet.

- D. Remuneration linked to risks, include:
- Main risk types (*key risk*) that are used in applying the remuneration include credit risk, market risk, operational risk, compliance risk, reputation risk, and legal risk.

Risiko Hukum, Risiko Kepatuhan, Risiko Reputasi:

- Bank komitmen terhadap pemberian upah tidak kurang dari atau sama dengan upah minimum provinsi. Hal ini diterapkan untuk karyawan internal Bank maupun karyawan alih daya.
- Bank patuh terhadap peraturan pemerintah dalam pemberian remunerasi yaitu keikutsertaan BPJS Ketenagakerjaan, BPJS Kesehatan dan BPJS Pensiun.
- Potensi yang timbul akibat kelemahan aspek yuridis antara lain adanya tuntutan hukum, ketiadaan peraturan perundang-undangan, saat ini Bank telah memberikan perlindungan kepada karyawan melalui asuransi D & O (*Director & Officers*).

Risiko Kredit:

- Bank memberikan keringanan subsidi di dalam pemberian fasilitas kredit karyawan.
- Bank memberikan retensi, menerapkan asas kehati-hatian dengan melakukan penilaian agunan serta keaslian surat-surat jaminan.

Risiko Operasional:

- Bank telah memiliki SOP operasional terkait pembayaran remunerasi karyawan dan sedang proses menyelesaikan SOP internal lainnya.
- Bank patuh terhadap ketentuan regulator dalam pelaporan yang terkait dalam hal kepegawaian/kekaryawanan. Contoh: tepat waktu dalam pelaporan pejabat eksekutif, pelaporan *training* dan lainnya.

Risiko Pasar:

- Bank telah turut serta di dalam *salary survey* dalam pemberian remunerasi karyawan melalui lembaga independen.
- b. Kriteria untuk menentukan jenis risiko utama, termasuk untuk risiko yang sulit diukur.
Kriteria untuk menentukan jenis risiko utama, dengan berdasarkan kepada risiko dalam kegiatan usaha Bank.
 - c. Dampak penetapan risiko utama terhadap kebijakan Remunerasi yang bersifat Variabel, termasuk yang Remunerasi yang bersifat Tetap jika ada.
Dampak penetapan risiko utama

Legal Risk, Compliance Risk, Reputation Risk:

- The Bank's commitment towards remuneration not \leq of the provincial minimum wage. It is applied to internal employees of the Bank as well as employees of outsourcing.
- The Bank adheres to the government regulations in the remuneration, namely the participation of BPJS Employment, BPJS Health and BPJS Retirement.
- The potential arising from the weakness of the judicial aspect among others, the lawsuits and the absence of legislation. Currently, the Bank has provided protection to employees through D & O (*Director & Officers*) insurance.

Credit Risk:

- The Bank provides subsidies relief within the credit facility for employees.
- The Bank provides retention, applying the principle of prudence with the assessment of collateral and guarantees the authenticity of the letters

Operational Risk:

- The Bank has operational SOPs related to remuneration to employees and is in the process of completing other internal SOPs.
- The Bank adheres to regulators provisions in reporting that related to employment. Example: timely manner in reporting executive officer training and more.

Market Risk:

- The Bank has participated in the salary survey in the remuneration of employees through an independent agency.
- b. Criteria for determining key risks, including the qualitative risks.
Criteria for determining type of key risks, based on the Bank's business risks.
 - c. The impact of determining key risks on the Variable Remuneration, including Fixed Remuneration, if any.
The impact of determining key risks on the Variable Remuneration, employees

terhadap kebijakan Remunerasi yang bersifat Variabel, bagi karyawan tersebut termasuk kategori *Material Risk Takers* akan diberikan Remunerasi yang bersifat Variabel yang ditangguhkan untuk menjaga permasalahan-permasalahan yang muncul di kemudian hari.

- d. Perubahan penentuan jenis risiko utama dibandingkan dengan penentuan jenis risiko utama tahun lalu beserta alasannya jika ada, termasuk perubahan kriteria.
Bank tidak menentukan perubahan jenis risiko utama untuk tahun 2018.
- E. Pengukuran kinerja dikaitkan dengan Remunerasi, meliputi:
 - a. Tinjauan kebijakan Remunerasi terkait dengan penilaian kinerja yaitu Bank telah mengatur di dalam kebijakan remunerasi berdasarkan penilaian kinerja karyawan (*employee appraisal*), hasil kinerja diukur berdasarkan pencapaian target. Tahun 2018 Bank menjalankan pemberian kenaikan gaji berdasarkan *performance level*.
 - b. Metode dalam mengaitkan Remunerasi individu dengan kinerja Bank, kinerja unit Kerja, dan kinerja individu.
Bank telah memiliki metode dalam mengaitkan remunerasi dengan berdasarkan kinerja yaitu dengan menggunakan metode *Management By Objective (MBO)*.
 - c. Uraian mengenai metode yang digunakan Bank untuk menyatakan bahwa kinerja yang disepakati tidak dapat tercapai sehingga perlu dilakukan penyesuaian atas Remunerasi serta besarnya penyesuaian Remunerasi jika kondisi tersebut terjadi.
Bank telah memberlakukan sistem demosi dimana dilakukan pencabutan atas tunjangan jabatan sebagai konsekuensi kinerja yang tidak tercapai.
- F. Penyesuaian Remunerasi dikaitkan dengan Kinerja dan Risiko, meliputi:
 - a. Kebijakan mengenai Remunerasi yang bersifat Variabel yang ditangguhkan, besarnya, dan kriteria untuk menetapkan besaran tersebut.
Bank menetapkan besarnya remunerasi yang bersifat variabel terhadap jangka waktu penangguhan pembayaran remunerasi bersifat variabel untuk ditangguhkan antara 70%-30% (70% dibayarkan terlebih dahulu dan sisanya

who are in the category of Material Risk Takers will be given deferred Variable Remuneration in the anticipation of future problems.

- d. The change in the determination of key risks compare to that of the prior year, with its reason if any, including change of criteria.
The Bank did not change the determination of key risks in 2018.
- E. Measurement of performance linked to Remuneration, including:
 - a. Remuneration policy review related to the assessment of performance where the Bank has been set up remuneration policy based on the performance appraisal (employee appraisal), performance results are measured based on the achievement of targets. In 2018, the Bank will conduct salary increases based on performance level.
 - b. Methods in linking individual Remuneration to Bank performance, Work unit performance, and individual performance.
The Bank has a method of linking remuneration with performance-based, namely by using the method of balanced scorecard (Financial, Customer, Internal Process, Learning & Growth).
 - c. A description of the method used by the Bank to state that the agreed performance is achieved so that adjustment of Remuneration is required and the amount of Remuneration adjustment in the event that the condition occurs.
The Bank has enacted a demotion system in which revocation of job allowances as a consequence of unfulfilled performance is achieved.
- F. Remuneration Adjustment is associated with Performance and Risk, including:
 - a. Deferred Variable Remuneration Policy, amount, and criteria for determining the amount.
The Bank determines the amount of variable remuneration to the period of suspension of the remuneration payment is variable to be deferred between 70% -30% (70% payable in advance and the remaining 30% deferred payment for 3 years, each prorated 10%) to material risk

30% ditangguhkan pembayaran selama 3 tahun, masing-masing *prorate* 10% kepada pihak *material risk taker* berdasarkan jangka waktu risiko (*time horizon of risk*), yaitu:

1. Tahun I sebesar 10% (sepuluh persen) dari total remunerasi yang bersifat variabel.
2. Tahun II sebesar 10% (sepuluh persen) dari total remunerasi yang bersifat variabel.
3. Tahun III sebesar 10% (sepuluh persen) dari total remunerasi yang bersifat variabel.

Pelaksanaan pemberian remunerasi bersifat variabel di J Trust Bank sampai saat ini belum ada dikarenakan kondisi perusahaan yang masih merugi. Bank telah melakukan skema insentif bisnis yang diberikan berdasarkan target pencapaian.

- b. Kebijakan Bank mengenai Remunerasi yang bersifat Variabel yang ditangguhkan yang ditunda pembayarannya (*Malus*), atau ditarik kembali dalam hal sudah dibayarkan (*clawback*).

Bank mengatur terhadap kriteria aturan *malus* dan *clawback*, yaitu:

1. Penurunan kinerja yang secara drastis dari tahun sebelumnya yang tercermin di dalam *Key Performance Indicator* (KPI) Direksi.
Yang dimaksud "kinerja" adalah kinerja keuangan, kinerja bank, dan kinerja individu.
2. Peningkatan *Non Performing Loan* (NPL) yang cukup tinggi sehingga mengganggu kinerja keuangan Bank.
3. Terjadinya *fraud* yang dilakukan oleh pihak *material risk taker* yang mengakibatkan kerugian Bank.
Yang dimaksud "*material risk taker*" adalah Direksi dan/atau Pegawai lainnya yang karena tugas dan tanggung jawabnya mengambil keputusan yang berdampak signifikan terhadap profil risiko Bank.
4. Kondisi Bank masuk dalam status pengawasan khusus atau Bank dalam penyehatan sesuai ketentuan dalam status dan tindak lanjut pengawasan Bank Umum konvensional.

- G. Penyesuaian Remunerasi dikaitkan dengan Kinerja dan Risiko sebagaimana butir f.1) juga meliputi:

taker based on the risk horizon (time horizon of risk), namely:

1. Year I amounting to 10% (ten percent) of total remuneration of a variable nature.
2. Year II of 10% (ten percent) of total variable remuneration.
3. Year III of 10% (ten percent) of total variable remuneration.

Implementation of variable remuneration in J Trust Bank until now is unavailable due to the condition of the Company that is still losing. The Bank has set business incentive scheme that will be granted based on the target achievement.

- b. The Bank Policy on Deferred Variable Remuneration (*Malus*), or withdrawn in the event that it has been paid (*clawback*).

The Bank has set the *malus* and *clawback* rule criteria, namely:

1. Drastic decline in performance from the previous year's which is reflected in the key performance Indicator (KPI) of the Board of Directors. By "performance" means the financial performance, the performance of the bank, and individual performance.
2. The increase in Non-Performing Loans (NPLs) are high enough to disrupt the financial performance of the Bank.
3. The occurrence of fraud conducted by material risk takers that result in losses of the Bank.
By "material risk takers" means the Board of Directors and/or other Personnel whose tasks and responsibilities is making decisions that have a significant impact on the Bank's risk profile.
4. The Bank's condition is under special surveillance status or the Bank is in restructuring program as stipulated in the status and follow-up of conventional Commercial Bank supervision.

- G. Remuneration Adjustment related to Performance and Risk as per item f.1) also includes:

- a. Kebijakan pembayaran (*vesting*) atas penangguhan yang dilakukan antara lain jangka waktu pembayaran.
Kondisi saat ini Bank belum mengatur secara rinci Kebijakan pembayaran atas penangguhan yang dilakukan berdasarkan jangka waktu.
- b. Pengungkapan faktor yang menentukan perbedaan Remunerasi yang bersifat Variabel yang ditanggung di antara Pegawai atau kelompok Pegawai, jika ada. Remunerasi yang bersifat Variabel yang ditanggung diperuntukkan bagi karyawan yang termasuk dalam kategori *Material Risk Takers* akan dituangkan dalam pedoman.
- H. Nama konsultan ekstern dan tugas konsultan terkait kebijakan Remunerasi, dalam hal Bank menggunakan jasa konsultan ekstern.
Perusahaan untuk saat ini tidak menggunakan jasa konsultan terkait dengan kebijakan remunerasi.
- I. Paket Remunerasi dan fasilitas yang diterima oleh Direksi dan Dewan Komisaris mencakup struktur Remunerasi dan rincian jumlah nominal, sebagaimana dalam tabel di bawah ini:

- a. The vesting policy of the suspension, among other things, is the term of payment.
The current condition of the Bank has not been set in detail the policy for suspension payment made based on a period of time.
- b. Disclosure of factors that determine the differences of Deferred Variable Remuneration among Employees or group of Employees, if any.

Deferred Variable Remuneration is intended for employees who fall into the category of Material Risk Takers to be set forth in the guidelines.

- H. Name of external consultants and consulting assignments related to Remuneration policy, in the event the Bank uses external consulting services.
Currently, the Company does not use consultant services regarding the remuneration policy.
- I. Remuneration Package and facilities received by the Board of Directors and Board of Commissioners include remuneration structure and details of the nominal amount, as shown in the table below:

Jenis Remunerasi dan Fasilitas Tahun 2017 Type of Remuneration and Facilities in 2017	Jumlah Diterima dalam 1 (Satu) Tahun *) Amount received in 1 (One) Year *)			
	Dewan Komisaris BOC		Direksi BOD	
	Orang Person	Rupiah	Orang Person	Rupiah
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non natura) Remuneration (salary, bonus, routine allowance, tantiem, and other non-natura facilities)	4 **)	7.602.153.643	6	18.210.568.830
Fasilitas lain dalam bentuk natura (perumahan, transportasi, asuransi kesehatan dan sebagainya) yang: - Dapat dimiliki (purna jabatan) - Tidak dapat dimiliki (asuransi D&O, Kendaraan) Other Facilities in the form of benefits in kind (housing, transportation, health insurance etc) that: - Can be owned (after retirement) - Can not be owned (D&O insurance, Vehicle)	4 **)	768.000.000	6	1.687.857.600
Total	4	8.370.153.643	6	19.898.426.430

Keterangan | Information:

*) Remunerasi yang diterima sudah termasuk pajak
Remuneration received includes tax

***) Komisaris tahun 2017 terdiri dari 6 orang (penerima honor 4 orang)

The Commissioners in 2017 consisted of 6 persons (among which 4 persons received honorarium)

Jenis Remunerasi dan Fasilitas Tahun 2018 Type of Remuneration and Facilities in 2018	Jumlah Diterima dalam 1 (Satu) Tahun *) Amount received in 1 (One) Year *)			
	Dewan Komisaris BOC		Direksi BOD	
	Orang Person	Rupiah	Orang Person	Rupiah
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non natura) Remuneration (salary, bonus, routine allowance, tantiem, and other non-natura facilities)	4 **)	5.623.497.300	7	18.634.402.806
Fasilitas lain dalam bentuk natura (perumahan, transportasi, asuransi kesehatan dan sebagainya) yang: - Dapat dimiliki (purna jabatan) - Tidak dapat dimiliki (asuransi D&O, Kendaraan) Other Facilities in the form of benefits in kind (housing, transportation, health insurance etc) that: - Can be owned (after retirement) - Can not be owned (D&O insurance, Vehicle)	4 **)	768.000.000	6 ***)	1.687.857.600
Total	4	6.391.497.300	6	20.322.260.406

Keterangan | Information:

*) Remunerasi yang diterima sudah termasuk pajak
Remuneration received includes tax

**) Komisaris tahun 2018 terdiri dari 5 orang (penerima honor 4 orang)

The Commissioners in 2018 consisted of 5 persons (among which 4 persons received honorarium)

***) Penerima fasilitas purna jabatan Direksi 6 orang

Beneficiary of BOD post service facility: 6 persons

- J. Paket Remunerasi yang dikelompokkan dalam tingkat penghasilan yang diterima oleh Direksi dan anggota Dewan komisaris dalam 1 (satu) tahun, sebagaimana dalam tabel di bawah ini:

Jumlah Remunerasi per Orang dalam 1 (Satu) Tahun *) Total Remuneration per Person per Year *)	Jumlah Komisaris Number of Commissioners		Jumlah Direksi Number of Directors	
	2017	2018	2017	2018
Di atas Rp2 miliar Above Rp2 billion	-	-	6	5
Di atas Rp1 miliar s.d. Rp2 miliar Above Rp1 billion to Rp2 billion	4	4	-	2
Di atas Rp500 juta s.d. Rp1 miliar Above Rp500 million to Rp1 billion	-	-	-	-
Rp500 juta ke bawah Up to Rp500 million	-	-	-	-

Keterangan | Notes:

*) yang diterima secara tunai | received in cash

*) Remunerasi yang diterima sudah termasuk pajak | Remuneration received includes tax

- K. Remunerasi yang bersifat variabel, meliputi:
- Bentuk Remunerasi yang bersifat Variabel beserta alasan pemilihan bentuk tersebut. Bank telah menetapkan bentuk remunerasi yang bersifat Variabel yaitu Bonus dan saham/instrumen berbasis saham dengan pertimbangan bahwa bonus/saham diberikan berdasarkan hasil kinerja Bank dimana setiap tahun akan berbeda pencapaiannya.
 - Penjelasan dalam hal terdapat perbedaan pemberian Remunerasi yang bersifat Variabel di antara para Direksi, Dewan Komisaris dan/atau Pegawai, termasuk penjelasan faktor-faktor yang menentukan perbedaan tersebut beserta pertimbangan yang mendasarinya.

- J. Remuneration Package grouped in levels of income received by the Board of Directors and the Board of Commissioners in 1 (one) year, as shown in the table below:

- K. Variable Remuneration includes:
- Form of Variable Remuneration and the reason for choosing it.
The Bank has established the form of Variable remuneration, namely bonus and shares/share-based instrument, by putting into consideration that bonus/shares are given based on the performance of the Bank, and each year will have different achievements.
 - Explanation in the case of differences in the provision of Variable Remuneration among Board of Directors, Board of Commissioners and/or Employees, including the explanation of the factors that determine the differences and the underlying considerations.

Bank belum menetapkan perbedaan pemberian remunerasi yang bersifat Variabel di antara para Dewan komisaris, Direksi, dan pegawai.

- L. Jumlah Direksi, Dewan Komisaris, dan Pegawai yang menerima remunerasi yang bersifat Variabel selama 1 (satu) tahun dan total nominal sebagaimana dalam tabel di bawah ini:

Remunerasi yang Bersifat Variabel Variable Remuneration	Jumlah Diterima dalam 1 (satu) Tahun Amount Received in 1 (one) Year					
	Direksi Board of Directors		Dewan Komisaris Board of Commissioners		Pegawai Employee	
	Orang Person	Juta Rp Rp million	Orang Person	Juta Rp Rp million	Orang Person	Juta Rp Rp million
Bonus/Saham Bonus/ Share	N/A	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A	N/A

The Bank has not established differences in variable remuneration among the Board of Commissioners, Directors and employees.

- L. Number of Directors, Commissioners, and Employees who received variable remuneration for 1 (one) year and the total nominal as shown in the table below:

- M. Jabatan dan jumlah pihak yang menjadi *Material Risk Takers* (MRT)

Bank sedang meminta persetujuan untuk jabatan yang digolongkan ke dalam MRT yang kondisi saat ini fokus pada bidang kredit, yaitu: Dewan Komisaris, Direksi, dan EVP.

- N. *Shares option* yang dimiliki Direksi, Dewan komisaris, dan Pejabat Eksekutif

Shares option adalah opsi untuk membeli saham oleh anggota Direksi, anggota Dewan Komisaris, dan/atau Pejabat Eksekutif yang dilakukan melalui penawaran saham atau penawaran opsi saham dalam rangka pemberian kompensasi yang diberikan kepada anggota Direksi, anggota Dewan Komisaris, dan/atau Pejabat Eksekutif Bank, dan yang diputuskan dalam Rapat Umum Pemegang Saham dan/atau Anggaran Dasar Bank.

Pengungkapan mengenai *shares option* minimal mencakup:

- 1) Kebijakan dalam pemberian *shares option*.
- 2) Jumlah saham yang telah dimiliki masing-masing anggota Dewan Komisaris, Direksi dan Pejabat Eksekutif sebelum diberikan *shares option*.
- 3) Jumlah *shares option* yang diberikan.
- 4) Jumlah *shares option* yang telah dieksekusi sampai dengan akhir masa pelaporan.
- 5) Harga opsi yang diberikan.
- 6) Jangka waktu berlakunya eksekusi *shares option*.

- M. Position and the number of parties that become Material Risk Takers (MRT)

The Bank is requesting approval for the position classified as MRT, which currently focus on the areas of credit, namely: the Board of Commissioners, the Board of Directors, and EVP.

- N. *Shares option* for the Board of Directors, the Board of Commissioners, and Executive Officers

Shares option is an option to purchase shares by members of the Board of Directors, the Board of Commissioners, and/or Executive Officer and is executed through stock offering or stock option as compensation to members of the Board of Directors, Board of Commissioners, and/or Executive Officers of the Banks, and is decided in the General Meeting of Shareholders and/or the Articles of Association of the Bank.

Disclosures regarding the minimum *shares option* include:

- 1) The policy in granting shares option.
- 2) The number of shares owned by each member of the Board of Commissioners, the Board of Directors and Executive Officers before being given shares option.
- 3) The number of shares option given.
- 4) Number of shares option that has been executed by the end of the reporting period.
- 5) Pricing of options.
- 6) The validity period of shares option execution.

Selama tahun 2018 **tidak ada** *shares option* dimaksud pada angka 2) s/d. angka 6) sebagaimana tabel berikut:

In 2018, **there was no** share option as referred to in item 2) until item 6), as shown in the following table:

Keterangan>Nama Note/name		Jumlah Saham yang dimiliki (lembar saham) Total Number of shares owned (Shares)	Jumlah Opsi Number of Option		Harga Opsi Option Pricing (Rp)	Jangka Waktu Period
			Yang diberikan (lembar saham) Provided (Shares)	Yang telah dieksekusi (lembar saham) Executed (Shares)		
Komisaris Commissioner	(nama) (Name)	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A
Direksi Board of Directors	(nama) (Name)	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A
Pejabat Eksekutif Executive Officers	(total)	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A
Total		Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A	Nihil N/A

O. Rasio gaji tertinggi dan terendah

Gaji adalah hak pegawai yang diterima dan dinyatakan dalam bentuk uang sebagai imbalan dari perusahaan/pemberi Kerja kepada pegawai yang ditetapkan dan dibayarkan menurut suatu perjanjian Kerja, kesepakatan, atau peraturan perundang-undangan atas suatu pekerjaan dan/atau jasa yang telah dilakukannya.

O. The ratio of highest and lowest salaries

Salary is the right of employees who accepted and expressed in terms of money as a reward from the company/employer to employees, which is determined and paid according to Labor agreement, contracts, or prevailing regulation for such profession and/or the services rendered.

Berikut adalah Rasio gaji tertinggi dan terendah tahun 2017 dan 2018, dalam skala perbandingan:

Below is the ratio of the highest and lowest salaries in 2017 and 2018, in the scale of comparison:

Rasio Ratio	Skala Perbandingan Comparative Scale	
	2017	2018
Rasio gaji pegawai yang tertinggi dan terendah The ratio of highest and lowest employee salaries	1 : 23	1 : 25
Rasio gaji Direksi yang tertinggi dan terendah The ratio of highest and lowest Director salaries	1 : 2,5	1 : 2,3
Rasio gaji Dewan Komisaris yang tertinggi dan terendah The ratio of highest and lowest Commissioner salaries	1 : 1	1 : 1
Rasio gaji Direksi tertinggi dan pegawai tertinggi The ratio of highest salaries of Director and Employee	1 : 3	1 : 2,5

Gaji yang diperbandingkan dalam rasio gaji tersebut adalah imbalan yang diterima oleh anggota Dewan Komisaris, Direksi dan pegawai per bulan. Yang dimaksud dengan pegawai adalah pegawai tetap PT Bank JTrust Indonesia Tbk dari tingkat pelaksana sampai Kepala Divisi.

The comparable salary in the salary ratio is the remuneration received by members of the Board of Commissioners, Board of Directors and employees per month. Employee means permanent employee of PT Bank JTrust Indonesia Tbk from executive level to the Head of Division.

- P. Jumlah penerima dan jumlah total Remunerasi yang bersifat Variabel yang dijamin tanpa syarat akan diberikan oleh Bank kepada calon Direksi, calon Dewan Komisaris, dan/atau calon Pegawai selama 1 (satu) tahun pertama bekerja

Kondisi saat ini Bank belum memberikan remunerasi yang bersifat Variabel, sehingga belum ada pegawai yang menerima remunerasi yang dijamin tanpa syarat akan diberikan oleh Bank.

- Q. Jumlah Pegawai yang terkena pemutusan hubungan kerja dan total nominal pesangon yang dibayarkan sebagaimana dalam tabel di bawah ini:

Bank telah menjalankan Program Pensiun Dini (*Early Retirement Program*) Non Eligible melalui SK Direksi No.06.01/S.Kep-Dir-HCD/JTRUST/X/2017 tanggal 6 Oktober 2017 dan Voluntary Separation Scheme (VSS) bagi karyawan dasar melalui SK Direksi No.24.01/S.Kep-Dir-HCD/JTRUST/X/2017 tanggal 24 Oktober 2017 yang merupakan penjabaran PKB Tahun 2016-2018 pada pasal 16 Batas Usia Karyawan butir 3 dimana karyawan yang mencapai usia sekurang-kurangnya 46 tahun dengan masa kerja 10 tahun atau belum mencapai 46 tahun tetapi sudah memiliki masa kerja lebih dari 15 tahun dapat mengajukan pensiun dipercepat. Kemudian selama tahun 2018 jumlah Karyawan yang menerima Pemutusan Hubungan Kerja (PHK) atau pemberhentian karena Karyawan pensiun normal dan atas permintaan Karyawan sendiri mengundurkan diri, dengan nominal pesangon yang dibayarkan adalah sebagai berikut:

Jumlah Nominal Pesangon yang dibayarkan per orang dalam 1 (Satu) Tahun 2018 Amount of severance paid to an individual in a year 2018	Jumlah Pegawai Total Employees
Di atas Rp1 miliar Above Rp1 billion	0
Di atas Rp500 juta s.d. Rp1 miliar Above Rp500 million to Rp1 billion	1
Rp500 juta ke bawah Up to Rp500 million	61

- R. Jumlah total Remunerasi yang bersifat Variabel yang ditangguhkan, yang terdiri dari tunai dan/atau saham atau instrumen yang berbasis saham yang diterbitkan Bank. Bank belum memberikan kompensasi dalam bentuk tersebut di atas.
- S. Jumlah total Remunerasi yang bersifat Variabel yang ditangguhkan yang dibayarkan selama 1 (satu) tahun. Bank belum memberikan kompensasi dalam bentuk tersebut di atas.
- T. Rincian jumlah Remunerasi yang diberikan dalam 1 (satu) tahun, meliputi:

- P. Number of recipients and the total amount of variable remuneration that are guaranteed unconditionally will be provided by the Bank to candidates of the Board of Directors, candidates of the Board of Commissioners, and/or prospective employee for 1 (one) year, during the first year of work

Under current condition, the Bank was not able to provide variable remuneration, thus there were no employees receiving remuneration pledged unconditionally provided by the Bank.

- Q. Number of Employees affected by layoffs and the total amount of severance paid as in the table below:

The Bank has conducted Non-Eligible Early Retirement Program through BOD Decision Letter No. No.06.01/S.Kep-Dir-HCD/JTRUST/X/2017 dated October 6, 2017, and Voluntary Separation Scheme (VSS) for employees of basic level through BOD Decision Letter No. No.24.01/S.Kep-Dir-HCD/JTRUST/X/2017 dated October 24, 2017, which was elaborated from the PKB of 2016-2018, article 16 on Employee Age Limit, point 3 wherein employees who reach the age of at least 46 years or having 10 years of service, or has not reached 46 years but already has more than 15 years of service, are entitled for early retirement. During 2018, the number of outgoing employees due to work severance, normal retirement, or voluntary resignation, along with the severance payment paid, is as follows:

- R. The total amount of suspended variable remuneration consisting of cash and/or shares or share-based instrument issued by the Bank. The Bank has not provided compensation in the form mentioned above.

- S. The total amount of suspended variable remuneration paid out in 1 (one) year. The Bank has not provided compensation in the form mentioned above.

- T. Details of the amount of Remunerasi given in 1 (one) year, include:

A. Remunerasi yang Bersifat Tetap *) Fixed Remuneration *)			
1. Tunai Cash	Rp33.394.441.147		
2. Saham/instrumen yang berbasis saham yang diterbitkan Bank Shares based instrument or shares published by Bank	N/A		
B. Remunerasi yang Bersifat Variabel *) Variable Remuneration *)		Tidak Ditangguhkan Non Deferred	Ditangguhkan Deferred
1. Tunai Cash		N/A	N/A
2. Saham/instrumen yang berbasis saham yang diterbitkan Bank Shares based instrument or shares published by Bank		N/A	N/A

Keterangan | Note:

*) Hanya untuk MRT dan diungkapkan dalam juta Rupiah | Only for MRT and disclosed in million Rupiah

U. Informasi kuantitatif

- Total sisa Remunerasi yang masih ditangguhkan baik yang terekspos penyesuaian implisit maupun eksplisit.
- Total pengurangan Remunerasi yang disebabkan karena penyesuaian eksplisit selama periode laporan.
- Total pengurangan Remunerasi yang disebabkan karena penyesuaian implisit selama periode laporan.

Bank belum melakukan informasi kuantitatif terkait total sisa Remunerasi yang masih ditangguhkan baik yang terekspos penyesuaian implisit maupun eksplisit, beserta total pengurangan Remunerasi baik yang disebabkan karena penyesuaian eksplisit dan implisit selama periode laporan.

U. Quantitative information

- Total remaining of deferred Remuneration exposed by both implicit or explicit adjustments.
- Total deductions on the Remuneration caused by explicit adjustments during the reporting period.
- Total deductions on the Remuneration due to imp

The Bank has not conducted quantitative information related to the total remaining of deferred remuneration which was exposed by both implicitly or explicitly adjustment, along with the total reduction of remuneration due to the explicit and implicit adjustments during the reporting period.

Jenis Remunerasi yang Bersifat Variabel *) Variable Remuneration *)	Sisa yang Masih Ditangguhkan The Deferred Remaining	Total Pengurangan Selama Periode Laporan Total Reduction During the Reporting Period		
		Disebabkan Penyesuaian Eksplisit (A) Due to Explicit Adjustment (A)	Disebabkan Penyesuaian Implisit (B) Due to Implicit Adjustment (B)	Total (A)+(B)
a. Tunai (dalam juta Rupiah) Cash (in million Rupiah)	N/A	N/A		N/A
b. Saham/Instrumen yang berbasis saham yang diterbitkan Bank (dalam lembar saham dan nominal juta Rupiah yang merupakan konversi dari lembar saham tersebut) Shares/share-based instruments issued by the Bank (in number of shares and nominal million Rupiah which is a conversion of such shares)	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A

Keterangan | Note:

*) Hanya untuk MRT | Only for MRT

c. Informasi mengenai Kebijakan Remunerasi Dewan Komisaris dan Direksi

(dalam jutaan Rupiah)

Remunerasi	Dewan Komisaris Board of Commissioners		Direksi Board of Directors		Remuneration
	2017	2018	2017	2018	
Honorarium/Gaji Pokok	3.918	2.720	10.122	9.463	Honorarium/Salary
Fasilitas Kendaraan	320	267	189	196	Vehicle Allowance
Tunjangan BBM & Supir	264	192	469	570	Fuel & Driver Allowance
Tunjangan <i>Handphone</i>	24	17	60	68	Handphone Allowance
Tunjangan Hari Raya (THR)	688	688	1.595	1.775	Holiday Allowance
Tunjangan Cuti	413	344	793	667	Leave Allowance
Tunjangan Pajak PPh21	1.975	1.395	4.983	5.896	PPh21 Tax Allowance
Purna Jabatan	768	768	1.687	1.688	Retirement
Jumlah	8.370	6.391	19.898	20.323	Total

c. Information on the Remuneration Policy of the Board of Commissioners and Board of Directors

(in million Rupiah)

2.7. Transaksi yang Mengandung Benturan Kepentingan

Transaksi yang menyebabkan terjadinya benturan kepentingan antara Bank dengan pribadi pemilik, anggota Dewan Komisaris, anggota Direksi, Pejabat Eksekutif, dan/atau pihak lain yang terkait dengan Bank, maka bagi anggota Dewan Komisaris, anggota Direksi, Pejabat Eksekutif dilarang mengambil tindakan/keputusan yang dapat merugikan Bank atau mengurangi keuntungan Bank.

Dalam menjalankan tugas dan tanggung jawab sehari-hari untuk melakukan hubungan bisnis dengan nasabah, rekanan maupun dengan rekan sekerja, serta menjaga kepentingan publik, PT Bank JTrust Indonesia Tbk senantiasa menjunjung tinggi integritas pribadi dan profesionalisme yang luhur, yang dituangkan dalam bentuk buku Pedoman Etika Korporasi perusahaan dan Pernyataan Fakta Integritas sebagai standar etika dan perilaku yang wajib dijadikan pedoman oleh seluruh anggota Bank (Dewan Komisaris, Direksi dan Karyawan Tetap/Kontrak).

Buku Pedoman Etika Korporasi perusahaan dan Pernyataan Fakta Integritas telah mengatur hal-hal yang harus dihindari untuk mencegah potensi terjadinya benturan kepentingan dalam setiap aktivitas dengan para nasabah, rekanan atau antara sesama anggota Bank, termasuk dalam pengambilan keputusan.

Selama tahun 2018 **tidak ada** transaksi yang mengandung benturan kepentingan, sebagaimana tabel berikut:

2.7 Transactions Involving Conflict of Interest

Transactions that caused conflicts of interest between the Bank and the owners, members of the Board of Commissioners, members of the Board of Directors, Executive Officers, and/or other parties related to the Bank, then the members of the Board of Commissioners, members of the Board of Directors, Executive Officers are prohibited from taking actions/decisions that may inflict damage to the Bank or reduce the profit of the Bank.

In carrying out the day-to-day duties and responsibilities in doing business relationship with customers, partners and their co-workers, as well as safeguarding public interests, PT Bank JTrust Indonesia Tbk always strives to uphold personal integrity and excellent professionalism, which is manifested in a Corporate Ethics guidelines of the company to serve as ethical and behavioral standards which must be applied as guidelines by all members of the Bank (the Board of Commissioners, Board of Directors and Permanent/Contract Employees).

Corporate Ethics guidelines of the company governs matters which should be avoided to prevent potential conflicts of interest in every activity with customers, partners or among members of the Bank, including in decision-making.

During 2018 **there were no** transactions which contain conflict of interest, as the table below:

No.	Nama dan Jabatan Pihak yang Memiliki Benturan Kepentingan Name and Position of Parties with Conflict of Interest	Nama dan Jabatan Pengambil Keputusan Name and Position of Policymaker	Jenis Transaksi Type of Transactions	Nilai Transaksi (jutaan Rupiah) Total Transactions (million Rupiah)	Keterangan *) Description *)
1	Tidak ada None	Tidak ada None	Tidak ada None	Tidak ada None	Tidak ada None
Keterangan Notes: *) Tidak sesuai sistem dan prosedur yang berlaku Against existing systems and procedures					

2.8 Kepemilikan saham anggota Dewan Komisaris dan anggota Direksi yang mencapai $\geq 5\%$ (lima persen) dari modal disetor, yang meliputi jenis dan jumlah lembar saham pada Bank tersebut, Bank lain, Lembaga Keuangan Bukan Bank, dan Perusahaan Lain yang berkedudukan baik di dalam maupun di luar negeri.

Selama tahun 2018 kepemilikan saham oleh anggota Dewan Komisaris dan anggota Direksi yang mencapai $\geq 5\%$ (lima persen) dari modal disetor telah diungkapkan dalam hubungan afiliasi.

2.9 Hubungan Keuangan dan Hubungan Keluarga anggota Dewan Komisaris dan anggota Direksi

Selama tahun 2018 **tidak ada** hubungan keuangan dan hubungan keluarga anggota Dewan Komisaris dan Direksi dengan anggota Dewan Komisaris dan Direksi lainnya, Direksi lainnya dan/atau Pemegang Saham Pengendali Bank sebagaimana telah diungkapkan dalam hubungan afiliasi.

2.10 Pembelian Kembali (*Buy Back*) Saham dan/atau Obligasi Bank

Pembelian kembali (*Buy back*) saham atau obligasi Bank adalah upaya mengurangi jumlah saham/obligasi yang telah diterbitkan Bank dengan cara membeli kembali saham atau obligasi tersebut dengan tata cara pembayaran dilaksanakan sesuai dengan ketentuan yang berlaku.

Pengungkapan mencakup:

- Kebijakan dalam melakukan pembelian kembali (*Buy back*) saham/obligasi Bank.
- Jumlah lembar saham dan/atau obligasi yang dibeli kembali.
- Harga pembelian kembali per lembar saham dan/atau obligasi.
- Peningkatan laba per lembar saham dan/atau obligasi.

Selama tahun 2018 **tidak ada** Pembelian kembali (*Buy back*) saham atau obligasi Bank yang terjadi di PT Bank JTrust Indonesia Tbk.

2.8. Shareholding of members of the Board of Commissioners and Board of Directors Which reached $\geq 5\%$ (five percent) of the paid-up capital, which includes the type and number of shares in the Bank, other banks, Non-Bank Financial Institutions, and other companies, which domiciled locally or abroad.

In 2018, there is no member of the Board of Commissioners, and member of the Board of Directors who own shares constituting more than five percent of the paid-up capital at another company.

2.9 Financial and family relations of members of the Board of Commissioners and Board of Directors

During 2018 there was no financial and family relations of members of the Board of Commissioners and Board of Directors with another members of the Board of Commissioners, Board of Directors and/or Controlling Shareholders of the Bank.

2.10 The buyback of the Bank's shares and/or bonds

Shares buyback or bonds buyback is the effort to reduce the number of shares or bonds issued by the Bank by repurchasing said shares or bonds, which payment mechanism is carried out subject to the prevailing laws.

The disclosure include:

- The shares and/or bonds buyback policy;
- The number of repurchased shares and/or bonds;
- The price of shares and/or bonds buyback;
- The increase profit per share and/or bond.

In 2018 there were no shares and/or bonds buyback by the Bank in PT Bank JTrust Indonesia Tbk.

2.11 Informasi tentang Kode Etik Emiten/Perusahaan Publik

- a) Pokok-pokok kode etik
 - a. Dasar hukum Etika Korporasi berpedoman pada ketentuan dalam Anggaran Dasar PT Bank JTrust Indonesia Tbk.
 - b. Etika Korporasi ini digunakan sebagai acuan bagi Anggota Bank dalam menjalankan dan membina hubungan bisnis dengan nasabah, rekanan dan rekan sekerja sehingga tercipta Anggota Bank yang memiliki integritas, loyalitas dan berdedikasi tinggi.
 - c. Etika Korporasi memungkinkan Anggota Bank untuk secara cepat mengetahui adanya penyimpangan dalam menjalankan usaha sehingga menjaga anggota Bank dari melakukan hubungan bisnis yang kurang baik. Meskipun demikian tidak bertujuan untuk mencampuri kehidupan pribadi dari Anggota Bank.
- b) Bentuk sosialisasi kode etik dan upaya penegakannya
Dilakukan sosialisasi bagi seluruh karyawan terutama Anggota Bank pada saat bergabung di PT Bank JTrust Indonesia Tbk dalam bentuk buku Etika Korporasi, dimana seluruh karyawan memahami akan kerahasiaan informasi dan konsekuensinya.
- c) Pernyataan bahwa kode etik berlaku bagi anggota Direksi, anggota Dewan Komisaris, dan karyawan Emiten
Pernyataan dilakukan dengan mengisi *annual statement* 1 (satu) tahun sekali. Anggota Bank harus memahami dan mengetahui bahwa seluruh informasi yang berhubungan dengan Bank dan nasabah bersifat rahasia sebagaimana tercantum dalam Undang-Undang kerahasiaan Bank dan peraturan lainnya dan Anggota Bank wajib menjaga kerahasiaan informasi tersebut.

2.12 Informasi tentang Budaya Perusahaan (*Corporate Culture*) atau Nilai-Nilai Perusahaan (*Core Values*)

Corporate Culture adalah Budaya Perusahaan yang memiliki peran sangat besar dalam menciptakan kelancaran operasional dan produktivitas perusahaan. Dengan budaya perusahaan yang jelas dan terarah, perusahaan mampu menggerakkan roda bisnis menuju kearah yang jelas dengan tuntunan, panduan atau cara untuk mencapainya.

J Trust Bank *Core Values* “**SUPERNOVA TEAM**”

2.11 Information on the Issuer's Code of Ethics

- a) Principles of the code of ethics
 - a. The legal basis of Corporate Ethics is based on the provisions of the Articles of Association of PT Bank JTrust Indonesia Tbk.
 - b. The Corporate ethics is used as a reference for the Member of the Bank in conducting and fostering business relationships with customers, partners and co-workers in order to create Members with integrity, loyalty and dedication.
 - c. Corporate Ethics allows Member of the Bank to promptly identify the irregularities in the operations so it can keep the members of the Bank away from conducting an unhealthy business practices. Nevertheless, it is not intended to interfere in the private lives of the Member of the Bank.
- b) The form of code of conduct socialization and enforcement effort
Socialization is conducted to all employees, especially Member of the Bank at the time of joining PT Bank JTrust Indonesia Tbk in the form of Corporate Ethics book, which all employees understand the confidentiality of information and its consequences.
- c) A statement that the code of ethics is applicable to members of the Board of Directors, Board of Commissioners, and employees of the Issuer
The statement is conducted by filling out annual statement annually. Members of the Bank must understand and acknowledge that all information relating to the Bank and the customer is confidential as stated in Bank Secrecy Act and other legislation and members of the Bank shall maintain the confidentiality of such information.

2.12 Information on the Corporate Culture or Core Values

Corporate Culture is a culture of the Company that has a significant role in creating smooth operations and productivity. With such a corporate culture that is clear and focused, the Company is able to run the business towards a clear direction with the guidance, strategies or method to achieve it.

J Trust Bank *Core Values* “**SUPERNOVA TEAM**”

SPEED

Selalu mempertimbangkan bagaimana memberikan 'kecepatan' dalam setiap aspek (layanan kepada pelanggan, hasil kerja, membalas e-mail, dll.), tidak perlu sempurna, kecepatan cukup lebih penting dibandingkan sempurna.

UNIQUENESS

Business Process, Value Added, Technology

- a. Menjadi unik di industry perbankan dengan memiliki nilai jual yang unik di dalam pekerjaan yang kita lakukan dan diri kita sendiri.
- b. Selalu memiliki gairah dalam pikiran anda untuk mengubah segala sesuatunya lebih baik dan selalu melihat cara yang lebih baik dalam melakukan pekerjaan anda dengan menambahkan nilai yang memberikan manfaat pada bisnis kita untuk mendukung eksistensi keunikan kita.
- c. Menyediakan teknologi keuangan terbaik yang memberikan solusi keuangan yang unik.

PROFESSIONALISM

Politeness, Efficiency, Punctual, Passion, Fairness

- a. Bersikaplah sopan mengenai apapun, jangan kasar/kecewa.
- b. Bersikap hormat satu sama lain.
- c. Jadilah efisien dalam apapun yang anda lakukan dalam pekerjaan anda.
- d. Waktu adalah uang, jadi, tepat waktu dalam segala hal dan jangan sia-siakan sumber daya berharga orang lain dan milik anda sendiri.

INNOVATION

Innovative

Selalu menjadi inovatif, jangan terpaku pada cara lama/kebiasaan lama, selalu mencoba untuk menciptakan metode baru untuk melewati situasi.

TEAM WORK

Teamwork, Transparent

- a. Kerjakan prioritas anda bersama dengan tim anda dan memaksimalkan hasilnya, jangan bergantung hanya pada diri anda sendiri.
- b. Jangan menyembunyikan/menghindari sesuatu dan jadilah transparan di dalam semua aspek.

SPEED

Always thinking to create speed in every aspect of work (services to customers, work, reply to e-mail, etc.), do not need to be perfect, speed is more important than perfect.

UNIQUENESS

Business Process, Value Added, Technology

- a. Become unique in the banking industry by having unique selling points in the work we do and ourselves.
- b. Always have passion in your mind to change things better and always see a better way of doing your work by adding value that benefits our business to support our unique existence.
- c. Providing the best financial technology that provides unique financial solutions.

PROFESSIONALISM

Politeness, Efficiency, Punctual, Passion, Fairness

- a. Be polite about anything, don't be rude/disappointed.
- b. Be respectful of each other.
- c. Be efficient in whatever you do in your work.
- d. Time is money, so, on time in all things and do not waste the valuable resources of others and your own.

INNOVATION

Innovative

Always being innovative, don't get hung up on old ways/habits, always try to create new methods to get past the situation.

TEAM WORK

Teamwork, Transparent

- a. Working on shared priority with team and maximizing the result, don't depend only on yourself.
- b. Don't hide/avoid something and always being transparent in all aspects.

2.13 Informasi tentang sanksi administratif yang dikenakan kepada Emiten/ Perusahaan Publik, anggota Dewan Komisaris dan Direksi, oleh otoritas Pasar Modal dan otoritas lainnya pada tahun 2018

Pemantauan dilakukan terhadap sanksi administratif yang dikenakan oleh otoritas. Secara umum pelanggaran yang terjadi antara lain tidak menyampaikan, keterlambatan dan kesalahan pelaporan yang diakibatkan oleh faktor *human error* pada LBU, LHBU, dan SLIK. Dalam rangka memitigasi agar sanksi tersebut tidak terjadi lagi, maka dilakukan langkah-langkah perbaikan seperti pemantauan dan peningkatan ketelitian serta pemahaman dari unit terkait terhadap berbagai aspek pelaporan-pelaporan tersebut.

2.14 Program Kepemilikan Saham oleh Karyawan dan/atau Manajemen yang Dilaksanakan Emiten/ Perusahaan Publik (jika ada), antara lain:

- a. Jumlah saham dan/atau Opsi
- b. Jangka waktu pelaksanaan
- c. Persyaratan karyawan dan/atau manajemen yang berhak, dan
- d. Harga pelaksanaan

PT Bank JTrust Indonesia Tbk belum ada program kepemilikan saham oleh Karyawan dan/atau Manajemen di tahun 2018.

2.13 Information on administrative sanctions imposed on Issuers/Public Companies, members of the Board of Commissioners and Board of Directors, by the Capital Market authorities and other authorities in 2018

Monitoring is conducted against administrative sanctions imposed by the authority. In general, the violations that occur are delays and errors in reporting caused by human error factors, such as LBU, LHBU, and SLIK. In order to mitigate such sanctions from reoccurring, improvement measures such as monitoring and improvement of accuracy and understanding from the units are made against various aspects of such reporting.

2.14 Management/Employee Stock Ownership Program conducted by Issuer/Public Company (if any), among others:

- a. Number of shares and/or Options
- b. Window Exercise
- c. Eligible employee and/or management requirements, and
- d. Exercise price

PT Bank JTrust Indonesia Tbk there is no management/employee stock ownership program in 2018.

BAB III KELENGKAPAN DAN PELAKSANAAN TUGAS KOMITE-KOMITE PT BANK JTRUST INDONESIA TBK

CHAPTER III Completion and Implementation of Duties of Committees of PT Bank JTrust Indonesia Tbk

Komite-Komite di bawah Dewan Komisaris

Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawabnya, Dewan Komisaris PT Bank JTrust Indonesia Tbk telah membentuk Komite-Komite di bawah Dewan Komisaris sebagaimana yang dipersyaratkan dalam ketentuan Penerapan Tata Kelola Bagi Bank Umum yang terdiri dari:

- Komite Audit (*Audit Committee*)
- Komite Pemantau Risiko (*Risk Monitoring Committee*)
- Komite Nominasi dan Remunerasi (*Nomination and Remuneration Committee*)

Pengangkatan anggota Komite tersebut di atas dilakukan oleh Direksi berdasarkan Keputusan Dewan Komisaris dengan rekomendasi Komite Nominasi dan Remunerasi. Komite-komite di bawah Dewan Komisaris diketuai oleh Komisaris Independen yang tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau pemegang saham pengendali atau bentuk hubungan lain dengan Bank yang bisa mempengaruhi independensinya.

Pelaksanaan tugas dan tanggung jawab komite-komite di bawah Dewan Komisaris PT Bank JTrust Indonesia Tbk mengacu pada Pedoman dan Tata Tertib Kerja/ Piagam Komite (*Committee Charter*) yang disusun berdasarkan peraturan yang berlaku di Indonesia terutama Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola Bagi Bank Umum, dan *best practices* yang diperbaharui secara berkala.

3.1 Komite Audit

Komite Audit merupakan komite yang dibentuk untuk mendukung Dewan Komisaris dalam rangka mendukung efektivitas pelaksanaan tugas dan fungsi pengawasannya atas hal-hal yang terkait dengan laporan keuangan, sistem pengendalian internal, pelaksanaan fungsi audit internal dan eksternal, implementasi Tata Kelola yang baik, serta kepatuhan terhadap peraturan perundang-undangan yang berlaku. Pembentukan Komite Audit mengacu pada peraturan-peraturan yang berlaku sebagai berikut:

Committees under BOC

In order to support the effectiveness of the implementation of its duties and responsibilities, the Board of Commissioners of PT Bank JTrust Indonesia Tbk has established Committees under the Board of Commissioners as required in the provisions on the Adoption of Governance for Commercial Banks which consist of:

- Audit Committee
- Risk Monitoring Committee
- Nomination and Remuneration Committee

The appointment of the members of the Committee is made by the Board of Directors based on the Board of Commissioners' Decision with the recommendation of the Nomination and Remuneration Committee. Committees under the Board of Commissioners are chaired by Independent Commissioners who have no financial, management, share ownership and/or family relationships with other members of the Board of Commissioners, the Board of Directors and/or other controlling shareholders or other forms of relationship with the Bank that may impair their independence.

The conduct of duties and responsibilities of committees under the Board of Commissioners of PT Bank JTrust Indonesia Tbk refers to the Charter of Committees (*Committee Charter*) prepared under the prevailing regulations in Indonesia, specifically Financial Services Authority Regulation on the Implementation of Good Corporate Governance for Commercial Banks, and best practices that are regularly updated.

3.1. Audit Committee

The Audit Committee is a committee established to support the Board of Commissioners in order to support the effectiveness of the performance of its duties and supervisory functions on matters relating to the financial statements, internal control systems, the implementation of internal and external audit functions, the implementation of Good Governance, and compliance with prevailing regulations. The establishment of the Audit Committee refers to the following regulations:

1. Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
2. Peraturan Otoritas Jasa Keuangan No.55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola bagi Bank Umum.
3. Surat Edaran Otoritas Jasa Keuangan No.13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum.
4. Peraturan Otoritas Jasa Keuangan No.13/POJK.03/2017 tanggal 27 Maret 2017 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan.

a. Piagam Komite Audit (*Audit Committee Charter*)

Komite Audit memiliki Piagam Komite Audit (*Audit Committee Charter*) yang mengatur hal-hal terkait dengan pelaksanaan tugas dan tanggung jawab serta kewenangan, komposisi dan struktur organisasi serta persyaratan keanggotaan, tata cara dan prosedur kerja serta waktu kerja, pelaksanaan rapat dan pelaporan, penanganan pengaduan/pelaporan sehubungan dugaan pelanggaran terkait pelaporan keuangan, masa tugas dan honorarium. Piagam Komite Audit (*Audit Committee Charter*) ini akan ditinjau secara berkala atau apabila dianggap perlu *di-review* kembali dan dievaluasi kecukupannya oleh Dewan Komisaris agar fungsi Komite Audit dapat dilaksanakan pada tingkat yang optimal sesuai dengan ketentuan perundangan terkait yang berlaku. Piagam Komite Audit (*Audit Committee Charter*) yang ada terakhir *di-review* dan dimutakhirkan pada tanggal 28 Februari 2018 serta telah diunggah dalam situs web Bank.

b. Struktur dan Keanggotaan Komite Audit

- Keanggotaan Komite Audit paling sedikit terdiri dari 1 (satu) orang Komisaris Independen yang merangkap sebagai Ketua, 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang keuangan atau akuntansi, dan 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang hukum atau perbankan.
- Komisaris Independen dan Pihak Independen yang menjadi anggota komite audit paling sedikit berjumlah 51% (lima puluh satu persen) dari jumlah anggota komite audit.
- Anggota Direksi dilarang menjadi anggota Komite Audit.
- Mantan anggota Direksi Bank, mantan Pejabat Eksekutif Bank atau pihak yang mempunyai hubungan dengan Bank yang dapat mempengaruhi kemampuan untuk bertindak

1. Regulation of the Financial Services Authority No. 55/POJK.04/2015 dated December 23, 2015 on the Establishment and Implementation Guidelines of the Audit Committee.
2. Regulation of the Financial Services Authority No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks.
3. Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Good Corporate Governance for Commercial Banks.
4. Regulation of the Financial Services Authority No. 13/POJK.03/2017 dated March 27, 2017 on the Utilization of Public Accountant Services and Public Accountant Firm in Financial Services Activities.

a. Audit Committee Charter

The Audit Committee maintains an Audit Committee Charter which regulates matters relating to the performance of duties and responsibilities and authority, composition and organizational structure and requirements of membership, procedures and working procedures as well as working hours, conduct of meetings and reporting, complaint handling/reporting regarding alleged violations related to financial reporting, term of office and fees. The Audit Committee Charter will be reviewed periodically or if it is deemed necessary to review and evaluate its adequacy by the Board of Commissioners in order that the function of the Audit Committee can be performed at an optimal level in accordance with prevailing laws and regulations. The latest Audit Committee Charter is reviewed and updated on 28 February 2018 and has been uploaded on the Bank's website.

b. Structure and Membership of Audit Committee

- Membership of the Audit Committee shall consist of at least 1 (one) Independent Commissioner who is also a Chairman, 1 (one) Independent Party with expertise in finance or accounting, and 1 (one) Independent Party having expertise in the field of law or banking.
- Independent Commissioners and Independent Parties who are members of the audit committee shall be at least 51% (fifty one percent) of the total members of the audit committee.
- Members of the Board of Directors are prohibited from becoming members of the Audit Committee.
- A former member of the Board of Directors of the Bank, former Executive Officer of the Bank or a party with a relationship with the Bank that may affect the ability to act independently, may not

independen, tidak dapat menjadi Pihak Independen pada Bank yang bersangkutan, sebelum menjalani masa tunggu (*cooling off*) paling singkat 6 (enam) bulan. Ketentuan masa tunggu (*cooling off*) untuk menjadi Pihak Independen tidak berlaku bagi mantan anggota Direksi Bank atau mantan Pejabat Eksekutif yang bertugas hanya melakukan fungsi pengawasan paling singkat 6 (enam) bulan.

- Anggota Komite Audit wajib memiliki integritas yang tinggi, kemampuan, pengetahuan, pengalaman sesuai dengan bidang pekerjaannya, mampu berkomunikasi, akhlak, dan moral yang baik. Bank harus meneliti kebenaran seluruh dokumen/data pendukung pemenuhan persyaratan Pihak Independen, antara lain surat pernyataan pribadi mengenai integritas Pihak Independen.
- Wajib memahami laporan keuangan, bisnis perusahaan khususnya yang terkait dengan layanan jasa atau kegiatan usaha Emiten atau Perusahaan Publik, proses audit, manajemen risiko, dan peraturan perundang-undangan di bidang Pasar Modal serta peraturan perundang-undangan terkait lainnya.
- Wajib mematuhi kode etik Komite Audit yang ditetapkan oleh Emiten atau Perusahaan Publik.
- Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
- Ketua Komite hanya dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 1 (satu) komite lain pada Bank yang sama.
- Rangkap jabatan Pihak Independen sebagai Pihak Independen anggota komite lain pada Bank yang sama, Bank lain, dan/atau perusahaan lain sepanjang memenuhi seluruh kompetensi yang dipersyaratkan, memenuhi kriteria independensi, mampu menjaga rahasia Bank, memperhatikan kode etik yang berlaku, dan tidak mengabaikan pelaksanaan tugas dan tanggung jawabnya.

Berdasarkan Surat Dewan Komisaris No.29.01/M.KOM/VI/2018 tertanggal 29 Juni 2018 dan Surat Keputusan Direksi No.29.31/S.Kep-Dir-HCD/JTRUST/VI/2018 tertanggal 29 Juni 2018, struktur dan keanggotaan Komite Audit sebagai berikut:

- 1) Mahdi Mahmudy (Komisaris Independen): Ketua/Anggota
- 2) Martinus Rosadi Nugroho (Pihak Independen): Sekretaris/Anggota
- 3) Amalia Setyanti Lestari (Pihak Independen): Anggota
- 4) Kwik Ing Hie (Komisaris Independen): Anggota

serve as an Independent Party in the Bank, before a cooling off period of 6 (six) months. The cooling off period to become an Independent Party shall not apply to former members of the Board of Directors of the Bank or former Executive Officer in charge of performing only a supervisory function for at least 6 (six) months.

- Audit Committee members must have high integrity, ability, knowledge, experience in accordance with their field of work, ability to communicate, good morale. The Bank shall examine the accuracy of all documents/data supporting the fulfillment of the requirements of the Independent Party, including a personal statement concerning the integrity of the Independent Party.
- It is compulsory to understand the financial statements, company business especially related to the services or business activities of the Issuer or Public Company, audit process, risk management, and capital market laws and regulations as well as other related legislation.
- It is compulsory to comply with the Code of Conduct of the Audit Committee stipulated by the Issuer or Public Company.
- Members are willing to improve competence continuously through education and training.
- The Chairman of the Committee may only concurrently serve as Chairman of the Committee at a maximum of another 1 (one) of committee of the same Bank.
- Multiple positions of Independent Party as Independent Party members of other committees of the same Bank, other Banks and/or other companies as long as they meet all required competencies, shall meet the criteria of independence, shall be able to keep the Bank's confidentiality, shall observe the applicable code of ethics, and shall not neglect the conduct of duties and responsibilities.

Based on the Letter of the Board of Commissioners No. 29.01/M.KOM/VI/2018 dated 29 June 2018 and Directors Decree No. 29.31/S.Kep-Dir-HCD/JTUST/NI/2018 dated 29 June 2018, and membership of the Audit Committee as follows:

- 1) Mahdi Mahmudy (Independent Commissioner): Member/Chairman
- 2) Martinus Rosadi Nugroho (Independent Party): Secretary/Member
- 3) Amalia Setyanti Lestari (Independent Party): Member
- 4) Kwik Ing Hie (Independent Commissioner): Member

Sebagaimana dinyatakan di atas, per 31 Desember 2018 Komite Audit diketuai oleh seorang Komisaris Independen dengan anggotanya terdiri dari:

- 1) 2 (dua) orang Komisaris Independen (termasuk 1 orang sebagai ketua)
- 2) 1 (satu) orang Pihak Independen yang ahli dalam bidang akuntansi dan keuangan
- 3) 1 (satu) orang Pihak Independen yang ahli di bidang hukum bisnis dan perbankan

Setiap Komisaris Independen yang menjadi Ketua dan anggota Komite Audit telah efektif dinyatakan lulus uji kelayakan dan kepatutan oleh OJK. Pengangkatan nama-nama Ketua dan anggota Komite Audit sebagaimana dimaksud di atas telah memenuhi kriteria yang ditetapkan dalam Peraturan OJK.

Sepanjang tahun 2018, jumlah Komisaris Independen dan Pihak Independen yang menjadi anggota Komite Audit berjumlah lebih dari 51% (lima puluh satu persen) dari jumlah keseluruhan anggota Komite Audit.

Masa Tugas/Jabatan Anggota Komite Audit

Masa tugas/jabatan anggota Komite Audit tidak boleh lebih lama dari masa jabatan Dewan Komisaris sebagaimana diatur dalam Anggaran Dasar dan dapat dipilih kembali hanya untuk 1 (satu) periode berikutnya.

Masa tugas/jabatan anggota Komite Audit per 31 Desember 2018 yaitu:

No	Nama Name	Posisi di Komite Position in Committee	Masa Tugas/Jabatan Term of Office	
			Tanggal efektif Effective Date	Akhir Masa Tugas/ Jabatan End of Term of Office
1.	Mahdi Mahmudy Komisaris Independen Independent Commissioner	Ketua/Anggota Chairman/Member	21 November 2016 November 21, 2016	30 Juni 2019 June 30, 2019
2.	Kwik Ing Hie Komisaris Independen Independent Commissioner	Anggota Member	21 November 2016 November 21, 2016	30 Juni 2019 June 30, 2019
3.	Amalia Setyanti Lestari Pihak Independen Independent Party	Anggota Member	11 Januari 2016 January 11, 2016	11 Januari 2019 January 11, 2016
4.	Martinus Rosadi Nugroho Pihak Independen Independent Party	Sekretaris/Anggota Secretary/Member	25 Januari 2017 January 25, 2017	25 Januari 2020 January 25, 2020

As stated above, as of December 31, 2018, the Audit Committee is chaired by an Independent Commissioner with members consisting of:

- 1) 2 (two) Independent Commissioners (including 1 person as chairman)
- 2) 1 (one) Independent Party who is expert in accounting and finance
- 3) 1 (one) Independent Party who is expert in business and banking law

Each Commissioner who becomes Chairman and member of the Audit Committee has effectively passed the feasibility and proper test by OJK. The appointment of the names of the Chairman and members of the Audit Committee as mentioned above meets the criteria set out in the OJK Rules.

Throughout 2018, the number of Independent Commissioners and Independent Members who are members of the Audit Committee amount to more than 51% (fifty one percent) of the total members of the Audit Committee.

Term of Office of Audit Committee Members

The term of office of the members of the Audit Committee shall not be longer than the term of office of the Board of Commissioners as stipulated in the Articles of Association and may be re-elected for only one (1) subsequent period.

Term of office of Audit Committee members as of December 31, 2018 is as follows:

c. Riwayat Pendidikan dan Pengalaman Kerja Anggota Komite Audit

Riwayat pendidikan dan pengalaman kerja anggota Komite Audit adalah sebagai berikut:

- **Mahdi Mahmudy**, Anggota/Ketua Komite Audit (menjabat sebagai anggota sejak 21 November 2016 dan menjabat sebagai Ketua sejak 29 Juni 2018)

Warga Negara Indonesia, 61 Tahun. Meraih gelar Sarjana Ekonomi di bidang Manajemen Finansial dari Fakultas Ekonomi Universitas Indonesia pada tahun 1984. Kemudian beliau meraih gelar Master di bidang Kebijakan Moneter dari University of Illinois pada tahun 1992, dan gelar Doktor di bidang Manajemen Strategik dari Universitas Indonesia pada tahun 2011. Beliau mulai berkarir di Bank Indonesia pada tahun 1986 dan memiliki pengalaman kerja 30 tahun di industri perbankan. Pengalaman kerja terakhir adalah sebagai Executive Director pada Bank Indonesia di Departemen Regional Area Kalimantan.

Melalui RUPST tanggal 30 Juni 2016 diangkat menjadi Komisaris Independen di PT Bank JTrust Indonesia Tbk hingga sekarang. Sejak tanggal 21 November 2016 hingga saat ini, beliau juga menjabat anggota Komite Pemantau Risiko, anggota Komite Audit, dan Ketua Komite Nominasi dan Remunerasi.

- **Kwik Ing Hie**, Anggota Komite Audit
Warga Negara Indonesia, 56 tahun. Meraih gelar Master of Business Administration dari Stanford University pada 1991, dan gelar Bachelor of Science in Computer Engineering dari Syracuse University pada 1986. Memiliki pengalaman 28 tahun di industri keuangan dan konsultasi. Sejak 1999 hingga 2006, beliau memimpin perusahaan investasi miliknya yang fokus kepada merger, akuisisi, dan investasi pinjaman darurat. Beliau pernah menjabat sebagai Presiden Direktur PT Affinity Equity Partners Indonesia dari Oktober 2009 hingga Juni 2014 dan sebagai Presiden Direktur PT Morgan Stanley Asia Indonesia dari 2006 hingga 2009. Beliau juga sebelumnya menjabat sebagai Komisaris MPM sejak 2010, dan juga menjabat sebagai anggota Komite GCG serta Ketua Komite Nominasi dan Remunerasi (KNR) MPM sejak 2013. Saat ini menjabat sebagai Managing Partner di Sternbridge Partner sejak 2015.

Melalui RUPST tanggal 30 Juni 2016 diangkat menjadi Komisaris Independen di PT Bank JTrust Indonesia Tbk hingga sekarang. Sejak

C. Background of Education and Work Experience of Audit Committee Members

Education background and experiences of the member of Audit Committee are as follow:

- **Mahdi Mahmudy**, Member/Chairman of Audit Committee (has become a member since November 21, 2016 and became a Chairman since June 29, 2018).

Indonesian citizen, 61 years old. Obtained Bachelor degree in Economic minor in Financial Management from Economic Department at University of Indonesia in 1984. Since then, he obtained Masters degree in Monetary Policy from University of Illinois in 1992, and obtained Doctorate degree in Strategic Management from University of Indonesia in 2011. He started his career at Bank of Indonesia in 1986 and had 30-year of work experience in banking industry. His last working experience was as Executive Director of Bank of Indonesia in Department of Regional Area Kalimantan.

Through AGMS on June 30, 2016, he was appointed as Independent Commissioner in PT Bank JTrust Indonesia Tbk up until now. Since November 21, 2016 up until now, he also become the member of Risk Supervising Committee, member of Audit Committee, and Chairman of Nomination and Remuneration Committee.

- **Kwik Ing Hie**, Member of Audit Committee
Indonesian citizen, 56 years old. Obtained Master degree in Business Administration from Stanford University in 1991, and Bachelor of Science in Computer Engineering from Syracuse University in 1986. He has 28-year working experience in financial industry and consultation. From 1999 to 2009, he led his own investment company that focused on merger, acquisition, and emergency loan investment. He also became President Director of PT Affinity Equity Partners Indonesia from October 2009 to June 2014 and as President Director of PT Morgan Stanley Asia Indonesia from 2006 to 2009. He previously also became Commissioner for MPM since 2010, and became the member of GCG Committee and Chairman of Nomination and Remuneration Committee MPM since 2013. Currently he become Managing Partner at Sternbridge Partner since 2015.

Through AGMS on June 30, 2016 he was appointed as Independent Commissioner at PT Bank JTrust Indonesia Tbk until now. Since November 21, 2016

tanggal 21 November 2016 hingga saat ini, beliau juga menjabat sebagai anggota Komite Audit dan Ketua Komite Pemantau Risiko.

- **Amalia Setyanti Lestari**, Anggota Komite Audit
Warga Negara Indonesia, 55 tahun. Meraih gelar Sarjana Ekonomi, jurusan akuntansi, dari Universitas Indonesia pada tahun 1988. Memiliki 10 tahun pengalaman kerja di dunia konsultasi dan 16 tahun di dunia perbankan. Sebagai Head of Internal Audit dan Audit Manager for Corporate Banking & Head Office function (2007-2009), sebagai Head of Compliance pada PT Bank Rabobank International Indonesia (2010-2013) dan sebagai TS Compliance dan Money Laundering Reporting Officer pada JP Morgan Chase Bank & Co (2013-2015). Saat ini menjabat sebagai anggota independen Komite Audit dan sebagai anggota independen Komite Pemantau Risiko & Compliance pada PT Bank Rabobank International Indonesia.

Sesuai Surat Dewan Komisaris No.11.01/S-KOM/JTRUST/I/2016 tertanggal 11 Januari 2016 dan Surat Keputusan Direksi No.11.09/S.Kep-Dir-HCD/JTrust/I/2016 tertanggal 11 Januari 2016, serta perubahan terakhir sesuai Surat Dewan Komisaris No.29.01/M.KOM/VI/2018 tertanggal 29 Juni 2018 dan Surat Keputusan Direksi No.29.31/S.Kep-Dir-HCD/JTRUST/VI/2018 tertanggal 29 Juni 2018 menduduki posisi sebagai anggota independen Komite Audit dan merangkap sebagai anggota independen dan sekretaris Komite Pemantau Risiko PT Bank JTrust Indonesia Tbk.

- **Martinus Rosadi Nugroho**, Anggota merangkap Sekretaris Komite Audit
Warga Negara Indonesia, 28 tahun. Meraih gelar Sarjana Ekonomi, jurusan akuntansi, dari Universitas Indonesia pada tahun 2013. Memiliki pengalaman 1 tahun di industri *Fast Moving Consumer Goods* dan 3 tahun di dunia audit dan perpajakan. Dengan posisi terakhir sebagai Area Sales Manager pada PT Arta Boga Cemerlang (2013) dan Senior Auditor pada KAP Ratna Widjaja (2014-2016).

Sesuai Surat Dewan Komisaris No.25.01/S.KOM/JTRUST/I/2017 tertanggal 25 Januari 2017, dan Surat Keputusan Direksi No.25.04/S.Kep-Dir-HCD/JTrust/I/2017 tertanggal 25 Januari 2017, serta perubahan terakhir sesuai Surat Dewan Komisaris No.29.01/M.KOM/VI/2018 tertanggal 29 Juni 2018 dan Surat Keputusan Direksi No.29.31/S.Kep-Dir-HCD/JTRUST/VI/2018 tertanggal 29 Juni

until now, he also become the member of Audit Committee and Chairman of Risk Supervision Committee.

- **Amalia Setyanti Lestari**, Member of Audit Committee
Indonesian citizen, 55 years old. She obtained her Bachelor of Economy, majoring accounting, from University of Indonesia in 1988. She has 10 years of working experience in consulting and 16 years in banking. As the Head of Internal Audit and Audit Manager for Corporate Banking & Head Office function (2007-2009), as the Head of Compliance for PT Bank Rabobank International Indonesia (2010-2013) and as TS Compliance and Money Laundering Reporting Officer for JP Morgan Chase Bank & Co (2013-2015). Currently working as independent member of Audit Committee and as independent member of Risk and Compliance Supervision Committee for PT Bank Rabobank International Indonesia.

Based on the Letter of the Board of Commissioners No. 11.01/S-KOM/JTRUST/I/2016 dated on January 11, 2016 and Decree of the Board of Directors No. 11.09/S.Kep-Dir-HDC/JTrust/I/2016 dated on 11 January 2016, as well as the amendment of the Letter of the Board of Commissioners No. 29.01/M.KOM/VI/2018 dated June 29, 2018 and Decree of the Board of Directors No. 29.31/S.Kep-Dir-HDC/JTRUST/VI/2018 dated June 29, 2018, she posits as independent member of Audit Committee and also as independent member and secretary of Risk Supervision Committee of PT Bank JTrust Indonesia Tbk.

- **Martinus Rosadi Nugroho**, member and secretary of Audit Committee
Indonesian citizen, 28 years old. Obtained his Bachelor of Economy, majoring accounting, from University of Indonesia in 2013. He has one year of working experience in Fast Moving Consumer Goods industry and three year in audit and taxing industry. His last position was Area Sales Manager for PT Arta Boga Cemerlang (2013) and Senior Auditor for KAP Ratna Widjaja (2014-2016).

Based on Letter of the Board of Commissioners No. 25.01/S.KOM/JTRUST/I/2017 dated January 25, 2017, and Decree of the Board of Directors No. 25.04/S.Kep-Dir-HDC/JTrust/I/2017 dated January 25, 2017, as well as the latest amendment according to the Letter of the Board of Commissioners No. 29.01/M.KOM/VI/2018 dated June 29, 2018 and Decree of the Board of Directors No. 29.31/S.Kep-Dir-HCD/JTRUST/VI/2018 dated

2018 menduduki posisi sebagai anggota independen dan Sekretaris Komite Audit dan merangkap sebagai anggota independen Komite Pemantau Risiko PT Bank JTrust Indonesia Tbk.

d. Independensi Anggota Komite Audit

Selama tahun 2018, seluruh anggota independen pada Komite Audit telah memenuhi persyaratan independensi sebagai berikut:

- 1) Seluruh anggota independen pada Komite Audit tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak independen.
- 2) Bukan merupakan orang dalam Kantor Akuntan Publik, Kantor Konsultan Hukum, Kantor Jasa Penilai Publik atau pihak lain yang memberi jasa asuransi, jasa non-asuransi, jasa penilai dan/atau jasa konsultasi lain kepada J Trust Bank dalam 6 (enam) bulan terakhir.
- 3) Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan J Trust Bank dalam 6 (enam) bulan terakhir, kecuali Komisaris Independen.
- 4) Tidak mempunyai saham baik secara langsung maupun tidak langsung pada J Trust Bank.
- 5) Tidak memiliki hubungan afiliasi dengan J Trust Bank, Dewan Komisaris, Direksi atau Pemegang Saham Utama J Trust Bank.
- 6) Tidak memiliki hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha J Trust Bank.

e. Tugas dan Tanggung Jawab Komite Audit

Komite Audit bertugas untuk memberikan pendapat profesional yang independen kepada Dewan Komisaris terhadap laporan-laporan atau hal-hal yang disampaikan oleh Direksi kepada Dewan Komisaris, membantu Dewan Komisaris atas tanggung jawab pengawasannya, termasuk mengidentifikasi hal-hal yang memerlukan perhatian Dewan Komisaris, dan mendukung tugas-tugas lain yang berkaitan dengan tugas Dewan Komisaris, antara lain:

- 1) Membuat rincian kegiatan tahunan yang disetujui oleh Dewan Komisaris.
- 2) Melakukan penelaahan atas informasi keuangan yang akan dikeluarkan perusahaan kepada publik dan/atau pihak otoritas seperti laporan keuangan, proyeksi dan laporan lainnya terkait dengan informasi keuangan perusahaan.

June 29, 2018 he was appointed as independent member and secretary of Audit Committee as well as independent member of Risk Supervision Committee PT Bank JTrust Indonesia Tbk.

d. Independence of Audit Committee Members

During 2018, all independent members of the Audit Committee have met the following independence requirements:

- 1) All independent members of the Audit Committee have no financial relationship, management relationship, share ownership, and/or family relationships with members of the BoC, BoD and/or Controlling Shareholders or any relationship with the Bank, which may affect the ability to act independently.
- 2) They are not insiders in a Public Accounting Firm, Law Firm, Public Appraisal Office or any other party providing insurance, non-life insurance services, assessment services and/or other consulting services to J Trust Bank in the last 6 (six) months.
- 3) They are not working or having the authority and responsibility to plan, lead, control or supervise the activities of J Trust Bank in the last 6 (six) months, except Independent Commissioners.
- 4) They do not own shares directly or indirectly in J Trust Bank.
- 5) They have no affiliated relationship with J Trust Bank, Board of Commissioners, Board of Directors or Major Shareholder of J Trust Bank.
- 6) They have no direct or indirect business relationship relating to the business activities of J Trust Bank.

e. Roles and Responsibilities of Audit Committee

The Audit Committee is responsible for providing independent professional opinion to the Board of Commissioners on reports or issues submitted by the Board of Directors to the Board of Commissioners, assisting the Board of Commissioners for its oversight responsibilities, including identifying matters requiring the attention of the Board of Commissioners, and supporting the duties or other tasks related to the duties of the Board of Commissioners, among others:

- 1) Prepare details of annual activities approved by the Board of Commissioners.
- 2) Review the financial information that will be issued by the Company to the public and/or the authority such as financial reports, projections and other reports related to the Company's financial information.

- 3) Melakukan penelaahan atas ketaatan terhadap peraturan perundang-undangan yang berhubungan dengan kegiatan perusahaan.
 - 4) Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan Akuntan atas jasa yang diberikan.
 - 5) Memberikan rekomendasi mengenai penunjukan Kantor Akuntan Publik kepada Dewan Komisaris untuk disampaikan kepada Rapat Umum Pemegang Saham dan menyampaikan kepada Otoritas Jasa Keuangan (OJK) dalam bentuk laporan berkala setiap tahun paling lama 10 (sepuluh) hari kerja setelah penunjukan Akuntan Publik dan/atau Kantor Akuntan Publik.
 - 6) Melakukan evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh Akuntan Publik dan/atau Kantor Akuntan Publik dan menyampaikan kepada Otoritas Jasa Keuangan (OJK) dalam bentuk laporan berkala setiap tahun paling lama 6 (enam) bulan setelah tahun buku berakhir.
 - 7) Memastikan bahwa semua risiko dan kontrol diperhatikan dalam laporan Audit Internal dan Auditor Eksternal, sehingga manajemen senantiasa menjalankan praktik perbankan yang sehat sesuai dengan prinsip kehati-hatian.
 - 8) Melakukan penelaahan atas pelaksanaan pemeriksaan oleh auditor internal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor internal.
 - 9) Menelaah pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Perusahaan.
 - 10) Menelaah dan memberikan saran kepada Dewan Komisaris terkait dengan adanya potensi benturan kepentingan Perusahaan.
 - 11) Menjaga kerahasiaan dokumen, data dan informasi perusahaan.
- 3) Review the compliance with laws and regulations relating to the activities of the Company.
 - 4) Render an independent opinion in the event of differences of opinion between management and Accountant for services provided.
 - 5) Provide recommendation on the appointment of Public Accountant Office to the Board of Commissioners to be submitted to the General Meeting of Shareholders and submit to the Financial Services Authority (OJK) in the form of periodic report every 10 (ten) business days after the appointment of Public Accountant and/or Public Accounting Firm.
 - 6) Evaluate the conduct of audit services for annual financial information by Public Accountant and/or Public Accounting Firm and submit to the Financial Services Authority (OJK) in the form of periodic report every year no later than 6 (six) months after the end of the financial year.
 - 7) Ensure that all risks and controls are addressed in the Internal Audit and External Auditor reports, so that management continues to practice sound banking practices in accordance with prudential principles.
 - 8) Review the conduct of audits by internal auditors and oversee the implementation of follow-up by the Board of Directors on the findings of internal auditors.
 - 9) Review complaints relating to the Company's accounting and reporting process.
 - 10) Review and advise the Board of Commissioners regarding the potential conflict of interest of the Company.
 - 11) Maintain the confidentiality of documents, data and company information.

f. Kebijakan dan Pelaksanaan Rapat Komite Audit

- 1) Setiap rapat Komite Audit dipimpin oleh Ketua Komite Audit yang merupakan Komisaris Independen Bank.
- 2) Rapat Komite Audit selalu dihadiri oleh lebih dari 51% dari jumlah anggota Komite Audit yang anggotanya terdiri dari Komisaris Independen serta pihak independen.
- 3) Keputusan Rapat Komite dilakukan berdasarkan musyawarah untuk mencapai mufakat. Jika tidak mencapai musyawarah untuk mufakat, maka pengambilan keputusan dilakukan berdasarkan pemungutan suara berdasarkan suara setuju 2/3 (dua per tiga) anggota Komite yang hadir dalam rapat.

f. Policy and Conduct of Audit Committee Meeting

- 1) Each Audit Committee Meeting is led by Audit Committee Chairman who also serves as the Independent Commissioner of the Bank
- 2) Audit Committee Meetings are always attended by more than 51% of Audit Committee members whose members consist of Commissioners and Independent Commissioners and 2 independent parties.
- 3) Decisions of the Committee Meetings shall be based on deliberations to reach consensus. If it does not reach a consensus, then the decision shall be made by vote based on the voting agreed by 2/3 (two thirds) of the Committee members present at the meeting.

- 4) Hasil rapat Komite Audit dituangkan dalam risalah rapat dan didokumentasikan secara baik.
- 5) Perbedaan pendapat (*dissenting opinions*) yang terjadi dalam rapat Komite wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat tersebut.
- 6) Sepanjang tahun 2018, Komite Audit telah menyelenggarakan 9 kali rapat dengan melibatkan Satuan Kerja Audit Interen, unit kerja lainnya (jika dipandang perlu), seperti: unit *Anti Fraud*, dan pihak auditor eksternal (KAP).

- 4) The results of Audit Committee meetings shall be set forth in minutes of meetings and properly documented.
- 5) The dissenting opinions that occur in Committee meetings shall be clearly stated in the minutes of the meeting and the reasons for such dissent.
- 6) Throughout 2018, the Audit Committee has held 9 meetings involving the Internal Audit Working Unit, other work units (if deemed necessary), such as the Anti Fraud Unit, and the external auditor (KAP).

Frekuensi tingkat kehadiran rapat setiap anggota Komite Audit sebagai berikut:

Frequency of meeting attendance of each Committee Audit member:

Nama Name	Periode Jabatan Term of Office	Jumlah Rapat Komite Audit Number of the Audit Committee Meetings	Jumlah Kehadiran Attendance	% Kehadiran Attendance
Benny Luhur Komisaris Independen, Ketua *) Independent Commissioner, Chairman	1 Januari s/d 28 Juni 2018 January 1 until June 28, 2018	9	3	33%
Mahdi Mahmudy Komisaris Independen, Ketua & Anggota **) Independent Commissioner, Chairman & Member **)	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	9	9	100%
Kwik Ing Hie Komisaris Independen, Anggota Independent Commissioner, Member	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	9	9	100%
Martinus Rosadi Nugroho Pihak Independen, Anggota/ Sekretaris Independent Party, Member/ Secretary	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	9	9	100%
Amalia Setyanti Lestari Pihak Independen, Anggota Independent Party, Member	1 Januari s/d 31 Desember 2018 January 1 until December 31, 2018	9	9	100%

*) Sejak tanggal 28 Juni 2018 sudah tidak menjabat sebagai anggota Dewan Komisaris.
Since June 28, 2018 no longer become the member of the Board of Commissioners

**) Sejak tanggal 29 Juni 2018 menjabat sebagai Ketua Komite Audit.
Since June 29, 2018 no longer become the Chairman of Audit Committee

g. Pendidikan dan/atau Pelatihan Anggota Komite Audit

Untuk menunjang pelaksanaan tugas dan tanggung jawab anggota Komite Audit, selama tahun 2018 anggota Komite Audit PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pendidikan/pelatihan, *workshop*, konferensi, seminar, antara lain:

g. Education and/or Training of Audit Committee Members

To support the execution of duties and responsibilities of Audit Committee members, during 2018 members of the Audit Committee of PT Bank JTrust Indonesia Tbk have attended various education/training programs, workshops, conferences, seminars, among others:

No.	Nama Name	Periode Menjabat Serving Period	Pelatihan, Workshop, Konferensi, Seminar Training, Workshop, Conference, Seminar	Penyelenggara Organizer	Tempat & Waktu Venue & Time
1	Martinus Rosadi Nugroho	01 Januari s/d 31 Desember 2018 01 January s/d 31 December 2018	<ul style="list-style-type: none"> Workshop Update PSAK 2018 Diskusi Panel dengan tema: Tanggung Jawab Komite Audit Terhadap Fraud Laporan Keuangan Panel discussion on the theme: Responsibility of Audit Committee Concerning Fraud in Financial Statements 	Ikatan Komite Audit Indonesia Ikatan Komite Audit Indonesia	Jakarta/29 Maret 2018 Jakarta/29 March 2018 Jakarta/4 Juni 2018 Jakarta/4 June 2018
2	Amalia Setyanti Lestari	01 Januari s/d 31 Desember 2018 01 January s/d 31 December 2018	<ul style="list-style-type: none"> APU PPT Workshop Update PSAK 2018 Seminar Fintech Outlook 2018 Diskusi Panel dengan tema: Tanggung Jawab Komite Audit Terhadap Fraud Laporan Keuangan Panel discussion on the theme: Responsibility of Audit Committee Concerning Fraud in Financial Statements Diskusi Panel dengan tema: Efektivitas Oversight Dewan Komisaris dan Komite Audit: Pembelajaran dari PT SNP Finance Panel discussion on the theme: Effectiveness of Oversight by Board of Commissioners and Audit Committee: Lessons Learned from PT SNP Finance 	Internal Ikatan Komite Audit Indonesia Bizcom.id Ikatan Komite Audit Indonesia Ikatan Komite Audit Indonesia	Jakarta/1 Maret 2018 Jakarta/1 March 2018 Jakarta/29 Maret 2018 Jakarta/29 March 2018 Jakarta/26 April 2018 Jakarta/26 April 2018 Jakarta/4 Juni 2018 Jakarta/4 June 2018 Jakarta/14 November 2018 Jakarta/14 November 2018

h. Program Kerja dan Realisasi Komite Audit

Program kerja Komite Audit sepanjang tahun 2018 sebagai berikut:

1. Memantau pencapaian rencana kerja SKAI sepanjang tahun 2018;
2. Memantau tindak lanjut manajemen atas temuan audit (internal dan eksternal) yang bersifat signifikan terhadap penerapan *internal control system*.

h. Work Program and Realization of Audit Committee

Audit Committee work program throughout 2018 is as follows:

1. Monitor the achievement of the SKAI work plan in 2018;
2. Monitor management follow-up on audit findings (internal and external) that are significant to the implementation of internal control system.

3. Memantau penyusunan laporan keuangan Bank sesuai dengan standar yang berlaku dan memberikan tanggapan yang dipandang perlu.
4. Memberikan evaluasi atas penggunaan jasa kantor akuntan publik yang melakukan audit atas laporan keuangan Bank.
5. Memberikan rekomendasi penunjukkan kantor akuntan publik yang akan melakukan audit atas laporan keuangan Bank.
6. Ikut berpartisipasi dalam rapat koordinasi Dewan Komisaris dan Direksi dan memberikan masukan yang dipandang perlu.

3. Monitor the preparation of the Bank's financial statements in accordance with applicable standards and provide the necessary responses.
4. Provide evaluation on the commission for public accounting services conducting audit on the Bank's financial report.
5. Provide recommendations on the appointment of a public accounting firm that will audit the Bank's financial statements.
6. Participate in the Board of Commissioners and Directors' coordination meetings and provide the necessary inputs.

Realisasi Program Kerja Komite Audit sepanjang tahun 2018 sebagai berikut:

Realization of Audit Committee Work Program in 2018 is as follows:

No.	Realisasi Program Kerja Work Program Realization
1	Mengadakan rapat dan diskusi dengan SKAI untuk memonitor <i>progress</i> kerja SKAI serta pencapaiannya; memonitor tindak lanjut atas hasil audit dan mendiskusikan hasil temuan yang signifikan Conduct meetings and discussion with SKAI to monitor SKAI's working progress as well as achievement; monitor the follow up on audit result and discuss significant findings.
2	Memonitor dan berdiskusi dengan SKAI dan unit-unit terkait tentang pinjaman-pinjaman yang berpotensi menjadi NPL Monitor and discuss with SKAI and related units on loans that has high NPL potential
3	Melakukan <i>review</i> atas Rencana Kerja Tahunan SKAI untuk tahun 2018 Review on SKAI's working plan for 2018
4	Memonitor <i>progress</i> dari pelaksanaan audit KAP atas laporan keuangan Bank untuk tahun buku 2018 Monitor the progress for KAP audit on the Bank's financial report for 2018 financial year
5	Melakukan <i>review</i> dan diskusi atas hasil <i>draft final</i> laporan keuangan Bank yang telah diaudit oleh KAP untuk tahun buku 2017 Review and discuss the final draft of the Bank's financial report that has been audited by KAP for 2017 financial year
6	Melakukan <i>review</i> dan diskusi atas <i>management letter</i> yang telah dikeluarkan oleh KAP untuk tahun buku 2017 Review and discuss management letter published by KAP for 2017 financial year
7	Berdiskusi dengan SKAI tentang progress audit OJK serta temuan-temuan yang bersifat signifikan Discuss with SKAI on OJK audit progress as well as the significant findings
8	Memonitor <i>progress</i> penyelesaian tindak lanjut manajemen atas temuan OJK Monitor the progress for management's solution follow up on OJK's findings
9	Melakukan <i>review</i> dan diskusi tentang laporan keuangan publikasi Bank Review and discuss the Bank's published financial report
10	Melakukan <i>review</i> dan diskusi tentang penyusunan laporan tahunan Bank Review and discuss the formulation of the Bank's annual report
11	Ikut berpartisipasi dalam rapat koordinasi Dewan Komisaris dan Direksi Participate on coordination meeting of the board of Commissioners and Directors
12	Memberikan rekomendasi pemilihan/mempertahankan dan memberhentikan auditor eksternal/KAP kepada Dewan Komisaris Recommend the selection/sustain and dismiss external auditor/KAP to the Board of Commissioners
13	Memberikan evaluasi terhadap kinerja kantor akuntan publik yang ditunjuk untuk melakukan audit atas laporan keuangan Bank tahun 2017 Provide evaluation on appointed public accounting office's performance to conduct audit on the Bank's financial report for 2017
14	Menyusun rencana kerja (<i>Work Plan</i>) Komite Audit tahun 2018 Formulate work plan for Audit committee for 2018

3.2 Komite Pemantau Risiko (*Risk Monitoring Committee*)

Komite Pemantau Risiko merupakan komite yang dibentuk untuk membantu Dewan Komisaris memenuhi tugas dan tanggung jawabnya dengan melakukan evaluasi atas penerapan kebijakan manajemen risiko oleh Bank yang antara lain mencakup *me-review* kesesuaiannya dengan regulasi yang ada, mengevaluasi konsistensi pelaksanaan kebijakan

3.2. Risk Monitoring Committee

The Risk Monitoring Committee is a committee established to assist the Board of Commissioners to fulfill its duties and responsibilities by evaluating the implementation of the Bank's risk management policy which includes reviewing compliance with existing regulations, evaluating the consistency of the implementation of the policy, and monitoring and

tersebut, dan melakukan pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko ("KMR") dan Satuan Kerja Manajemen Risiko ("SKMR") guna memberikan rekomendasi kepada Dewan Komisaris. Pembentukan Komite Pemantau Risiko mengacu pada Peraturan-peraturan yang berlaku sebagai berikut:

1. Peraturan Otoritas Jasa Keuangan No.55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola bagi Bank Umum.
2. Surat Edaran Otoritas Jasa Keuangan No.13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum.

a. Piagam Komite Pemantau Risiko (*Risk Monitoring Committee Charter*)

Komite Pemantau Risiko memiliki Piagam Komite Pemantau Risiko (*Risk Monitoring Committee Charter*) yang mengatur hal-hal terkait dengan pelaksanaan tugas dan tanggung jawab serta kewenangan, komposisi dan struktur organisasi serta persyaratan keanggotaan, tata cara dan prosedur kerja serta waktu kerja, pelaksanaan rapat dan pelaporan, masa tugas dan honorarium. Piagam Komite Pemantau Risiko (*Risk Monitoring Committee Charter*) ini akan ditinjau secara berkala atau apabila dianggap perlu di-review kembali dan dievaluasi kecukupannya oleh Dewan Komisaris agar fungsi Komite Pemantau Risiko dapat dilaksanakan pada tingkat yang optimal sesuai dengan ketentuan perundangan terkait yang berlaku. Piagam Komite Pemantau Risiko (*Risk Monitoring Committee Charter*) yang ada terakhir di-review dan dimutakhirkan pada tanggal 27 Juli 2017 serta telah diunggah dalam situs web Bank.

b. Struktur dan Keanggotaan Komite Pemantau Risiko

- Keanggotaan Komite Pemantau Risiko paling sedikit terdiri dari 1 (satu) orang Komisaris Independen yang merangkap sebagai Ketua, 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang keuangan, dan 1 (satu) orang Pihak Independen yang memiliki keahlian di bidang manajemen risiko.
- Komisaris Independen dan Pihak Independen yang menjadi anggota komite pemantau risiko paling sedikit berjumlah 51% (lima puluh satu persen) dari jumlah anggota komite pemantau risiko.
- Anggota Direksi dilarang menjadi anggota Komite Pemantau Risiko.
- Mantan anggota Direksi Bank, mantan Pejabat Eksekutif Bank atau pihak yang mempunyai hubungan dengan Bank yang dapat

evaluating the implementation of the Risk Management Committee ("KMR") and the Risk Management Business Unit ("SKMR") to provide recommendations to the Board of Commissioners. The establishment of the Risk Monitoring Committee shall refer to the following Regulations:

1. Regulation of the Financial Services Authority No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks.
2. Circular Letter of the Financial Services Authority No.13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Good Corporate Governance for Commercial Banks.

a. Risk Monitoring Committee Charter

The Risk Monitoring Committee maintains a Risk Monitoring Committee Charter which regulates matters related to the performance of duties and responsibilities and authority, composition and organizational structure as well as membership requirements, methods and work procedures as well as working hours, conduct of meetings and reporting, duty and honorarium. The Risk Monitoring Committee Charter will be reviewed periodically or if it is deemed necessary to review and evaluate its adequacy by the Board of Commissioners in order that the Risk Oversight Committee function can be performed at an optimal level in accordance with prevailing laws and regulations. The latest Risk Monitoring Committee Charter is reviewed and updated on July 27, 2017 and has been uploaded on the Bank's website.

b. Structure and Membership of Risk Monitoring Committee

- Membership of the Risk Oversight Committee shall consist of at least 1 (one) Independent Commissioner who is also a Chairman, 1 (one) Independent Party with expertise in finance, and 1 (one) Independent Party with expertise in risk management.
- Independent Commissioners and Independent Parties who are members of the risk monitoring committee shall be at least 51% (fifty percent) of the total members of the risk monitoring committee.
- Members of the Board of Directors are prohibited from becoming members of the Risk Oversight Committee.
- A former member of the Board of Directors of the Bank, former Executive Officer of the Bank or a party with a relationship with

mempengaruhi kemampuan untuk bertindak independen, tidak dapat menjadi Pihak Independen pada Bank yang bersangkutan, sebelum menjalani masa tunggu (*cooling off*) paling singkat 6 (enam) bulan. Ketentuan masa tunggu (*cooling off*) untuk menjadi Pihak Independen tidak berlaku bagi mantan anggota Direksi Bank atau mantan Pejabat Eksekutif yang bertugas hanya melakukan fungsi pengawasan paling singkat 6 (enam) bulan.

- Anggota Komite Pemantau Risiko wajib memiliki integritas yang tinggi, kemampuan, pengetahuan sesuai dengan bidang pekerjaannya, mampu berkomunikasi, akhlak, dan moral yang baik. Bank harus meneliti kebenaran seluruh dokumen/data pendukung pemenuhan persyaratan Pihak Independen, antara lain surat pernyataan pribadi mengenai integritas Pihak Independen.
- Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
- Ketua Komite hanya dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 1 (satu) komite lain pada Bank yang sama.
- Rangkap jabatan Pihak Independen sebagai Pihak Independen anggota komite lain pada Bank yang sama, Bank lain, dan/atau perusahaan lain sepanjang memenuhi seluruh kompetensi yang dipersyaratkan, memenuhi kriteria independensi, mampu menjaga rahasia Bank, memperhatikan kode etik yang berlaku, dan tidak mengabaikan pelaksanaan tugas dan tanggung jawabnya.

Berdasarkan Surat Dewan Komisaris No.29.01/M.KOM/VI/2018 tertanggal 29 Juni 2018 dan Surat Keputusan Direksi No.29.32/S.Kep-Dir-HCD/JTrust/VI/2018 tertanggal 29 Juni 2018, struktur dan keanggotaan Komite Pemantau Risiko adalah sebagai berikut:

1. Kwik Ing Hie (Komisaris Independen): Ketua/Anggota
2. Amalia Setyanti Lestari (Pihak Independen): Sekretaris/Anggota
3. Mahdi Mahmudy (Komisaris Independen): Anggota
4. Nobiru Adachi (Komisaris Utama): Anggota
5. Shigeyoshi Asano (Komisaris): Anggota
6. Martinus Rosadi Nugroho (Pihak Independen): Anggota

the Bank that may affect the ability to act independently, may not be an Independent Party in the Bank, before a cooling off period of 6 (six) months. The cooling off period to become an Independent Party shall not apply to former members of the Board of Directors of the Bank or former Executive Officer in charge of performing only a supervisory function for at least 6 (six) months.

- Members of the Risk Monitoring Committee are required to have high integrity, competence, knowledge, experience in accordance with their field of work, ability to communicate, and good morale. The Bank shall examine the truth of all documents/data supporting the fulfillment of the requirements of the Independent Party, including a personal statement concerning the integrity of the Independent Party.
- Members are willing to increase competence continuously through education and training.
- The Chairman of the Committee may only concurrently serve as Chairman of the Committee at a maximum of another one committee within the same Bank.
- Multiple positions of Independent Party as Independent Party members of other committees of the same Bank, other Banks and/or other companies as long as they meet all required competencies, shall meet the criteria of independence, shall be able to keep the Bank's confidentiality, shall observe the applicable code of ethics, and shall not neglect the implementation duties and responsibilities.

Based on the Letter of the Board of Commissioners No. 29.01/M.KOM/VI/2018 dated 29 June 2018 and the Decree of the Board of Directors No. 29.32/S.Kep-Dir-HCD/JTrust/VI/2018 dated 29 June 2018, the structure and membership The Risk Monitoring Committee is as follows:

1. Kwik Ing Hie (Independent Commissioner): Chairman/Member
2. Amalia Setyanti Lestari (Independent Party): Secretary/Member
3. Mahdi Mahmudy (Independent Commissioner): Member
4. Nobiru Adachi (President Commissioner): Member
5. Shigeyoshi Asano (Commissioner): Member
6. Martinus Rosadi Nugroho (Independent Party): Member

Sebagaimana dinyatakan di atas, per 31 Desember 2018 Komite Pemantau Risiko diketuai oleh seorang Komisaris Independen dengan anggotanya terdiri dari:

- 1 (satu) orang Komisaris Utama
- 1 (satu) orang Komisaris
- 2 (dua) orang Komisaris Independen (termasuk 1 orang sebagai ketua)
- 1 (satu) orang Pihak Independen yang ahli dalam bidang akuntansi dan keuangan
- 1 (satu) orang Pihak Independen yang ahli di bidang hukum bisnis dan perbankan

Setiap Komisaris yang menjadi Ketua dan anggota Komite Pemantau Risiko telah efektif dinyatakan lulus uji kelayakan dan kepatutan oleh OJK. Pengangkatan nama-nama Ketua dan anggota Komite Pemantau Risiko sebagaimana dimaksud di atas telah memenuhi kriteria yang ditetapkan dalam Peraturan OJK.

Sepanjang tahun 2018, jumlah Komisaris Independen dan Pihak Independen yang menjadi anggota Komite Pemantau Risiko berjumlah lebih dari 51% (lima puluh satu perseratus) dari jumlah keseluruhan anggota Komite Pemantau Risiko.

Masa Tugas/Jabatan Anggota Komite Pemantau Risiko

Masa tugas/jabatan anggota Komite Pemantau Risiko tidak boleh lebih lama dari masa jabatan Dewan Komisaris sebagaimana diatur dalam Anggaran Dasar dan dapat dipilih kembali hanya untuk 1 (satu) periode berikutnya.

Masa tugas/jabatan anggota Komite Pemantau Risiko Per 31 Desember 2018 yaitu:

No	Nama Name	Posisi di Komite Position in the Committee	Masa Tugas/Jabatan Term of Duty/Position	
			Tanggal efektif Effective Date	Akhir Masa Tugas/Jabatan The end of Duty/Position
1	Kwik Ing Hie (Komisaris Independen Independent Commissioner)	Ketua Chairman	21 November 2016 November 21, 2016	30 Juni 2019 June 30, 2019
2	Nobiru Adachi (Komisaris Utama President Commissioner)	Anggota Member	26 Mei 2015 May 26, 2015	30 Juni 2020 June 30, 2020
3	Shigeyoshi Asano (Komisaris Commissioner)	Anggota Member	21 November 2016 November 21, 2016	30 Juni 2019 June 30, 2019
4	Mahdi Mahmudy (Komisaris Independen Independent Commissioner)	Anggota Member	21 November 2016 November 21, 2016	30 Juni 2019 June 30, 2019
5	Amalia Setyanti Lestari (Pihak Independen Independent Party)	Sekretaris/Anggota Secretary/Member	11 Januari 2016 January 11, 2016	11 Januari 2019 January 11, 2019
6	Martinus Rosadi Nugroho (Pihak Independen Independent Party)	Anggota Member	25 Januari 2017 January 25, 2017	25 Januari 2020 January 25, 2020

As stated above, as of December 31, 2018, the Risk Oversight Committee is chaired by an Independent Commissioner with members consisting of:

- 1 (one) President Commissioner
- 1 (one) Commissioners
- 2 (two) Independent Commissioners (including 1 person as chairman)
- 1 (one) Independent Party who is expert in accounting and finance
- 1 (one) Independent Party who is expert in business and banking law

Each Commissioner who becomes the Chairman and a member of the Risk Oversight Committee has effectively passed the feasibility and proper test by OJK. The appointment of the names of the Chairman and members of the Risk Oversight Committee as mentioned above meets the criteria set out in the OJK Rules.

Throughout 2018, the number of Independent Commissioners and Independent Members who are members of the Risk Monitoring Committee is totalling more than 51% (fifty one percent) of the total members of the Risk Oversight Committee.

Term of Office of Members of Risk Monitoring Committee

Term of office of members of Risk Monitoring Committee shall be no longer than the term of office of Board of Commissioners as set forth in Articles of Association and may be re-appointed only for the next 1 (one) period.

The term of office of Risk Monitoring Committee members as of December 31, 2018 is as follows:

c. Riwayat Pendidikan dan Pengalaman Kerja Anggota Komite Pemantau Risiko

Riwayat pendidikan dan pengalaman kerja anggota Komite Pemantau Risiko adalah sebagai berikut:

Kwik Ing Hie, Ketua/Anggota Komite Pemantau Risiko (menjabat sebagai Ketua sejak tanggal 29 Juni 2018, dan menjadi anggota sejak 21 November 2016 hingga sekarang)

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

Nobiru Adachi, Anggota Komite Pemantau Risiko Warga Negara Jepang, 59 tahun. Menyelesaikan pendidikan di beberapa universitas yaitu Universitas Tokyo, Fakultas Hukum, tahun 1980; Case Western University, Fakultas Ekonomi, tahun 1983. Pada April 1980, bergabung dengan Departemen Keuangan Jepang dan menjabat berbagai jabatan strategis, yaitu Direktur Kantor Pelayanan Pajak Onomichi pada Juli 1986, Direktur Wakil Menteri Keuangan untuk Urusan Internasional, bagian Sekretariat Menteri pada Juni 1997, Penasehat Hukum di Biro Anggaran, Direktur pada Divisi Riset Biro Internasional pada Juni 2002, Direktur Institut Riset Kebijakan Departemen Keuangan pada Juni 2004, Direktur Jenderal Bea Cukai di Hakodate pada Juni 2005. Pada April 2006, ditunjuk sebagai Officer di Jasdac Securities Exchange, Inc, lalu dipromosikan menjadi Executive Officer pada Juni 2006 dan pada Oktober 2008, menjadi Country Head untuk Jepang di ETF Securities Ltd. Kemudian, menjabat Chairman dan CEO di M & A Solution Japan Co, Ltd pada Oktober 2011. Pada April 2013 masuk sebagai Advisor bagi J Trust. Lalu menjabat sebagai Managing Director J Trust pada Juni 2013.

Posisi selanjutnya adalah menjadi Direktur Perwakilan dan Senior Managing Director yang bertanggung jawab atas Corporate Management Dept. di J Trust dan terakhir pada November 2014 ditunjuk sebagai Komisaris PT Bank MutiaraTbk, yang kemudian ditunjuk sebagai Komisaris Utama PT Bank Mutiara Tbk pada tanggal 30 Desember 2014 yang berubah nama menjadi PT Bank JTrust Indonesia Tbk sejak 29 Mei 2015. Lulus *Fit and Proper Test* pada tanggal 14 April 2015 dan merangkap jabatan sebagai anggota Komite Audit, anggota Komite Pemantau Risiko dan anggota Komite Nominasi dan Remunerasi mulai bulan Mei 2015 hingga saat ini. Sejak tanggal 30 Oktober 2017 dan 29 Juni 2018 masing-masing tidak menjabat lagi sebagai anggota Komite Audit, dan anggota Komite Nominasi dan Remunerasi.

c. Educational Background and Work Experience of Members of Risk Monitoring Committee

The education and work experience of members of the Risk Monitoring Committee are as follow:

Kwik Ing Hie, Chairman/Member of Risk Monitoring Committee (served as the Chairman since June 29, 2018, and became the member since November 21, 2016 until now)

His education background and working experience is similar to what has been explained above.

Nobiru Adachi, Member of Risk Monitoring Committee

Japanese citizen, 59 years old. Obtained education in several universities: University of Tokyo, Faculty of Law, in 1980; Case Western University, Faculty of Economy, 1983. On April 1980, he joined with the Financial Department of Japan and served several strategic position, including Director of Onomichi Tax Service Office on July 1986, Director of Vice Finance Minister for International Affairs, within the Ministerial Secretariat on June 1997, Legal Advisor in Budget Bureau, Director on Research Division of International Bureau on June 2002, Director of Policy Research Institute of Finance Department on June 2004, Director General of Custom in Hakodate on June 2005. On April 2006, appointed as Officer in Jasdac Securities Exchange, Inc, then promoted as Executive Office on June 2006 and on October 2008, became Country Head for Japan in ETF Securities Ltd. Then, served as Chairman and CEO in M & A Solution Japan co, Ltd on October 2011. On April 2013, served as Advisor for J Trust. Then served as Managing Director J Trust on June 2013.

Next position is become Representative Director and Senior Managing Director that responsible on Corporate Management Dept. for JTrust and lastly on November 2014, appointed as the Commissioner of PT Bank Mutiara Tbk, then appointed as President Commissioner of PT Bank Mutiara Tbk on December 30, 2014 that changed its name to PT Bank JTrust Indonesia Tbk since May 29, 2015. Passed fit and proper test on April 14, 2015 and concurrently serve as the member of Audit Committee, member of Risk Monitoring Committee and member of Nomination and Remuneration Committee started on May 2015 until now. Since October 30, 2017 and June 29, 2018 he is no longer served as the member of Audit Committee and the member of nomination and Remuneration Committee.

Shigeyoshi Asano, Anggota Komite Pemantau Risiko

Warga Negara Jepang, 48 Tahun. Meraih gelar Sarjana Teknik dari Institut Teknologi Tokyo pada tahun 1992. Kemudian, beliau meraih gelar Master Teknik dari Institut Teknologi Tokyo pada tahun 1994. Memulai karir di Tokyo Gas Co., Ltd. pada tahun 1994 dan memiliki pengalaman kerja 22 tahun di industry investasi dan bisnis. Pengalaman bekerja terakhir adalah sebagai Komisaris pada PT J Trust Investments Indonesia, Direktur dan Pejabat Eksekutif di J Trust Co., Ltd., Komisaris di PT Group Lease Finance Indonesia, serta Direktur di J Trust Asia PTE. LTD.

Melalui RUPST tanggal 30 Juni 2016 diangkat menjadi Komisaris pada PT Bank JTrust Indonesia Tbk hingga sekarang. Sejak tanggal 21 November 2016 hingga saat ini, beliau juga menjabat sebagai anggota Komite Audit, anggota Komite Pemantau Risiko, dan anggota Komite Nominasi dan Remunerasi. Sejak tanggal 30 Oktober 2017 tidak menjabat lagi sebagai anggota Komite Audit.

Mahdi Mahmudy, Anggota Komite Pemantau Risiko (menjabat sebagai Ketua sejak tanggal 21 November 2016 hingga 29 Juni 2018, dan menjadi anggota sejak 21 November 2016 hingga sekarang)

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

Amalia Setyanti Lestari, Anggota merangkap Sekretaris Komite Pemantau Risiko

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

Martinus Rosadi Nugroho, Anggota Komite Pemantau Risiko

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

d. Independensi Anggota Komite Pemantau Risiko

Selama tahun 2018, seluruh anggota independen pada Komite Pemantau Risiko telah memenuhi persyaratan independensi sebagai berikut:

- 1) Seluruh anggota independen pada Komite Pemantau Risiko tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak independen.

Shigeyoshi Asano, Member of Risk Monitoring Committee

Japanese citizen, 48 years old. Obtained Bachelor of Engineering from Tokyo Institute of Technology in 1992. He obtained Master of Engineering from Tokyo Institute of Technology in 1994. Started his career in Tokyo Gas Co., Ltd. In 1994 and obtained working experiences of 22 years in investment and business industry. The latest working experience is Commissioner for PT JTrust Investment Indonesia, Director and Executive Position for JTrust Co., Ltd., Commissioner for JTrust Co., Ltd., Commissioner for PT Group Lease Finance Indonesia, as well as Director for JTrust Asia PTE. LTD.

Through AGMS on June 30, 2016 he was appointed as Commissioner for PT Bank JTrust Indonesia Tbk until now. Since November 21, 2016 until now, he also serves as the member of Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee. Since 30 October 2017, he is no longer serve as the member of Audit Committee.

Mahdi Mahmudy, Member of Risk Monitoring Committee (served as Chairman since November 21, 2016 to June 29, 2018, and became the member since November 21, 2016 until now)

His educational background and working experience is similar to what has been described above.

Amalia Setyanti Lestari, Member as well as Secretary of Risk Monitoring Committee

Her educational background and working experience is similar with the description above.

Martinus Rosadi Nugroho, Member of Risk Monitoring Committee

His educational background and working experience is similar with the description above.

d. Independence of Members of Risk Monitoring Committee

During 2018, all independent members of the Risk Oversight Committee have fulfilled the following independence requirements:

- 1) All independent members of the Risk Oversight Committee shall have no financial, management, share ownership and/or family relationships with members of the BoC, BoD and/or Controlling Shareholders or any relationship with the Bank, which may affect the ability to act independently.

- 2) Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan J Trust Bank dalam 6 (enam) bulan terakhir, kecuali Komisaris Independen.
- 3) Tidak mempunyai saham baik secara langsung maupun tidak langsung pada J Trust Bank.
- 4) Tidak memiliki hubungan afiliasi dengan J Trust Bank, Dewan Komisaris, Direksi atau Pemegang Saham Utama J Trust Bank.
- 5) Tidak memiliki hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha J Trust Bank.

e. Tugas dan Tanggung Jawab Komite Pemantau Risiko

Komite Pemantau Risiko bertugas untuk memberikan pendapat profesional yang independen kepada Dewan Komisaris terhadap laporan-laporan atau hal-hal yang disampaikan oleh Direksi kepada Dewan Komisaris, membantu Dewan Komisaris atas tanggung jawab pengawasannya, termasuk mengidentifikasi hal-hal yang memerlukan perhatian Dewan Komisaris, dan mendukung tugas-tugas lain yang berkaitan dengan tugas Dewan Komisaris, antara lain:

- 1) Mengevaluasi kebijakan manajemen risiko yang diajukan oleh Direksi untuk memperoleh persetujuan Dewan Komisaris.
- 2) Mengevaluasi pertanggungjawaban Direksi kepada Dewan Komisaris atas pelaksanaan kebijakan manajemen risiko.
- 3) Melakukan pemantauan dan evaluasi atas kesesuaian antara kebijakan manajemen risiko dengan pelaksanaan kebijakan tersebut.
- 4) Melakukan pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko, guna memberikan rekomendasi kepada Dewan Komisaris.
- 5) Melakukan penelaahan atas ketaatan Bank terhadap peraturan dan perundang-undangan di bidang manajemen risiko dan peraturan perundang-undangan lainnya yang berhubungan dengan kegiatan bank.
- 6) Memberikan masukan dan rekomendasi kepada Dewan Komisaris untuk memberikan nasihat kepada Direksi atas informasi dan/ atau peristiwa-peristiwa yang diidentifikasi berpotensi atau mengandung risiko-risiko.
- 7) Melakukan penelaahan dan penelitian yang dianggap perlu terhadap pelaksanaan fungsi Direksi dalam menyelenggarakan pengelolaan risiko.
- 8) Mengevaluasi dan memutuskan permohonan Direksi yang berkaitan dengan transaksi yang memerlukan persetujuan Dewan Komisaris.

- 2) None of them are working or having the authority and responsibility to plan, lead, control or supervise the activities of J Trust Bank in the last 6 (six) months, except Independent Commissioners.
- 3) They do not own shares directly or indirectly in J Trust Bank.
- 4) They have no affiliated relationship with J Trust Bank, Board of Commissioners, Board of Directors or Major Shareholder of J Trust Bank.
- 5) Has no direct or indirect business relationship relating to the business activities of J Trust Bank.

e. Roles and Responsibilities of Risk Monitoring Committee

The Risk Oversight Committee has the duty to provide independent professional opinion to the Board of Commissioners on reports or matters submitted by the Board of Directors to the Board of Commissioners, assisting the Board of Commissioners for its oversight responsibilities, including identifying issues requiring the attention of the Board of Commissioners, and supporting other tasks related to the duties of the Board of Commissioners, among others:

- 1) Evaluate the risk management policy proposed by the Board of Directors to obtain approval from the Board of Commissioners.
- 2) Evaluate the Board of Directors' accountability to the Board of Commissioners on the implementation of risk management policy.
- 3) Monitor and evaluate the conformity between risk management policy and the implementation of the policy.
- 4) Monitor and evaluate the execution of the duties of the Risk Management Committee and Risk Management Work Unit to provide recommendations to the Board of Commissioners.
- 5) Review the Bank's compliance with laws and regulations in risk management and other legislation relating to bank activities.
- 6) Provide input and recommendation to the Board of Commissioners to advise the Board of Directors on information and/or events identified as potentially or risk-bearing.
- 7) Conduct review and research deemed necessary for the implementation of the functions of the Board of Directors in organizing risk management.
- 8) Evaluate and decide on the proposal from the Board of Directors relating to transactions that require the approval of the Board of Commissioners.

- 9) Memastikan perbaikan yang berkesinambungan atas kebijakan manajemen risiko dan pelaksanaan prosedur dan praktik manajemen risiko pada semua tingkatan guna memastikan telah dilakukannya pengelolaan dan pengendalian risiko yang sehat.

f. Kebijakan dan Pelaksanaan Rapat Komite Pemantau Risiko

- 1) Setiap rapat Komite Pemantau Risiko dipimpin oleh Ketua Komite Pemantau Risiko yang merupakan Komisaris Independen Bank.
- 2) Rapat Komite Pemantau Risiko selalu dihadiri oleh lebih dari 51% dari jumlah anggota Komite Pemantau Risiko yang anggotanya terdiri dari Komisaris dan Komisaris Independen serta pihak independen.
- 3) Keputusan Rapat Komite dilakukan berdasarkan musyawarah untuk mencapai mufakat. Jika tidak mencapai musyawarah untuk mufakat, maka pengambilan keputusan dilakukan berdasarkan pemungutan suara berdasarkan suara setuju 2/3 (dua per tiga) anggota Komite yang hadir dalam rapat.
- 4) Hasil rapat Komite Pemantau Risiko dituangkan dalam risalah rapat dan didokumentasikan secara baik.
- 5) Perbedaan pendapat (*dissenting opinions*) yang terjadi dalam rapat Komite wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat tersebut.
- 6) Sepanjang tahun 2018, Komite Pemantau Risiko telah menyelenggarakan 6 kali rapat dengan melibatkan Satuan Kerja Manajemen Risiko, juga unit kerja lainnya yang terkait (jika dipandang perlu), seperti Kepatuhan, dan lain-lain.

Frekuensi tingkat kehadiran rapat setiap anggota Komite Pemantau Risiko sebagai berikut:

Nama Name	Periode Jabatan Term of Office	Jumlah Rapat Komite Pemantau Risiko Number of Risk Monitoring Committee Meetings	Jumlah Kehadiran Attendance	% Kehadiran Attendance
Kwik Ing Hie (Komisaris Independen, Ketua/ Anggota Independent Commissioner, Chairman Member) ¹⁾	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	6	100%
Nobiru Adachi (Komisaris Utama, Anggota President Commissioner Member)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	3	50%
Shigeyoshi Asano (Komisaris, Anggota Commissioner, Member) ²⁾	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	2	33%
Mahdi Mahmudy (Komisaris Independen, Anggota Independent Commissioner, Member) ³⁾	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	6	100%

- 9) Ensure continuous improvements of risk management policies and implementation of risk management procedures and practices at all levels to ensure healthy risk management and control.

f. Policy and Conduct of Risk Monitoring Committee

- 1) Every meeting of the Risk Monitoring Committee is chaired by the Chairman of the Risk Oversight Committee who is an Independent Commissioner of the Bank.
- 2) Risk Monitoring Committee Meetings are always attended by more than 51% of the Risk Monitoring Committee members whose members consist of Commissioners and Independent Commissioners and independent parties.
- 3) Decisions of the Committee Meetings shall be based on deliberations to reach consensus. If it does not reach a consensus, then the decision shall be made by voting agreed by 2/3 (two thirds) of the Committee members present at the meeting.
- 4) The results of the Risk Oversight Committee meetings shall be set forth in minutes of meetings and properly documented.
- 5) The dissenting opinions that occur in Committee meetings shall be clearly stated in the minutes of the meeting and the reasons for such dissent.
- 6) Throughout 2018, the Risk Oversight Committee has conducted 6 meetings involving Risk Management Work Unit, as well as other related work units (if deemed necessary), such as Compliance, and others.

Frequency of attendance of each member of the Risk Monitoring Committee as follows:

Nama Name	Periode Jabatan Term of Office	Jumlah Rapat Komite Pemantau Risiko Number of Risk Monitoring Committee Meetings	Jumlah Kehadiran Attendance	% Kehadiran Attendance
Amalia Setyanti Lestari (Pihak Independen, Sekretaris/ Anggota Independent Party, Secretary/Member)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	6	100%
Martinus Rosadi Nugroho (Pihak Independen, Anggota Independent Party, Member)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	6	6	100%

*) Sejak tanggal 29 Juni 2018 menjabat sebagai Ketua Komite Pemantau Risiko

***) Sejak tanggal 29 Juni 2018 tidak lagi menjabat sebagai Ketua Komite Pemantau Risiko, namun tetap menjadi anggota Komite Pemantau Risiko

****) Sebagai Direktur Utama berdasarkan Surat OJK No. KEP-31/D.03/2019 tanggal 21 Februari 2019

*) Since June 29, 2018 serves as Chairman of the Risk Monitoring Committee

***) Since June 29, 2018 no longer serves as Chairman of the Risk Monitoring Committee, however remain a member of Risk Monitoring Committee

****) As President Director based on OJK Letter No. No. KEP-31/D.03/2019 dated February 21, 2019

g. Pendidikan dan/atau Pelatihan Anggota Komite Pemantau Risiko

Untuk menunjang pelaksanaan tugas dan tanggung jawab anggota Komite Pemantau Risiko, selama tahun 2018 anggota Komite Pemantau Risiko PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pendidikan/pelatihan, *workshop*, konferensi, seminar, antara lain:

g. Education and/or Training of Members of Risk Monitoring Committee

To support the implementation of duties and responsibilities of Risk Monitoring Committee members, during 2018 members of Risk Monitoring Committee of PT Bank JTrust Indonesia Tbk have attended various education/training programs, workshops, conferences, seminars, among others:

No.	Nama Name	Periode Menjabat Terms of Position	Pelatihan, Workshop, Konferensi, Seminar Trainings, Workshop, Conference, Seminar	Penyelenggara Organizer	Tempat & Waktu Place and Time
1	Martinus Rosadi Nugroho	01 Januari s/d 31 Desember 2018 01 January s/d 31 December 2018	<ul style="list-style-type: none"> Workshop Update PSAK 2018 Diskusi Panel dengan tema: Tanggung Jawab Komite Audit Terhadap Fraud Laporan Keuangan 	Ikatan Komite Audit Indonesia Ikatan Komite Audit Indonesia	Jakarta/29 Maret 2018 Jakarta/29 March 2018 Jakarta/4 Juni 2018 Jakarta/4 June 2018
2	Amalia Setyanti Lestari	01 Januari s/d 31 Desember 2018 01 January s/d 31 December 2018	<ul style="list-style-type: none"> APU PPT Workshop Update PSAK 2018 Seminar Fintech Outlook 2018 Diskusi Panel dengan tema: Tanggung Jawab Komite Audit Terhadap Fraud Laporan Keuangan Diskusi Panel dengan tema: Efektivitas Oversight Dewan Komisaris dan Komite Audit: Pembelajaran dari PT. SNP Finance 	Internal Ikatan Komite Audit Indonesia Bizcom.id Ikatan Komite Audit Indonesia Ikatan Komite Audit Indonesia	Jakarta/1 Maret 2018 Jakarta/1 March 2018 Jakarta/29 Maret 2018 Jakarta/29 March 2018 Jakarta/26 April 2018 Jakarta/26 April 2018 Jakarta/4 Juni 2018 Jakarta/4 June 2018 Jakarta/14 November 2018 Jakarta/14 November 2018

h. Program Kerja dan Realisasi Komite Pemantau Risiko

Program kerja Komite Pemantau Risiko sepanjang tahun 2018 sebagai berikut:

- 1) Memantau penerapan manajemen risiko Bank termasuk dalam penentuan parameter yang digunakan dalam penilaian sendiri profil risiko serta tingkat kesehatan Bank.
- 2) Memberikan pendapat atas kebijakan Bank yang terkait dengan penerapan manajemen risiko Bank.
- 3) Memantau penerapan perbaikan-perbaikan yang dilakukan terhadap proses yang ada guna memitigasi risiko.
- 4) Ikut berpartisipasi dalam rapat koordinasi Dewan Komisaris dan Direksi dan memberikan masukan yang dipandang perlu.

Realisasi Program Kerja Komite Pemantau Risiko sepanjang tahun 2018 sebagai berikut:

h. Work Program and Realization of Risk Monitoring Committee

The work program of the Risk Monitoring Committee in 2018 is as follows:

- 1) Monitor the implementation of risk management of the Bank including the determination of parameters used in the self-assessment of risk profile and Bank soundness.
- 2) Provide an opinion on the Bank's policies related to the implementation of risk management of the Bank.
- 3) Monitor implementation of improvements made to existing processes to mitigate risks.
- 4) Participate in the coordination meetings of the Board of Commissioners and the Board of Directors and provide the necessary inputs.

Realization of Work Program of Risk Monitoring Committee in 2018 is as follows:

No.	Realisasi Program Kerja Realization of Working Program
1	Pembahasan tentang <i>Risk Appetite Statement</i> Bank Discussion on the Bank's Risk Appetite Statement
2	Pembahasan hasil <i>review</i> pihak ketiga atas parameter-parameter yang digunakan dalam penyusunan laporan profil risiko Bank Discussion on the third-party review on parameters used on formulating the Bank's risk profile
3	Pembahasan tentang Profil Risiko Bank serta Tingkat Kesehatan Bank sebagaimana disampaikan kepada OJK secara triwulanan Discussion on the Bank's Risk Profile as well as Increase the Bank's Healthiness as delivered to OJK quarterly
4	Pembahasan tentang perbaikan-perbaikan yang dilakukan Bank atas kebijakan internal Bank terkait perkreditan Discussion on improvements carried out by the Bank on internal policy related to loans
5	Pembahasan tentang perbaikan atas fungsi-fungsi <i>control</i> yang ada, seperti: <i>Quality Assurance</i> , dan lain lain Discussion on improvements on existing control functions, such as: Quality Assurance, and others
6	Berdiskusi secara mendalam dengan pihak Direksi terkait kinerja perkreditan Bank, seperti: evaluasi atas kredit-kredit yang dapat berpotensi menjadi bermasalah di periode berikut Further discussion with the Board of Directors related to the Bank's lending performance, such as: evaluation on loans that will potentially cause problems in the next period
7	Pembahasan tentang revisi atas kebijakan APU-PPT sebagai bagian dari upaya pemenuhan Bank atas ketentuan OJK yang terkini terkait APU-PPT Discussion on revision on APU-PPT policy as part of the the Bank's fulfillment on OJK's updated provision on APU-PPT
8	Pembahasan tentang kerangka ICAAP serta pelaporannya Discussion on ICAAP framework as well as its report
9	Evaluasi atas pencapaian rencana kerja SKMR dan Kepatuhan Evaluation on achievements from SKMR and Compliance working plan
10	Ikut berpartisipasi dalam rapat koordinasi Dewan Komisaris dan Direksi Participate in coordination meeting for the Board of Commissioners and Directors

3.3 Komite Nominasi dan Remunerasi (*Nomination and Remuneration Committee*)

Komite Nominasi dan Remunerasi merupakan komite yang dibentuk untuk membantu Dewan Komisaris melaksanakan pengawasan terkait kebijakan nominasi dan remunerasi anggota Direksi dan anggota Dewan Komisaris. Selain itu, tujuan pembentukan Komite juga untuk memastikan hal-hal sebagai berikut:

3.3 Nomination and Remuneration Committee

The Nomination and Remuneration Committee is a committee established to assist the Board of Commissioners in supervising the nomination and remuneration policies of members of the Board of Directors and members of the Board of Commissioners. In addition, the purpose of establishing the Committee is also to ensure the following:

- Memastikan kepatuhan terhadap ketentuan-ketentuan otoritas pengawas Bank, Menteri Tenaga Kerja dan Peraturan lainnya serta hal-hal yang telah ditetapkan dalam Rapat Umum Pemegang Saham ("RUPS").
- Memastikan pelaksanaan tugas penerapan tata kelola Dewan Komisaris serta memenuhi persyaratan yang ditetapkan oleh otoritas pengawas Bank.

Pembentukan Komite Nominasi dan Remunerasi mengacu pada Peraturan-peraturan yang berlaku sebagai berikut:

1. Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola bagi Bank Umum.
2. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum.
3. Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 tanggal 23 Desember 2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
4. Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tanggal 26 September 2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
5. Peraturan Otoritas Jasa Keuangan No. 34/POJK.04/2014 tanggal 8 Desember 2014 tentang Komite Nominasi dan Remunerasi emiten atau Perusahaan Publik.

a. Piagam Komite Nominasi dan Remunerasi (Nomination and Remuneration Committee Charter)

Komite Nominasi dan Remunerasi memiliki Piagam Komite Nominasi dan Remunerasi (*Nomination and Remuneration Committee Charter*) yang mengatur hal-hal terkait dengan pelaksanaan tugas dan tanggung jawab serta kewenangan, komposisi dan struktur organisasi serta persyaratan keanggotaan, tata cara dan prosedur kerja serta waktu kerja, pelaksanaan rapat dan pelaporan, masa tugas dan honorarium. Piagam Komite Nominasi dan Remunerasi (*Nomination and Remuneration Committee Charter*) ini akan ditinjau secara berkala atau apabila dianggap perlu di-review kembali dan dievaluasi kecukupannya oleh Dewan Komisaris agar fungsi Komite Nominasi dan Remunerasi dapat dilaksanakan pada tingkat yang optimal sesuai dengan ketentuan perundangan terkait yang berlaku. Piagam Komite Nominasi dan Remunerasi (*Nomination and Remuneration Committee Charter*) yang ada terakhir di-review dan dimutakhirkan pada tanggal 02 Agustus 2017 serta telah diunggah dalam situs web Bank.

- Ensure compliance with the requirements from the supervisory authority of the Bank, the Minister of Manpower and other Regulations as well as matters specified in the General Meeting of Shareholders ("GMS").
- Ensure the implementation of the governance duties of the Board of Commissioners' and to meet the requirements stipulated by the supervisory authority of the Bank.

The establishment of the Nomination and Remuneration Committee refers to the following Regulations:

1. Regulation of the Financial Services Authority No. 55/POJK.03/2016 dated December 7, 2016 concerning the Implementation of Good Corporate Governance for Commercial Banks.
2. Circular Letter of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 on the Implementation of Good Corporate Governance for Commercial Banks.
3. Regulation of the Financial Services Authority No. 45/POJK.03/2015 dated December 23, 2015 concerning the Implementation of Good Corporate Governance in the Provision of Remuneration for Commercial Banks.
4. Circular Letter of the Financial Services Authority No. 40/SEOJK.03/2016 dated September 26, 2016 regarding the Implementation of Good Corporate Governance in the Provision of Remuneration for Commercial Banks.
5. Regulation of the Financial Services Authority No. 34/POJK.04/2014 dated December 8, 2014 on the Nomination and Remuneration Committee of the issuer or Public Company.

a. Nomination and Remuneration Committee Charter

The Nomination and Remuneration Committee maintains a Nomination and Remuneration Committee Charter which governs matters relating to the performance of duties and responsibilities and authority, composition and organizational structure and requirements of membership, methods and work procedures and working hours, conduct of meetings and reporting, term of duty and honorarium. The Nomination and Remuneration Committee Charter will be reviewed periodically or if it is deemed necessary to review and evaluate its adequacy by the Board of Commissioners in order that the Nomination and Remuneration Committee functions can be performed at an optimal level in accordance with prevailing laws and regulations. The last Nomination and Remuneration Committee Charter was reviewed and updated on August 02, 2017 and has been uploaded on the Bank's website.

b. Struktur dan Keanggotaan Komite Nominasi dan Remunerasi

- Keanggotaan Komite Nominasi dan Remunerasi paling sedikit terdiri dari 1 (satu) orang Komisaris Independen yang merangkap sebagai Ketua, 1 (satu) orang Komisaris Non Independen, dan 1 (satu) orang Pejabat Eksekutif yang membawahkan Sumber Daya Manusia atau 1 (satu) orang perwakilan pegawai.
- Pejabat Eksekutif yang membawahkan Sumber Daya Manusia atau perwakilan pegawai yang menjadi anggota komite harus memiliki pengetahuan dan mengetahui ketentuan sistem remunerasi dan/atau nominasi serta rencana suksesi (*succession plan*) Bank.
- Anggota Direksi dilarang menjadi anggota Komite Nominasi dan Remunerasi.
- Dalam hal jumlah anggota Komite Nominasi dan Remunerasi yang ditetapkan lebih dari 3 (tiga) orang maka anggota Komisaris Independen paling sedikit berjumlah 2 (dua) orang.
- Dalam hal Bank membentuk Komite Nominasi dan Remunerasi secara terpisah maka Pejabat Eksekutif atau perwakilan pegawai yang menjadi anggota komite remunerasi harus memiliki pengetahuan mengenai sistem remunerasi Bank, dan Pejabat Eksekutif atau perwakilan pegawai yang menjadi anggota komite nominasi harus memiliki pengetahuan mengenai sistem nominasi dan rencana suksesi (*succession plan*) Bank.
- Memiliki integritas yang tinggi, akhlak, moral yang baik, kemampuan pengetahuan dan pengalaman perbankan yang memadai, serta mampu berkomunikasi dengan baik.
- Memiliki pengetahuan yang cukup untuk membaca dan memahami laporan keuangan bank.
- Memiliki pengetahuan yang memadai tentang peraturan perundang-undangan yang terkait dengan kegiatan usaha bank.
- Memiliki sikap mental dan etika serta tanggung jawab profesi yang tinggi.
- Memiliki kemampuan untuk menjaga informasi perusahaan yang bersifat rahasia.
- Bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
- Ketua Komite hanya dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 1 (satu) komite lain pada Bank yang sama.

b. Structure and Membership of Nomination and Remuneration Committee

- Membership of the Nomination and Remuneration Committee shall consist of at least 1 (one) Independent Commissioner who is also the Chairman, 1 (one) Non-Independent Commissioner, and 1 (one) Executive Officer in charge of Human Resources or 1 (one) employee representative.
- The Executive Officer in charge of Human Resources or an employee representative who is a member of the Committee shall have knowledge and know the provisions of the Bank's remuneration and/or nomination system and the Bank's succession plan.
- Members of the Board of Directors are prohibited from becoming members of the Nomination and Remuneration Committee.
- In the event that the number of appointed members of the Nomination and Remuneration Committee are more than 3 (three) individuals, the Independent Commissioner shall be at least 2 (two) members.
- In the event that a Bank establishes a separate Nomination and Remuneration Committee, the Executive Officer or employee representative who is a member of the remuneration committee shall have knowledge of the Bank's remuneration system, and the Executive Officer or employee representative of the nomination committee shall have knowledge of the nomination system and succession plan of the Bank.
- They have high integrity, good morale, knowledge and adequate banking experience, and ability to communicate well.
- They have sufficient knowledge to read and understand the bank's financial statements.
- They have adequate knowledge of the laws and regulations related to the business activities of the bank.
- They have high mental and ethical attitudes and professional responsibilities.
- They have the ability to maintain the confidentiality of the Company's information.
- They are willing to improve competence continuously through education and training.
- The Chairman of the Committee may only concurrently serve as Chairman of the Committee at a maximum of another 1 (one) committee within the same Bank.

Berdasarkan Surat Dewan Komisaris No.29.01/M.KOM/VI/2018 tertanggal 29 Juni 2018 dan Surat Keputusan Direksi No.29.33/S.Kep-Dir-HCD/JTrust/VI/2018 tertanggal 29 Juni 2018, maka struktur dan keanggotaan Komite Nominasi dan Remunerasi menjadi sebagai berikut:

1. Mahdi Mahmudy (Komisaris Independen): Ketua/Anggota
2. N. Krisbiyanto (Pejabat Eksekutif): Sekretaris/Anggota
3. Shigeyoshi Asano (Komisaris): Anggota

Sebagaimana dinyatakan di atas, per 31 Desember 2018 Komite Nominasi dan Remunerasi diketuai oleh seorang Komisaris Independen dengan anggotanya terdiri dari:

- a. 1 (satu) orang Komisaris
- b. 1 (satu) orang Komisaris Independen
- c. 1 (satu) orang Pejabat Eksekutif

Setiap Komisaris yang menjadi Ketua dan anggota Komite Nominasi dan Remunerasi telah efektif dinyatakan lulus uji kelayakan dan kepatutan oleh OJK. Pengangkatan nama-nama Ketua dan anggota Komite Nominasi dan Remunerasi sebagaimana dimaksud di atas telah memenuhi kriteria yang ditetapkan dalam Peraturan OJK.

Sepanjang tahun 2018, jumlah Komisaris Independen dan Pejabat Eksekutif yang menjadi anggota Komite Nominasi dan Remunerasi senantiasa berjumlah lebih dari 51% (lima puluh satu perseratus) dari jumlah keseluruhan anggota Komite Nominasi dan Remunerasi.

Masa Tugas/Jabatan Anggota Komite Nominasi dan Remunerasi

Masa tugas/jabatan anggota Komite Nominasi dan Remunerasi maksimal 3 (tiga) tahun dengan ketentuan bahwa masa tugas/jabatan tidak boleh melebihi masa jabatan Komisaris.

Masa tugas/jabatan anggota Komite Nominasi dan Remunerasi Per 31 Desember 2018 yaitu:

Based on Letter of the Board of Commissioners No. 29.01/M.KOM/VI/2016 dated 29 June 2018 and Directors Decree No.29.33/S.Kep-Dir-HCD/JTrust/VI/2018 dated 29 June 2018, the membership of the Nomination and Remuneration Committee is as follows:

1. Mahdi Mahmudy (Independent Commissioner): Chairman/Member
2. N. Krisbiyanto (Executive Officer): Secretary/Member
3. Shigeyoshi Asano (Commissioner): Member

As stated above, as of 31 December 2018, Nomination and Remuneration Committee is chaired by an Independent Commissioner with the member consisting of:

- a. 1 (one) Commissioner
- b. 1 (one) Independent Commissioners
- c. 1 (one) Executive Officer

Each Commissioner who becomes the Chairman and member of the Nomination and Remuneration Committee has effectively passed the feasibility and proper test by OJK. Appointment of the names of the Chairman and members of the Nomination and Remuneration Committee as mentioned above meets the criteria set forth in the OJK Rules.

Throughout 2018, the number of Independent Commissioners and Executive Officers who are members of the Nomination and Remuneration Committee consists of more than 51% (fifty one percent) of the total members of the Nomination and Remuneration Committee

Term of Office of Members of Nomination and Remuneration Committee

Terms of office of members of Nomination and Remuneration Committee maximum is 3 (three) years, provided always that the terms of office shall not exceed the terms of office of Commissioner.

The term of office of members of Nomination and Remuneration Committee as of December 31, 2018 is as follows:

No	Nama Name	Posisi di Komite Position in Committee	Masa Tugas/Jabatan Terms of Duty/Position	
			Tanggal efektif Effective Date	Akhir Masa Tugas/ Jabatan End of Term of Duty/ Position
1	Mahdi Mahmudy (Komisaris Independen Independent Commissioner)	Ketua Chairman	21 November 2016 21 November 2016	30 Juni 2019 30 June 2019
2	Shigeyoshi Asano (Komisaris Commissioner)	Anggota Member	21 November 2016 21 November 2016	30 Juni 2019 30 June 2019
3	N. Krisbiyanto (Pejabat Eksekutif Executive Officer)	Sekretaris/Anggota Secretary/Member	15 Juni 2016 15 June 2016	21 Februari 2019 21 February 2019

c. Riwayat Pendidikan dan Pengalaman Kerja Anggota Komite Nominasi dan Remunerasi

Riwayat pendidikan dan pengalaman kerja anggota Komite Nominasi dan Remunerasi PT Bank JTrust Indonesia Tbk adalah sebagai berikut:

Mahdi Mahmudy, Ketua/Anggota Komite Nominasi dan Remunerasi (menjabat sebagai Ketua sejak 29 Juni 2018 hingga sekarang)

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

Shigeyoshi Asano, Anggota Komite Nominasi dan Remunerasi

Riwayat pendidikan dan pengalaman kerja sama seperti yang telah diuraikan di atas.

N. Krisbiyanto, Anggota merangkap Sekretaris Komite Nominasi dan Remunerasi

Warga Negara Indonesia, 55 tahun. Meraih gelar Sarjana Teknik dari Universitas Indonesia pada tahun 1988, dan gelar Master of Business Administration (MBA) di Bidang Finance dari Oklahoma University, Oklahoma, USA pada tahun 1992.

Beliau pernah mengikuti beberapa kursus dan seminar antara lain Visioning Misioning by BTPN, ESQ, Job Valuation, Global Leadership by Telkomsel, Employee Branding, Hongkong, HR Expo, Singtel Singapore dan lain-lain.

Pengalaman bekerja di beberapa perusahaan dan perbankan, beliau mulai meniti karir di PT Pertamina sebagai Assistant Manager Human Resources (1992-1995), di Citibank NA sebagai Manager Human Resources for Compensation and Benefit Head (1995-1997), di PT Bank Universal Tbk sebagai Senior Vice President of Human Capital (1997-2002), dan pernah menjadi Ketua Tim Merger Human Resources dari gabungan 5 Bank di Permata Bank (2002-2003), di Bank Permata Tbk sebagai Senior Vice President of Human Capital (2003-2005), di PT Telekomunikasi Selular Indonesia (TELKOMSEL) sebagai Senior Vice President of Human Resources (2005-2007), di PT Potentia HR Consulting a Northstar Group sebagai Senior Consultant to PT Potentia HR Consulting (2007) dan di BPTN sebagai Executive Vice President for Corporate Human Capital Head (2007-2010) dan sebelum bergabung di PT Bank JTrust Indonesia Tbk beliau terakhir bekerja di PT Bank Sahabat sebagai part of Senior Executive Triputra Group (2010-2011) dan sejak tanggal 1 Juni 2016 sebagai Kepala Divisi Human Capital Division di PT Bank JTrust Indonesia Tbk.

c. Educational Background and Work Experience of Nomination and Remuneration Committee

Educational background and working experiences of the member of Nomination and Remuneration Committee of PT Bank JTrust Indonesia Tbk are as follow:

Mahdi Mahmudy, Chairman/Member of Nomination and Remuneration Committee (served as the Chairman since 29 June 2018 until now)

His educational background and working experiences are similar as described above.

Shigeyoshi Asano, Member of Nomination and Remuneration Committee

His educational background and working experiences are similar as described above.

N. Krisbiyanto, Member and also Secretary of Nomination and Remuneration Committee.

Indonesian Citizen, 55 years old. Obtained Bachelor of Engineering from University of Indonesia in 1998 and Masters of Business Administration (MBA) in Finance from Oklahoma University, USA in 1992.

He enrolled several courses and seminars such as: Visioning Missioning by BTPN, ESQ, Job Evaluation, Global Leadership by Telkomsel, Employee Branding, Hongkong, HR Expo, Singtel Singapore, etc.

His working experiences includes working in several companies and banking. He started his career at PT Pertamina as Assistant Manager of Human Resources (1992-1995), in Citibank NA as Manager of Human Resources for Compensation and Benefit Head (1995-1997), in PT Bank Universal Tbk as Senior Vice President of Human Capital (1997-2002), and the Head of Human Resources Merger Team from the merging process of five Bank in Permata Bank (2002-2003), in Bank Permata Tbk as Senior Vice President of Human Capital (2003-2005), in PT Telekomunikasi Selular Indonesia (TELKOMSEL) as Senior Vice President of Human Resources (2005-2007), in PT Potentia HR Consulting a Northstar Group as Senior Consultant to PT Potentia HR Consulting (2007) and in BPTN as Executive Vice President for Corporate Human Capital Head (2007-2010) and before joining PT Bank JTrust Indonesia Tbk, he was working for PT Bank Sahabat as part pf Senior Executive Triputra Group (2010-2011) and since 1 June 2016 as Head of Human Capital Division in PT Bank JTrust Indonesia Tbk.

d. Independensi Anggota Komite Nominasi dan Remunerasi

Selama tahun 2018, seluruh anggota independen pada Komite Nominasi dan Remunerasi telah memenuhi persyaratan independensi sebagai berikut:

- 1) Seluruh anggota independen pada Komite Nominasi dan Remunerasi tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak independen.
- 2) Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan J Trust Bank dalam 6 (enam) bulan terakhir, kecuali Komisaris Independen.
- 3) Tidak mempunyai saham baik secara langsung maupun tidak langsung pada J Trust Bank.
- 4) Tidak memiliki hubungan afiliasi dengan J Trust Bank, Dewan Komisaris, Direksi atau Pemegang Saham Utama J Trust Bank.
- 5) Tidak memiliki hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha J Trust Bank.

e. Tugas dan Tanggung Jawab Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi bertugas dan bertanggung jawab untuk memberikan rekomendasi kepada Dewan Komisaris, termasuk namun tidak terbatas pada hal-hal sebagai berikut:

- 1) Terkait dengan Kebijakan Nominasi:
 1. Memberikan rekomendasi kepada Dewan Komisaris mengenai:
 - Komposisi jabatan anggota Direksi dan/atau anggota Dewan Komisaris;
 - Kebijakan dan kriteria yang dibutuhkan dalam proses Nominasi;
 - Kebijakan evaluasi kinerja bagi anggota Direksi dan/atau anggota Dewan Komisaris
 2. Membantu Dewan Komisaris melakukan penilaian kinerja anggota Direksi dan/atau anggota Dewan Komisaris berdasarkan tolok ukur yang telah disusun sebagai bahan evaluasi.

d. Independence of Members of Nomination and Remuneration Committee

During 2018, all independent members of the Nomination and Remuneration Committee have fulfilled the following independence requirements:

- 1) All independent members of the Nomination and Remuneration Committee shall have no financial relationship, management relationship, share ownership and/or family relationships with members of the BoC, BoD and/or Controlling Shareholders or any relationship with the Bank, which may affect the ability to act independently.
- 2) They are not employed by or have the authority and responsibility to plan, lead, control or supervise the activities of J Trust Bank in the last 6 (six) months, except Independent Commissioners.
- 3) They do not own shares directly or indirectly in J Trust Bank.
- 4) They have no affiliated relationship with J Trust Bank, Board of Commissioners, Board of Directors or Major Shareholder of J Trust Bank.
- 5) They have no direct or indirect business relationship related to the business activities of J Trust Bank.

e. Roles and Responsibilities of Nomination and Remuneration Committee

The Nomination and Remuneration Committee is responsible for providing recommendations to the Board of Commissioners, including but not limited to the following:

- 1) Related to Nomination Policy:
 1. Provide recommendations to the Board of Commissioners on:
 - Composition of members of the Board of Directors and/or members of the Board of Commissioners;
 - Policies and criteria required in the Nomination process;
 - Performance evaluation policy for members of the Board of Directors and/or members of the Board of Commissioners
 2. Assist the Board of Commissioners to evaluate the performance of members of the Board of Directors and/or members of the Board of Commissioners on the basis of benchmarks that have been prepared as evaluation materials.

3. Memberikan rekomendasi kepada Dewan Komisaris mengenai program pengembangan kemampuan anggota Direksi dan/atau anggota Dewan Komisaris.
 4. Memberikan usulan calon yang memenuhi syarat sebagai anggota Direksi dan/atau anggota Dewan Komisaris kepada Dewan Komisaris untuk disampaikan kepada RUPS.
- 2) Terkait dengan Kebijakan Remunerasi:
1. Memberikan rekomendasi kepada Dewan Komisaris mengenai:
 - Struktur Remunerasi
 - Kebijakan atas Remunerasi
 - Besaran atas Remunerasi
 2. Membantu Dewan Komisaris melakukan penilaian kinerja dengan kesesuaian Remunerasi yang diterima masing-masing anggota Direksi dan/atau anggota Dewan Komisaris.
 3. Komite memastikan bahwa kebijakan remunerasi paling kurang sesuai dengan:
 - Kinerja keuangan dan pemenuhan cadangan sebagaimana diatur dalam peraturan perundang-undangan yang berlaku.
 - Prestasi kerja individual.
 - Kewajaran dengan *peer group*.
 - Pertimbangan sasaran dan strategi jangka panjang Bank.
 4. Memberikan rekomendasi tentang:
 - Penilaian terhadap sistem penggajian dan pemberian tunjangan;
 - Sistem pensiun dan sistem kompensasi serta manfaat lainnya dalam hal efisiensi jumlah karyawan.
 5. Memberikan rekomendasi mengenai bonus dan tantiem bagi anggota Direksi dan/atau anggota Dewan Komisaris.
 6. Memberikan arahan terhadap kebijakan Perseroan berkenaan dengan sistem pengangkatan, penilaian kerja, pembagian tugas dan wewenang.
 7. Sistem penggajian dan pemberian tunjangan bagi pejabat Perseroan yang mempunyai pengaruh terhadap kebijakan dan operasional Perseroan serta bertanggung jawab langsung kepada Direksi (Pejabat Eksekutif Perseroan).
 8. Menyusun pedoman dan tata tertib kerja Komite (Piagam), dan melakukan *review* secara periodik sesuai kebutuhan agar fungsi Komite dapat dilaksanakan pada tingkat yang optimal.
3. Provide recommendations to the Board of Commissioners regarding the capacity building program for members of the Board of Directors and/or members of the Board of Commissioners.
 4. Provide proposals of eligible candidates as members of the Board of Directors and/or members of the Board of Commissioners to the Board of Commissioners to be submitted to the GMS.
- 2) Related to Remuneration Policy:
1. Provide recommendations to the Board of Commissioners on:
 - Remuneration Structure
 - Policy on Remuneration
 - Amount of Remuneration
 2. Assist the Board of Commissioners to conduct performance evaluation against the remuneration received by each member of the Board of Directors and/or members of the Board of Commissioners.
 3. The Committee shall ensure that the remuneration policy is at least consistent with:
 - Financial performance and reserve as required under the prevailing laws and regulations.
 - Individual work achievement.
 - Fairness with peer group.
 - Consideration of the Bank's long term goals and strategy.
 4. Provide recommendations on:
 - Assessment of payroll systems and benefits;
 - Pension system and compensation system and other benefits in terms of efficiency of the number of employees.
 5. Provide recommendations on bonuses and tantiem for members of the Board of Directors and/or members of the Board of Commissioners.
 6. Provide guidance on the Company's policy regarding the appointment system, job evaluation, segregation of duties and authority.
 7. Payroll system and allowances for Company officers who have influence on the Company's policies and operations and are directly responsible to the Board of Directors (Executive Officer of the Company).
 8. Prepare the guidelines and work order of the Committee (Charter), and conduct periodic review as necessary so that the functions of the Committee can be implemented at an optimal level.

f. Kebijakan dan Pelaksanaan Rapat Komite Nominasi dan Remunerasi

- 1) Setiap rapat Komite Nominasi dan Remunerasi dipimpin oleh Ketua Komite yang merupakan seorang Komisaris Independen Bank, dan
- 2) Rapat Komite Nominasi dan Remunerasi selalu dihadiri oleh lebih dari 51% jumlah anggota Komite Nominasi dan Remunerasi yang anggotanya terdiri dari Komisaris Independen selaku Ketua; dan sebagai anggota adalah Komisaris dan Pejabat Eksekutif.
- 3) Keputusan Rapat Komite dilakukan berdasarkan musyawarah untuk mencapai mufakat. Jika tidak mencapai musyawarah mufakat, maka pengambilan keputusan dilakukan berdasarkan pemungutan suara berdasarkan suara setuju 2/3 (dua per tiga) anggota Komite yang hadir dalam rapat.
- 4) Hasil rapat tertuang di dalam risalah rapat dan didokumentasikan dengan baik.
- 5) Perbedaan pendapat (*dissenting opinions*) yang terjadi dalam rapat Komite wajib dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaan pendapat tersebut.
- 6) Sepanjang tahun 2018, Komite Nominasi dan Remunerasi telah menyelenggarakan 3 kali rapat.

Frekuensi tingkat kehadiran rapat setiap anggota Komite Nominasi dan Remunerasi sebagai berikut:

f. Policy and Conduct of Nomination and Remuneration Committee Meeting

- 1) Each Nomination and Remuneration Committee meeting is chaired by the Chairman of the Committee who is an Independent Commissioner of the Bank, and;
- 2) Nomination and Remuneration Committee Meetings are always attended by more than 51% of the members of the Nomination and Remuneration Committee whose members consist of: Independent Commissioner as Chairperson; and as a member: Commissioner and Executive Officer.
- 3) Decisions of the Committee Meetings shall be based on deliberations to reach consensus. If no consensus is reached, then the decision is made based on voting agreed by 2/3 (two thirds) of the Committee members present at the meeting.
- 4) Meeting results are set forth in minutes of meetings and well documented.
- 5) The dissenting opinions that occur in Committee meetings shall be clearly stated in the minutes of the meeting and the reasons for such dissent.
- 6) Throughout 2018, the Nomination and Remuneration Committee has held 3 meetings.

The frequency of attendance of each member of the Nomination and Remuneration Committee is as follows:

Nama Name	Periode Jabatan Terms of Position	Jumlah Rapat Komite Nominasi dan Remunerasi Number of Meetings for Nomination and Remuneration Committee	Jumlah Kehadiran Number of Presence	% Kehadiran % of Presence
Mahdi Mahmudy (Komisaris Independen, Ketua Independent Commissioner, Chairman)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	3	3	100%
Shigeyoshi Asano (Komisaris, Anggota Commisioner, Member) *)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	3	3	100%
N. Krisbiyanto (Pejabat Eksekutif, Anggota Executive Officer, Member)	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	3	3	100%

*) Sebagai Direktur Utama berdasarkan Surat OJK No. No.KEP-31/D.03/2019 tanggal 21 Februari 2019
*) As the President Director based on the Letter of OJK No. KEP-31/D.03/2019 dated 21 February 2019

g. Pendidikan dan/atau Pelatihan Anggota Komite Nominasi dan Remunerasi

Untuk meningkatkan kompetensi dan pemahaman dalam menunjang pelaksanaan tugas dan tanggung jawabnya, selama tahun 2018 anggota Komite Nominasi dan Remunerasi PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pendidikan/pelatihan, *workshop*, konferensi, seminar, antara lain:

No.	Nama Name	Periode Menjabat Terms of Position	Pelatihan, Workshop, Konferensi, Seminar Trainings, Workshops, Conference, Seminars	Penyelenggara Organizer	Tempat & Waktu Place and Time
1	N. Krisbiyanto	01 Januari s/d 31 Desember 2018 01 January to 31 December 2018	<ul style="list-style-type: none"> • PDCA & Sertifikasi ISO 9001: 2015 • Workshop HC GS • Workshop Direktorat Business 2018 • PDCA & ISO 9001: 2015 • Executive Learning Lounge 2018 • The 5th Talent Management Summit 	Phitagoras Internal Training Internal Training Phitagoras Business Growth PT. Inti Pesan Pariwisata	Jakarta/12-13 Januari 2018 Jakarta/12-13 January 2018 Jakarta/12 Januari 2018 Jakarta/12 January 2018 Jakarta/19 Januari 2018 Jakarta/19 January 2018 Jakarta/10 Februari 2018 Jakarta/10 February 2018 Jakarta/7 Maret 2018 Jakarta/7 March 2018 Lombok/3-4 Mei 2018 Lombok/3-4 May 2018

h. Program Kerja dan Realisasi Komite Nominasi dan Remunerasi

Program kerja Komite Nominasi dan Remunerasi sepanjang tahun 2018 sebagai berikut:

1. Memberikan rekomendasi kepada Dewan Komisaris mengenai nominasi calon anggota Dewan Komisaris dan Direksi untuk disampaikan dalam Rapat Umum Pemegang Saham.
2. Memberikan rekomendasi kepada Dewan Komisaris mengenai remunerasi dari anggota Dewan Komisaris dan Direksi.
3. Memantau penerapan kebijakan sumber daya manusia terkait remunerasi dan nominasi khususnya atas Dewan Komisaris, Direksi dan pejabat eksekutif.

Realisasi Program Kerja Komite Nominasi dan Remunerasi sepanjang tahun 2018 sebagai berikut:

No.	Realisasi Program Kerja Realization of Working Program
1	Menyetujui pengunduran diri Sdr. Ahmad Fajar sebagai Komisaris PT Bank JTrust Indonesia Tbk, terhitung tanggal 1 Mei 2018. Approved the resignation of Mr. Ahmad Fajar as Commissioner of PT Bank JTrust Indonesia Tbk, started 1 May 2018
2	Penunjukkan Sdr. Nobuiku Chiba sebagai Komisaris PT Bank JTrust Indonesia Tbk. Appointment of Mr. Nobuiku Chiba as Commissioner of PT Bank JTrust Indonesia Tbk.
3	Pengangkatan Sdr. Shigeyoshi Asano sebagai Direktur Utama PT Bank JTrust Indonesia Tbk. Promotion of Mr. Shigeyoshi Asano as President Director of PT Bank JTrust Indonesia Tbk.
4	Pengangkatan Sdr. Ritsuo Ando sebagai Direktur PT Bank JTrust Indonesia Tbk. Promotion of Mr. Ritsui Ando as Director of PT Bank JTrust Indonesia Tbk.
5	Memberikan pengurangan paket remunerasi untuk semua BOD dan EVP. Reduce remuneration package for entire BOD and EVP.

g. Education and/or Training of Members of Nomination and Remuneration Committee

To improve the competence and understanding in supporting the conduct of its duties and responsibilities, during 2018 Nomination and Remuneration Committee members of PT Bank JTrust Indonesia Tbk have attended various education/training programs, workshops, conferences, seminars, among others:

h. Work Program and Realization of Nomination and Remuneration Committee

The work program of the Nomination and Remuneration Committee in 2018 is as follows:

1. Provide recommendations to the Board of Commissioners regarding the nomination of candidates for members of the Board of Commissioners and Board of Directors to be submitted in the General Meeting of Shareholders.
2. Provide recommendations to the Board of Commissioners regarding the remuneration of members of the Board of Commissioners and Board of Directors.
3. Monitor the implementation of human resources policies related to remuneration and nomination particularly to the Board of Commissioners, Directors and executive officers.

The realization of the Work Program of the Nomination and Remuneration Committee in 2018 is as follows:

3.4 Penilaian Terhadap Kinerja Komite-Komite Di bawah Dewan Komisaris

Penilaian Kinerja Komite Audit, Komite Pemantau Risiko, dan Komite Nominasi dan Remunerasi

PT Bank JTrust Indonesia Tbk melaksanakan proses evaluasi kinerja Komite-komite di bawah Dewan Komisaris untuk menilai efektivitas pelaksanaan tugas Komite-komite di bawah Dewan Komisaris melalui *self assessment* penerapan tata kelola Bank dimana masing-masing komite tersebut, yaitu: Komite Audit, Komite Pemantau Risiko dan Komite Nominasi dan Remunerasi mengisi Kertas Kerja *Self Assessment* untuk faktor penilaian pelaksanaan tugas dan tanggung jawabnya yang telah disampaikan kepada OJK melalui penyampaian Laporan hasil *self assessment* penerapan tata kelola Bank sebagaimana diatur pada Surat Edaran Otoritas Jasa Keuangan Nomor 13/SEOJK.03/2017 tanggal 17 Maret 2017 Tentang Penerapan Tata Kelola Bagi Bank Umum.

Kriteria/Indikator yang digunakan mencakup 3 (tiga) aspek *Governance*:

1. **Penilaian *Governance Structure***
Menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses penerapan prinsip Tata Kelola yang baik menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
2. **Penilaian *Governance Process***
Menilai efektivitas proses penerapan prinsip Tata Kelola yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.
3. **Penilaian *Governance Outcome***
Menilai kualitas *outcome* yang memenuhi harapan Pemangku Kepentingan Bank yang merupakan hasil proses penerapan prinsip Tata Kelola yang baik yang didukung oleh kecukupan struktur dan infrastruktur Tata Kelola Bank.

Komite-Komite di bawah Direksi

Untuk dapat mengidentifikasi dan mengelola seluruh jenis risiko yang dihadapi Bank selain dilakukan oleh unit kerja/Satuan Kerja Manajemen Risiko (SKMR), dan membentuk Komite Pemantau Risiko yang berada pada tingkat Dewan Komisaris, maka Direksi PT Bank JTrust Indonesia Tbk juga telah membentuk dan menetapkan Komite-Komite di bawah Direksi sesuai dengan Surat Keputusan Direksi yang bertugas dan bertanggung jawab secara kolektif untuk membantu Direksi dalam melakukan fungsi tertentu yang membutuhkan keahlian khusus dengan memberikan bimbingan/saran/rekomendasi mengenai kebijakan

3.4. Performance Evaluation of Committees under BOC

Performance Evaluation of Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee

PT Bank JTrust Indonesia Tbk conducts performance evaluation process of Committees under the Board of Commissioners to assess the effectiveness of the performance of the duties of Committees under the Board of Commissioners through the self-assessment of the implementation of the Bank's governance whereby each committee namely the Audit Committee, Risk Monitoring Committee and the Nomination and Remuneration Committee shall fill out the Self Assessment Working Paper for the assessment of the implementation of the duties and responsibilities submitted to OJK through the submission of the self assessment report on the implementation of the Bank's governance as stipulated in the Circular of the Financial Services Authority No. 13/SEOJK.03/2017 dated March 17, 2017 On the Implementation of Good Corporate Governance for Commercial Banks.

Criteria/Indicators include 3 (three) aspects of *Governance*:

1. **Governance Structure Assessment**
Assessing the adequacy of the Bank's governance structure and infrastructure so that the process of adopting the Good Governance principles results in an outcome that is consistent with the expectations of the Bank's Stakeholders.
2. **Governance Process Assessment**
Assessing the effectiveness of the process of adopting GCG principles supported by the adequacy of Bank Governance structure and infrastructure so as to produce an outcome that aligns with the expectations of the Bank's Stakeholders.
3. **Governance Outcome Assessment**
Assessing the quality of outcomes that meet the expectations of the Bank's Stakeholders as a result of the process of adopting the Good Governance principles supported by the adequacy of the Bank's structure and infrastructure.

Committees under BOD

In order to identify and manage all types of risks faced by the Bank in addition to the business unit/Risk Management Unit (SKMR), and establish a Risk Monitoring Committee at the Board of Commissioners level, the Board of Directors of PT Bank JTrust Indonesia Tbk has also established and determined the Committees under the Board of Directors in accordance with the Board of Directors' duty and collective responsibility to assist the Board of Directors in performing certain functions requiring special expertise by providing guidance/advice/recommendations for the policy and by supervising

dan melakukan pengawasan terhadap pengelolaan risiko Bank. Rekomendasi dari setiap komite menjadi acuan Direksi dalam proses pengambilan keputusan.

Komposisi keanggotaan komite-komite di bawah Direksi PT Bank JTrust Indonesia Tbk disusun sesuai dengan kompleksitas tugas dan tanggung jawab komite. Komite-Komite di bawah Direksi antara lain:

3.1 Komite Manajemen Risiko (*Risk Management Committee*)

Struktur dan Keanggotaan

Komite Manajemen Risiko adalah Komite dalam Sistem Manajemen Risiko Bank yang bersifat non-struktural, berkedudukan di Kantor Pusat yang merumuskan kebijakan, strategi dan pedoman penerapan manajemen risiko, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi profil risiko serta memberikan saran dan langkah perbaikan dalam forum rapat minimal diselenggarakan 1 (satu) kali dalam triwulanan. Pembentukan Komite ini berdasarkan pada Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2016 Tentang Penerapan Manajemen Risiko Bagi Bank Umum.

Sesuai Surat Keputusan Direksi No.26.05/S.Kep-Dir-RMD/JTRUST/XII/2018 tanggal 26 Desember 2018, Struktur dan keanggotaan Komite Manajemen Risiko sebagai berikut:

Susunan Anggota Komite Manajemen Risiko:

Ketua : President Director
Wakil ketua : MD Risk, Legal & Compliance

Sekretaris : Risk Management Division Head
Anggota : Anggota Tetap dengan Hak Suara
(*Voting Member*)

- Direktur Utama
 - MD Risk, Legal & Compliance
 - MD Finance, Planning & IT
 - MD/EVP Business Risk & Operation
 - MD Treasury & Funding
 - MD/EVP Business
 - MD/EVP Human Capital & General Services
- Anggota Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Permanent Non Voting Member*)

1. Internal Audit Division Head
2. Corporate Legal & Compliance Division Head
3. Financial Control Division Head
4. Operation & Credit Administration Division Head
5. Planning Performance Division Head

the Bank's risk management. Recommendations from each committee will serve as a reference for the Board of Directors in the decision-making process.

The composition of committees under the Board of Directors of PT Bank JTrust Indonesia Tbk is prepared in accordance with the complexity of the committee's duties and responsibilities. Committees under the Board of Directors include:

3.1. Risk Management Committee

Structure and Membership

The Risk Management Committee is a non-structural Risk Management Committee of the Bank, domiciled in the Head Office to formulate policies, strategies and guidelines for the implementation of risk management, to oversee policy implementation, to monitor the progress and conditions of the risk profile and to provide suggestions and remedial measures in the meeting which is held at least 1 (one) time on a quarterly basis. The establishment of this Committee is based on the Financial Services Authority Regulation No. 18/POJK.03/2016 concerning Implementation of Risk Management for Commercial Banks.

In accordance with the Decree of the Board of Directors No. 26.05/S.Kep-Dir-RMD/JTRUST/XII/2018 dated 26 December 2018, Structure and membership of the Risk Management Committee is as follows:

Members of the Risk Management Committee:
Chairman: President Director
Vice Chairman: Director of Risk, Legal & Compliance
Secretary: Head of Risk Management Division
Member: Permanent Voting Member

- President Director
 - MD Risk, Legal & Compliance
 - MD Finance, Planning & IT
 - MD/EVP Business Risk & Operation
 - MD Treasury & Funding
 - MD/EVP Business
 - MD/EVP Human Capital & General Services
- Contributing Permanent Non-Voting Member:

1. Internal Audit Division Head
2. Corporate Legal & Compliance Division Head
3. Financial Control Division Head
4. Operation & Credit Administration Division Head
5. Planning Performance Division Head

6. Corporate Secretary Division Head
7. Risk Management Division Head
8. Information Technology Division Head
9. Treasury & Capital Markets Division Head
10. Financial Institution Division Head
11. Cash & Financial Technology Division Head
12. Funding & Distribution Management Division Head
13. Corporate, Commercial & Business Linkage Division Head
14. Retail Business Division Head
15. Special Asset Management Division Head
16. Human Capital & General Services Division Head
17. Credit Risk Reviewer Division Head
18. President Office & Japan Linkage Division Head

Wewenang dan Tanggung Jawab

Wewenang dan tanggung jawab Komite Manajemen Risiko adalah melakukan evaluasi dan memberikan rekomendasi kepada President Director terkait Manajemen Risiko, yang sekurang-kurangnya meliputi:

- Penyusunan kebijakan Manajemen Risiko serta perubahannya, termasuk strategi Manajemen Risiko, tingkat risiko yang diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*), kerangka Manajemen Risiko serta rencana kontijensi untuk mengantisipasi terjadinya kondisi tidak normal.
- Penyempurnaan proses Manajemen Risiko yang meliputi identifikasi, pengukuran, pemantauan dan pengendalian secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal serta internal Bank yang mempengaruhi kecukupan permodalan, profil risiko Bank dan tidak efektifnya penerapan Manajemen Risiko berdasarkan hasil evaluasi.
- Penetapan (*justification*) dan/atau keputusan bisnis yang menyimpang dari prosedur normal (*irregularities*) seperti pelampauan ekspansi usaha yang *significant* dibandingkan dengan Rencana Bisnis Bank yang telah ditetapkan sebelumnya atau pengambilan posisi atau eksposur risiko yang melampaui limit yang telah ditetapkan.

Pelaksanaan Tugas dan Frekuensi Rapat

Selama tahun 2018, Komite Manajemen Risiko telah menyelenggarakan 4 (empat) kali rapat baik dalam forum rapat dan sirkuler yang membahas agenda sebagai berikut:

6. Corporate Secretary Division Head
7. Risk Management Division Head
8. Information Technology Division Head
9. Treasury & Capital Markets Division Head
10. Financial Institution Division Head
11. Cash & Financial Technology Division Head
12. Funding & Distribution Management Division Head
13. Corporate, Commercial & Business Linkage Division Head
14. Retail Business Division Head
15. Special Asset Management Division Head
16. Human Capital & General Services Division Head
17. Credit Risk Reviewer Division Head
18. President Office & Japan Linkage Division Head

Roles and Responsibilities

The roles and responsibilities of the Risk Management Committee are to provide recommendations to the President Director related to Risk Management, which at least include:

- Preparation of Risk Management policies and its amendment, including Risk Management strategies, risk appetite, and risk tolerance, Risk Management Framework as well as contingency plan to anticipate unexpected condition.
- Improvement Risk Management process that include identification, measurement, monitor and mitigation periodically as well as incidental as the impact of the Bank's external and internal change that affect the capital adequacy, the Bank's risk profile and ineffectiveness of Risk Management implementation based on evaluation.
- The justification and/or deviant business decision (*irregularities*) such as significant exceed business expansion compared to the Bank's Business Plan that already stipulated or position taking or risk exposure that exceed the stipulated limit.

Conduct of Duties and Frequency of Meetings

During 2018, the Risk Management Committee has held 4 (four) meetings and conducted various work programs with the following agenda:

No	Tanggal Date	Agenda Pembahasan Discussion Agenda
1	17 Januari 2018 17 Januari 2018	Laporan Tingkat Kesehatan Bank - Periode Desember 2017/Semester II 2018 ke Otoritas Jasa Keuangan (OJK) melalui sirkuler Report on the Bank's Healthiness Level - Period of December 2017/Semester II 2018 to the Financial Services Authority through circular
2	19 April 2018 19 April 2018	Laporan Profil Risiko Periode Maret 2018/Triwulan I ke Otoritas Jasa Keuangan (OJK) melalui sirkuler Report on Risk Program for the Period of March 2018/Quarter I to the Financial Services Authority through circular
3	26 Juli 2018 26 Juli 2018	Laporan Tingkat Kesehatan Bank - Periode Juni 2018/Semester I 2018 ke Otoritas Jasa Keuangan (OJK) Report on the Bank's Healthiness Level - Period of June 2018/Semester I 2018 to the Financial Services Authority
4	17 Oktober 2018 17 Oktober 2018	Laporan Profil Risiko Periode September 2018/Triwulan III ke Otoritas Jasa Keuangan (OJK) melalui sirkuler Report on Risk Profile for the Preiod of September 2018/Quarter III to the Financial Services Authority through circular

Penilaian Kinerja Komite Manajemen Risiko

Komite Manajemen Risiko secara rutin dan aktif telah melaksanakan tugasnya untuk memastikan bahwa pengelolaan risiko di Bank berjalan dengan baik, sehingga Bank dapat mengantisipasi setiap perubahan sebagai akibat dari perkembangan usaha maupun adanya perubahan kondisi eksternal. Selama tahun 2018, Komite Manajemen Risiko telah melakukan antara lain:

- Menyetujui Laporan Profil Risiko Bank yang dilakukan secara berkala.
- Menyetujui Laporan Tingkat Kesehatan Bank yang dilakukan secara berkala.

3.2 Asset & Liability Committee (ALCO)

Sesuai dengan Ketentuan Bank Indonesia, dimana Bank membentuk *Asset & Liability Committee* (ALCO) yang besaran organisasinya disesuaikan dengan kompleksitas Bank. *Asset & Liability Committee* (ALCO) adalah suatu komite yang bertanggung jawab menetapkan kebijakan tingkat suku bunga dan strategi pengelolaan aktiva dan pasiva Bank berdasarkan prinsip kehati-hatian dan sesuai dengan ketentuan yang berlaku.

Struktur dan Keanggotaan

Asset & Liability Committee (ALCO) tidak lagi merupakan Sub Komite dari Komite Manajemen Risiko, melainkan komite tersendiri yang bertanggung jawab kepada Direksi. Sesuai Surat Keputusan Direksi No.01.63/S.Kep-DIR/TRD/JTRUST/X/2015 tanggal 01 Oktober 2015 dan perubahannya sesuai Memo No.549/Memo/TRD/V/2016 tanggal 31 Mei 2016 perihal Permohonan Pengesahan Surat Keputusan Direksi PT Bank J Trust Indonesia Tbk tentang Asset & Liability Committee, Struktur dan keanggotaan Asset & Liability Committee (ALCO) sebagai berikut:

Performance Evaluation of Risk Management Committee

The Risk Management Committee regularly and actively undertakes its duties to ensure that risk management in the Bank is well implemented, so that the Bank can anticipate any changes as a result of business development as well as changes in external conditions. During 2018, the Risk Management Committee has conducted among others:

- Approval for Bank Risk Profile Reports conducted periodically.
- Approval for periodic Bank Healthiness Rating Report.

3.2. Asset & Liability Committee (ALCO)

In accordance with Bank Indonesia Regulations, in which the Bank established an Asset & Liability Committee (ALCO) whose organizational size is adjusted to the Bank's complexity. Asset & Liability Committee (ALCO) is a committee that is responsible for determining interest rate policy and management strategy of Bank assets and liabilities based on prudent principles and in accordance with prevailing regulations.

Structure and Membership

The Asset & Liability Committee (ALCO) is no longer a Sub Committee of the Risk Management Committee, but a separate committee that is responsible to the Board of Directors. In accordance with the Letter of Decision of the Board of Directors No. 01.63/S.Kep-DIR/TRD/JTRUST/X/2015 dated October 01, 2015 and the amendment pursuant to Memo No. 549/Memo/TRD/V/2016 dated May 31, 2016 regarding Request for Approval of Decision Letter of Directors PT Bank J Trust Indonesia Tbk on Asset & Liability Committee, Structure and Membership of Asset & Liability Committee (ALCO) is as follows:

Susunan Anggota ALCO:

Ketua	: Direktur Utama
Wakil ketua	: Direktur/EVP Treasury & Institutional Banking
Sekretaris	: Kepala Divisi Treasury

1. Anggota dengan Hak Suara (*Voting Member*)
 - a. Anggota Tetap dengan Hak Suara (*Permanent Voting Member*)
 - Direktur Utama
 - EVP/Direktur Business
 - EVP/Direktur Treasury & Institutional
 - EVP/Direktur Corporate Business
 - EVP/Direktur Retail & Network
 - EVP/Direktur Business Development
 - b. Anggota Tidak Tetap dengan Hak Suara (*Non-Permanent Voting Member*)
 - EVP/Direktur Finance & Operation
 - EVP/Direktur Commercial Risk
2. Anggota Pemberi Kontribusi Tanpa Hak Suara (*Contributing Non-Voting Member*)
 - a. Anggota Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Permanent Non-Voting Member*)
 - Direktur Risk & Compliance
 - Direktur Information & Technology
 - Linkage Business Division Head
 - Retail Business Division Head
 - Retail Priority & Network Division Head
 - Satuan Kerja Manajemen Risiko (SKMR)
 - Compliance & Legal Division Head
 - Planning Performance Management Division Head
 - Middle Business Division Head
 - Corporate Business Division Head
 - Micro Business Division Head
 - b. Anggota Tidak Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Non-Permanent & Non-Voting Member*) yang hadir sesuai keterkaitan dengan agenda/topik.
 - Financial Control Division Head
 - Kepala Kantor Wilayah yang terkait dengan materi yang menjadi agenda pembahasan rapat komite.

Tugas dan Tanggung Jawab

Asset & Liability Committee (ALCO) memiliki tugas pokok sebagai berikut:

- Melakukan pengembangan, kajian dan simulasi strategi asset dan liabilities management (ALMA).
- Melakukan evaluasi risiko suku bunga, risiko nilai tukar dan risiko likuiditas beserta strategi pengelolannya.
- Melakukan kaji ulang *pricing* aktiva dan pasiva dalam rangka mengoptimalkan pendapatan dari aktiva dan mengurangi dari beban (biaya) dari pasiva.

Composition of ALCO Members:

Chairman	: President Director
Vice Chairman	: Director/EVP of Treasury & Institutional Banking
Secretary	: Head of Treasury Division

1. Voting Member
 - a. Permanent Voting Member
 - President Director
 - EVP/Director of Business
 - EVP/Director of Treasury & Institutional
 - EVP/Director of Corporate Business
 - EVP/Director of Retail & Network
 - EVP/Director of Business Development
 - b. Non-Permanent Voting Member
 - EVP/Director of Finance & Operation
 - EVP/Director of Commercial Risk
2. Contributing Non-Voting Member
 - a. Contributing Permanent Non-Voting Member
 - Director of Risk & Compliance
 - Director of Information & Technology
 - Linkage Business Division Head
 - Retail Business Division Head
 - Retail Priority & Network Division Head
 - Risk Management Business Unit (SKMR)
 - Compliance & Legal Division Head
 - Planning Performance Management Division Head
 - Middle Business Division Head
 - Corporate Business Division Head
 - Micro Business Division Head
 - b. Contributing Non-Permanent & Non-Voting Member who is present based on the involvement in agenda/topic.
 - Financial Control Division Head
 - Head of Regional Office related to the committee meeting agenda.

Roles and Responsibilities

The *Asset & Liability Committee (ALCO)* has the following key tasks:

- Conduct the development, review and simulation of asset and liability management strategies (ALMA).
- Evaluate interest rate risk, exchange rate risk and liquidity risk and management strategies.
- Review assets and liabilities pricing in order to optimize revenue from assets and reduce expenses from liabilities.

- Melakukan kaji ulang antar realisasi dan rencana bisnis bank yang telah ditetapkan.
 - Menyampaikan informasi setiap perkembangan ketentuan dan peraturan yang mempengaruhi strategi dan kebijakan ALMA kepada Direksi.
1. Anggota Tetap Dengan Hak Suara (*Permanent Voting Member*) dan Anggota Tidak Tetap dengan Hak Suara (*Non-Permanent Voting Member*)
 - Sebagai pengambilan keputusan yaitu 75% dari Anggota Tetap Dengan Hak Suara (*Permanent Voting Member*) dan ditambah minimal oleh 1 (satu) orang dari Anggota Tidak Tetap dengan Hak Suara (*Non-Permanent Voting Member*).
 2. Anggota Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Permanent Non-Voting Member*) dan Anggota Tidak Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Non-Permanent & Non-Voting Member*)
 - Sebagai pengambilan keputusan yaitu 50% dari Anggota Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Permanent Non-Voting Member*)
 3. *Working Group*
 - *Working Group* komite ALCO adalah kelompok kerja yang beranggotakan perwakilan masing-masing divisi, minimal diwakili oleh Departement Head dari Anggota Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Permanent Non-Voting Member*) dan Anggota Tidak Tetap Pemberi Kontribusi Tanpa Hak Suara (*Contributing Non-Permanent & Non-Voting Member*). *Working Group* bertanggung jawab untuk mendukung Komite dalam merumuskan usulan dari unit kerja hingga menjadi rekomendasi yang akan diputus oleh komite di dalam rapat Komite. Peserta *Working Group* dapat disesuaikan dengan materinya yang akan diusulkan atau dibahas dalam rapat Komite.
 - Dalam mendukung persiapan Rapat Komite, *Working Group* akan melakukan pembahasan atas usulan yang terkait dengan agenda Rapat Komite.
 - Dalam hal dipandang perlu melaksanakan Rapat Lintas Komite, maka *Working Group* dapat mengundang group terkait dalam Komite lain untuk membahas materi dalam rapat secara lintas komite tersebut.
 - Pertemuan *Working Group* diselenggarakan selambat-lambatnya 2 (dua) hari kerja sebelum penyelenggaraan Rapat komite dan membahas materi yang akan diputuskan pada Rapat Komite.
- Review the realizations and business plans of the established bank.
 - Deliver information on every development of the rules and regulations affecting the ALMA strategy and policies to the Board of Directors.
1. Permanent Voting Member and Non-Permanent Voting Member
 - Decision making is 75% of Permanent Voting Members and is added at least by 1 (one) person from Non-Permanent Voting Member.
 2. Contributing Permanent Non-Voting Member and Contributing Non-Permanent & Non-Voting Member
 - Decision-making is 50% of Contributing Permanent Non-Voting Member
 3. Working Group
 - The Working Group of the ALCO Committee is a working group of representatives of each division, at least represented by the Head Department of a Contributing Permanent Non-Voting Member and Contributing Non-Permanent & Non-Voting Member. The Working Group is responsible for supporting the Committee in formulating proposals from the business unit as recommendations to be decided by the committee in the Committee meetings. Working Group participants may be adapted based on the materials to be proposed or discussed in the Committee meetings.
 - In support of the preparation of the Committee Meetings, the Working Group will discuss the proposals related to the agenda of the Committee Meetings.
 - Where it is deemed necessary to conduct a Cross-Committee Meeting, the Working Group may invite relevant groups in other Committees to discuss the matter in meetings on a cross-committee basis.
 - The Working Group Meeting shall be held no later than 2 (two) working days prior to the conduct of the Committee Meeting and it will discuss the material to be decided at the Committee Meetings.

- Rapat *Working Group* memiliki wewenang untuk menyetujui atau tidak menyetujui pengajuan usul materi untuk dibahas dalam Rapat Komite.
- Rapat *Working Group* dipimpin oleh Sekretaris Komite sesuai topik yang dibahas. Dalam hal Sekretaris berhalangan, maka Sekretaris pengganti ditetapkan oleh Sekretaris Komite yang bertindak sebagai Pimpinan Rapat *Working Group* yaitu dipimpin oleh pejabat struktural yang ditunjuk oleh Sekretaris Komite.
- Risalah Rapat *Working Group* dibuat oleh Sekretaris Komite dan disampaikan kepada peserta rapat dengan tembusan kepada *Voting Members*.
- *Working Group* bertanggung-jawab dalam pembahasan bahan rapat serta rekomendasi yang akan disampaikan dalam Rapat Komite.
- Dalam hal terdapat usul materi yang dibahas dalam Rapat *Working Group* telah menghasilkan rekomendasi yang tetap, maka proses pengesahan dan/atau persetujuannya dari Anggota dengan Hak Suara (Direksi & EVP) dapat dilaksanakan secara sirkuler.
- Working Group Meetings have the authority to approve or not approve the submission of material for discussion in the Committee Meetings.
- Working Group Meetings are chaired by the Secretary of the Committee based on the topics covered. In the event that the Secretary is absent, the replacement Secretary shall be determined by the Secretary of the Committee acting as Chairman of the Working Group Meeting which is chaired by a structural officer appointed by the Secretary of the Committee.
- Minutes of Working Group Meetings are made by the Secretary of the Committee and submitted to the meeting participants with a copy to the Voting Members.
- The Working Group is responsible for the discussion of meeting materials and recommendations to be presented in the Committee Meetings.
- In the event that any proposed material discussed in the Working Group Meeting has resulted in a permanent recommendation, the process of ratification and/or approval of the Member with the Voting Right (Board of Directors & EVP) may be implemented in circular.

Pelaksanaan Tugas dan Frekuensi Rapat

Selama tahun 2018, *Asset & Liability Committee (ALCO)* telah melaksanakan 12 (dua belas) kali rapat dan melakukan berbagai program kerja yang membahas agenda sebagai berikut:

Conduct of Duties and Frequency of Meetings

During 2018, the Asset & Liability Committee (ALCO) has conducted 12 (twelve) meetings and conducted various work programs with agenda as follows:

No	Tanggal Date	Agenda Pembahasan Discussion Agenda
1	9 Januari 2018 9 January 2018	1. Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 10 Januari 2018 Calculation of Fund Transfer Pricing (FTP) started on 10 January 2018 2. Perubahan Suku Bunga Kredit berlaku mulai tanggal 10 Januari 2018 Amendment of Credit Interest Rate started on 10 January 2018 3. Perubahan Suku Bunga Simpanan berlaku mulai tanggal 10 Januari 2018 Amendment of Saving Interest Rate started on 10 January 2018
2	13 Februari 2018 13 February 2018	1. Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 15 Februari 2018 Calculation of Fund Transfer Pricing (FTP) started on 15 February 2018 2. Perubahan Suku Bunga Kredit berlaku mulai tanggal 15 Februari 2018 Amendment of Credit Interest Rate started on 15 February 2018 3. Perubahan Suku Bunga Simpanan berlaku mulai tanggal 15 Februari 2018 Amendment of Saving Interest Rate started on 15 February 2018
3	14 Maret 2018 14 March 2018	1. Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 15 Maret 2018 Calculation of Fund Transfer Pricing (FTP) started on 15 March 2018 2. Perubahan Suku Bunga Kredit berlaku mulai tanggal 15 Maret 2018 Amendment of Credit Interest Rate started on 15 March 2018 3. Perubahan Suku Bunga Simpanan berlaku mulai tanggal 15 Maret 2018 Amendment of Saving Interest Rate started on 15 March 2018
4	11 April 2018 11 April 2018	1. Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 12 April 2018 Calculation of Fund Transfer Pricing (FTP) started on 12 April 2018 2. Perubahan Suku Bunga Kredit berlaku mulai tanggal 12 April 2018 Amendment of Credit Interest Rate started on 12 April 2018 3. Perubahan Suku Bunga Simpanan berlaku mulai tanggal 12 April 2018 Amendment of Saving Interest Rate started on 12 April 2018
5	14 Mei 2018 14 May 2018	1. Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 15 Mei 2018 Calculation of Fund Transfer Pricing (FTP) started on 15 May 2018 2. Perubahan Suku Bunga Kredit berlaku mulai tanggal 15 Mei 2018 Amendment of Credit Interest Rate started on 15 May 2018 3. Perubahan Suku Bunga Simpanan berlaku mulai tanggal 15 Mei 2018 Amendment of Saving Interest Rate started on 15 May 2018

No	Tanggal Date	Agenda Pembahasan Discussion Agenda
6	25 Juni 2018 25 June 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) berlaku mundur selama Juni 2018 Calculation of Fund Transfer Pricing (FTP) applied backward on June 2018 Perubahan Suku Bunga Kredit berlaku mundur selama Juni 2018 Amendment of Credit Interest Rate applied backward on June 2018 Perubahan Suku Bunga Simpanan berlaku mundur selama Juni 2018 Amendment of Saving Interest Rate applied backward on June 2018
7	9 Juli 2018 9 July 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 11 Juli 2018 Calculation of Fund Transfer Pricing (FTP) started on 11 July 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 11 Juli 2018 Amendment of Credit Interest Rate started on 11 July 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 11 Juli 2018 Amendment of Saving Interest Rate started on 11 July 2018
8	23 Juli 2018 23 July 2018	<ol style="list-style-type: none"> Perubahan wewenang Suku Bunga Special Deposito *) Amendment of Authority on Time Deposit Special Interest Rate *) Rapat bersifat <i>ad hoc</i>, tidak ada Memo yang diedarkan *)The meeting is <i>ad hoc</i>, and there were no Memo distribute.
9	9 Agustus 2018 9 August 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 13 Agustus 2018 Calculation of Fund Transfer Pricing (FTP) started on 13 August 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 13 Agustus 2018 Amendment of Credit Interest Rate started on 13 August 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 13 Agustus 2018 Amendment of Saving Interest Rate started on 13 August 2018
10	12 September 2018 12 September 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 12 September 2018 Calculation of Fund Transfer Pricing (FTP) started on 12 September 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 12 September 2018 Amendment of Credit Interest Rate started on 12 September 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 12 September 2018 Amendment of Saving Interest Rate started on 12 September 2018
11	1 Oktober 2018 1 October 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 2 Oktober 2018 Calculation of Fund Transfer Pricing (FTP) started on 2 October 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 2 Oktober 2018 Amendment of Credit Interest Rate started on 2 October 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 2 Oktober 2018 Amendment of Saving Interest Rate started on 2 October 2018
12	7 November 2018 7 November 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 8 November 2018 Calculation of Fund Transfer Pricing (FTP) started on 8 November 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 8 November 2018 Amendment of Credit Interest Rate started on 8 November 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 8 November 2018 Amendment of Saving Interest Rate started on 8 November 2018
13	7 Desember 2018 7 December 2018	<ol style="list-style-type: none"> Perhitungan <i>Fund Transfer Pricing</i> (FTP) mulai tanggal 10 Desember 2018 Calculation of Fund Transfer Pricing (FTP) started on 10 December 2018 Perubahan Suku Bunga Kredit berlaku mulai tanggal 10 Desember 2018 Amendment of Credit Interest Rate started on 10 December 2018 Perubahan Suku Bunga Simpanan berlaku mulai tanggal 10 Desember 2018 Amendment of Saving Interest Rate started on 10 December 2018

Penilaian Kinerja Komite ALCO

Komite ALCO melakukan rapat rutin bulanan untuk memantau risiko likuiditas dan *Interest Rate Risk in Banking Book* (IRRBB), serta mengarahkan strategi untuk mengoptimalkan komposisi *Balance Sheet* dan mengoptimalkan *Net Interest Margin* (NIM) Bank.

3.3 Komite Pengarah Teknologi Informasi (IT Steering Committee)

Komite Pengarah Teknologi Informasi berfungsi membantu Direksi dalam merumuskan dan menetapkan rencana strategis dan kebijakan dalam setiap tahapan penggunaan teknologi informasi sejak proses perencanaan, pengadaan, pengembangan, operasional, pemeliharaan hingga penghentian dan penghapusan sumber daya teknologi informasi, untuk meningkatkan efektivitas dan efisiensi pengolahan

ALCO Committee Performance Evaluation

The ALCO Committee conducts monthly meetings to monitor liquidity risk and the Interest Rate Risk in Banking Book (IRRBB), and devises strategies to optimize Balance Sheet composition and optimize the Bank's Net Interest Margin (NIM).

3.3 IT Steering Committee

The Information Technology Steering Committee functions to assist the Board of Directors in formulating and establishing strategic and policy plans in each stage of the utilization of information technology since the planning, procurement, development, operation, maintenance to discontinuation and elimination of information technology resources, to improve the effectiveness and efficiency of data processing of

data kegiatan usaha PT Bank JTrust Indonesia Tbk sehingga dapat memberikan hasil yang benar, akurat, tepat waktu, dan dapat menjamin kerahasiaan informasi.

Struktur dan Keanggotaan

Sehubungan dengan perubahan struktur organisasi PT Bank JTrust Indonesia Tbk yang berlaku karena adanya proses penyempurnaan organisasi dalam rangka penerapan prinsip-prinsip dasar tata kelola yang baik dan untuk menyesuaikan kondisi bisnis Bank saat ini, maka dilakukan perubahan Struktur Keanggotaan Komite Pengarah Teknologi Informasi PT Bank JTrust Indonesia Tbk berdasarkan Surat Keputusan Direksi No.23.02/ S.Kep-Dir-ITD/JTRUST/XI/2018 tanggal 23 Nopember 2018 sebagai berikut:

Susunan Anggota Komite Pengarah Teknologi Informasi:

1. Ketua, merangkap anggota: Direktur Finance, Planning & IT
2. Sekretaris, merangkap anggota: Kepala Divisi IT
3. Anggota-anggota:
 - Direktur Business Risk & Operation
 - Direktur Treasury and Funding
 - EVP Business
 - Kepala Divisi Cash & Financial Technology
 - Kepala Divisi Risk Management
 - Kepala Divisi Corporate Legal & Compliance
 - Kepala Divisi Operation & Credit Administration
 - Kepala Divisi Financial Control
 - Kepala Divisi Planning and Performance

Fungsi

Komite Pengarah Teknologi Informasi berfungsi membantu Direksi dalam merumuskan dan menetapkan rencana strategis dan kebijakan dalam setiap tahapan penggunaan teknologi informasi sejak proses perencanaan, pengadaan, pengembangan, operasional, pemeliharaan hingga penghentian dan penghapusan sumber daya teknologi informasi, untuk meningkatkan efektivitas dan efisiensi pengolahan data kegiatan usaha PT Bank JTrust Indonesia Tbk sehingga dapat memberikan hasil yang benar, akurat, tepat waktu, dan dapat menjamin kerahasiaan informasi.

Wewenang

- 1) Memberikan rekomendasi kepada Direksi yang terkait dengan Rencana Strategis Teknologi Informasi (*Information Technology Strategic Plan*) yang searah dengan rencana strategis kegiatan usaha PT Bank JTrust Indonesia Tbk.
- 2) Memberikan rekomendasi kepada Direksi yang terkait dengan kesesuaian proyek-proyek Teknologi Informasi yang disetujui dengan Rencana Strategis Teknologi Informasi yang telah dibuat oleh PT Bank JTrust Indonesia Tbk dan juga

business activities PT Bank JTrust Indonesia Tbk so as to provide correct, accurate, timely results and to maintain the confidentiality of information.

Structure and Membership

In connection with changes in organizational structure of PT Bank JTrust Indonesia Tbk applicable due to the process of improving the organization in order to apply the basic principles of good governance and to adjust the current business condition of the Bank, the changes the Membership Structure of Information Technology Steering Committee PT Bank JTrust Indonesia Tbk based on Decree of Directors No.23.02/ S.Kep-Dir-ITD/JTRUST/XI/2018 dated 23 November 2018 is as follows:

Composition of Members of IT Steering Committee:

1. Chairman, cum member: Director of Finance, Planning & IT
2. Secretary, cum member: Head of IT Division
3. Members:
 - Director of Business Risk & Operation
 - Director of Treasury and Funding
 - EVP Business
 - Head of Cash & Financial Technology
 - Head of Risk Management Division
 - Head of Corporate Legal & Compliance Division
 - Head of Operation & Credit Administration Division
 - Head of Financial Control Division
 - Head of Planning & Performance Division

Function

The Information Technology Steering Committee functions to assist the Board of Directors in formulating and establishing strategic and policy plans in each stage of the utilization of information technology since the planning, procurement, development, operation, maintenance to discontinuation and elimination of information technology resources, to improve the effectiveness and efficiency of data processing of business activities PT Bank JTrust Indonesia Tbk so as to provide correct, accurate, timely results and to maintain the confidentiality of information.

Authorities:

- 1) Provide recommendations to the Board of Directors in connection with the Information Technology Strategic Plan that is in line with the strategic plan of PT Bank JTrust Indonesia Tbk.
- 2) Provide recommendations to the Board of Directors in relation to the conformity of approved Information Technology projects with the Information Technology Strategic Plan established by PT Bank JTrust Indonesia Tbk and also establish

menetapkan status prioritas proyek Teknologi Informasi serta bersifat kritikal (berdampak signifikan) terhadap kegiatan operasional Bank.

- 3) Memberikan rekomendasi kepada Direksi yang terkait dengan kesesuaian antara pelaksanaan proyek-proyek Teknologi Informasi dengan rencana proyek yang disepakati, agar sejalan dengan Rencana Bisnis Bank dan senantiasa mengupayakan investasi teknologi informasi yang memberikan nilai tambah kepada Bank.
- 4) Memberikan rekomendasi kepada Direksi tentang teknologi yang sesuai kebutuhan sistem informasi manajemen dan kegiatan usaha, dimana rekomendasi yang disampaikan memperhatikan faktor efisiensi, efektivitas serta hal-hal sebagai berikut:
 - a. Rencana pelaksanaan (*road map*) untuk mencapai kebutuhan teknologi informasi yang mendukung strategi bisnis Bank. *Road map* terdiri dari kondisi saat ini (*current state*), kondisi yang ingin dicapai (*future state*) serta langkah-langkah yang akan dilakukan untuk mencapai *future state*.
 - b. Sumber daya yang dibutuhkan.
 - c. Keuntungan/manfaat yang akan diperoleh saat rencana diterapkan.
- 5) Memberikan rekomendasi kepada Direksi yang terkait dengan efektivitas langkah-langkah meminimalkan risiko atas investasi Bank pada sektor Teknologi Informasi agar investasi tersebut memberikan kontribusi terhadap tercapainya tujuan bisnis Bank.
- 6) Memberikan rekomendasi kepada Direksi yang terkait dengan aktivitas pengawasan dan pemantauan atas kinerja Teknologi Informasi dan upaya peningkatannya.
- 7) Memberikan rekomendasi kepada Direksi yang terkait dengan upaya penyelesaian berbagai masalah terkait Teknologi Informasi, yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara secara efektif, efisien dan tepat waktu.
8. Memberikan rekomendasi kepada Direksi dalam menetapkan *vendor* terkait penyelenggaraan Teknologi Informasi yang diserahkan kepada pihak ketiga, atas dasar *due diligence* dengan melakukan evaluasi dan menilai informasi-informasi yang terkait dengan penyedia jasa antara lain meliputi:
 - a. Eksistensi dan sejarah perusahaan.
 - b. Kualifikasi, latar belakang dan reputasi pemilik perusahaan.
 - c. Perusahaan lain yang menggunakan jasa yang sama dari penyedia jasa sebagai referensi.
 - d. Kondisi keuangan termasuk *review* atas laporan keuangan *audited*.
 - e. Kemampuan dan efektivitas pemberian jasa termasuk dukungan purna jual.

the priority status of the Information Technology project as well as critical (significant) impact on the Bank's operational activities.

- 3) Provide recommendations to the Board of Directors related to the conformity of the implementation of the Information Technology projects with the agreed project plan, in line with the Business Plan of the Bank and continuously seek information technology investments that add value to the Bank.
- 4) Provide recommendation to the Board of Directors on technology that suits the needs of management information systems and business activities, where the recommendations conveyed consider the efficiency, effectiveness and the following factors:
 - a. Road map to achieve the information technology needs that support the Bank's business strategy. Road map consists of the current condition (current state), the condition to be achieved (future state) and the steps to be taken to achieve the future state.
 - b. Resources needed.
 - c. The benefits that will be obtained when the plan is implemented.
- 5) Provide recommendations to the Board of Directors in relation to the effectiveness of measures to minimize risks to the Bank's investment in the Information Technology sector so that the investment contributes to the achievement of the Bank's business objectives.
- 6) Provide recommendations to the Board of Directors in connection with monitoring activities on the performance of Information Technology and its improvement efforts.
- 7) Provide recommendations to the Board of Directors in connection with efforts to resolve various problems related to Information Technology, which can not be completed by the user and organize business units effectively, efficiently and timely.
- 8) Provide recommendations to the Board of Directors in determining vendors related to the implementation of Information Technology submitted to third parties, on the basis of due diligence by evaluating and assessing information related to service providers, including:
 - a. Existence and history of the company.
 - b. Qualifications, background and reputation of the company owner.
 - c. Other companies that use the same services from service providers as references.
 - d. Financial conditions including review of audited financial statements.
 - e. Ability and effectiveness of providing services including after sales support.

- f. Teknologi dan arsitektur sistem.
 - g. Lingkungan pengendalian intern, sejarah pengamanan dan cakupan audit.
 - h. Kepatuhan terhadap hukum dan ketentuan yang berlaku.
 - i. Kepercayaan dan keberhasilan dalam berhubungan dengan sub kontraktor.
 - j. Jaminan asuransi.
 - k. Kemampuan untuk menyediakan *disaster recovery* dan *business continuity plan*.
 - l. Penerapan manajemen risiko.
 - m. Laporan hasil pemeriksaan pihak independen.
- 9) Membuat rekomendasi kepada Direksi sebagai hasil proses analisa yang dilakukan terhadap usulan pengembangan dan/atau pembelian aplikasi/*software* yang diajukan oleh *End User/* Unit Kerja.
 - 10) Memberikan rekomendasi kepada Direksi terkait kesiapan *Disaster Recovery Center* (DRC), dimana tersedianya fasilitas pengganti pada saat Pusat Data (*Data Center*) mengalami gangguan atau tidak dapat berfungsi dan merekomendasikan diperlukannya pengujian secara berkala dalam mendukung keberlangsungan kegiatan usaha (*Business Continuity Plan*).

Tanggung Jawab

- 1) Melakukan *review* dan evaluasi secara berkala atas implementasi proyek-proyek Teknologi Informasi yang dilakukan untuk memastikan keselarasan dengan rencana semula.
- 2) Membantu Direksi dalam menetapkan penerapan prinsip-prinsip sistem pengawasan dan pengamanan terhadap penggunaan sistem dan aplikasi yang mengandung risiko tinggi, khususnya yang menyangkut teknologi topologi jaringan, *database*, komputer mikro, dan komunikasi data.
- 3) Membantu Direksi dalam menetapkan kebijakan dalam penggunaan Teknologi Informasi agar sesuai dengan kebutuhan dan kemampuan keuangan PT Bank JTrust Indonesia Tbk.
- 4) Membantu Direksi dalam menetapkan pengendalian manajemen yang meliputi perencanaan, penetapan kebijakan, standar dan prosedur, serta organisasi yang berkaitan dengan penggunaan Teknologi Informasi pada PT Bank JTrust Indonesia Tbk.
- 5) Membantu Direksi dalam menetapkan sistem kontrol terhadap sistem aplikasi Teknologi Informasi yang akan digunakan yang mencakup pengadaan, pengembangan, pengoperasian dan pemeliharannya.
- 6) Melakukan analisa atas usulan pengembangan dan atau pembelian aplikasi/*software* yang diajukan oleh *End User/*unit kerja.
- 7) Analisa yang dimaksud pada angka 6) di atas sekurang-kurangnya terdiri atas:

- f. Technology and system architecture.
 - g. Internal control environment, security history and audit coverage.
 - h. Compliance with prevailing laws and regulations.
 - i. Trust and success in dealing with sub contractors.
 - j. Insurance coverage.
 - k. Ability to provide disaster recovery and business continuity plan.
 - l. Implementation of risk management.
 - m. Independent inspection report.
- 9) Make recommendations to the Board of Directors as a result of the process of analysis carried out on the proposal of development and/or purchase of applications/*software* submitted by the End User/ Business Unit.
 - 10) Provide recommendations to the Board of Directors regarding the readiness of the Disaster Recovery Center (DRC), where substitute facilities are available when the Data Center is impaired or unable to function and make recommendation for regular testing in support of Business Continuity Plan. In this case it includes Data Center and DRC readiness in case of Data Center or DRC relocation.

Responsibilities:

- 1) Conduct periodic review and evaluation of the implementation of Information Technology projects undertaken to ensure alignment with the original plan.
- 2) Assist the Board of Directors in determining the application of supervisory and security system principles to the use of systems and applications that contain high risk, particularly concerning the technology of network topology, database, microcomputer, and data communications.
- 3) Assist the Board of Directors in establishing policies in the use of Information Technology to meet the needs and financial capabilities of PT Bank JTrust Indonesia Tbk.
- 4) Assist the Board of Directors in determining management control which includes planning, stipulation of policies, standards and procedures, and organizations related to the use of Information Technology at PT Bank JTrust Indonesia Tbk.
- 5) Assist the Board of Directors in establishing a control system on the Information Technology application system to be used which includes procurement, development, operation and maintenance.
- 6) Analyze the proposal for development and/or purchase of applications/*software* submitted by End Users/work units.
- 7) The analysis referred to in number 6) above shall consist of at least:

- Tujuan pengembangan dan atau pembelian.
 - Tingkat kebutuhan dan kepentingan Bank untuk melakukan pengembangan dan atau pembelian.
 - Kesesuaian dengan Rencana Kerja Tahunan Bank.
 - Fitur-fitur pengamanan dan pengendalian yang terdapat pada aplikasi/*software*, perangkat keras/*hardware* dan jaringan komunikasi tersebut.
 - *Maintenance* dan *support* dari pihak *vendor*.
 - Aspek biaya dan manfaat.
 - Kecukupan kebijakan dan prosedur dalam penyelenggaraan teknologi informasi oleh pihak ketiga.
- 8) Berkoordinasi dan menyampaikan kepada unit kerja terkait mengenai Rencana Strategis Teknologi Informasi (*Information Technology Strategic Plan*) yang mendukung kegiatan strategis usaha Bank, yang selanjutnya dijabarkan dalam Rencana Bisnis Bank.
- 9) Melakukan analisa terhadap perkembangan dan perubahan teknologi sistem informasi terutama di bidang perbankan.
- 10) Mengkaji keefektifan rencana mitigasi risiko atas pelaksanaan investasi IT serta memastikan kontribusi investasi terhadap rencana bisnis Bank.
- 11) Melakukan penilaian diri sendiri/*self assessment* untuk efektivitas fungsi dari Komite Pengarah Teknologi Informasi.
- Purpose of development and or purchase.
 - The level of needs and interests of the Bank for development and or purchase.
 - Compliance with the Bank's Annual Work Plan.
 - Security and control features contained in applications/*software*, hardware and communication networks.
 - Maintenance and support from vendors.
 - Aspects of costs and benefits.
 - The adequacy of policies and procedures in the organization of information technology by third parties.
- 8) Coordinate and submit to the relevant business unit on the Information Technology Strategic Plan that supports the Bank's strategic business activities, which are further elaborated in the Bank's Business Plan.
- 9) Analyze the development and change of information system technology particularly in the banking sector.
- 10) Review the effectiveness of risk mitigation plans for the implementation of IT investments and ensure investment contribution to the Bank's business plan.
- 11) Conduct self-assessment for the effectiveness of functions of the Information Technology Steering Committee.

Pelaksanaan Tugas dan Frekuensi Rapat

Selama tahun 2018, Komite Pengarah Teknologi Informasi telah melaksanakan 2 (dua) kali rapat yang membahas agenda sebagai berikut:

No	Tanggal Date	Agenda Pembahasan Discussion Agenda
1	5 Februari 2018 5 February 2018	Pembahasan Post Implementation Review Core Banking System Finacle Discussion on Post Implementation Review Core Banking System Finacle
2	23 Juli 2018 23 July 2018	Pengajuan pengadaan Loan Origination System Proposal on Loan Origination System procurement

Penilaian Kinerja Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi telah memberikan kontribusi dalam pelaksanaan seluruh kegiatan terkait Teknologi Informasi, di antaranya melakukan *review* terhadap strategi Teknologi Informasi, *review* anggaran Teknologi Informasi, melaksanakan evaluasi proyek Teknologi Informasi yang dikembangkan sesuai dengan kebutuhan dari *business user* dengan mengacu ke IT *Road Map* dan/atau Rencana Bisnis Bank serta memastikan investasi proyek Teknologi Informasi yang akan dijalankan memberikan hasil optimal.

Conduct of Duties and Frequency of Meeting

During 2018, the Information Technology Steering Committee has conducted 2 (two) meetings on the following agenda:

Performance Evaluation of IT Steering Committee

The Information Technology Steering Committee has contributed to the implementation of all Information Technology related activities, including reviewing the Information Technology strategy, reviewing the Information Technology budget, implementing an Information Technology project evaluation developed in accordance with the needs of the business user with reference to the IT Road Map and/or the Bank's Business Plan and ensuring the investment of the Information Technology project to be run will provide optimal results.

3.4 Komite Human Capital (Human Capital Committee)

Struktur dan Keanggotaan

Kegiatan anggota Komite *Human Capital* telah dilaksanakan menyesuaikan dengan perubahan struktur organisasi PT Bank JTrust Indonesia Tbk yang berlaku. Berdasarkan Surat Keputusan (SK) Direksi No.07.07/S.Kep-DIR-HCD/JTRUST/XI/2016 tanggal 07 November 2016, maka susunan Anggota Komite *Human Capital*:

Ketua Komite A Chairman Committee A	Anggota Member	Ketua Komite B Chairman Committee B	Anggota Member
Direktur Utama President Director	Direktur Utama President Director	Direktur Utama President Director	Direktur Utama President Director
	Seluruh Direktur Bidang Entire Directors		Seluruh Direktur Bidang Entire Directors
	Kepala Divisi Human Capital Head of Human Capital Division		Kepala Divisi Human Capital Head of Human Capital Division
			Kepala Divisi Terkait Head of Related Division

Tugas dan Tanggung Jawab

Komite A:

- Memastikan keselarasan Kebijakan *Human Capital* dengan strategi dan tujuan perusahaan;
- Menetapkan strategi untuk mempertahankan sumber dan mengembangkan *Human Capital* yang berkualitas;
- Membahas dan menyempurnakan berbagai kebijakan penting terkait *Human Capital*;
- Menetapkan program yang akan dijalankan berkaitan dengan kebijakan *Human Capital*;
- Menyetujui usulan remunerasi untuk karyawan baru *level Department Head*/setingkat ke atas.

Komite B:

- Melakukan wawancara/*interview/assessment* terhadap calon karyawan/ karyawan yang diusulkan promosi untuk *level Department Head*/setingkat ke atas;
- Menyetujui usulan rotasi, mutasi/demosi karyawan untuk *level Department Head*/setingkat ke atas;
- Menyetujui usulan remunerasi untuk karyawan baru *level Department Head*/setingkat ke atas.

Pelaksanaan Tugas dan Frekuensi Rapat

Selama tahun 2018, Komite Human Capital telah melaksanakan 18 (delapan belas) kali rapat sirkulasi terkait dengan proses rekrutmen dengan tujuan untuk memenuhi *level Department Head*/setingkat ke atas dengan agenda sebagai berikut:

3.4 Human Capital Committee

Structure and Membership

The activities of the Human Capital Committee members have been carried out in accordance with changes to the applicable organizational structure of PT Bank JTrust Indonesia Tbk. Based on the Decision Letter (SK) of the Board of Directors No. 07.07/S.Kep-DIR-HCD/JTRUST/XI/2016 dated November 07, 2016, the composition of Human Capital Committee Members is as follows:

Roles and Responsibilities

Committee A:

- Ensure the alignment of Human Capital Policies with corporate strategy and objectives;
- Establish strategies for sustaining sources and developing qualified Human Capital;
- Discuss and refine various important policies related to Human Capital;
- Establish programs to be implemented in relation to Human Capital policies;
- Approve the remuneration proposal for new employees at Department Head level/above.

Committee B:

- Conduct interviews/*assessment* of prospective employee/employee promotion candidate for Department Head level/above;
- Approve the rotation, employee transfer/demotion for the Department Head level/above;
- Approve the remuneration proposal for new employees at Department Head level/above.

Conduct of Duties and Frequency of Meeting

During 2018, the Human Capital Committee has conducted 18 (eighteen) circulation meetings related to the recruitment process with the aim of meeting the needs of Department Head level/above with the following agenda:

No.	Tanggal Sirkulasi Radir HC Dates HC Directors Meeting Circulation	Agenda Pembahasan Rapat Terkait Usulan dan Penetapan Karyawan Discussion Agenda for Meetings Related to Proposals and Employee Determination	Penempatan Karyawan Employee Placement
1	08 Januari 2018 08 January 2018	Senior Business Manager	Cabang Medan Medan Branch
2	25 Januari 2018 25 January 2018	Business Linkage Division Head	Kantor Pusat Head Office
3	05 Februari 2018 05 February 2018	Team Head	Kantor Pusat Head Office
4	05 Februari 2018 05 February 2018	Team Head	Kantor Pusat Head Office
5	05 Februari 2018 05 February 2018	Team Head	Cabang Surabaya Surabaya Branch
6	07 Februari 2018 07 February 2018	Funding Management Division Head	Kantor Pusat Head Office
7	03 Maret 2018 03 March 2018	IT Audit Department Head	Kantor Pusat Head Office
8	19 Maret 2018 19 March 2018	Operation Center Division Head	Kantor Pusat Head Office
9	09 April 2018 09 April 2018	Fix Asset & GA Department Head	Kantor Pusat Head Office
10	19 April 2018 19 April 2018	IT Project Management	Kantor Pusat Head Office
11	26 Juni 2018 26 June 2018	Branch Manager	Cabang Palembang Palembang Branch
12	22 Juni 2018 22 June 2018	Human Capital Division	Kantor Pusat Head Office
13	02 Juli 2018 02 July 2018	Financial Technology Solution Department Head	Kantor Pusat Head Office
14	09 Juli 2018 09 July 2018	Cash Management Department Head	Kantor Pusat Head Office
15	11 Juli 2018 11 July 2018	Fee Based Revenue Management Department Head	Kantor Pusat Head Office
16	25 Agustus 2018 25 August 2018	Legal Business Support Department Head	Kantor Pusat Head Office
17	15 Oktober 2018 15 October 2018	Bank Financial Institution Department Head	Kantor Pusat Head Office
18	18 Desember 2018 18 December 2018	IT Operation & Infrastructure Department Head	Kantor Pusat Head Office

Penilaian Kinerja Komite Human Capital

Komite *Human Capital* telah berkontribusi dalam penyempurnaan dan penyesuaian kebijakan SDM dengan strategi dan tujuan perusahaan sehingga Bank dapat berjalan sesuai strategi dan tujuan perusahaan yang diharapkan.

3.5 Komite Produk & Aktivitas Baru (PAB)

Dengan semakin kompleksnya risiko terhadap produk dan aktivitas baru yang diterbitkan Bank sehingga diperlukan peningkatan kewaspadaan bank melalui kajian dan analisa yang komprehensif agar produk dan aktivitas baru yang diterbitkan tidak menimbulkan dampak kerugian, serta penerbitan produk dan aktivitas baru harus memperhatikan ketentuan yang terkait dalam Peraturan Bank Indonesia, Surat Edaran Bank Indonesia, Peraturan OJK, SOP Produk dan Aktivitas Baru, dan menerapkan prinsip-prinsip GCG.

Sehubungan dengan hal tersebut, maka PT Bank JTrust Indonesia Tbk telah membentuk Komite Produk & Aktivitas Baru (PAB).

Performance Evaluation of Human Capital Committee

The Human Capital Committee has contributed to the improvement and alignment of HR policies with the Company's strategy and objectives so that the Bank can proceed based on the Company's strategy and objectives.

3.5 Committee of New Products & Activities (PAB)

With the increasing complexity of risks to new products and activities issued by the bank, it is necessary to raise bank awareness through comprehensive review and analysis so that new products and activities issued will not cause any disadvantage, and the issuance of new products and activities should take into account the relevant provisions of Bank Indonesia Regulation, Bank Indonesia Circular Letter, OJK Regulations, SOP of New Products and Activities, and adoption of GCG principles.

In relation thereto, PT Bank JTrust Indonesia Tbk has established a New Product & Activity Committee (PAB).

Struktur dan Keanggotaan

Berdasarkan Surat Keputusan (SK) Direksi No.20.07/S.Kep-Dir-CFTD/JTRUST/XII/2018 tanggal 20 Desember 2018 (menggantikan SK Direksi No.23.03/S.Kep-DIR-BID/JTRUST/ VIII/2016 tanggal 23 Agustus 2016), maka susunan Anggota Komite Produk & Aktivitas Baru (PAB):

1. Ketua, merangkap anggota: Direktur Non Business
2. Sekretaris Komite: Penunjukan oleh Ketua Komite
3. Anggota:
 - 1) Cash & Financial Technology Division (Inisiator)
 - 2) Funding & Distribution Management Division (Inisiator)
 - 3) Internal Audit Division
 - 4) Corporate Legal & Compliance Division
 - 5) Information Technology Division
 - 6) Financial & Control Division
 - 7) Operation & Credit Administration Division
 - 8) Risk Management Division
 - 9) Treasury & Capital Market Division

Fungsi

1. Memberikan masukan dan kajian terhadap rencana produk dan aktivitas baru yang akan diterbitkan dengan mempertimbangkan profil risiko yang mungkin timbul dari rencana tersebut.
2. Membuat kajian dan masukan ke manajemen terhadap produk dan aktivitas bank, dalam rangka penyesuaian, pengkinian dan perubahan dengan mengacu pada regulasi dan ketentuan yang berlaku.

Kewenangan

1. Melakukan tinjauan dan kajian secara komprehensif terhadap produk dan aktivitas baru yang diajukan.
2. Merekomendasikan keputusan Komite Produk & Aktivitas Baru kepada Direksi terhadap suatu produk dan aktivitas baru bank.

Tugas-Tugas

1. Menyelenggarakan pertemuan/rapat untuk mengkaji penerbitan produk dan aktivitas bank, baik untuk produk baru maupun produk yang sudah berjalan apabila dirasa diperlukan.
2. Membahas regulasi/ketentuan baru yang berlaku yang memiliki dampak pada operasional, produk, layanan dan teknologi bank, dalam rangka penyesuaian, pengkinian dan perubahan yang harus dilakukan.
3. Memberikan jawaban, penjelasan dan masukan kepada regulator seperti Otoritas Jasa Keuangan (OJK) dan Bank Indonesia (BI) atas kebijakan dan ketentuan berkenaan dengan Produk dan Aktivitas Baru.

Structure and Membership

Based on the Directors Decree (SK) No.20.07/S.Kep-Dir-CFTD/JTRUST/XII/2018 dated 20 December 2018 (replacing SK No. 23.03/S.Kep-DIR-BID/JTRUST/ VIII/2016 dated August 23, 2016), the composition of New Product & Activity Committee (PAB) Members is as follows:

1. Chairman, cum member: Director of Non Business
2. Secretary: Appointed by the Chairman of the Committee
3. Members:
 - 1) Cash & Financial Technology Division (Initiator)
 - 2) Funding & Distribution Management Division (Initiator)
 - 3) Internal Audit Division
 - 4) Corporate Legal & Compliance Division
 - 5) Information Technology Division
 - 6) Financial & Control Division
 - 7) Operation & Credit Administration Division
 - 8) Risk Management Division
 - 9) Treasury & Capital Market Division

Function

1. Provide input and review of new product plans and activities to be issued by taking into account the risk profile that may arise from the plan.
2. Prepare a review and feedback to management on bank products and activities, in order to adapt, update and change with reference to prevailing rules and regulations.

Authority

1. Conduct a comprehensive review of the proposed new products and activities.
2. Recommend the decision of the New Products & Activity Committee to the Board of Directors of a new product and activity of the bank.

Duties

1. Organize meetings to review the issuance of bank products and activities, both for new products and products that are already in operation if deemed necessary.
2. Discuss the newly enacted regulations that have an impact on the operations, products, services and technology of the bank, in the context of adjustments, updates and changes to be made.
3. Provide answers, explanations and inputs to regulators such as the Financial Services Authority (OJK) and Bank Indonesia (BI) on policies and regulations regarding New Products and Activities.

Tanggung Jawab

1. Bertanggung jawab bahwa produk dan aktivitas baru yang diterbitkan sudah sesuai dengan (*comply with*) regulasi yang berlaku.
2. Bertanggung jawab memberikan masukan dan rekomendasi kepada Direksi terhadap usulan Produk dan Aktivitas Baru.

Pelaksanaan Tugas dan Frekuensi Rapat

Di tahun 2018, Komite Produk & Aktivitas Baru (PAB) telah menyelenggarakan 7 (tujuh) kali rapat yang membahas agenda sebagai berikut:

No	Tanggal Date	Agenda Pembahasan Discussion Agenda
1	31 Juli 2018 31 July 2018	Internet banking Individu dan Internet Banking Mobile Individual Internet banking and Internet Banking Mobile
2	8 Agustus 2018 8 August 2018	Rapat persiapan JTrust Bank sebagai Bank penyimpanan dan margin JTrust Bank preparation Meeting as saving and margin Bank
3	10 Agustus 2018 10 August 2018	Virtual Account and Pay Day Loan
4	28 September 2018 28 September 2018	Piloting ATM CRM
5	9 Oktober 2018 9 October 2018	Piloting Jtrust Virtual Account
6	12 Oktober 2018 12 October 2018	Debito on line dan QR payment
7	13 Desember 2018 13 December 2018	Piloting ATM Setor Tarik

Penilaian Kinerja Komite Produk & Aktivitas Baru

Komite Produk & Aktivitas Baru telah melakukan fungsinya dengan memberikan masukan dan opini produk-produk yang akan di-*launching*/diterbitkan. Pemberian opini dilakukan melalui memo dan juga evaluasi pada saat pertemuan tentang produk tersebut. Beberapa produk yang telah dibahas antara lain: penerbitan produk *bancassurance*, Giro bisnis dan rencana Tabungan Komunitas (Tabungan Moe). Pembahasan yang dilakukan berkaitan dengan risiko yang timbul dari produk baru, ketentuan yang berlaku yang berhubungan dengan produk tersebut, legalitas dari perjanjian kerja sama dan sistem operasional.

Keputusan yang diambil oleh Komite Produk & Aktivitas Baru akan menjadi rekomendasi bagi manajemen untuk memutuskan kebijakan terhadap suatu produk. Ini merupakan hal yang paling penting dari kehadiran Komite Produk & Aktivitas Baru. Kinerja Komite Produk & Aktivitas Baru diwujudkan melalui masukan yang tepat dan akurat terhadap produk-produk yang diterbitkan, memberikan saran dan kajian serta menjaga agar produk-produk tersebut tidak bertentangan dengan ketentuan yang berlaku. Dengan adanya masukan tersebut manajemen akan terbantu dalam menentukan kebijakan.

3.6. Komite Kredit (Credit Committee)

Proses kredit yang memperhatikan prinsip kehati-hatian dan penerapan *four eyes principle* merupakan prinsip utama yang mendasari pengambilan

Responsibilities

1. Be responsible that newly issued products and activities are in compliance with applicable regulations.
2. Be responsible to provide input and recommendation to the Board of Directors on the proposed New Products and Activities.

Conduct of Duties and Frequency of Meeting

In 2018, the New Products & Activity Committee (PAB) has organized 7 (seven) meetings that discuss the following agenda:

Performance Evaluation of PAB Committee

The New Product & Activity Committee has performed its function by providing input and opinion of the products to be launched/published. Opinion is made through memo and also evaluation at the meetings pertaining to the product. Some of the products that have been discussed include: publishing bancassurance products, Business account and Community Savings plans (Tabungan Moe). Discussions are made in relation to risks arising from new products, applicable provisions relating to such products, the legality of cooperative agreements and operational systems.

Decisions made by the New Products & Activity Committee will be a recommendation for management to decide policies for such product. This is the most important matter for the launch of the New Products & Activity Committee. The performance of the New Products & Activity Committee is realized through appropriate and accurate inputs on published products, by advising and reviewing and keeping the products from conflicting with the applicable provisions. Such inputs will assist management in determining the policy.

3.6. Credit Committee

The credit process that takes into account the prudent principle and four eyes principle serves as the main principles underlying credit decision making where

keputusan kredit dimana setiap keputusan kredit minimal dilakukan oleh 2 (dua) orang pemegang kewenangan yang independen, berasal dari *Business Unit* di satu pihak, dan *Credit Risk Reviewer (CRR)* pada pihak lainnya. Proses Persetujuan Kredit secara *four-eyes* dilakukan oleh Komite Kredit sesuai limit kewenangannya.

Inisiasi kredit dan pengajuan *proposal* kredit dilakukan oleh *Business Unit*. *Credit Risk Reviewer* akan melakukan kaji ulang (*review*) dan memberikan rekomendasi terhadap *proposal* kredit yang telah dibuat oleh *Business Unit*. Dalam proses *review*, *Business Unit* dapat meminta unit *Credit Risk Reviewer* untuk melakukan kunjungan proyek (*on the spot*), khususnya dalam rangka menilai suatu permohonan kredit yang dinilai kompleks. *Proposal* atau inisiasi kredit dibuat secara lengkap oleh *Business Unit* sesuai dengan Pedoman Pelaksanaan Kredit Bank dan ketentuan-ketentuan lain seperti memorandum prosedur yang mengatur mengenai SOP pemberian kredit.

Struktur dan Keanggotaan

Keputusan kredit diambil oleh pemegang kewenangan melalui Rapat Komite Kredit atau sirkulair sesuai dengan limit kredit yang diajukan.

Rapat Komite Kredit (RKK) dihadiri oleh pejabat pemegang kewenangan memutus kredit sesuai limit yang ditetapkan (*voting member*), perkomendasi, pengusul, dan *non voting member* yaitu Divisi *Corporate Legal & Compliance*.

Pemutus kredit adalah pejabat yang karena kemampuan, kompetensi dan integritasnya diberi wewenang untuk memutus kredit yang mewakili fungsi *Business Unit* dan *Credit Risk Reviewer* sesuai dengan *four eyes principle*.

Keputusan kredit di bawah kewenangan Direksi/EVP dilakukan oleh minimal 2 (dua) Pemegang Kewenangan Memutus Kredit (PKK) yaitu individu yang diberi kewenangan memutus kredit mewakili *Business Unit* dan *Credit Risk Reviewer* dengan Batas Wewenang Memutus Kredit yang ditetapkan oleh Direksi.

Dengan demikian sesuai limit kredit yang ditetapkan dalam Pedoman Pelaksanaan Kredit di tahun 2018 bahwa kewenangan Komite Kredit terdiri atas:

Pemegang Kewenangan dapat dikategorikan menjadi 2 (dua), yaitu:

a) Pemegang Kewenangan Kategori A

- 1) Lembaga yang memutus kredit tertinggi, minimal terdiri dari 2 (dua) pihak yaitu dari Direksi *Business* atau *Treasury & Funding*

every credit decision is made by 2 (two) independent authorities, derived from Business Unit on one side, and Credit Risk Reviewer (CRR) on the other side. The Credit Approval process is conducted by the Credit Committee in accordance with the limit of authority.

Credit initiation and credit proposal submission are conducted by Business Unit. Credit Risk Reviewers will conduct reviews and provide recommendations on credit proposals made by Business Units. In the review process, Business Units may request Credit Risk Review unit to undertake project visits (on the spot), particularly in order to assess a complex credit application. The credit proposal or initiation is made completely by the Business Unit in accordance with the Bank Credit Implementation Guidelines and other provisions such as the memorandum of procedures which govern SOP for loan process.

Structure and Membership

Credit decisions are taken by the authorized party through Credit Committee Meeting or circulars in accordance with the proposed credit limit.

Credit Committee Meetings (RKK) are attended by officers who have the authority to terminate the credit based on the stipulated limit (voting member), recommendation, proposal, and non voting members which are Corporate Legal & Compliance Division.

Credit decision maker is an officer whose ability, competence and integrity are authorized to approve credits representing Business Unit and Credit Risk Reviewer in accordance with the four eyes principle.

Credit decisions under the authority of the Board of Directors/EVP shall be conducted by at least 2 (two) Authorized Parties to Approve Credit (PKK) i.e. individuals authorized to approve credit representing Business Units and Credit Risk Reviewer with the Limit of Authority to Approve Credit stipulated by the Board of Directors.

Accordingly, in accordance with the credit limit stipulated in the Credit Implementation Guidelines 2018 that the authority of Credit Committee is as follows:

Authority owner can be categorized into 2 (two):

a) Authority Category A

- 1) The highest decision authority, at least comprises of 2 (two) parties: Business or Treasury & Funding Director and Business

dan Direksi *Business Risk* yang melakukan kajian atas rekomendasi tingkat pertama dan memberikan keputusan kredit final sesuai limit kewenangannya melalui mekanisme Sirkulasi atau RKK.

2) Kategori A dibagi menjadi 3 sub kategori, antara lain:

(a) Kategori A1 (> Rp50 miliar)

Mekanisme persetujuan melalui RKK.

Voting Member:

Keputusan kredit wajib diputuskan dan ditandatangani oleh 3 Direksi di bawah ini:

- President Director
- MD *Business Risk*
- MD *Business* atau MD *Treasury & Funding*

Non Voting Member:

- MD *Risk, Legal & Compliance* (wajib menandatangani keputusan kredit dan hadir pada RKK)
- *Compliance Division Head* dan *Corporate Legal Division Head* (wajib membuat opini kepatuhan dan tidak diwajibkan menghadiri RKK)
- *Risk Management Division Head* (sebagai pejabat pengganti *Compliance Division Head*)

Propose:

- *Business Unit* (wajib membuat NAK); dan
- *Credit Risk Reviewer Unit* (wajib membuat ARR).

(b) Kategori A2 (> Rp20 - 50 miliar)

Mekanisme persetujuan melalui Sirkulasi dan apabila dipandang perlu dilakukan RKK sesuai dengan permintaan *President Director*.

Voting Member:

Keputusan kredit wajib diputuskan dan ditandatangani oleh 3 Direksi di bawah ini:

- President Director
- MD *Business Risk*
- MD *Business* atau MD *Treasury & Funding*

Non Voting Member:

- MD *Risk, Legal & Compliance* (wajib menandatangani keputusan kredit)
- *Compliance Division Head* dan *Corporate Legal Division Head* (wajib membuat opini kepatuhan dan tidak diwajibkan menghadiri RKK)

Risk Director who conducts a review on recommendation on the first level and provide final credit decision according to their authority limit through Circulation mechanism or RKK.

2) Category A is divided into 3 sub categories as follow:

(a) Category A1 (>Rp50 billion)

Approval mechanism through RKK

Voting Member:

Credit decision is obligated to be decided and signed by these 3 Directors:

- President Director
- MD Business Risk
- MD Business or MD Treasury & Funding

Non Voting Member:

- MD Risk, Legal & Compliance (required to sign the credit decision and present in RKK)
- Compliance Division Head and Corporate Legal Division Head (required to make compliance opinion and not obligated to present at RKK)
- Risk Management Division Head (as replacement officer replacing Compliance Division Head)

Propose:

- Business Unit (required to make NAK); and
- Credit Risk Reviewer Unit (required to make ARR).

(b) Category A2 (>Rp20 - 50 billion)

The approval mechanism is through Circulation and, if necessary, required to conduct RKK according to the request from *President Director*.

Voting Member:

Credit decision is required to be made and signed by these 3 Directors:

- President Director
- MD Business Risk
- MD Business or MD Treasury & Funding

Non Voting Member:

- MD Risk, Legal & Compliance (required to sign credit decision)
- Compliance Division Head and Corporate Legal Division Head (required to make compliance opinion and not required to attend RKK)

- *Risk Management Division Head* (sebagai pejabat pengganti *Compliance Division Head*)

Propose:

- *Business Unit* (wajib membuat NAK); dan
- *Credit Risk Reviewer Unit* (wajib membuat ARR).

(c) Kategori A3 (> Rp5 – 20 miliar)

Mekanisme persetujuan melalui Sirkulasi.

Voting Member:

Keputusan kredit wajib diputuskan dan ditandatangani oleh 2 Direksi di bawah ini:

- MD *Business Risk*
- MD *Business* atau MD *Treasury & Funding*

Non Voting Member:

- MD *Risk, Legal & Compliance* (wajib menandatangani keputusan kredit)
- *Compliance Division Head* dan *Corporate Legal Division Head* (wajib membuat opini kepatuhan dan tidak diwajibkan menghadiri RKK)
- *Risk Management Division Head* (sebagai pejabat pengganti *Compliance Division Head*)

Propose:

- *Business Unit* (wajib membuat NAK); dan
- *Credit Risk Reviewer Unit* (wajib membuat ARR).

(3) Apabila *President Director* berhalangan hadir, maka dapat digantikan dengan 2 (dua) orang MD yang ditunjuk secara tertulis dan khusus oleh *President Director* sebagai pemutus kredit.

(4) Khusus untuk MD pengusul yang membawahi *Business Unit* atau *Treasury & Funding* apabila berhalangan hadir, maka dapat digantikan dengan 2 (dua) orang EVP yang memiliki kompetensi yang memadai di bidang perkreditan.

b) Pemegang Kewenangan Kategori B

(1) Lembaga yang memutus kredit di tingkat kedua untuk limit *Division Head* yang terdiri dari 2 (dua) pihak *voting member*, yaitu *Business Unit* dan *Credit Risk Reviewer* serta memberikan rekomendasi pada usulan kredit yang akan diajukan pada tingkat pertama (Komite Kredit Kategori A) dengan melakukan

- Risk Management Division Head (as the replacement officer for Compliance Division Head)

Propose:

- Business Unit (required to make NAK); and
- Credit Risk Reviewer Unit (required to make ARR).

(c) Category A3 (> Rp5 – 20 billion)

Approval mechanism conducted through Circulation.

Voting Member:

Credit decision is required to be decided and signed by these 2 Directors:

- MD Business Risk
- MD Business or MD treasury & Funding

Non Voting Member:

- MD Risk, Legal & Compliance (required to sign credit decision)
- Compliance Division Head and Corporate Legal Division Head (required to make compliance opinion and not required to attend RKK)
- Risk Management Division Head (as replacement office for Compliance Division Head)

Propose:

- Business Unit (required to make NAK); and
- Credit Risk reviewer Unit (required to make ARR).

3) Should the *President Director* is present, hence it can be replaced with 2 (two) MD appointed in writing and specifically by *President Director* as credit decision maker.

4) For MD who propose that lead *Business Unit* or *Treasury & Funding*, should they are not able to present, hence replaceable with 2 (two) EVP that has ample competencies in credit sector.

Authorization Holder Category B

1) Credit decision maker institution in the second level for the limit of *Division Head* consist of 2 (two) voting member: *Business Unit* and *Credit Risk Reviewer* as well as provide recommendation on credit proposal proposed in the first level (*Credit Committee Category A*) by conducting a study and preliminary deviation on the compliance

kajian dan keputusan awal terhadap kelayakan pemberian kredit tersebut. Mekanisme persetujuan kredit melalui Komite Kredit Kategori B dilakukan secara sirkular.

(2) Pemegang Keputusan Kredit (PKK) adalah individu (atau pejabat Bank secara *ex-officio*) yang diberikan kewenangan memutuskan kredit di tingkat kedua sesuai dengan Batas Wewenang Memutus Kredit (BWMK). BWMK merupakan besarnya limit yang diberikan oleh Direksi untuk memutuskan kredit secara *four eyes principle*.

(3) Kategori B dibagi menjadi 2 sub kategori, antara lain:

(a) Kategori B1 (≤ Rp10 miliar)

Voting Member:

- Business Unit Division Head
- Credit Risk Reviewer Division Head

(b) Kategori B2 (≤ Rp5 miliar)

Voting Member:

- Pejabat yang ditunjuk oleh *Business Unit Division Head*
- Pejabat yang ditunjuk oleh *Credit Risk Reviewer Division Head*

(4) Pejabat pemegang kewenangan memutuskan kredit kategori B hanya dapat memutuskan persetujuan kredit sesuai dengan limit kewenangannya sesuai dengan daftar pejabat pemegang kewenangan memutuskan kredit (PKK) yang tercantum pada Surat Keputusan Direksi yang diatur secara terpisah.

Tugas dan Tanggung Jawab

Komite Kredit bertanggung jawab untuk menelaah dan memberikan keputusan atas aplikasi/permohonan fasilitas kredit sesuai Batas Wewenang Memutus Kredit (BWMK)-nya dalam rangka pemenuhan prinsip kehati-hatian pemberian kredit yang sehat baik untuk permohonan fasilitas kredit baru, penambahan, perpanjangan, perubahan (penggantian agunan, perubahan jangka waktu/*rescheduling*, restrukturisasi, dan sebagainya).

Pelaksanaan Tugas dan Frekuensi Rapat

Selama tahun 2018, Komite Kredit telah melaksanakan rapat sesuai kebutuhan dan permohonan kredit. Selanjutnya program kerja yang dilaksanakan adalah memastikan keputusan kredit telah sesuai dengan Kebijakan Perkreditan Bank dan Pedoman Pelaksanaan Kredit PT Bank JTrust Indonesia Tbk yang berlaku.

Penilaian Kinerja Komite Kredit

Komite Kredit telah memperhatikan prinsip kehati-hatian dan penerapan *four eyes principle* sesuai limit kewenangannya dalam proses pemberian kredit.

of the credit decision. The credit approval mechanism through Credit Committee Category B is conducted circularly.

2) Credit Decision maker (PKK) is an individual (or Bank officer in ex-officio) that given an authority to decide credit in second level in line with credit disbursement limit (BWMK). BWMK is the amount of limit that given by the Board of Directors to decide credit in four eyes principle.

3) Category B consists of 2 sub categories:

(a) Category B1 (≤ Rp10 billion)

Voting Member:

- Business Unit Division Head
- Credit Risk Reviewer Division Head

(b) Category B2 (≤ Rp5 billion)

Voting Member:

- Officers appointed by Business Unit Division Head
- Officers appointed by Credit Risk Reviewer Division Head

4) Credit decision maker for category B only can approve credit according to their authority credit limit according to the list of decision maker officers (PPK) that stipulated in the Decree of the Board of Directors stipulated separately.

Roles and Responsibilities

The Credit Committee is responsible for reviewing and giving decision on the application/request for credit facility according to the Limit of Authority to Approve Credit (BWMK) in order to comply with the prudent principle of sound credit for the application of new credit facility, addition, extension, amendment (replacement of collateral, amendment of time period/*rescheduling*, restructuring, etc.).

Conduct of Duties and Frequency of Meeting

During 2018, the Credit Committee has conducted meetings based on needs and credit applications. The further work program being implemented is to ensure that the credit decision is in accordance with the Credit Policy of Bank and Guidelines for Credit Implementation of PT Bank JTrust Indonesia Tbk.

Performance Evaluation of Credit Committee

The Credit Committee has taken into account the prudent principles and four eyes principle in accordance with the limits of its authority in the process of credit approval.

BAB IV PENERAPAN FUNGSI KEPATUHAN BANK, AUDIT INTERN DAN AUDIT EKSTERN

CHAPTER IV Implementation of the Bank's Compliance Function, Internal Audit, and External Audit

4.1 Penerapan Fungsi Kepatuhan Bank

Penerapan Fungsi Kepatuhan Bank berpedoman pada Peraturan Otoritas Jasa Keuangan Nomor 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.

Fungsi Kepatuhan adalah serangkaian tindakan atau langkah-langkah yang bersifat preventif (*ex-ante*) untuk:

- a. Mewujudkan terlaksananya Budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank.
- b. Mengelola Risiko Kepatuhan yang dihadapi oleh Bank.
- c. Memastikan bahwa kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan yang berlaku.
- d. Memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang.

Komitmen penerapan fungsi kepatuhan perlu dilaksanakan secara konsisten dan merupakan unsur yang penting dalam meminimalkan risiko kepatuhan dan membangun budaya kepatuhan.

4.1.1. Peran Dewan Komisaris dan Direksi

Dewan Komisaris dan Direksi memegang peranan penting dalam melakukan pengawasan aktif antara lain dalam bentuk persetujuan atas kebijakan dan prosedur, pelaporan secara periodik, dan permintaan penjelasan. Fungsi Kepatuhan yang bersifat *ex-ante* (sebelum terjadi *event* yang tidak diharapkan) dapat terlaksana secara menyeluruh (*comprehensive*), yaitu tersedianya kebijakan/peraturan, Standar Operasional Prosedur (SOP), juga pencegahan langsung oleh para pelakunya jika telah terjadi internalisasi budaya kepatuhan secara menyeluruh bagi seluruh karyawan sehingga karyawan diharapkan memiliki kesadaran atas risiko di masing-masing unit kerjanya.

- a. **Dewan Komisaris** wajib melakukan pengawasan aktif terhadap pelaksanaan Fungsi Kepatuhan di Bank, dengan:
 - a) Mengevaluasi pelaksanaan Fungsi Kepatuhan Bank paling kurang 2 (dua) kali dalam

4.1. Implementation of the Bank's Compliance Function

The implementation of the Bank's Compliance Function refers to Financial Services Authority Regulation (PBI) No. 46/POJK.03/2017 dated July 12, 2017 on "Implementation of the Compliance Function of Commercial Bank."

The Compliance Function is a series of tasks or measures that are preventive in nature to:

- a. Realize and implement the compliance culture at all levels of the organization and activities of the Bank.
- b. Manage compliance risks faced by the Bank.
- c. Ensure that the policies, regulations, systems and procedures, as well as business activities of the Bank are in accordance with the provisions of Bank Indonesia/Financial Services Authority and the prevailing legislations.
- d. Ensure the Bank is in compliance with the commitments made to Financial Services Authority and/or other relevant supervisory authorities.

The commitment for the implementation of the compliance function should be carried out consistently and is an important element in minimizing compliance risk and building a compliance culture.

4.1.1. Role of the Board of Commissioners and Directors

The Board of Commissioners and the Board of Directors have an important role in conducting active surveillance, among others in the form of approval of policies and procedures, periodic reports, and requesting explanations. The Compliance Function is preventive and anticipative in nature, and carried out in a comprehensive manner, not only through enforcing the policies/regulations and standard operating procedures (SOP), but also directly preventing the perpetrators. This environment can only be created if there has been a comprehensive internalization of the compliance culture to all employees so they are well aware of the risks in each of their work units.

- a. The Board of Commissioners is required to actively monitor the implementation of compliance function at the Bank through:
 - a) Evaluating the implementation of Bank Compliance Function at least 2 (two) times

satu tahun melalui laporan pelaksanaan tugas yang disampaikan oleh Direktur yang Membawahkan Fungsi Kepatuhan kepada Otoritas Jasa Keuangan, yang ditembuskan kepada Direktur Utama dan Dewan Komisaris, maupun laporan mengenai pelaksanaan Fungsi Kepatuhan Bank yang disampaikan oleh Divisi/Satuan Kerja Kepatuhan. Untuk melaksanakan evaluasi yang tepat dan akurat dapat dilakukan melalui rapat-rapat, baik rapat Dewan Komisaris, rapat Direksi maupun rapat komite-komite.

- b) Berdasarkan hasil evaluasi pelaksanaan Fungsi Kepatuhan, Dewan Komisaris menyampaikan saran kepada Direktur Utama dengan tembusan kepada Direktur yang membawahkan Fungsi Kepatuhan dalam rangka meningkatkan kualitas pelaksanaan Fungsi Kepatuhan Bank.

b. Direksi berkewajiban:

- a) Menumbuhkan dan mewujudkan terlaksananya Budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank.
- b) Memastikan terlaksananya Fungsi Kepatuhan Bank.

4.1.2. Kerangka Kerja Kepatuhan

Kerangka Kerja Kepatuhan menyajikan kebijakan dan pedoman/Standar Operasional Prosedur kepatuhan serta pengawasan bagi Bank. Kebijakan dan Pedoman Kepatuhan ini bertujuan untuk memastikan ketaatan pada hukum, peraturan, perundang-undangan, kebijakan internal, kode etik dan pedoman tingkah laku. Kebijakan dan Pedoman disusun sesuai dengan Peraturan Otoritas Jasa Keuangan Nomor 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum, dan *best practice* yang berlaku dalam rangka mengidentifikasi, menilai, memonitor dan mengontrol risiko kepatuhan secara terus menerus di seluruh kegiatan usaha dan aktivitas di Bank.

Bank melaksanakan mitigasi risiko kepatuhan sejalan dengan perkembangan, tantangan serta risiko usaha Bank yang semakin besar dan kompleks.

Fungsi Kepatuhan pada satuan kerja kepatuhan selain memiliki kemampuan pemantauan yang bersifat *ex-ante*, juga secara berkesinambungan melakukan pengelolaan Risiko Kepatuhan selaras dengan penerapan manajemen risiko di Bank secara keseluruhan.

a year through the implementation report submitted by the Director responsible for the Compliance Function and the implementation report submitted by the Compliance Division/Unit. The appropriate and accurate evaluation are carried out through the Board of Commissioners, Board of Directors and Committee meetings.

- b) Based on the evaluation results on the implementation of the Compliance Function, the Board of Commissioners conveys the recommendations of the Directors in order to improve the quality of the Bank's Compliance Function implementation.

b. The Board of Directors will:

- a) Develop and realize the Compliance Culture at all levels of the organization and activities of the Bank.
- b) Ensure the implementation of the Bank's Compliance Function.

4.1.2. Compliance Framework

The Compliance Framework presents the policies and guidelines/Standard Operating Procedures of compliance and supervision of the Bank. The Compliance Policy and Guidelines are intended to ensure compliance with laws, regulations, legislation, internal policies, codes of conduct, and behavioral guidelines. The Policies and Guidelines are prepared in accordance with Financial Services Authority Regulation (PJOK) 46/POJK.03/2017 dated July 12, 2017 on the Implementation of the Compliance Function for Commercial Bank, and the applicable best practices in order to continually identify, assess, monitor and control compliance risk in all businesses and activities of the Bank.

Bank carry out mitigation implementation of compliance risk in line with the development and increased complexity, challenges, and risks of the Bank's business.

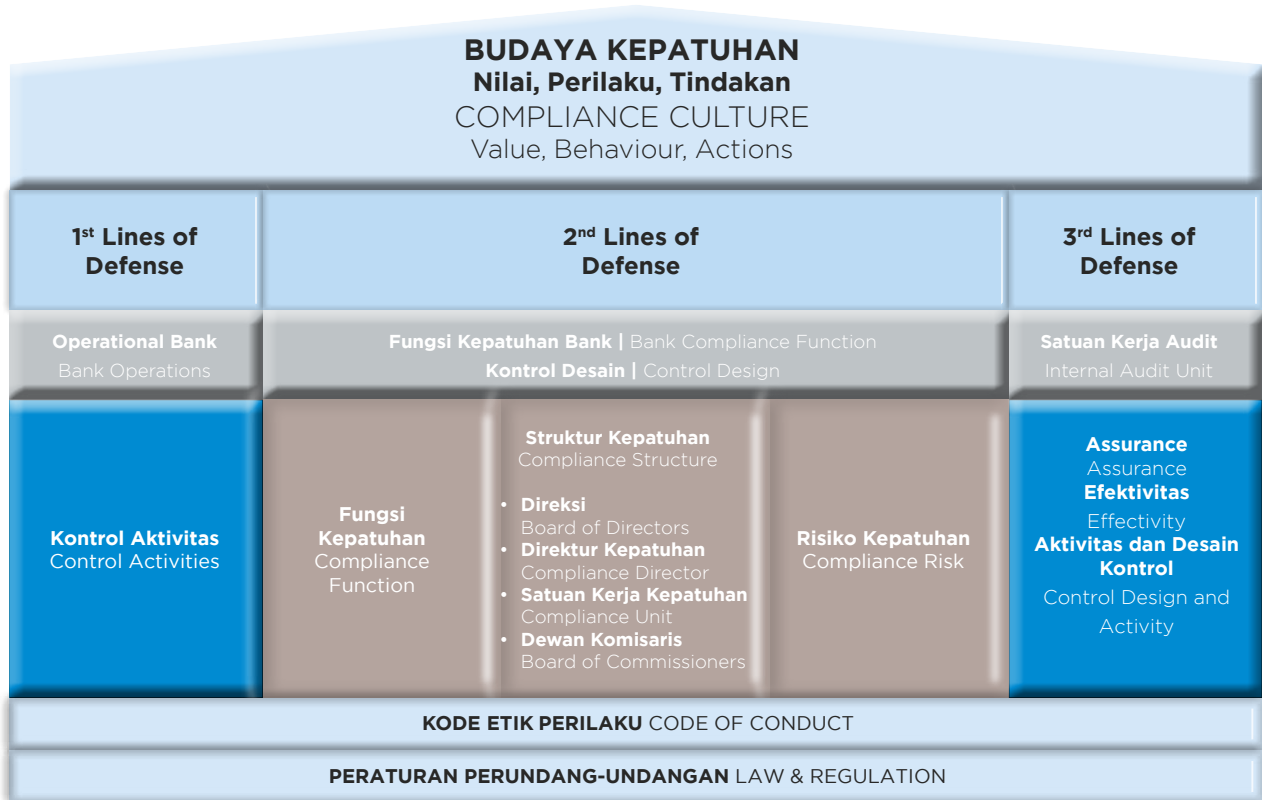
The role of the compliance work unit in addition to monitor preventory and anticipatory capabilities, is to perform Compliance Risk management on an ongoing basis in line with the implementation of risk management of the Bank as a whole.

Kerangka Kerja Pengelolaan Risiko Kepatuhan

Kerangka kerja pengelolaan Risiko Kepatuhan dilakukan melalui pendekatan penerapan budaya kepatuhan yang didasarkan pada 3 (tiga) lini pertahanan yaitu:

Compliance Risk Management Framework

The Compliance Risk management framework is implemented through an approach based on the following 3 (three) lines of defense:



- First Lines of Defense**, merupakan peran lini pertahanan pertama yang diwakili oleh Unit Bisnis dan Unit Pendukung yang berfungsi sebagai unit pengambil dan pemilik risiko (*risk taking and risk owner unit*), dimana mereka mengejar pertumbuhan usaha dan mengambil keputusan yang mempertimbangkan aspek risiko.
 - Second Lines of Defense**, merupakan lini pertahanan kedua yang dilakukan oleh *Risk Management Division* dan *Compliance Division* yang berfungsi sebagai *risk control unit*, yang tugasnya antara lain: menetapkan kerangka dan regulasi internal mengenai pengelolaan risiko, baik yang sifatnya finansial maupun non finansial; melakukan pemantauan terhadap bagaimana fungsi bisnis dan non bisnis dilaksanakan dalam koridor kebijakan manajemen risiko, dan prosedur standar operasional yang telah ditetapkan. Lini pertahanan ini melakukan serangkaian tindakan atau langkah-langkah yang bersifat preventif/pencegahan (*ex ante*).
 - Third Lines of Defense**, merupakan lini pertahanan ketiga yang dilaksanakan oleh auditor internal yang berfungsi sebagai *risk assurance*. Auditor
- First Lines of Defense**, a role represented by the Business Units and Support Units that serves as the risk-taking and risk owner unit, where they pursue business growth and make decisions which take into account risk aspects.
 - Second Lines of Defense**, carried out by the Risk Management Division and the Compliance Division, which serves as a risk control unit, whose duties include: establishing the framework and internal regulations on the management of risk, both in financial and non-financial nature; monitoring of how the business and non-business functions are carried out in the corridors of risk management policies and established standard operating procedures *ex ante* (preventive measures).
 - Third Lines of Defense**, carried out by the internal auditor who serves as risk assurance. Auditors are independent and responsible directly to the

bersifat independen dan bertanggung jawab langsung kepada Direktur Utama. Peran utama auditor internal terkait manajemen risiko adalah melakukan *review* dan evaluasi berkala terhadap kerangka dan tata kelola risiko di Bank secara keseluruhan yang dilakukan oleh lini pertahanan pertama dan kedua untuk memastikan kedua lini ini berjalan sesuai dengan perannya masing-masing (*ex post*).

4.1.3. Kunci Keberhasilan dan Tantangan Dalam Penerapan Fungsi Kepatuhan

PT Bank JTrust Indonesia Tbk terus berupaya meningkatkan sinergi antara fungsi kepatuhan dan fungsi bisnis tetap berjalan dengan baik apabila serangkaian faktor kunci keberhasilan (*key success factor*) dapat dipenuhi, yaitu:

- **Start From The Top**
Komitmen tinggi dari Direksi dan Dewan Komisaris, termasuk para pejabat eksekutif organisasi tersebut. Keberadaan kebijakan dan prosedur kepatuhan yang telah ditetapkan harus diupayakan semaksimal mungkin oleh seluruh jajaran manajemen sesuai dengan tugas, tanggung jawab dan wewenangnya masing-masing.
- **Compliance Culture**
Adanya budaya 'patuh' disemua jajaran pekerja dan manajemen merupakan salah satu faktor penentu keberhasilan dalam menjaga strategi sinergi antara fungsi kepatuhan dan fungsi bisnis sebagaimana diinginkan. Secara konkrit untuk menjamin bahwa kepatuhan telah disepakati sebagai salah satu budaya perusahaan, maka perlu dituangkan dalam berbagai ketentuan internal bank yang berlaku, antara lain dalam ketentuan GCG, kode etik, serta kebijakan dan prosedur kepatuhan lainnya. Dengan demikian penerapannya dapat dipantau dan ditingkatkan.
- **Compliance Procedure and Policy in Place**
Keberadaan kebijakan dan prosedur kepatuhan formal merupakan kunci keberhasilan karena hal tersebut mencerminkan kesiapan dan kesungguhan suatu organisasi untuk menerapkan fungsi kepatuhan sebagaimana diamanatkan oleh regulator. Harus jelas tergambar uraian tugas, tanggung jawab dan wewenang fungsi kepatuhan dalam mengelola risiko yang dihadapi oleh organisasi, termasuk tata cara pengelolaan isu-isu utama risiko yang mencakup proses identifikasi, pengukuran, penilaian dan mitigasi risiko kepatuhan.
- **People and Infrastructure**
Faktor kunci keberhasilan penerapan fungsi kepatuhan di suatu organisasi pada akhirnya akan bertumpu pada keberadaan sumber

President Director. The primary role of internal auditors related to risk management is conducting a review and periodic evaluation of the framework and the governance of the overall risk of the Bank's performed by the first and second line of defense to ensure these lines are operating in accordance with their respective roles *ex post* (review after the event).

4.1.3. Key of Success and Challenges in the Implementation of the Compliance Function

PT Bank JTrust Indonesia Tbk continuously strives to improve the synergy between the compliance function and business functions given the following key success factors are maintained and implemented namely:

- **Start From the Top**
The high commitment of the Board of Commissioners, Board of Directors, and Executive Officers of the organization. The prevailing compliance policies and procedures are fully adhered to at all levels of management in accordance with their respective duties, responsibilities, and authorities.
- **Compliance Culture**
The existence of the 'compliance' culture across the ranks of employees and management is one of the critical success factors in maintaining the synergy between the compliance and the business function. In concrete terms, to ensure that compliance is embedded as one of the element of corporate culture, it is necessary to set forth in the Bank's various prevailing internal provisions, among others the provisions in GCG, code of conduct, as well as other compliance policies and procedures. Subsequently enabling the implementation to be monitored and improved.
- **Compliance Procedure and Policy in Place**
The existence of formal compliance policies and procedures is a key to success because it reflects the readiness and seriousness of an organization to implement the compliance functions as mandated by the regulator. These compliance policies and procedures should clearly illustrate the duties, responsibilities, and authority of the compliance function in managing the risks faced by the organization, including the procedures for managing the main issues of risk that includes the identification, measurement, assessment, and mitigation of compliance risk.
- **People and Infrastructure**
A key factor in successful implementation of the compliance function of an organization ultimately relies on the human resources and

daya manusia dan infrastruktur lainnya seperti teknologi sistem informasi baik untuk pelaporan maupun penyimpanan data. Dalam hal ini perlu dicermati kondisi sumber daya manusia, dalam artian diperlukan sumber daya manusia yang memiliki *multi-talent* atau *skills* mengingat isu-isu kepatuhan yang demikian luas cakupannya dan senantiasa berubah secara dinamis.

4.1.4. Direktur yang Membawahkan Fungsi Kepatuhan

1. Tugas dan tanggung jawab yang dimiliki oleh Direktur yang Membawahkan Fungsi Kepatuhan adalah:
 - a. Merumuskan strategi guna mendorong terciptanya Budaya Kepatuhan Bank.
 - b. Mengkaji dan mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi.
 - c. Menetapkan sistem dan prosedur kepatuhan yang akan digunakan untuk menyusun ketentuan dan pedoman internal Bank.
 - d. Mengkomunikasikan kebijakan dan prosedur kepada unit kerja/karyawan melalui surat edaran atau internal memo maupun internal email.
 - e. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan berdasarkan prinsip kehati-hatian Bank, tata kelola perusahaan yang baik dan peraturan perundang-undangan.
 - f. Meminimalkan Risiko Kepatuhan Bank.
 - g. Melakukan berbagai upaya perbaikan dan penyempurnaan terhadap ketentuan internal serta mekanisme sistem pelaporan dan pengendalian intern.
 - h. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan.
 - i. Melakukan tugas-tugas lain yang terkait dengan Fungsi Kepatuhan, antara lain memantau dan menjaga kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan maupun otoritas pengawas lainnya yang berwenang.
2. Tugas dan tanggung jawab tersebut tidak menghilangkan hak dan kewajiban Direktur yang Membawahkan Fungsi Kepatuhan sebagai anggota Direksi Bank sebagaimana diatur dalam Undang-Undang tentang Perseroan Terbatas.

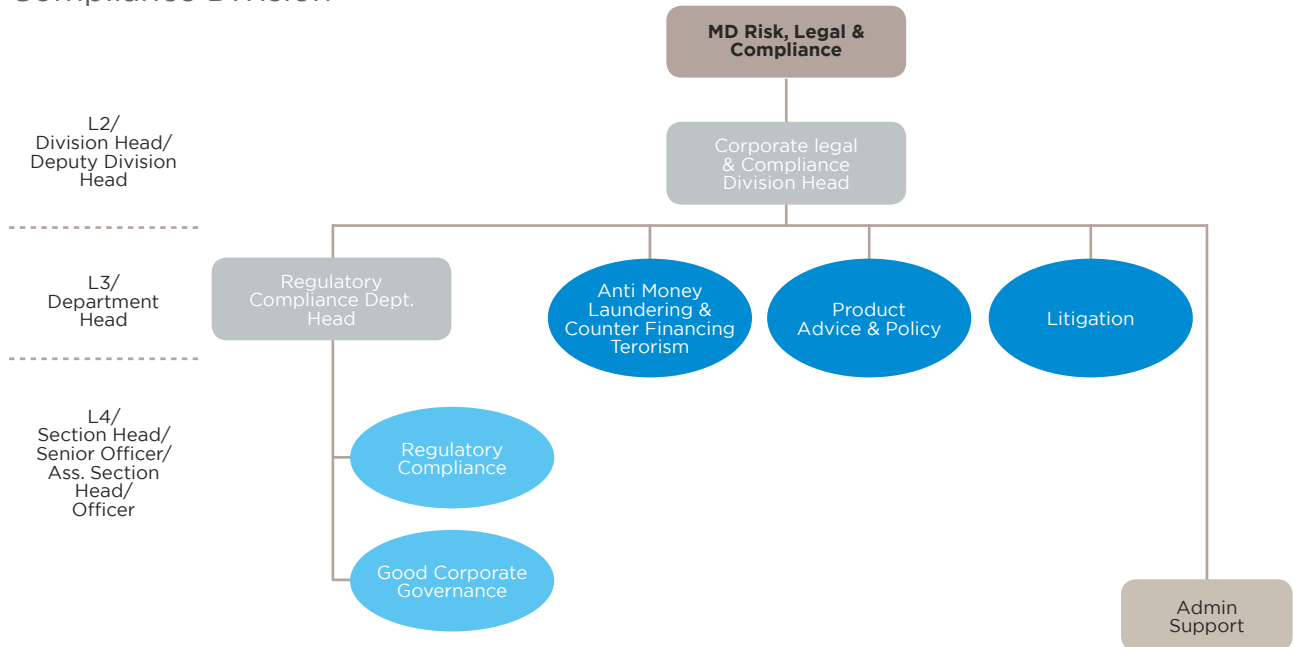
other infrastructure, such as information systems technology, both for reporting and data storage. In this respect, the conditions of the human resources must be observed, human resources that have multi-talent or skills is required, considering compliance issues are so broad in scope and dynamically changing.

4.1.4. Director Responsible for the Compliance Function

1. Duties and responsibilities of the Director Responsible for the Compliance Function are:
 - a. Formulate strategies to encourage the creation of the Bank's Compliance Culture.
 - b. Study and recommend compliance policy or principles to be endorsed by the Board of Directors.
 - c. Establish the compliance systems and procedures to be utilized to formulate the Bank's internal rules and guidelines.
 - d. Communicate the policies and procedures to unit and employees through Circular Letter or internal memos as well as internal email.
 - e. Ensure that all policies, regulations, systems and procedures, as well as business activities conducted by the Bank are in accordance with the provisions of Financial Services Authority based on the principle of prudence, Good Corporate Governance, and the prevailing legislations.
 - f. Minimize the Bank's Compliance Risk.
 - g. Improve and refine the internal regulations and the mechanisms for reporting and internal control systems.
 - h. Take precautions to ensure that policies and/or decisions made by the Board of Directors of the Bank do not deviate from the provisions of Bank Indonesia and the prevailing legislations.
 - i. Perform other tasks related to the compliance function, among others, monitor and maintain the Bank's compliance to the commitments made by the Bank to the Financial Services Authority as well as other related supervisory authorities.
2. The duties and responsibilities does not eliminate the rights and obligations of the Director in charge of the Compliance Function as a member of the Board of Directors of the Bank as stipulated in the Law on Limited Liability Companies.

3. Direktur yang Membawahkan Fungsi Kepatuhan memenuhi persyaratan independensi dan kriteria lain yaitu:
 - a. Tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga sampai derajat kedua dengan anggota Dewan Komisaris, Direksi, dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank yang dapat mempengaruhi kemampuannya untuk bertindak independen.
 - b. Tidak ada rangkap jabatan dengan Direktur Utama dan/atau Wakil Direktur Utama.
 - c. Tidak membawahkan fungsi-fungsi:
 - 1) Bisnis dan operasional (kegiatan penghimpunan dan/atau penyaluran dana dan kegiatan keagenan).
 - 2) Manajemen risiko yang melakukan pengambilan keputusan pada kegiatan usaha Bank.
 - 3) *Treasury*.
 - 4) Keuangan dan akuntansi.
 - 5) Logistik dan pengadaan barang/jasa.
 - 6) Teknologi informasi.
 - 7) Audit Intern.
 - d. Memiliki integritas dan pengetahuan yang memadai mengenai ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan.
4. Perubahan terakhir di tahun 2018 atas Struktur Organisasi unit kerja/Divisi di bawah Direktur yang Membawahkan Fungsi Kepatuhan berdasarkan SK Direksi Nomor 24.04/S.Kep. DIR-HCD/JTRUST/X/2018 tertanggal 24 Oktober 2018 tentang Struktur Organisasi PT Bank JTrust Indonesia Tbk., dimana Compliance Division (CPD) digabungkan dengan Corporate Legal & Litigation Division (CLLD) menjadi nama *Corporate Legal & Compliance Division (CLCD)* sehingga Direktur Kepatuhan membawahkan *Corporate Legal & Compliance Division*, dan Risk Management Division (RMD).
5. Struktur Organisasi Corporate Legal & Compliance Division PT Bank JTrust Indonesia Tbk berdasarkan SK Direksi Nomor 31.45/S.Kep-DIR-HCD/JTRUST/X/ 2018 tertanggal 31 Oktober 2018 yang berlaku sejak tanggal 01 November 2018 sebagai berikut:
 3. Director Responsible in charge of the Compliance Function shall meet the independence requirement and other criteria, namely:
 - a. Has no financial relationship, stewardship, share ownership, and/or family relationship up to the second degree with members of the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders or any relationship with the Bank that may affect its ability to act independently.
 - b. No concurrent positions with the President Director and/or Vice President Director.
 - c. Not responsible for the following functions:
 - 1) Business and Operations (activities of collection and/or distribution of funds and agency related activities).
 - 2) Risk management, taking decision for the Bank's business activities.
 - 3) Treasury.
 - 4) Finance and accounting.
 - 5) Logistics and goods/services procurement.
 - 6) Information Technology.
 - 7) Internal Audit.
 - d. Have integrity and a sufficient knowledge of the regulations of Bank Indonesia and the prevailing legislation.
 4. The latest amendment in 2018 on the Organizational Structure under the Director responsible for the compliance function Board of Directors Decree (SK) No. 24.04/S.Kep.DIR-HCD/JTRUST/X/2018 dated 24 October 2018 on the Organizational Structure of PT Bank JTrust Indonesia Tbk., where Compliance Division (CPD) is merged with Corporate Legal & Litigation Division (CLLD) and become Corporate Legal & Compliance Division (CLDC) hence the Director of Compliance oversees Corporate Legal & Compliance Division, and Risk Management Division (RMD).
 5. The Organizational Structure of Corporate Legal & Compliance Division PT Bank JTrust Indonesia Tbk based on Directors Decree No. 31.45/S.Kep-DIR-HCD/JTRUST/X/ 2018 dated 31 October 2018 that valid started on 01 November 2018 is as follows:

Divisi Compliance Compliance Division



Dalam melaksanakan tugas dan tanggung jawabnya di Direktorat *Risk, Legal & Compliance*, Direktur yang Membawahkan Fungsi Kepatuhan dibantu oleh Kepala Divisi *Corporate Legal & Compliance (Corporate Legal & Compliance Division Head)* yang membawahkan gabungan dari Unit Kerja *Corporate Legal* (meliputi Departemen *Product Advice & Policy*, Departemen *Litigation*, dan *Admin Support*) dengan Satuan Kerja Kepatuhan (meliputi Departemen *Regulatory Compliance*, dan Departemen *Anti Money Laundering & Counter Financing Terrorism*).

In carrying out its duties and responsibilities in the Directorate of Risk, Legal & Compliance, Director that oversee the Compliance Function is assisted by Corporate Legal & Compliance Division Head that oversee the incorporation of Corporate Legal Working Unit (consist of Product Advice & Policy Department, Litigation Department, and Admin Support) with Compliance Working Unit (consist of Regulatory Compliance Department, and Anti Money Laundering & Counter Financing Terrorism Department).

6. Kepala Divisi/Satuan Kerja Kepatuhan

Kepala Divisi *Corporate Legal & Compliance (Corporate Legal & Compliance Division Head)* PT Bank JTrust Indonesia Tbk yang membawahkan gabungan dari Unit Kerja *Corporate Legal* dengan Satuan Kerja Kepatuhan (*Compliance*) telah memenuhi kriteria yaitu:

- Memenuhi persyaratan independensi.
- Menguasai ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan.
- Tidak melaksanakan tugas lain di luar Fungsi Kepatuhan atau tidak merangkap jabatan struktural lain.
- Memiliki komitmen yang tinggi untuk melaksanakan dan mengembangkan Budaya Kepatuhan (*compliance culture*).

6. Compliance Division Head

Corporate Legal & Compliance Division Head of PT Bank JTrust Indonesia Tbk that responsible for the incorporation of Corporate Legal Working Unit and Compliance Working Unit has fulfill these following criteria:

- Fulfill the requirement of independency.
- Master the provision from Financial Services Authority and prevailing laws.
- Not carrying out other duties outside Compliance Function or not taking another structural position.
- Has high commitment to conduct and develop compliance culture.

Selama tahun 2018 pengangkatan, pemberhentian, atau penggantian Kepala Divisi Kepatuhan (*Compliance Division Head*) telah dilaporkan kepada Bank Indonesia/OJK yang mengacu ketentuan pelaporan bagi Pejabat Eksekutif mengenai Bank Umum.

7. Divisi/Satuan Kerja Kepatuhan

Satuan Kerja Kepatuhan mempunyai kedudukan setingkat Divisi dan bertanggung jawab kepada Direktur yang Membawahkan Fungsi Kepatuhan sebagai unit kerja yang bersifat independen yaitu:

- a. Dibentuk secara tersendiri di Kantor Pusat Bank, namun melaksanakan tugasnya di seluruh jaringan kantor Bank.
- b. Bebas dari pengaruh satuan kerja lainnya.
- c. Mempunyai akses langsung pada Direktur yang Membawahkan Fungsi Kepatuhan.

Pejabat dan staf di Divisi/Satuan Kerja Kepatuhan tidak ditempatkan pada posisi menghadapi *conflict of interest* dalam melaksanakan tanggung jawab Fungsi Kepatuhan.

Dalam rangka melaksanakan Fungsi Kepatuhan Bank, Divisi/Satuan Kerja Kepatuhan memiliki tugas dan tanggung jawab antara lain:

- a) Membuat langkah dalam rangka mendukung terciptanya Budaya Kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi.
- b) Berkoordinasi dengan Satuan Kerja Manajemen Risiko untuk melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan mengenai Penerapan Manajemen Risiko bagi Bank Umum.
- c) Menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan.
- d) Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
- e) Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
- f) Melakukan tugas lain yang terkait dengan Fungsi Kepatuhan, antara lain:

During 2018 appointment, termination, or replacement for Compliance Division Head has been reported to Central Bank/OJK that based on the provision of reporting for Executive Position on Commercial Bank.

7. Compliance Division/Working Unit

Compliance Working Unit has the same level of position as Division and responsible to the Director that responsible on Compliance Function as independent working unit:

- a. Formed independently in the Bank's Head Office, however carrying out its duty in entire of the Bank's office network.
- b. Independent from other working unit's influence.
- c. Has direct access to the Director that oversees Compliance Function.

Officers and staff of the Compliance Division/Work Unit are not assigned in the position which faces conflict of interest in carrying out their compliance function responsibilities.

In implementing the Bank's compliance function, the duties and responsibilities of Compliance Division include:

- a) Take steps to support the creation of compliance culture in all Bank's business activities at every level of the organization.
- b) Coordinating with the Risk Management Unit for the identification, measurement, monitoring, and control of the Compliance Risk with reference to Financial Services Authorities Regulation concerning the Implementation of Risk Management for Commercial Banks.
- c) Assessing and evaluating the effectiveness, adequacy, and suitability of policies, regulations, and systems and procedures of the Bank with the prevailing legislations.
- d) Reviewing and recommending update and refinement of policies, regulations, and systems and procedures of the Bank to comply with Financial Services Authorities regulations and the prevailing legislations.
- e) Ensuring that the policies, regulations, systems and procedures, as well as business activities of the Bank are in accordance with the provisions of Financial Services Authorities and the prevailing legislations.
- f) Performing other tasks related to the Compliance Function, among others:

- 1) Memastikan kepatuhan komitmen Bank kepada Otoritas Jasa Keuangan maupun otoritas pengawas lain yang berwenang.
 - 2) Sosialisasi/pelatihan kepada seluruh pegawai Bank mengenai ketentuan yang berlaku terkait dengan fungsi Kepatuhan.
 - 3) Bertindak sebagai narahubung (*contact person*) untuk permasalahan kepatuhan Bank bagi pihak internal maupun eksternal.
- g) Melakukan *Compliance Checklist* secara *on-site* atas aktivitas yang berkaitan dengan perizinan pembukaan/relokasi/penutupan dan perubahan status jaringan kantor.

4.1.5. Program Kerja Pelaksanaan Fungsi Kepatuhan Bank

Sesuai dengan tugas dan tanggung jawab Direktur yang Membawahkan Fungsi Kepatuhan, selama tahun 2018 Satuan Kerja Kepatuhan telah melaksanakan Fungsi Kepatuhan Bank pada seluruh unit kerja sebagai berikut:

1. Pemantauan tingkat kepatuhan Bank terhadap seluruh ketentuan dan peraturan perundang-undangan yang berlaku sebagai berikut:
 - a) Indikator kepatuhan Bank dari perkembangan masing-masing faktor yang dimonitor menunjukkan keadaan antara lain:

- 1) Ensuring compliance with the Bank's commitment to Financial Services Authorities or other relevant supervisory authorities.
 - 2) Disseminating/training to all employees of the Bank regarding the applicable provisions relating to the Compliance function.
 - 3) Acting as the contact person for the Bank's compliance issues for internal and external parties.
- g. Conduct Compliance Checklist of on-site activities related to the licensing of the opening/relocation/closure and improvement of the status of the office network.

4.1.5. Work Program on Implementation of the Bank's Compliance Function

In accordance with the duties and responsibilities of the Director in charge of Compliance Function, during 2018, the Compliance Function Work Unit has implemented the Bank's Compliance Function throughout the work units as follows:

1. Monitoring the level of the Bank's compliance to all applicable rules and regulations as follows:
 - a) The Bank's compliance indicators on development of each factor monitored indicate the following conditions:

Faktor-Faktor yang Dimonitor Monitored Factors	Indikator/Rasio Indicator/Ratio		Keterangan Description
	Semester I Posisi Juni 2018 Semester I as of June 2018	Semester II Posisi Desember 2018 Semester II as of December 2018	
Rasio Kecukupan Modal (Capital Adequacy Ratio/CAR) untuk Risiko Kredit, Operasional & Pasar Capital Adequacy Ratio (CAR) for Credit, Operational, and Market Risk	11,80%	14,03%	Patuh Comply
Batas Maksimum Pemberian Kredit (BMPK) BMPK Kredit: Maximum Credit Disbursement Limit (BMPK) BMPK Credit:			
Pelanggaran Violation Pelampauan Excess	Nil Rp66.349 juta million	Nil Rp79.868 juta million	Patuh Comply Masih terdapat pelampauan BMPK, namun terus diupayakan agar di tahun 2019 dapat diselesaikan. Excess of BMPK is still exceed but to be settled in 2019.
BMPK Surat Berharga: BMPK Obligation: Pelanggaran Violation Pelampauan Excess	Nil Nil	Nil Nil	Patuh Comply Patuh Comply

Faktor-Faktor yang Dimonitor Monitored Factors	Indikator/Rasio Indicator/Ratio		Keterangan Description
	Semester I Posisi Juni 2018 Semester I as of June 2018	Semester II Posisi Desember 2018 Semester II as of December 2018	
Posisi Devisa Neto (PDN) Nett Foreign Exchange Position (PDN)	5.05%	1,54%	Patuh, sesuai ketentuan maksimal 20% Comply, in line with maximum provision 20%
Kualitas Aktiva Produktif (KAP)/ Non Performing Loan (NPL): Non Performing Loan (NPL): NPL Gross	4,17%	4,26%	Patuh, sesuai ketentuan di bawah 5% Comply, in line with provision below 5%
NPL Net	2.95%	3,12%	Patuh, sesuai ketentuan di bawah 5% Comply, in line with provision below 5%
Giro Wajib Minimum (GWM): Minimum Statutory Reserves (GWM): GWM Rupiah Primer Primary Reserve in Rupiah	9,63%	14,66%	Patuh, sudah sesuai ketentuan Comply as required
– Harian Daily	6,42%	9,77%	
– Rata-rata Average	3,21%	4,89%	
GWM Rupiah Sekunder PLM GWM Rupiah Secondary PLM	14,80%	20,35%	
GWM Rupiah LDRLFR (Giro RIM) GWM Rupiah LDRLFR (Giro RIM)	Nil	0,92%	Patuh, sesuai ketentuan min.4% Comply with the minimum of 4%
GWM Valas GWM Forex	21,62%	10,34%	Patuh, sudah sesuai ketentuan Comply as required Patuh, sudah sesuai ketentuan minimal 8% Comply with the minimum provision of 8%
Tingkat Kesehatan Bank (TKB) Bank Soundness Level	3 (cukup sehat fairly healthy)	3 (cukup sehat fairly healthy)	Peringkat Komposit TKB sesuai penilaian OJK Composite TKB rating as per OJK requirement
Profil Risiko Bank: The Risk Profile: Profil Risiko Risk Profile Risiko Inheren Inherent Risk Kualitas Penerapan Manajemen Risiko Risk Management Implementation Quality	3 <i>Moderate</i> <i>Fair</i>	3 <i>Moderate</i> <i>Fair</i>	<i>Trend</i> peringkat komposit tetap Fixed composite rating trend

b) Sesuai dengan ketentuan regulator yang berlaku tentang Transparansi dan Publikasi Laporan Bank, Bank masih terdapat sanksi peringatan/teguran, administrasi dan denda kewajiban membayar terhadap proses dan penyampaian Laporan Rutin Bank kepada Regulator (Otoritas Jasa Keuangan/Bank Indonesia). Hal ini akan terus menerus menjadi perhatian khusus Bank terhadap pelaksanaan kepatuhan pelaporan kepada pihak *Stakeholders*.

b) According to the prevailing provisions by the regulator on Transparency and Publication of Bank Report, the Bank still has sanction for warning, administration and fine for the process and deliveries of the Bank's Report to the regulator (Financial Services Authority/ Central Bank). It will continuously become the Bank's main attention on reporting compliance to the Stakeholders.

- c) Melakukan pemantauan terhadap kewajiban penyampaian laporan rutin/non rutin kepada regulator secara akurat dan tepat waktu, dengan mengimplementasikan *Compliance Report Monitoring (CRM)* secara lebih efektif dan rutin disampaikan kepada setiap unit kerja terkait sebagai *reminder-media* sehingga Bank terhindar dari sanksi administratif baik berupa teguran tertulis maupun denda. Adapun informasi mengenai nama dan jenis laporan, periode/batas waktu dan tujuan penyampaian laporan, sanksi, unit kerja terkait (*PIC Reporting*) tertuang dalam SOP Pemantauan Kepatuhan Pelaporan tanggal 05 November 2018, dimana ketentuan ini telah terdokumentasi dalam aplikasi *E-mail (Outlook)* dan aplikasi *Garoon*.
- d) Dalam melakukan monitoring perkreditan terdapat proses analisa kredit yang perlu dilakukan secara lebih optimal termasuk monitoring kredit serta pemenuhan kelengkapan data, dimana masih terdapat beberapa hal yang tidak dicantumkan/diinformasikan antara lain:
- Belum dipenuhi Regulasi Eksternal, antara lain: penggunaan Data BMPK tidak terkini, Tanggal BI *Checking*/Tanggal Surat Permohonan Kredit/ Surat Permohonan Kredit tidak dicantumkan dalam NAK, Laporan Keuangan *Unaudited*, Kelengkapan dokumen yang diwajibkan dalam NAK, dan masalah BI *Checking*.
 - Belum dipenuhi secara optimal *internal policy*, antara lain: penetapan provisi, suku bunga, dan BAK tidak sesuai *counter rate*; Rasio CCR tidak sesuai dengan ketentuan; Hal-hal yang tidak dicantumkan dalam NAK.
 - Belum dipenuhi aspek keuangan, antara lain: profil risiko sesuai informasi & data keuangan khusus dengan *Risk Rating "High"* dan mitigasi risikonya; Rasio *NPF* tidak dicantumkan dalam NAK; Analisa Kebutuhan Modal Kerja: Penentuan proyeksi penjualan agar menggunakan sumber data yang sama sebagaimana tertuang pada "Tabel Rencana Penjualan".
 - Belum dipenuhi aspek legalitas, antara lain: Legalitas usaha yang diberikan tidak dicantumkan dalam NAK, atau tidak lengkap, atau sudah jatuh tempo pada saat kredit diajukan.
- c) Monitor the obligation on routine/non-routine report delivery to the regulator accurately and punctually, by implementing Compliance Report Monitoring (CRM) effectively and routinely delivered to every related working unit as reminder-media hence the Bank will avoid any administrative sanction both in writing and fines. The information on names and type or report, period/deadlines and objective of the report delivery, sanction, related working unit (PIC Reporting) is depicted on SOP on Compliance Report Monitoring dated 05 November 2018, where this provision is documented in E-mail application (Outlook) and Garoon.
- d) In monitoring credit activities, there are credit analysis process that required to be conducted optimally including credit monitoring as well as data completion, where some of the details are not depicted/informed, such as:
- External Regulation is not yet available, such as: the BMPK data is not updated, the date of BI Checking/ Date for Credit Proposal/Letter for Credit Proposal is not depicted in NAK, Unaudited Financial Report, document completion that required in NAK, and BI Checking problem.
 - Internal policy that has not fulfilled optimally, such as: determination of provisions, interest rate, and BAK is not matching with counter rate; CCR ratio does not match with provisions; Other details that are not depicted in NAK.
 - Financial aspect that has not been fulfilled, such as: risk profile according to information and special financial data with "High" Risk Rating and its risk mitigation; NPF Ratio is not depicted in NAK; Working Capital requirement analysis; Determination of sales projection in order to use the same data source as shown in "Sales Plan Table."
 - Legal aspect that is not fulfilled, such as: legal basis for the business is not shown in NAK, or incomplete, or expired when the credit is proposed.

- | | |
|--|---|
| <p>e. Belum dipenuhi aspek <i>KYC</i>, yaitu pada <i>internet checking</i> agar diperhatikan adanya berita negatif terkait dengan calon debitur.</p> | <p>e. <i>KYC</i> aspect is not fulfilled, that is any internet sources on negative articles about credit applicant should be considered.</p> |
| <p>e) Selama tahun 2018 terdapat 1 (satu) kasus <i>fraud</i> (penipuan) sebesar Rp267 juta yang dilakukan oleh Pegawai Tetap. Bank telah melakukan penyelesaian kasus <i>internal fraud</i> tersebut sesuai dengan kebijakan perusahaan dan SOP Strategi Anti Fraud. Kasus <i>fraud</i> tersebut telah dilaporkan kepada OJK sesuai dengan ketentuan yang berlaku.</p> | <p>e) During 2018, there are 1 (one) fraud case as much as Rp267 million that committed by an employee. The Bank has settled this internal fraud case according to the company's policy and SOP on Anti-Fraud Strategy. This fraud case has already reported to OJK according to the prevailing provisions.</p> |
| <p>f) Bekerja sama dengan unit kerja SKAI dalam memantau pelaksanaan/<i>progress</i> tindak lanjut hasil temuan Tim Pengawas OJK yang masih belum diselesaikan maupun temuan Hasil Audit internal yang dilakukan SKAI pada seluruh unit kerja di Kantor Pusat dan seluruh Kantor Cabang/Capem.</p> | <p>f) Cooperates with SKAI working unit in monitoring the implementation/<i>progress</i> on follow up the findings from Supervisory Team from OJK that has not been completed as well as findings from Internal Audit that carried out by SKAI in entire working unit in Head Office and entire Branch Offices.</p> |
| <p>2. Melakukan pemantauan atas aktivitas yang berkaitan dengan perizinan pembukaan/relokasi/penutupan dan perubahan status jaringan kantor yaitu melalui:</p> | <p>2. Conduct monitoring on activities related to permit in opening/relocating/closing and changing office network status through:</p> |
| <p>a) Penyusunan <i>Compliance Checklist</i> persiapan kantor untuk memastikan kesiapan fisik gedung, kesiapan sumber daya manusia dan kesiapan aktiva yang akan digunakan sebelum pengajuan permohonan izin kepada Otoritas Jasa Keuangan/Bank Indonesia.</p> | <p>a) Formulation of <i>Compliance Checklist</i> office preparation to ensure the preparedness of the building, human resources, and fixed asset that will be used before proposing a permit to the Financial Service Authority/Central Bank.</p> |
| <p>b) Koordinasi dengan <i>project manager</i> (Unit Kerja terkait yang berwenang).</p> | <p>b) Coordination with project manager (related working unit)</p> |
| <p>c) Melakukan <i>review</i> dokumen yang akan disampaikan kepada Otoritas Jasa Keuangan/Bank Indonesia.</p> | <p>c) reviewing documents proposed to the Financial Services Authority/Central Bank.</p> |
| <p>d) Melakukan kunjungan (<i>on-site</i>) sekaligus untuk melihat dan memastikan kesiapan sarana dan prasarana ke lokasi kantor yang diajukan permohonannya kepada Otoritas Jasa Keuangan/Bank Indonesia.</p> | <p>d) Making <i>on-site</i> visit to see and ensure infrastructure and means to office locations that will be proposed to the Financial Services Authority/Bank Indonesia.</p> |

Sampai dengan periode Desember 2018, PT Bank JTrust Indonesia Tbk telah mengajukan Pembukaan maupun Relokasi, Penutupan, dan Peningkatan/Penurunan Status Jaringan Kantor yang telah disetujui oleh Otoritas Jasa Keuangan/Bank Indonesia dan telah diklasifikasikan dengan rincian:

Until December 2018 period PT Bank JTrust Indonesia Tbk submitted the Opening or Relocation, Closure, and Increase/Decrease of Office Network Status approved by the Financial Services Authority/Bank Indonesia and were classified with details:

Keterangan Description	Status Januari s/d Desember 2018 Disetujui Bank Indonesia/OJK Status January to December 2018 Approved by Central Bank/OJK		Proses Persetujuan Approval Process	Belum Dapat Disetujui Not Approved
	Business Plan	Realisasi Realization		
Pembukaan Kantor Office Opening	KC Pontianak	Done, 16 Mei 2018 Done, May 16, 2018	Surat Izin OJK No. S-136/ PB.12/2018 tanggal 30 April 2018 OJK Permit No. S-136/PB.12/2018 dated April 30, 2018	-
	KC Bandar Lampung	Done, 12 Juli 2018 Done, July 12, 2018	Surat Izin OJK No. S-149/ PB.12/2018 tanggal 18 Mei 2018 OJK Permit No. S-149/PB.12/2018 dated May 18, 2018	-
	KC Malang	Done, 8 Agustus 2018 Done, August 8, 2018	Surat Izin OJK No. S-180/ PB.12/2018 tanggal 2 Juli 2018 OJK Permit No. S-180/PB.12/2018 dated July 2, 2018	-
	KC Cirebon	Done, 6 September 2018 Done, September 6, 2018	Surat Izin OJK No. S-187/PB.12/2018 tanggal 6 Juli 2018 OJK Permit OJK No. S-187/ PB.12/2018 dated July 6, 2018	-
	KK Bogor	Carry forward 2019	-	-
	KK Jakarta	Carry forward 2019	-	-
Relokasi Kantor Office Relocation	KC Makassar - Ahmad Yani	Done, 26 Maret 2018 Done, March 26, 2018	Surat Izin OJK No. S-67/ KR.061/2018 tanggal 9 Maret 2018 OJK Permit No. S-67/KR.061/2018 dated march 9, 2018	-
	KC Pangkal Pinang - Melintas	Done, 12 Februari 2018 Done, February 12, 2018	Surat Izin OJK No. S-19/ KR.071/2018 tanggal 9 Januari 2018 OJK Permit No.S-19/KR.071/2018 dated January 9, 2018	-
	KCP Palembang - Sudirman	Done, 29 Januari 2018 Done, January 29, 2018	Surat Izin OJK No. S-8/ KR.0711/2018 tanggal 5 Januari 2018 OJK Permit No. S-8 KR.0711/2018 dated January 5, 2018	-
	KCP Jakarta - Hayam Wuruk	Done, 25 Juni 2018 Done, June 25, 2018	Surat Izin OJK No. S-29/ PB.1211/2018 tanggal 25 April 2018 OJK Permit No. S-29/PB.1211/2018 dated April 25, 2018	-
	KC Batam - Imam Bonjol	Done, 29 Oktober 2018 Done, October 29, 2018	Surat Izin OJK No. S-363/ KO.0502/2018 tanggal 8 Oktober 2018 OJK Permit No. S-363/ KO.0502/2018 dated October 8, 2018	-
	KC Surabaya - Kertajaya	Done, 8 Oktober 2018 Done, October 8, 2018	Surat Izin OJK No. S-265/ KR.041/2018 tanggal 19 September 2018	-
	KCP Surabaya - Rajawali		OJK Permit No. S-265/KR.041/2018 dated September 19, 2018	-
KC Surabaya	Carry forward 2019	Surat Izin OJK No. S-185/ KR.042/2018 tanggal 20 Desember 2018 OJK Permit No. S-185/KR.042/2018 dated December 20, 2018	-	

Keterangan Description	Status Januari s/d Desember 2018 Disetujui Bank Indonesia/OJK Status January to December 2018 Approved by Central Bank/OJK		Proses Persetujuan Approval Process	Belum Dapat Disetujui Not Approved
	Business Plan	Realisasi Realization		
Penutupan Kantor Office Closing	KCP Surabaya	Carry forward 2019	Surat Izin OJK No. S-365/KR.041/2018 tanggal 18 Desember 2018 OJK Permit No. S-365/KR.041/2018 dated December 18, 2018	-
	KK Jakarta - Melawai	Done, 28 Desember 2018 Done, December 28, 2018	Laporan Form A0807 - LAPORAN DATA JARINGAN KANTOR No.00000133F0E7125CE5C48891 A0807 Form Report - REPORT OF OFFICE NETWORK DATA No.00000133F0E7125CE5C48891	-
	KCP Jakarta - Kuningan	Carry forward 2019	Surat Izin OJK No. S-187/PB.121/2018 tanggal 7 Desember 2018 OJK Permit No. S-187/PB.121/2018 tanggal December 7, 2018	-
	KCP Jakarta - Cibubur	Done, 14 Desember 2018 Done, December 14, 2018	Surat Izin OJK No. S-172/PB.121/2018 tanggal 14 November 2018 OJK Permit No. S-172/PB.121/2018 dated November 14, 2018	-
Peningkatan/ Penurunan Status Increase/ Decrease Status	KC Jakarta - Tanah Abang	Done, 2 Mei 2018 Done, May 2, 2018	Surat Izin OJK No. S-101/PB.12/2018 tanggal 26 Maret 2018 OJK Permit No. S-101/PB.12/2018 dated Maret 26, 2018	-
	KC Jakarta - Kelapa Gading			-
	KC Jakarta - Fatmawati			-
	KC Jakarta - Tomang			-
	KK Jakarta - Pintu Kecil	Carry forward 2019	Surat Izin OJK No. S-191/PB.121/2018 tanggal 18 Desember 2018 OJK Permit No. S-191/PB.121/2018 dated Desember 18, 2018	-
	KK Jakarta - Sunter	Carry forward 2019		-
	KK Jakarta - Puri Indah	Carry forward 2019		-
	KK Jakarta - Tebet	Carry forward 2019		-
	KK Depok - Margonda	Carry forward 2019	Surat Izin OJK No. S-955/KR.022/2018 tanggal 21 Desember 2018 OJK Permit No. S-955/KR.022/2018 dated December 21, 2018	-
	KK Karanganyar - Palur	Carry forward 2019	Surat Izin OJK No. S-975/KO.0301/2018 tanggal 19 Desember 2018 OJK Permit No. S-975/KO.0301/2018 dated Desember 19 2018	-
KK Medan - Asia	Carry forward 2019	Surat Izin OJK No. S-279/KR.051/2018 tanggal 27 November 2018 OJK Permit No. S-279/KR.051/2018 dated November 27, 2018	-	

Sampai dengan periode akhir Desember 2018 jumlah jaringan kantor menjadi sebanyak 47 kantor dengan perincian sebagai berikut:

Up to December 2018 the number of branch network of 47 offices is as follows:

Jenis Kantor	Jumlah Total		Type of Office
	Sampai dengan Juni 2018 Up to June 2018	Sampai dengan Desember 2018 Up to December 2018	
Kantor Wilayah	-	-	Regional Office
Kantor Cabang	19	22	Branch Office
Kantor Cabang Pembantu	24	23	Sub-branch Office
Kantor Kas	3	2	Cash Office
Total	46	47	Total

3. Mengikuti proses pengambilan keputusan manajemen bank dengan mengkaji/menguji terlebih dahulu terhadap setiap rencana/rancangan peraturan intern Bank maupun kebijakan/keputusan manajemen apakah telah patuh pada ketentuan dan perundang-undangan yang berlaku, serta memberikan arahan dan saran dalam mengikuti proses Rapat Komite Kredit (RKK), Rapat Teknis, Rapat penetapan Suku Bunga Dasar Kredit (SBDK), Rapat ALCO, Rapat Penyusunan Kebijakan dan SOP, dan rapat-rapat lainnya.
4. Melakukan pemantauan penerapan kebijakan dan prosedur kepatuhan (*compliance procedure*) kegiatan operasi Bank pada setiap satuan kerja/Divisi terkait, yang memberikan "*Compliance Opinion*" atas penerapan kebijakan dan prosedur kepatuhan seperti permohonan masukan/opini dari Divisi/unit kerja lain dalam rangka persiapan peluncuran produk dan aktivitas baru agar tidak menyimpang dari ketentuan yang berlaku.
5. Mensosialisasikan kesadaran kepatuhan untuk seluruh jajaran insan JTrust Bank dalam rangka pengembangan Budaya Kepatuhan (*Compliance Culture*) dengan:
 - a) Melaksanakan sosialisasi dan pelatihan yang terkait dengan prosedur, peraturan dan ketentuan yang berlaku yang diselenggarakan secara internal bank maupun oleh pihak eksternal di tempat pelatihan yang ditentukan kepada seluruh karyawan di unit kerja/Divisi, dan Kantor Cabang/Capem/Kas.
 - b) Rapat Budaya setiap hari Rabu (*Wednesday Culture Meeting*) oleh seluruh Divisi/unit kerja, dan Kantor Cabang/Capem/Kas yang senantiasa mengingatkan karyawan untuk melaksanakan aktivitas kinerja sesuai dengan prosedur, ketentuan, dan peraturan yang berlaku.
 - c) Menumbuh-kembangkan budaya kepatuhan terhadap prinsip kehati-hatian serta pengelolaan risiko di lingkungan PT Bank JTrust Indonesia Tbk, antara lain:
 3. Participate in the bank's management decision-making process by reviewing/testing prior to any plan/draft regulations as well as the Bank's internal policy/management decisions to determine compliance level to the prevailing rules and legislations, as well as providing guidance and recommendations in the Credit Committee Meeting (RKK), Technical Meeting, Prime Lending Rate (SBDK) Meeting, ALCO Meeting, Policy and SOP Formulation Meeting, and other meeting processes.
 4. To monitor the implementation of policies and procedures for compliance (compliance procedure) of the Bank's operations in each related business unit/division, which provides "Compliance Opinion" on the application of compliance policies and procedures such as application for input/opinions from other Division/Work Unit, in preparation for the launching of new products and activities, therefore not deviating from the prevailing provisions.
 5. Socialization for awareness of compliance to all level of employees of J Trust Bank in order to embed Compliance Culture with:
 - a) Implement socialization and training associated with the applicable procedures, rules and regulations, organized internally by the bank and by external parties in a designated training location to all employees in the work unit/division, Regional Office, Branch Office/Sub-Branch Office/Cash office, among others training associated with AML-TPP, Good Corporate Governance/GCG, compliance, and others.
 - b) Culture Meeting every Wednesday by all Division/Work Unit, Regional Office, and Branch/Sub-Branch Office/Cash Office constantly reminding employees to carry out performance activities in accordance with the prevailing procedures, rules and regulations.
 - c) Grow and develop the compliance culture towards the prudence principles as well as risk management at PT Bank JTrust Indonesia Tbk, among others:

- a. Meningkatkan citra Bank kepada pihak pemangku kepentingan (*Stakeholders*) dengan mengembangkan penerapan budaya kepatuhan secara konsisten, dengan mematuhi peraturan dan kebijakan yang ditetapkan oleh regulator/ eksternal maupun internal pada setiap unit kerja/lingkungan kerja.
 - b. Memastikan bahwa suatu rencana, kebijakan dan atau keputusan yang akan diambil oleh Manajemen tetap memperhatikan prinsip kehati-hatian (*prudential banking*) dan tata kelola perusahaan yang baik.
 - c. Memantau dan menjaga/memastikan kepatuhan Bank terhadap seluruh perjanjian dan komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan maupun otoritas pengawas lain yang berwenang.
 - d. Melakukan pembinaan dan/atau pelatihan terhadap penerapan program Anti Pencucian Uang (APU) dan Pencegahan Pendanaan Terorisme (PPT) sesuai dengan ketentuan yang berlaku.
 - e. Memantau dan melakukan pengkinian data nasabah, termasuk didalamnya pemantauan terhadap kelengkapan data *mandatory* atas pembukaan CIF/Rekening baru sesuai dengan data yang telah disampaikan oleh seluruh Kantor Cabang/Capem/Kas.
 - f. Melaksanakan Sertifikasi kompetensi termasuk *refreshment* bagi seluruh Pejabat/Staff sesuai dengan jenjang jabatan.
 - g. Mengirimkan personil Bank untuk mengikuti seminar dan pelatihan yang terkait dengan ketentuan dan peraturan perbankan yang berlaku.
- a. Improve the image of the Bank to the Stakeholders by developing a consistent compliance culture implementation, in compliance with the rules and policies set by the regulators/external or internal in each work unit/work environment.
 - b. Ensure that a plan, policy or decision to be taken by the management takes into account the prudence principle (prudential banking) and Good Corporate Governance.
 - c. Monitor and maintain/ensure the Bank's compliance to all agreements and commitments made by the Bank to Financial Services Authority or another competent supervisory authority.
 - d. Counselling and/or training on the application of the Anti-Money Laundering (AML) and Combating the Financing of Terrorism (PPT) program in accordance with the applicable regulations.
 - e. Monitor and update customer data, including monitoring on the completeness of the data for the opening of CIF/ New accounts are in accordance with the data that has been submitted by all Branch/Sub-Branch/Cash Offices.
 - f. Implement competency Certification including refreshment for all Officers/Staff in accordance with the level of position.
 - g. Sending personnel to attend seminars and trainings related to applicable banking rules and regulations.
6. Pengelolaan Risiko Kepatuhan Bank yang baik dan tepat waktu diharapkan dapat meminimalisir dampak risiko sedini mungkin agar sejalan dengan penerapan manajemen risiko yang telah berjalan di Bank secara keseluruhan.
 - a) Risiko Kepatuhan yang dihadapi
 - a. Ketentuan regulator yang telah dipenuhi posisi Desember 2018 adalah ratio *NPL Gross*, *NPL Net* di bawah 5% dan ratio *CAR* sesuai Profil Risiko.
 - b. Pelampauan BMPK debitur sebesar 5.54% dari total modal dan Bank telah menyampaikan *action-plan* kepada OJK mengenai rencana tindak-lanjut penyelesaian pelampauan BMPK tersebut.
 - c. Pengenaan sanksi denda atas penyampaian Laporan kepada Regulator baik karena faktor keterlambatan maupun koreksi *data-error*.
6. The management of the Bank's Compliance Risk in an adequate and timely manner is expected to minimize the impact of risk as early as possible, to be in line with the risk management implementation, which has been implemented in the Bank comprehensively.
 - a) Compliance Risk faced
 - a. Provision for regulators that has been fulfilled as of December 2018 are Gross NPL ratio, Nett NPL ratio under 5% and CAR ratio according to Risk Profile.
 - b. Excession of BMPK of lender as much as 5.54% from the total capital and the Bank has delivered action-plan to OJK regarding follow-up plan in settling the BMPK excess.
 - c. Fine on Report delivery to the Regulator both because of delay and data-error.

- d. Ketentuan Bank Indonesia tentang Sertifikasi Manajemen Risiko terhadap pejabat Bank untuk Direksi telah terpenuhi, dan untuk pejabat eksekutif (kepala divisi) dan *level* di bawahnya yang diwajibkan masih dalam proses sertifikasi/*refreshment* untuk memenuhi ketentuan yang berlaku.
- b) Mitigasi Risiko Kepatuhan yang Telah Dilaksanakan
- a. Pengawasan aktif Dewan Komisaris dan Direksi dalam pemantauan terhadap Kepatuhan Bank melalui Laporan yang disampaikan secara rutin oleh *Compliance Division*, seperti Laporan Pemantauan Kepatuhan, Laporan Uji Kepatuhan di bidang Kredit, dan Laporan yang terkait di bidang Tata Kelola.
- b. Peningkatan fungsi unit kepatuhan untuk memastikan bahwa Bank sudah melaksanakan kepatuhan sesuai dengan ketentuan dari regulator, salah satunya melalui *Compliance Report Monitoring* secara lebih sistematis, dan mengevaluasi secara berkelanjutan.
- c. Untuk pelampauan BMPK, Bank telah menyusun *Action Plan* perpanjangan waktu dalam menyelesaikan permasalahan pelampauan BMPK tersebut.
- c) Pengukuran Profil Risiko untuk Risiko Kepatuhan
Hasil dari penilaian (*Assessment*) OJK atas *Compliance Risk* yang menjadi bagian dari Laporan *Risk Profile* Bank tahun 2018 telah disampaikan sebagai berikut:

No	Periode/Posisi Penilaian Period/Assessment Position	Peringkat Komposit Profil Risiko Risk Profil composition Ranking	Trend	Peringkat Risiko Inheren Inherent Risk Ranking	Trend	Peringkat Kualitas Penerapan Manajemen Risiko Quality Risk Management Implementation Ranking	Trend
1.	Semester I/ Juni 2018 Semester I/ June 2018	Moderate	Tetap Fixed	Fair	Tetap Fixed	Moderate	Tetap Fixed
2.	Semester II/ Desember 2018 Semester II/ December 2018	Moderate	Tetap Fixed	Fair	Tetap Fixed	Moderate	Tetap Fixed

7. Menyampaikan laporan secara berkala kepada OJK tentang pelaksanaan tugas Direktur yang Membawahkan Fungsi Kepatuhan dalam bentuk:
- a) Laporan Rencana kerja kepatuhan, yang dimuat dalam rencana bisnis Bank.
- b) Laporan khusus mengenai kebijakan dan/ atau keputusan Direksi yang menurut Direktur yang Membawahkan Fungsi Kepatuhan telah menyimpang dari ketentuan Bank Indonesia/OJK dan/atau peraturan perundang-undangan.

- d. Bank Indonesia Regulation on Risk Management Certification for Bank executives to Directors has been met, and for executive positions (division heads) and the levels below compulsory is still on certification/refreshment process to fulfill existing regulations.
- b) Implemented Compliance Risk Mitigation
- a. Active supervision of the Board of Commissioners and Directors in monitoring the Bank Compliance through regular reports submitted by the Compliance Division, such as the Compliance Monitoring Reports, Compliance Assessment Report in the field of credit, and such GCG Report.
- b. Increased compliance unit functions to ensure that the Bank has implemented compliance in accordance with the provisions of the regulator, one of which through the Compliance Monitoring Report in a more systematic manner, and evaluating on an ongoing basis.
- c. For the exceedance of the BMPK, the Bank has formulated the Action Plan to resolve the BMPK exceedance issue.
- c) Assessing the Risk Profile for Compliance Risk
Results of the OJK's Assessment on Compliance Risk as part of the Bank's Risk Profile Reports 2018 has been submitted as follows:

7. Deliver periodic reports to the OJK on the implementation of the tasks of the Director responsible for Compliance Function in the form of:
- a) Report of compliance work plan which is contained in the Bank's business plan.
- b) A special report on the policies and/or the Board of Directors' decision that according to the Director in charge of the Compliance Function notwithstanding the provisions of Bank Indonesia/OJK and/or prevailing legislation.

c) Laporan kepatuhan, yang ditandatangani oleh Direktur yang Membawahkan Fungsi Kepatuhan dan disampaikan secara semesteran (setiap periode Juni dan Desember) serta disajikan secara komparatif dalam 2 (dua) periode laporan dengan tembusan kepada Dewan Komisaris dan Direktur Utama. Selama tahun 2018 telah disampaikan Laporan Kepatuhan kepada OJK dengan perincian sebagai berikut:

c) Compliance report, signed by the Director in charge of the Compliance Function and submitted biannually (every period in June and December) and are presented comparatively in two (2) reporting period with a copy to the Board of Commissioners and the Board of Directors. During the year 2018 Compliance Report to OJK was submitted with details as follows:

Laporan Kepatuhan Compliance Report	Nomor Surat No. Letter	Tanggal Surat Date on Letter
Semester I	No.30.14/S.Dir-CPD/JTRUST/VII/2018	30 Juli 2018 30 July 2018
Semester II	No.30.07/S.Dir-CLCD/JTRUST/I/2019	30 Januari 2019 30 January 2019

8. Untuk meningkatkan efektivitas penerapan program APU dan PPT sesuai dengan Peraturan Otoritas Jasa Keuangan Nomor 12/POJK.01/2017 tanggal 16 Maret 2017 dan Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.03/2017 tanggal 22 Juni 2017, Bank telah melakukan hal sebagai berikut:

- 1) Menyusun Rencana Kerja (*Action Plan*) penerapan program APU dan PPT Tahun 2019.
- 2) Bank telah menyampaikan Laporan Kegiatan Pengkinian Data kepada Otoritas Jasa Keuangan berupa:
 - Laporan Realisasi Rencana Pengkinian Data PT Bank JTrust Indonesia Tbk Tahun 2018 sesuai target yang telah disusun oleh seluruh kantor dalam Laporan Kepatuhan Semester II Tahun 2017 terdahulu.
 - Laporan Rencana Pengkinian Data PT Bank JTrust Indonesia Tbk Tahun 2019 sesuai Data CIF Nasabah yang akan dikinikan.
- 3) Sosialisasi/Pelatihan Reguler/Sosialisasi APU-PPT.
- 4) Memberikan opini/*review* terkait penerapan APU dan PPT terhadap produk dan/atau aktivitas baru.
- 5) Menjawab surat dan atau pemenuhan permintaan data/informasi dari KPK, PPATK, Badan Narkotika Nasional (BNN) dan Kantor Pajak (Direktorat Jenderal Pajak) yang terkait dengan proses hukum, serta korespondensi kepada Pihak Eksternal.
- 6) Kewajiban Pelaporan kepada Pihak Otoritas, antara lain:

8. To improve the effectiveness of the implementation of the AML and PFT program in accordance with Financial Services Authority Regulation No. 12/POJK.01/2017 dated March 16, 2017 and Financial Services Authority Circular Letter No. 32/SEOJK.03/2017 dated June 22, 2017, the Bank has conduct the following:

- 1) Prepare action plan form program implementation APU and PPT year 2019.
- 2) Provide opinion/*review* in connection to the APU and PPT implementation on new products and/or activities, that is:
 - Realization Report on PT Bank JTrust Indonesia Tbk Data Update Plan in 2018 in line with the formulated target by entire offices in Compliance Report Semester II of 2017.
 - Report on PT Bank JTrust Indonesia Tbk Data Update Plan in 2019 in line with CIF Customer Data that will be updated.
- 3) Socialization/Regular Training/Socializing APU-PPT.
- 4) Provide opinion/*review* related to APU and PPT implementation on product and/or new activities.
- 5) Respond to letter and/or fulfillment of data/information request from KPK, PPATK, National Narcotics Agency (BNN) and Tax Office related to legal process, and correspondence to External Parties.
- 6) Reporting Obligations to Authority Party, among others:

Jenis Laporan Type of Report	Periode Period	
	Semester II (Juli 2018 s/d Desember 2018) July 2018 to December 2018	Semester I (Januari 2018 s/d Juni 2018) January 2018 to June 2018
LTKM/STR	18 laporan report	14 laporan report
LTKT/CTR	1.934 laporan report	1.630 laporan report
LTKL/IFTI	2.389 laporan report	2.420 laporan report
SIPESAT	11.066 nasabah customers	3.940 nasabah customers
Penundaan/Penghentian sementara transaksi nasabah kepada PPAK Suspension/temporary cancellation of customer transaction to PPAK	Nihil	3 laporan report

Keterangan | Note:

LTKM/STR	:	Laporan Transaksi Keuangan Mencurigakan Suspicious Transaction Report
LTKT/CTR	:	Laporan Transaksi Keuangan Tunai Cash Transaction Report
LTKL/IFTI	:	Laporan Transaksi Keuangan dari dan ke LN International Fund Transfer Instruction
SIPESAT	:	Sistem Informasi Pengguna Jasa Terpadu Integrated Services User Information System

- 7) Distribusi/penyebaran data Daftar Terduga Teroris dan Organisasi Teroris (DTTOT) dan Daftar Pendanaan Proliferasi Senjata Pemusnah Massal dari Otoritas Jasa Keuangan/Polri kepada seluruh kantor cabang melalui mekanisme *upload*, serta melakukan identifikasi melalui pengecekan secara otomatis ke *database* nasabah untuk mendeteksi kemungkinan kesamaan/ kemiripan nama/profil yang dilakukan di sistem *Smart AML*.
- 8) Kegiatan Lainnya, antara lain:
- Melakukan koordinasi dengan IT Division, Operation Division (OPD), Financial Control Division (FCD), dan SKMR terkait Pelaporan Perpajakan Nasabah baik nasabah Domestik maupun Nasabah Asing Sesuai dengan PMK No. 70/PMK.03/2017.
 - Melakukan koordinasi dengan IT Division dan pihak *Vendor* Aplikasi Smart AML, perihal pelaksanaan Integrasi *Database Core Banking System* ke *database Smart AML*.
 - Pencantuman Daftar Nama Pasangan Calon Pemilihan Kepala Daerah tahun 2018 yang bersumber dari PPAK di Aplikasi Smart AML.
 - dan sebagainya.

4.2 Fungsi Audit Intern

Fungsi Audit Internal perusahaan merupakan salah satu komponen GCG yang ikut berperan aktif dalam membentuk dan meningkatkan lingkungan pengendalian perusahaan.

Tugas dan Tanggung Jawab Audit Internal

Satuan Kerja Audit Internal (SKAI) PT Bank JTrust Indonesia Tbk merupakan Independen unit yang tidak memihak dalam menjalankan tugasnya, meliputi aktivitas *Assurance* dan *Consulting* bidang *Risk/Control* yang didisain untuk dapat memberikan nilai

- 7) Distribution of List of Alleged Terrorist and Terrorist Organization (DTTOT) data and List of Funding for Mass Destruction Weapon Proliferation data from the Financial Services Authority/Police to all branch offices via mechanisms of automatic uploading and checking to the customer database to detect possible similarities/names/profiles performed on the Smart AML system.
- 8) Other Activities, namely:
- Coordination with IT Division, Operation Division (OPD), Financial Control Division (FCD), and SKMR related to Customer Tax Report both Domestic and Foreign Customers in line with PMK No. 70/PMK.03/2017.
 - Coordinate with IT Division and Vendors of AML Smart Application on the implementation of Database Core Banking System Integration to Smart AML database.
 - Inclusion of the List of Names of Running Regional Leaders Election in 2018 from PPAK in Smart AML Application.
 - Others

4.2. Internal Audit Function

Internal Audit Function of a company is one component of GCG that plays an active role in shaping and improving the company's control environment.

Duties and Responsibilities of Internal Audit

Internal Audit Unit (SKAI) of PT Bank JTrust Indonesia Tbk is an independent unit and impartial in carrying out its duties, including the activity of Assurance and Consulting on Risk/Control, which is designed to provide added value, improve operations, assist and

tambah, dapat meningkatkan operasional, membantu dan mengamankan pencapaian Rencana Bisnis Bank (RBB) dengan cara melakukan evaluasi efektivitas dan meningkatkan fungsi *Control, Risk Management* dan *Governance Process*.

Dalam rangka pelaksanaan peran tersebut di atas, SKAI berperan sebagai *Strategic Business Partner* bagi semua unit kerja dan hal ini akan secara terus menerus dilakukan dalam rangka pencapaian tujuan dari PT Bank JTrust Indonesia Tbk.

Dalam rangka menjaga independensi fungsi audit intern, secara struktur organisasi posisi SKAI berada di bawah langsung dan melapor kepada Direktur Utama, dan mempunyai garis koordinasi dengan Dewan Komisaris melalui Komite Audit. SKAI berperan membantu Direktur Utama dalam menjabarkan hasil pengawasannya dalam hal proses pengendalian Intern (SPI), manajemen risiko dan tata kelola perusahaan. Posisi, kewenangan, tanggung jawab, profesionalisme, organisasi, dan cakupan tugas SKAI telah mengacu pada Standar Pelaksanaan Fungsi Audit Intern (SPFAIB) yang ditetapkan dalam Peraturan Bank Indonesia Nomor 1/6/PBI/1999 tanggal 20 September 1999 tentang Penugasan Direktur Kepatuhan (*Compliance Director*) dan Penerapan Standar Pelaksanaan Fungsi Audit Intern Bank Umum yang saat ini sudah diganti dengan POJK Nomor 1/POJK.03/ 2019 dan POJK Nomor 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal.

SKAI membantu Bank dalam mencapai tujuan dengan pendekatan yang sistematis dan disiplin dalam mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian intern/*control* serta GCG. Aktivasinya mencakup bidang-bidang operasional, kredit, teknologi, dan sistem informasi serta fungsi-fungsi pendukung di Kantor Pusat. Dalam menjalankan tugasnya, SKAI berwenang mengakses semua fungsi, catatan, properti dan karyawan Bank sesuai penugasan audit tanpa dibatasi oleh pihak manapun.

secure the process of achieving the Bank's Business Plan (RBB) through evaluating the effectiveness and improving the function of Control, Risk Management and Governance Process.

In order to implement the above, the role of SKAI is to be the Strategic Business Partner for all work units and ensure these units benefit from SKAI for security and business improvement.

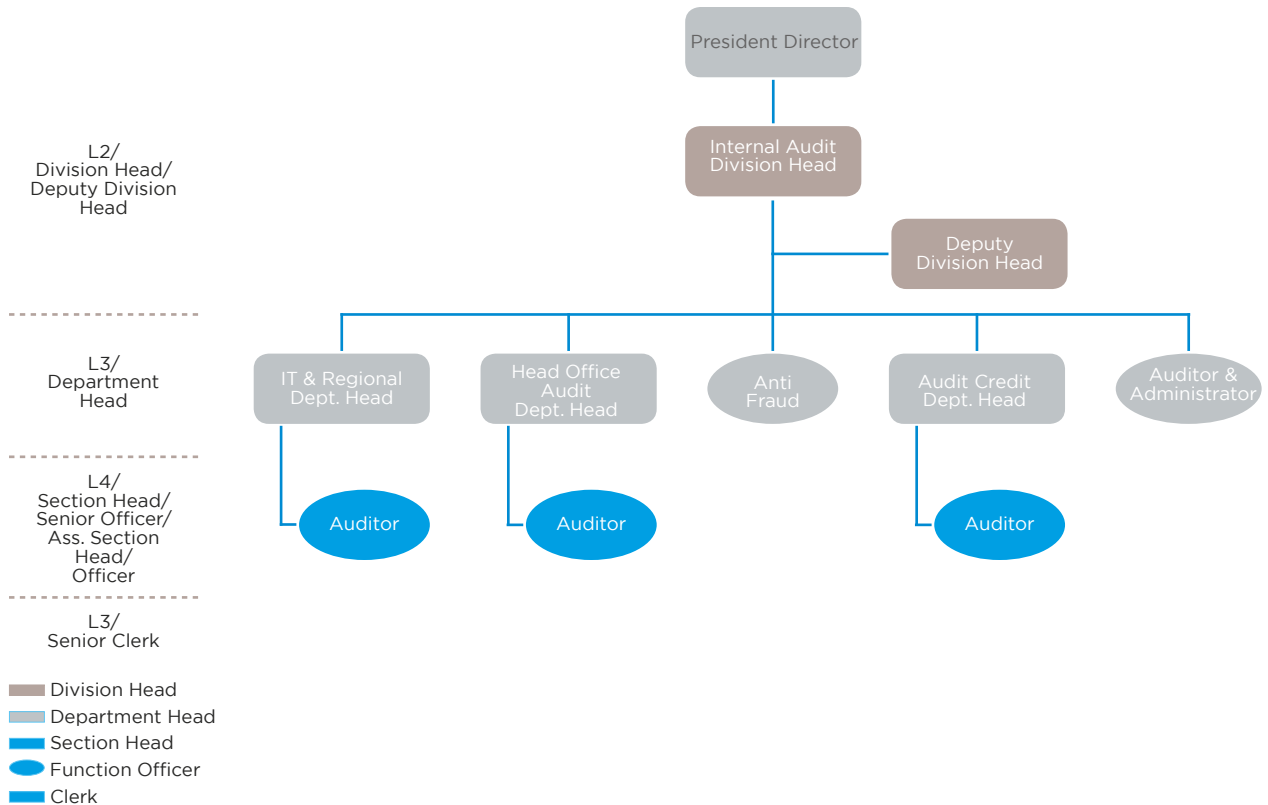
In order to maintain the independence of the internal audit function, the position of Internal Audit under the direct and reports to the President Director, and has a line of co-ordination with the Board of Commissioners through the Audit Committee. SKAI acts as the eyes and ears of the President Director on enforcing the Internal Control System (SPI) and securing the Bank's operational activities associated with the activity of raising funds, credit, charge and fee-based income. Position, authority, responsibility, professionalism, organization, and the scope of duties of SKAI refers to the Internal Audit Implementation Standards (SPFAIB) stipulated in Bank Indonesia Regulation No. 1/6/PBI/1999 dated September 20, 1999 on the Assignment of Compliance Director and the Implementation of Internal Audit Standards for Commercial Banks and POJK No. 56/POJK.04/2015 on the Establishment and Guidelines for the Preparation of the Charter of the Internal Audit Unit.

SKAI assist the Bank in achieving its objectives through a systematic and disciplined approach to evaluate and improve the effectiveness of risk management, internal control and corporate governance. Its activities cover the areas of operational, credit, technology, and information systems and support functions from Headquarters. In performing its duties, Internal Audit is authorized to access all functions, records, property and employees of the Bank in accordance with the audits without being restricted by any party.

**Struktur Organisasi Satuan Kerja Audit Intern (SKAI)
PT Bank JTrust Indonesia Tbk Tahun 2018**

**Organizational Structure of the 2018 Internal Audit
Unit (SKAI) of PT Bank JTrust Indonesia Tbk**

Internal Audit Division - Proposed
Internal Audit Division - Proposed



Berdasarkan ketentuan pada Pasal 11 ayat (3) Peraturan Bank Indonesia Nomor 1/6/PBI/1999 tanggal 20 September 1999 tentang Penugasan Direktur Kepatuhan (*Compliance Director*) dan Penerapan Standar Pelaksanaan Fungsi Audit Intern Bank Umum, dinyatakan bahwa Kepala SKAI diangkat dan diberhentikan oleh Direktur Utama Bank dengan persetujuan Dewan Komisaris.

Saat ini SKAI di PT Bank JTrust Indonesia Tbk dikepalai oleh Sdr. Edi Alpian, Warga Negara Indonesia, berdomisili di Jl. Taman Malaka Utara II Blok C8/7 Rt.007/12, Jakarta Timur dan menjabat sebagai Kepala SKAI sejak bulan April 2017. Memiliki pengalaman di dunia perbankan lebih dari 20 tahun maupun instansi pemerintah selama 5 tahun. Selain memiliki latar belakang pendidikan Sarjana Ekonomi Akuntansi, beliau juga memegang sertifikasi profesi internasional dari GARP dan sertifikasi nasional (QIA, Manajemen Risiko level 4).

Sebelum bergabung dengan PT Bank JTrust Indonesia Tbk pernah berkarir di beberapa Bank maupun instansi

Based on the provision in Article 11 paragraph (3) of Bank Indonesia Regulation No. 1/6/PBI/1999 dated 20 September 1999 on Compliance Director Assignment and the Implementation of Internal Audit Function Implementation Standard for Commercial Bank, it stated that the Head of SKAI is appointed and dismissed by the Bank's President Director with approval form the Board of Commissioners.

Currently, the SKAI in PT Bank JTrust Indonesia Tbk is headed by Mr. Edi Alpian, Indonesian citizen, domiciled in Jl. Taman Malaka Utara II Blok C8/7 Rt.007/12, East Jakarta and has served as SKAI Head since April 2017. Having experience in the banking industry for more than 19 years and government agencies for 5 years. In addition to his education background in Bachelor of Accounting Economics, he also holds an international profession certification from GARP and national certification (QIA, Risk Management level 4).

Prior to joining PT Bank JTrust Indonesia Tbk, his career was in several banks and government agencies such

pemerintah seperti PT. Bank MNC Internasional, Tbk (kepala SKAI), PT. Bank Internasional Indonesia, Tbk (Deputy Division Head Audit Credit), Badan Penyehatan Perbankan/BPPN (Team Leader Audit Bank Restructuring), PT. Bank Dana Asia/Danamon Central Asia (Regional Audit Head), PT. Bank Indo Monex (Supervisor Operational & Credit Audit), KAP-KPMG (Supervisor Audit).

Piagam Audit Internal

PT Bank JTrust Indonesia Tbk memiliki Piagam Audit Internal yang mendefinisikan: Tujuan, Aktivitas SKAI, Kewenangan dan Tanggung Jawab SKAI dalam Organisasi, termasuk hubungannya dengan Direksi dan Dewan Komisaris. Kepala SKAI bertanggung jawab langsung kepada Direktur Utama dan mempunyai garis koordinatif kepada Komite Audit untuk mengkomunikasikan hasil-hasil kerja SKAI kepada Direksi dan Komisaris. SKAI PT Bank JTrust Indonesia Tbk bertugas membantu Direktur Utama dan Dewan Komisaris untuk memastikan kecukupan dan efektivitas Sistem Pengendalian Intern (SPI), proses manajemen risiko dan tata kelola Bank.

Sesuai Peraturan Otoritas Jasa Keuangan No.56/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Audit Internal dan Peraturan Bank Indonesia No. 1/6/PBI/1999 tanggal 20 September 1999 perihal Penugasan Direktur Kepatuhan (*Compliance Director*) dan Penerapan Standar Pelaksanaan Fungsi Audit Intern Bank (SPFAIB), maka dalam pembentukan dan pelaksanaan tugasnya, Divisi Internal Audit telah membuat dan melaksanakan Piagam Audit Internal yang memuat Kedudukan, Visi, Misi, Ruang Lingkup, Independensi, Kode Etik, Akuntabilitas, Tanggung Jawab, Wewenang, Tidak Memihak, dan Standar Praktik Audit Intern. Piagam Audit Internal dikaji ulang secara berkala setiap tahun atau sewaktu-waktu apabila diperlukan, dimana kaji ulang terakhir telah dilakukan pada tanggal 21 September 2016 dan akan dilakukan kembali pada tahun 2019.

Metodologi Audit

Kepala SKAI membuat *Annual Audit Plan* yang harus disetujui oleh Direktur Utama dan Dewan Komisaris serta pelaksanaannya dimonitor oleh Komite Audit.

Dalam menetapkan pandangan dan pemikirannya, Kepala Divisi Internal Audit (SKAI) diberikan ruang yang bebas dan obyektif serta bebas dari tekanan pihak manapun (*independence*), sehingga terhindar dari benturan kepentingan (*conflict of interest*) atas obyek atau kegiatan yang diperiksanya.

as PT. Bank MNC Internasional, Tbk (head of SKAI), PT Bank Internasional Indonesia, Tbk (Deputy Division Head Audit Credit), Bank Restructuring Agency/BPPN (Team Leader Audit Bank Restructuring), PT. Bank Dana Asia/Danamon Central Asia (Regional Audit Head), PT Bank Indo Monex (Supervisor Operational & Credit Audit), KAP-KPMG (Audit Supervisor).

Internal Audit Charter

Internal Audit charter is a formal document defining: Objectives, Activities of SKAI, Authority and Responsibility of SKAI within the Organization, including its relationship with the Board of Directors and Board of Commissioners. The Head of the Internal Audit Unit is directly responsible to the President Director and has a coordinating line to the Audit Committee to communicate results to the Board of Directors and Board of Commissioners. SKAI of PT Bank JTrust Indonesia Tbk is responsible for assisting the President Director and the Board of Commissioners to ensure the completeness and effectiveness of the Internal Control System (SPI), risk management process and the Bank's governance.

In accordance with the Regulation of the Financial Services Authority No. 56/POJK.04/2015 dated December 23, 2015 on the Establishment and Guidelines for Formulating Internal Audit Charter and Bank Indonesia Regulation No. 1/6/PBI/1999 dated September 20, 1999, concerning the Assignment of Compliance Director and Standard Implementation Function of Bank Audit Intern (SPFAIB), therefore in establishing and executing its duties, the Internal Audit Division has created and implemented the Internal Audit Charter containing Position, Vision, Mission, Scope, Independence, Code of Conduct, Accountability, Responsibility, Authority, impartial, and Audit Intern Standards Practice. The Internal Audit Charter is periodically reviewed annually or at any time as necessary, whereby the final review has been made on September 21, 2016 and will be conducted in 2019.

Audit Methodology

Head of SKAI formulates Annual Audit Plan that has to be approved by President Director and the Board of Commissioners and the implementation is monitored by Audit Committee.

In setting views and thoughts, the Head of the Internal Audit Division (SKAI) is given the independence to avoid conflict of interest on the audited objects or activities.

Dalam melaksanakan audit, SKAI membuat analisa dan penelitian di bidang keuangan, akuntansi, operasional dan kegiatan lainnya melalui pemeriksaan/audit secara *on-site* dan pemantauan secara *off-site*, serta memberikan saran perbaikan dan informasi obyektif tentang kegiatan yang perlu mendapat perhatian khusus oleh semua tingkatan manajemen, juga mampu mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana.

Audit dilakukan dengan metodologi *Risk Based Audit* bertujuan untuk melakukan evaluasi kelengkapan dan penilaian keandalan/efektivitas dari SPI untuk dapat meminimalisir risiko, disamping itu temuan audit akan digunakan sebagai dasar dalam melakukan *corrective action* atas kelemahan SPI dan meningkatkan *risk awareness* petugas dalam mengendalikan pekerjaan yang ditangani.

Kualifikasi/Sertifikasi Profesi Audit Internal dan Pelatihan

Untuk meningkatkan kompetensi Audit Internal secara berkesinambungan sehingga memberikan nilai tambah (*value added*) bagi perusahaan, maka selama tahun 2018 seluruh Auditor telah diikutsertakan dalam program pelatihan dan sertifikasi.

Sampai dengan tahun 2018, Audit Internal telah memperoleh berbagai kompetensi baik internasional maupun nasional seperti International Certificate in Banking Risk dari GARP, CBIA (Certified Bank Internal Audit), Qualified Internal Audit (QIA), sertifikasi Manajemen Risiko level 1 – 4. Untuk terus meningkatkan kompetensi auditor SKAI secara berkesinambungan sehingga mampu menjalankan fungsi audit intern secara profesional, maka kualifikasi/sertifikasi profesi yang diperlukan bagi auditor SKAI adalah:

- Semua SDM SKAI telah mempunyai Sertifikasi Manajemen Risiko *Level 1* untuk Auditor, *Level 2* untuk *Team Leader*, *Level 3* untuk *Department Head*, dan *Level 4* untuk Kepala SKAI.
- Selain itu, untuk mendukung kompetensi teknis, SKAI telah memiliki 13 (tiga belas) orang auditor yang mempunyai *Certified Bank Internal Audit* dari LSPP.
- Selain mengikuti proses sertifikasi profesi, seluruh auditor juga telah diikutkan dalam *training-training* baik yang terkait dengan aktivitas audit maupun operasional bank (kredit, IT, dan lain-lain).

Seiring dengan dinamika perusahaan, SKAI dituntut untuk melakukan penyesuaian yang berkelanjutan agar mampu mempertahankan standar kinerja. Untuk itu PT Bank JTrust Indonesia Tbk senantiasa mengikutsertakan petugas dan pejabat SKAI ke pelatihan baik internal maupun eksternal agar diperoleh kualifikasi yang:

In performing the audit, SKAI formulates analysis and research in the fields of finance, accounting, operations and other activities through on-site inspection/audit and off-site monitoring, as well as providing suggestions for improvement and objective information on activities that need special attention by the management at all levels. In addition, SKAI also identifies every possible improvement and increases efficient use of resources and funds.

Audits are conducted through the Risk Based Audit methodology, which aims to evaluate the completeness and reliability of assessment/effectiveness of SPI in order to minimize risk. In addition, the audit findings are used as the basis for corrective action on weaknesses of SPI and to improve the risk awareness of personnel in managing the job at hand.

Internal Audit Professional Qualifications/Certification and Training

To continuously improve the Internal Audit's competence in order to provide added value on the company, during 2018 all auditors have been included in the training and certification programs.

Up to 2018, the Internal Audit has acquired a wide range of international and national competencies such as the Certified Bank Internal Audit, Qualified Internal Audit (QIA), Risk Management Certification Level 1 - 4. To continuously improve the competence of SKAI auditors in a sustainable manner and able to manage the internal audit function professionally, SKAI requires the following professional qualifications/certifications, namely:

- All SKAI HR possess Risk Management Certification level 1 for Auditor, level 2 for Team Leader, Level 3 for the Department Head, and level 4 for SKAI Head.
- In addition, to support technical competence, SKAI has 13 (thirteen) auditors with the Certified Bank Internal Audit from LSPP.
- In addition on taking the professional certification process, all auditors have also been included in trainings both related to audit activities as well as bank operations (credit, IT, etc.).

In line with the company's dynamics, SKAI is required to perform continuous adjustments to be able to maintain performance standards. Accordingly, PT Bank JTrust Indonesia Tbk include officers and management of SKAI in both internal and external training in order to obtain qualifications:

- a. Memiliki pengetahuan yang memadai secara umum dan teknis dalam bidang tugas yang relevan dengan spesialisasinya.
- b. Mempunyai perilaku yang independen, jujur, obyektif, tekun dan loyal.
- c. Memiliki kemampuan mempertahankan kualitas profesi yang profesional.
- d. Memiliki kecakapan interaksi dan komunikasi secara lisan maupun tulisan.
- e. Dapat meningkatkan perannya menjadi konsultan dan *catalyst*.

Evaluasi atau Kaji Ulang Pelaksanaan Audit Intern Bank

Untuk melakukan evaluasi atau kaji ulang atas hasil kerja SKAI Bank dan kepatuhannya terhadap Standar Pelaksanaan Fungsi Audit Intern Bank (SPFAIB) serta perbaikan yang mungkin dilakukan sesuai dengan ketentuan dalam Peraturan Bank Indonesia yang berlaku, maka paling kurang setiap tiga tahun sekali dilakukan evaluasi atau kaji ulang oleh auditor/pihak ekstern, yang terakhir telah dilakukan pada tahun 2016 untuk periode audit 2013 –2016 dan dinyatakan bahwa SKAI telah memenuhi ketentuan SPFAIB. Untuk evaluasi/kaji ulang periode berikutnya atas hasil kerja SKAI Bank dan kepatuhannya terhadap Standar Pelaksanaan Fungsi Audit Intern Bank (SPFAIB) akan dilaksanakan pada tahun 2019.

Tujuan dan Tahapan Pelaksanaan Audit Intern Bank

SKAI dalam melaksanakan tugasnya terutama untuk memastikan terlaksananya SPI yang bertujuan untuk:

- a. Memastikan kecukupan pengamanan dana masyarakat, meliputi deposito, giro, tabungan serta dana pihak ketiga lainnya.
- b. Pengamanan *Assets* berupa audit atas Kualitas Aktiva Produktif (kredit) melalui audit unit kerja pengelola kredit dan *Loan Review (end to end process)* untuk memastikan bahwa proses kredit (Inisiasi, Analisa, Keputusan, Pencairan dan *Monitoring*) telah dilakukan secara *prudent*.
- c. Pencapaian tujuan dan sasaran kegiatan operasional yang telah ditetapkan, pemanfaatan sumber daya secara ekonomis dan efisien, efektif dan mengawasi kegiatan tertentu seperti kegiatan sistem teknologi informasi (*Core Banking, Opics, Trade Innovation, Swift*, dan lain-lain).
- d. Kebenaran dan keutuhan informasi, termasuk pencatatan kewajiban Bank dan rekening administratif yang akurat, lengkap dan tepat waktu.
- e. Kepatuhan terhadap kebijakan, rencana, prosedur, hukum dan peraturan, termasuk penilaian aspek-aspek yang dapat mempengaruhi Tingkat Kesehatan Bank.
- f. Penilaian *awareness* lini manajemen/supervisi terhadap 5 (lima) komponen SPI.

- a. Have adequate knowledge of general and technical tasks in relevant to the field of specialty.
- b. Independent, honest, objective, diligent, and loyal.
- c. Able to maintain the quality of professional profession.
- d. Have interaction and communication skills both oral and writing.
- e. Able to increase its role as a consultant and catalyst.

Evaluation or Review on the Bank's Internal Audit Implementation

To perform an evaluation or review on the work of the Bank's SKAI and its compliance with the Bank Internal Audit Function Implementation Standards (SPFAIB) as well as possible improvements in accordance with the prevailing provisions in the Bank Indonesia Regulation, at least once every three years, an evaluation or review by external auditor/parties have been conducted, the most recent was conducted in 2016 for the 2013-2016 audit period, and the SKAI was declared to have met the SPFAIB requirements. The next evaluation/ review on the work results of the Bank's SKAI and its compliance toward the Bank Internal Audit Function Implementation Standards (SPFAIB) has been conducted in 2019.

Objectives and the Implementation Phase of the Bank Internal Audit

SKAI performs its duties to ensure the implementation of SPI, with the following objectives:

- a. Ensuring the security of public funds, including deposits, current accounts, savings, and other third-party funds.
- b. Securing *Assets* include audit on the Quality of productive asset through the audit work unit of credit management and *Loan Review (end to end process)* to ensure that the process of credit (Initiation, Analysis, Decision, Disbursement and Monitoring) has been carried out prudently.
- c. The goals and objectives of the operational activities are achieved through economically efficient and effective use of resources and supervise the activities of certain activities such as information technology systems (*Core Banking, Opics, Trade Innovation, Swift*, and others).
- d. The integrity and completeness of information, including accurate, complete, and timely recording of the Bank obligations in the administrative accounts.
- e. Compliance with policies, plans, procedures, laws and regulations, including the assessment of those aspects that affect the Bank's Soundness Level.
- f. Assessment on awareness of management/ supervision of 5 (five) SPI components.

Pra Audit diawali dengan pemilihan metode pendekatan audit seperti *Scope Audit* berdasarkan hasil *assessment*, *Audit Program* terkait, *Mandays*, penetapan *sample size*, teknik pengujian, bukti minimal dan cara mendapatkannya.

Penetapan penugasan ditetapkan oleh Kepala SKAI berdasarkan *schedule* yang ada pada *Audit Plan*.

Penugasan Audit dimulai dengan pembuatan surat tugas, *entry meeting*, *field audit*, *exit meeting*, pembuatan Daftar Monitoring Tindak Lanjut (DMTL) dan hasil audit berupa hasil penilaian SPI akan dicerminkan dalam *Audit Rating* dengan kualifikasi *Strong*, *Satisfactory*, *Fair*, *Marginal* dan *Unsatisfactory*.

Hasil audit akan ditindaklanjuti dengan pembuatan *executive summary report* yang disampaikan kepada Direktur Utama, Dewan Komisaris dengan tembusan kepada Direktur Kepatuhan dan Direktur terkait.

4.2.1 Pelaksanaan Tugas Audit Intern

A. Pemeriksaan Umum (*General Audit*)

Yaitu pemeriksaan dengan ruang lingkup aspek kegiatan operasional Bank, dengan tujuan menilai efektivitas SPI terutama penilaian atas sistem dan prosedur yang berlaku serta implementasinya. Pemeriksaan ini dilaksanakan pada seluruh Kantor Cabang/Capem dan Divisi-Divisi Kantor Pusat. Pada tahap awal menuju *Risk Based Audit* maka pada awal tahun telah digunakan metodologi *COSO Framework* (5 komponen) yang meliputi:

- Control Environment*
- Risk Assessment*
- Information & Communication*
- Monitoring*
- Control Activity*

B. Pemeriksaan Pasif (*On Desk Audit*)

Yaitu pemeriksaan yang dilakukan secara *on desk* yang meliputi *monitoring* kepada penyelesaian DMTL, Rekening Perantara, penelitian dan pembuatan rekapitulasi berdasarkan laporan yang disampaikan oleh Kantor Cabang/Capem.

4.2.2. Realisasi/Pencapaian Penugasan Audit Intern

Selama tahun 2018, SKAI telah melaksanakan pemeriksaan umum (*General Audit*) sesuai dengan rencana kerja audit tahun 2018 sebagai berikut:

Pre Audit begins with the selection of audit approach methods such as Audit Scope based on the assessment results, Audit related program, Mandays, the determination of sample size, testing technique, minimal evidence and ways to acquire them.

The Assignment determined by the Head of the Internal Audit Unit based on the recommendation of the Regional Head/General Audit Head

Audit Assignment begins with formulating the work order, entry meeting, field audits, exit meetings, formulating the follow up list to be monitored, and audit results in the form of SPI assessment as reflected in the Audit Rating with the following qualifications, Strong, Satisfactory, Fair, Marginal, and Unsatisfactory.

Audit Results will be followed up by creating executive summary reports to the President Director, Board of Commissioners and copies to the respective Compliance Director and Director.

4.2.1. Internal Audit Implementation

A. General Audit

Inspection based on scope of the Bank's operational activities, aimed to assess the effectiveness of the SPI, particularly the prevailing systems and procedures and their implementation. These inspections are carried out in all Branches/Sub Branch and Head Office Divisions. At the initial stage of Risk Based Audit and at the beginning of the year, COSO Framework (5 parts) methodology was used which include:

- Control Environment
- Risk Assessment
- Information & Communication
- Monitoring
- Control Activity

B. On Desk Audit

Inspection conducted at desk which includes monitoring the completion of DMTL, Intermediary Account, research, and recapitulation based on reports submitted by the Branch/Sub Branch Office.

4.2.2. Realization/Achievement of Internal Audit Assignment

In 2018, SKAI has performed General Audits in accordance with the audit work plan of 2018 as follows:

Obyek Audit Audit Object	2018			2017		
	Rencana Audit Audit Plan	Realisasi Audit Audit Realization	Pencapaian Completion (%)	Rencana Audit Audit Plan	Realisasi Audit Audit Realization	Pencapaian Completion (%)
Kantor Cabang Branch Office	11	11	100	21	21	100
Kantor Cabang Pembantu Sub-Branch Office	16	16	100	20	20	100
Kantor Kas Cash Office *)	-	-	-	-	-	-
Unit Kerja/Divisi Kantor Pusat Working Unit/Head Office Division	38	37	97	12	10	83
Audit Khusus Special Audit **)	-	10	-	-	7	-
Total Audit	65	74	114	53	58	111
<i>Loan Review</i>	20	22	110	60	61	102
Audit Tematik Thematic Audit	-	2	-	6	8	133

Keterangan | notes:

*) Pemeriksaan Kantor Kas menjadi satu kesatuan dengan audit Kantor Cabang yang menjadi induknya.
Cash Office Audit is integrated with its Parent Branch Office

**) Penugasan/Audit Khusus terkait dengan fungsi anti *fraud* yang merupakan bagian dari organisasi SKAI.
Assignment/Special Audit related to anti-fraud function is part of SKAI organization

Selain melakukan audit sesuai dengan rencana kerja audit, selama tahun 2018 IAD juga telah melaksanakan fungsi konsultatif audit dalam memberikan masukan (opini) dan rekomendasi sebanyak 24 Memorandum audit.

4.2.3. Temuan Pemeriksaan Audit Intern

Beberapa kesimpulan penting terkait dengan hasil pemeriksaan terhadap beberapa Kantor Cabang, Kantor Cabang Pembantu dan Unit Kerja/Divisi di Kantor Pusat/Kredit sebagai berikut:

1. Pemeriksaan pada Kantor Cabang/Capem
Hasil Audit SKAI pada Kantor Cabang/Capem, secara umum dapat diungkapkan bahwa Sistem Pengendalian Intern (5 COSO Component) sudah cukup memadai, temuan audit rata-rata ditemukan pada *Control Activities*, *Control Environment* dan *Monitoring* yaitu petugas operasional maupun Supervisor (Kacab/BSOM/BO) yang belum sepenuhnya menjalankan SOP secara konsisten dan berkesinambungan terhadap transaksi harian pada hari H+1, masih kurangnya *control* otomasi (IT), dengan *Audit Rating* 75,20 (*Satisfactory*).
2. Bidang Kredit
Dari hasil audit Divisi-Divisi Kredit/*Loan Review*, temuan umumnya lebih disebabkan karena kurang komprehensifnya proses pengendalian kredit dan kurangnya *monitoring* pasca pencairan kredit, sehingga berpengaruh kepada kualitas kredit dengan nilai *Audit Rating* 70,13 (*Fair*).
3. Pemeriksaan pada Unit Kerja/Divisi di Kantor Pusat
Hasil audit SKAI pada Unit Kerja/Divisi di Kantor Pusat pada umumnya temuan audit lebih disebabkan karena belum secara optimal menerapkan *monitoring* atas aktivitas Operasional pada Divisi tersebut dan belum dilakukannya pengkinian SOP dengan *Audit Rating* 78,82 (*Satisfactory*).

In addition to conducting audits in accordance with the audit work plan, during 2018 IAD has also implemented the consultative audit function in providing input (opinion) and recommendations as many as 24 Memorandum audits.

4.2.3. Internal Audit Investigation Findings

Several important findings on Branch Offices, Sub-Branch Offices, and Work Unit/Division of the Head Office/Credit:

1. Examination at the Branch/Sub-Branch Office
The SKAI Audit on Branch/Sub Branch Office indicated the internal control system (5 COSO Component) is adequate, the audit findings most often found in aspect of *Control Activities*, *Control Environment*, and *Monitoring*, concerning operational personnel and Supervisors (Kacab/KBO/OO) that do not conform to the SOPs consistently and continuously regarding the daily transactions on H+1, with an Audit Rating of 75.20 (*Satisfactory*).
2. Loan Sector
Based on the audits results on Credit Divisions/*Loan Review*, audit findings are mostly due to the less comprehensive credit control processes as well as inadequate post-loan disbursement monitoring process, with an Audit Rating of 70.13 (*Fair*).
3. Examination of the entire Work Unit/Division at Head Office
The result and audit findings of SKAI audit on Work Units/Division at the Head Office are generally due to non optimum implementation of monitoring on operational activities at such divisions and non updated SOP, with an Audit Rating of 78.82 (*Satisfactory*).

4.3. Fungsi Audit Ekstern

Pengawasan terhadap PT Bank JTrust Indonesia Tbk selain dilaksanakan oleh auditor internal, juga dilaksanakan oleh auditor eksternal, di antaranya Bank Indonesia/Otoritas Jasa Keuangan dan Kantor Akuntan Publik (KAP). Untuk memastikan pelaksanaan efektivitas fungsi audit ekstern, maka PT Bank JTrust Indonesia Tbk mengacu kepada dan berupaya untuk memenuhi ketentuan mengenai hubungan antara Bank, Kantor Akuntan Publik dan Bank Indonesia sebagaimana yang diatur dalam ketentuan Otoritas Jasa Keuangan tentang Transparansi Kondisi Keuangan Bank.

Salah satu komponen/faktor penting dalam penerapan tata kelola yang baik adalah tersedianya laporan keuangan yang memadai serta kecukupan proses pelaporan keuangan, sesuai dengan prinsip-prinsip keterbukaan/transparansi (*transparency*), akuntabilitas (*accountability*), pertanggungjawaban (*responsibility*), independensi (*independency*), dan kewajaran (*fairness*).

Efektivitas Pelaksanaan Audit Ekstern

Untuk memastikan pemenuhan ketentuan penyusunan dan penyajian laporan keuangan Bank sesuai dengan Standar Akuntansi Keuangan di Indonesia, maka peran Auditor Eksternal (dalam hal ini Kantor Akuntan Publik/KAP) sangatlah penting.

Peran dan fungsi Auditor Eksternal antara lain adalah:

1. Memastikan kesesuaian laporan keuangan dengan standar akuntansi yang berlaku.
2. Memastikan laporan keuangan internal sudah memenuhi ketentuan Otoritas Jasa Keuangan yang berlaku tentang Transparansi Kondisi Keuangan Bank.

Hasil audit atas Laporan Keuangan yang dihasilkan oleh KAP merupakan *outcome* dari suatu proses yang obyektif, independen, profesional, sehingga diharapkan dapat mendukung prinsip tata kelola yang baik dalam pengelolaan manajemen Bank sehingga dapat memenuhi harapan *stakeholder* Bank.

Pengungkapan informasi (*disclosure*) secara transparan kepada masyarakat luas/publik melalui Otoritas Jasa Keuangan, Bursa Efek Indonesia, Media Cetak, dan sebagainya serta ditampilkan pada *Homepage* atau situs web PT Bank JTrust Indonesia Tbk, dengan alamat www.jtrustbank.co.id

Transparansi kondisi keuangan Bank diatur dalam:

1. Peraturan Otoritas Jasa Keuangan Nomor 6/POJK.03/2015 tanggal 31 Maret 2015 tentang "Transparansi dan Publikasi Laporan Bank", sebagaimana telah diubah dalam POJK Nomor 32/POJK.03/2016 tanggal 8 Agustus 2016.

4.3. External Audit Function

In addition to internal auditor, the supervision of PT Bank JTrust Indonesia Tbk is also conducted by external auditors, including Bank Indonesia/Financial Services Authority and Public Accounting Office (KAP). To ensure effectiveness of the implementation of the external audit function, PT Bank JTrust Indonesia Tbk refers and strives to meet the terms engagement between the Bank, the Public Accountant Office, and Bank Indonesia as stipulated in Bank Indonesia regulation concerning Transparency of the Bank's Financial Condition.

One important component in the implementation of Good Corporate Governance (GCG) is the availability of an adequate financial statements and the adequacy of financial reporting process, in accordance with the principles of transparency, accountability, responsibility, independency, and fairness.

Effectivity of External Audit Implementation

In order to support and ensure adequacy of financial statements and the financial reporting process, the role of the External Auditor (in this case the Public Accounting Office) is important.

The role and function of the External Auditor includes:

1. Ensure compliance of financial statements with the prevailing accounting standards.
2. Ensure internal financial statements comply with the provisions of Bank Indonesia concerning transparency of the Bank's Financial Condition.

The audit result on Financial Report produced by KAP is an outcome of an objective, independent, professional process that expected to support good corporate governance principle both in Bank's management governance hence fulfilling the expectation of Bank's stakeholders.

Disclosure of information in a transparent manner to the general public through Financial Services Authority, Print Media, YLKI, LPPI, and others, and displayed on the Home Page or Website of PT Bank JTrust Indonesia, www.jtrustbank.co.id.

Transparency of the Bank's financial condition is set as follows:

1. Financial Services Authority Regulation No. 6/POJK.03/2015 dated March 31, 2015 on "Transparency and Publication of the Bank Reports", as amended in POJK No. 32/POJK.03/2016 dated 8 August 2016.

2. Surat Edaran Otoritas Jasa Keuangan Nomor 43/SEOJK.03/2016 tanggal 28 September 2016 tentang "Transparansi dan Publikasi Laporan Bank Umum Konvensional".

Laporan Publikasi disusun untuk memberikan informasi mengenai posisi keuangan, kinerja atau hasil usaha Bank, informasi keuangan lainnya serta informasi kualitatif kepada berbagai pihak yang berkepentingan dengan perkembangan usaha Bank. Seluruh informasi tersebut diharapkan dapat meningkatkan transparansi kondisi keuangan Bank kepada publik dan menjaga kepercayaan masyarakat terhadap lembaga perbankan.

Implementasi penyusunan dan penyajian Laporan Publikasi PT Bank JTrust Indonesia Tbk disampaikan dalam bentuk dan cakupan sebagaimana telah ditetapkan dalam ketentuan Otoritas Jasa Keuangan yang terdiri dari:

- Laporan Publikasi Bulanan
- Laporan Publikasi Triwulanan
- Laporan Publikasi Tahunan
- Laporan Publikasi Lain

Ruang lingkup Laporan Keuangan Tahunan meliputi:

- 1) Informasi umum, paling sedikit meliputi:
 - a. Susunan Direksi, Dewan Komisaris, dan Pejabat Eksekutif beserta jabatan, dan ringkasan riwayat hidupnya;
 - b. Susunan dan komposisi Pemegang Saham, yaitu nama Pemegang Saham dan persentase kepemilikan saham;
 - c. Perkembangan usaha Bank dan kelompok usaha Bank;
 - d. Strategi dan kebijakan yang ditetapkan oleh manajemen Bank;
 - e. Laporan manajemen yang memuat informasi mengenai pengelolaan Bank.
- 2). Laporan Keuangan tahunan, paling sedikit meliputi:
 - Laporan Keuangan, paling sedikit mencakup:
 - a. Laporan Posisi Keuangan;
 - b. Laporan Laba Rugi dan Penghasilan Komprehensif Lain;
 - c. Laporan Perubahan Ekuitas;
 - d. Laporan Arus Kas; dan
 - e. Catatan atas Laporan Keuangan, termasuk informasi mengenai komitmen dan kontinjensi.
 - Penambahan Pengungkapan Informasi bagi Bank yang merupakan bagian dari suatu kelompok usaha.
 - Opini dari Akuntan Publik yang memuat pendapat atas laporan keuangan tahunan.

2. Circular of the Financial Services Authority No. 43/SEOJK.03/2016 dated September 28, 2016 on "Transparency and Publication for Conventional Commercial Bank Reports".

The Publications Report is prepared to provide information on the Bank's financial position, performance or results, other financial information and qualitative information to various parties concerned with the Bank's business development. All information is expected to improve the transparency of the Bank's financial condition to the public and maintain public confidence towards banking institutions.

Implementation of the presentation and preparation of financial statements of PT Bank JTrust Indonesia Tbk is delivered in the form and scope as set out in the Regulation of Financial Authority Services which consists of:

- Monthly Publications Report
- Quarterly Publications Report
- Annual Publications Report
- Other Publications Report

The Annual Financial Report scope covers the following:

- 1) General information, which includes:
 - a. Composition of the Board of Directors, Board of Commissioners, and Executive Officers along with their positions, and their life summary;
 - b. The composition of Shareholders, ie shareholder name and share ownership percentage;
 - c. The Bank's business development and the Bank's business groups;
 - d. Management strategy and policy;
 - e. Management report containing information on Bank management.
- 2) Annual Financial Report, which includes:
 - Financial Reports which includes:
 - a. Statement of Financial Position;
 - b. Statement of Comprehensive Income;
 - c. Statement of Changes in Equity;
 - d. Cash flow statement;
 - e. Notes to the financial statements, including information on commitments and contingencies.
 - Additional Disclosure to Information on Banks that are part of a business group.
 - Opinion from a Public Accountant containing opinions on annual financial statements.

- 3) Informasi kinerja keuangan, meliputi:
 - Perhitungan Kewajiban Penyediaan Modal Minimum (KPMM);
 - Jumlah dan kualitas aset produktif serta Cadangan Kerugian Penurunan Nilai (CKPN);
 - Rasio keuangan, paling sedikit mencakup:
 - a. Rasio KPMM;
 - b. *Return on Asset* (ROA);
 - c. *Return on Equity* (ROE);
 - d. Rasio Beban Operasional terhadap Pendapatan Operasional (BOPO);
 - e. Persentase pelanggaran dan pelampauan Batas Maksimum Pemberian Kredit (BMPK);
 - f. Rasio Posisi Devisa Neto (PDN);
 - g. Nilai *Liquidity Coverage Ratio* (LCR) secara individu dan konsolidasi.
 - Transaksi spot dan transaksi derivatif.
- 4) Pengungkapan permodalan dan praktik manajemen risiko yang diterapkan Bank, paling sedikit meliputi uraian jenis risiko, potensi kerugian yang dihadapi Bank, dan mitigasi risiko sebagaimana diatur mengenai permodalan dan manajemen risiko.
- 5) Pengungkapan lain yang diatur dalam Standar Akuntansi Keuangan.
- 6) Informasi lain yang ditentukan oleh Otoritas Jasa Keuangan.

Dalam menjalankan fungsi penerapan tata kelola perusahaan yang baik yaitu fungsi transparansi kondisi keuangan, Bank telah menyusun dan menyajikan Laporan Keuangan untuk tahun-tahun yang berakhir pada tanggal 31 Desember 2018 (*Audited*) dan tanggal 31 Desember 2017 (*Audited*).

Sesuai dengan hasil keputusan RUPS Tahunan PT Bank JTrust Indonesia Tbk yang telah diselenggarakan pada tanggal 28 Juni 2018, bahwa dalam RUPS dilakukan penunjukan Akuntan Publik yang terdaftar atau pemberian kuasa untuk melakukan penunjukan Akuntan Publik yang terdaftar kepada Dewan Komisaris Perseroan untuk menetapkan Kantor Akuntan Publik (KAP) yang mengaudit laporan keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2018.

Dalam prosesnya, Komite Audit memberikan rekomendasi penunjukan Kantor Akuntan Publik (KAP) Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Rekan (*An Independent Member Firm of Crowe Global*) kepada Dewan Komisaris melalui surat No. No.16.01/KA/JTrust/VIII/2018 tertanggal 16 Agustus 2018. Kemudian berdasarkan hasil rekomendasi dari Komite Audit tersebut, Dewan Komisaris menunjuk Kantor Akuntan Publik (KAP) Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Rekan (*An Independent Member Firm of Crowe Global*) sebagai auditor eksternal yang

- 3) Financial Performance Information, including:
 - Calculation of Minimum Capital Adequacy Requirement (KPMM);
 - Total and productive quality assets and Impairment Losses Reserves (CKPN);
 - Financial ratios, including at least the following:
 - a. KPMM Ratio;
 - b. Return on Assets (ROA);
 - c. Return on Equity (ROE);
 - d. Ratio of Operating Expenses to Operating Income (BOPO);
 - e. Percentage of violation and exceedance of Legal Lending Limit (LLL);
 - f. Net Open Position (NOP) ratio;
 - g. Individual and consolidated Liquidity Coverage Ratio (LCR) value.
 - Spot and derivative transaction
- 4) Disclosure on capital and risk management practices adopted by the Bank shall include, at a minimum, description of risks types, potential losses faced by the Bank, and risk mitigation as regulated on capital and risk management.
- 5) Other disclosures provided in the Financial Accounting Standards.
- 6) Other information as determined by the Financial Services Authority.

In conducting Good Corporate Governance function that is the transparency of financial conditions, the Bank has prepared and presented the Financial Statements for the years ended December 31, 2018 (*Audited*) and dated December 31, 2017 (*Audited*).

In accordance with the decision of the Annual GMS of PT Bank JTrust Indonesia Tbk, which was held on 28 June 2018, the GMS appointed a registered Public Accountant or granting power to make the appointment of a registered Public Accountant to the Board of Commissioners to determine the Public Accounting Office (KAP) to audit the financial statements of the Company for the fiscal year ended December 31, 2018.

In the process, the Audit Committee recommends the appointment of Public Accountant Firm (KAP) Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Associates An Independent Member Firm of Crowe Global to the Board of Commissioners through letter No.16.01/KA/JTrust/VIII/2018 dated 16 August 2018. Based on the recommendations of the Audit Committee, the Board of Commissioners appoints the Public Accounting Firm of Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Associates (*An Independent Member Firm of Crowe Global*) as external auditors who will audit the

akan mengaudit Laporan Keuangan untuk tahun buku yang berakhir pada 31 Desember 2018 melalui surat No.20.01/S-KOM/JTrust/VIII/2018 tertanggal 20 Agustus 2018 dan penunjukan telah dilaporkan oleh pihak Bank kepada Otoritas Jasa Keuangan (OJK) melalui surat No.20.02/S-Dir-FCD/JTRUST/VIII/2018 tertanggal 20 Agustus 2018.

Untuk Laporan Keuangan tahun buku 2018 dan 2017 telah disusun dan diaudit oleh Kantor Akuntan Publik (KAP) Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Rekan (*An Independent Member Firm of Crowe Horwath Global*) dengan *partner* penanggung jawab (*partner in charge*) adalah Tjong Eng Pin, CPA yang berdasarkan Laporan Auditor Independen No. 00271/2.1051/AU.1/07/0517-3/1/III/2019 tanggal 27 Maret 2019 menyatakan opini "WAJAR", dalam semua hal yang material, posisi keuangan PT Bank JTrust Indonesia Tbk tanggal 31 Desember 2018, serta kinerja keuangan dan arus kas untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Informasi ringkas Laporan Keuangan Tahunan posisi 31 Desember 2018 (*Audited*) dan 31 Desember 2017 (*Audited*) dapat kami sampaikan sebagai berikut:

Laporan Keuangan

ASET (*Audited*)

(dalam jutaan Rupiah)

No	Pos-Pos Tertentu	31-12-2018	31-12-2017	Items
1	Giro pada Bank Indonesia	803.124	885.824	Current Account with Bank Indonesia
2	Giro pada Bank Lain - Neto	249.546	264.140	Current Accounts with Other Bank - Nett
3	Penempatan pada Bank Indonesia & Bank Lain - Neto	649.905	514.950	Placement with Bank Indonesia and Other Banks
4	Surat-Surat Berharga - Neto	3.562.738	2.938.516	Marketable Securities - Net
5	Tagihan Derivatif - Neto	11.324	810	Derivative Receivable - Net
6	Kredit yang Diberikan - Neto	10.129.117	11.281.861	Loan - Net
7	Agunan yang Diambil Alih - Neto	237.653	231.367	Foreclosed Collateral - Net

LIABILITAS dan EKUITAS

LIABILITAS (*Audited*)

(dalam jutaan Rupiah)

No	Pos-Pos Tertentu	31-12-2018	31-12-2017	Items
1	Simpanan Nasabah: - Pihak Berelasi - Pihak Ketiga	87.043 13.161.562	120.767 12.783.853	Deposits from Customers: Related Parties Third Parties
2	Simpanan dari Bank lain	1.911.604	1.485.561	Deposits from Other Banks
3	Liabilitas Derivatif	640	411	Derivative Payables

Financial Statements for the year ended on December 31, 2018 through letter No.20.01/S-KOM/JTrust/VIII/2018 dated 20 August 2018 and the appointment has been reported by the Bank to the Financial Services Authority (OJK) by letter No.20.02/S-Dir-FCD/JTRUST/VIII/2018 dated 20 August 2018.

The Financial Statements for 2018 and 2017 have been prepared and audited by the Public Accounting Firm (KAP) Kosasih, Nurdiyaman, Mulyadi, Tjahjo & Partners (*An Independent Member Firm of Crowe Horwath Global*) with partner in charge Tjong Eng Pin, CPA based on Independent Auditor's Report No. 00271/2.1051/AU.1/07/0517-3/1/III/2019 dated 27 March 2019 expresses "FAIRLY" opinion, in all material respects, the financial position of PT Bank JTrust Indonesia Tbk dated December 31, 2018, financial performance and cash flows for the year end, in accordance with Indonesian Financial Accounting Standards.

Concise information of the Annual Financial Report on the December 31, 2018 (*Audited*) and December 31, 2017 (*Audited*) positions are disclosed as follows:

Financial Statements

ASSETS (*Audited*)

(in million Rupiah)

LIABILITIES AND EQUITY

LIABILITIES (*Audited*)

(in million Rupiah)

EKUITAS (Audited)**EQUITY (Audited)**

(dalam jutaan rupiah)

(in million Rupiah)

No	Pos-Pos Tertentu	31-12-2018	31-12-2017	Items
1	Modal Saham yg ditempatkan & disetor penuh	12.223.149	12.223.155	Issued and Fully Paid in Capital
2	Tambahan modal disetor	178.765	178.759	Additional Paid-in-Capital
3	Surplus Revaluasi Aset Tetap - Neto	124.962	143.097	Revaluation Surplus of Fixed Assets - Net

LABA (RUGI) (Audited)**PROFIT (LOSS) (Audited)**

(dalam jutaan rupiah)

(in million Rupiah)

No	Pos-Pos Tertentu	31-12-2018	31-12-2017	Items
1	Laba (Rugi) Bersih	(401.101)	121.534	Net Profit (Loss)
2	Laba (Rugi) per Saham Dasar	(40,06)	12,14	Basic Loss per Share

Rasio-Rasio Keuangan yang Penting (Audited)**Important Financial Ratios (Audited)**

	Pos-Pos Tertentu	Items	31-12-2018	31-12-2017
Permodalan Capital	- Rasio KPMM yang tersedia untuk Risiko Kredit dan Risiko Operasional	- Capital Adequacy Ratio with Credit and Operational Risk	14,10%	14,35%
	- Rasio KPMM yang tersedia setelah memperhitungkan Risiko Kredit, Risiko Pasar, dan Risiko Operasional	- Capital Adequacy Ratio with Credit, Market and Operational Risk	14,03%	14,15%
	- Aset Tetap terhadap Modal	- Fixed Asset to Capital	12,44%	20,50%
Aset Produktif Earning Assets	- Aset Produktif bermasalah	- Non Performing Earning Assets	7,13%	5,98%
	- NPL - Gross	- NPL - Gross	4,26%	2,94%
	- NPL - Neto	- NPL - Net	3,12%	1,53%
	- PPAP terhadap Aset Produktif	- Allowance for Possible Losses (PPAP) on Earning Assets	4,59%	4,32%
	- Pemenuhan PPAP	- PPAP Compliance	82,49%	100,79%
Rentabilitas Profitability	- ROA	- ROA (Return on Assets)	(2,25%)	0,73%
	- ROE	- ROE (Return on Equity)	(29,13%)	8,09%
	- NIM	- NIM (Net Interest Margin)	2,28%	2,41%
	- BOPO	- BOPO (Operating Expenses to Operating Revenues Ratio)	116,32%	93,87%
Likuiditas Liquidity	LFR	LDR (Loans to Deposits Ratio)	77,43%	88,87%
Kepatuhan Compliance	Giro Wajib Minimum (GWM)	Minimum Statutory Reserves		
	- GWM Primer Rupiah	- Primary Reserve in Rupiah	14,66%	9,93%
	• Harian	• Daily	9,77%	6,62%
	• Rata-rata	• Average	4,89%	3,31%
	- PLM	- PLM	20,35%	-
	- GWM Sekunder Rupiah	- Secondary Reserve in Rupiah	-	13,85%
	- GWM Mata Uang Asing/Valas	- Reserve in Foreign Currencies	10,34%	9,63%
PDN (Per posisi Neraca terhadap Modal Akhir Tahun)	NOP (Per Balance Sheet Position to Capital at Year End)	1,54%	3,58%	

4.4 Sekretaris Perusahaan (Corporate Secretary)

Sekretaris Perusahaan memiliki peranan yang penting dalam memastikan aspek penghubung (*liaison officer*) antara Bank dengan pihak eksternal khususnya berkaitan dengan pasar modal, publik serta kebijakan internal berkaitan dengan penerapan tata kelola perusahaan yang baik. Ketentuan pembentukan Sekretaris Perusahaan PT Bank JTrust Indonesia Tbk merujuk pada Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik.

4.4.1. Profil Sekretaris Perusahaan

Sekretaris Perusahaan diangkat dan diberhentikan berdasarkan keputusan Direksi. Pengangkatan Sekretaris Perusahaan telah memenuhi persyaratan yang telah ditetapkan antara lain oleh Peraturan Otoritas terkait (OJK), dimana selama tahun 2018 jabatan Sekretaris Perusahaan/Kepala Divisi Corporate Secretary PT Bank JTrust Indonesia Tbk dipegang oleh Sdr. Rudyanto Gunawan, berdasarkan Surat Keputusan Direksi No.05.08/S.Kep-Dir-HCD/JTRUST/VII/2018 tanggal 05 Juli 2018.

Rudyanto Gunawan, Warga Negara Indonesia, 48 tahun, berdomisili di Tangerang Selatan. Mengawali karier sebagai *budget staff* di Prima Express Bank pada 1994, sebelum melanjutkan karier di Permata Bank pada hingga 2003 dengan jabatan terakhir sebagai Budget Department Head. Beliau bergabung dengan J Trust Bank (sebelumnya bernama Mutiara Bank) sejak 2010 yang kemudian pada tahun yang sama ditunjuk menjadi Planning and Performance Division Head.

Beliau meraih gelar Sarjana Teknik Sipil dari Universitas Katolik Parahyangan, Bandung pada 1994. Kemudian, beliau menyelesaikan program Postgraduate Degree dan Master of Management in Banking and Finance di Massey University, New Zealand pada 2008

4.4.2. Pendidikan dan/atau Pelatihan Sekretaris Perusahaan

Untuk meningkatkan kompetensi dan pemahaman dalam menunjang pelaksanaan tugas dan tanggung jawabnya, selama tahun 2018 Sekretaris Perusahaan PT Bank JTrust Indonesia Tbk telah mengikuti berbagai program pendidikan/pelatihan, *workshop*, konferensi,

4.4. Corporate Secretary

The Corporate Secretary has an important role in ensuring the liaison aspect (*liaison officer*) between the Bank and external parties with particular regard to the capital market, public, and internal policies with regard to the implementation of good corporate governance. The Basic Terms of Reference for the establishment of the Corporate Secretary of PT Bank JTrust Indonesia Tbk refers to the Financial Services Authority Regulation No. 35/POJK.04/2014 on Corporate Secretary of Public Company.

4.4.1. Profile of the Corporate Secretary

The Corporate Secretary shall be appointed and dismissed by the Board of Directors. The appointment of the Corporate Secretary has met the requirements stipulated by the related Regulation Authority (OJK), where during the year 2018 the Corporate Secretary/ Corporate Secretary Division Head of PT Bank JTrust Indonesia Tbk was held by Mr. Rudyanto Gunawan based on Decree of the Board of Directors No.05.08/S. Kep-Dir-HCD/JTRUST/VII/2018 dated 05 July 2018.

Rudyanto Gunawan, Indonesian citizen, 48 years old, domiciled in South Tangerang. Started his career as budget staff at Prima Express Bank in 1994, then joined Permata Bank until 2003 with the last position as Budget Department Head. He joined J Trust Bank (previously known as Mutiara Bank) in 2010 and in the same year is appointed as Planning and Performance Division Head.

He graduated with a Civil Engineer Degree from the Catholic University of Parahyangan, Bandung in 1994. Later, he finished Postgraduate Degree program and Master's Degree in Management in Banking and Finance from the Massey University, New Zealand in 2008.

4.4.2. Education and/or Training of Corporate Secretary

To improve competence and understanding in support of its duties and responsibilities, during 2018 Corporate Secretary of PT Bank JTrust Indonesia Tbk has attended various education/training programs, workshops, conferences, seminars, among others:

seminar, antara lain:

No.	Nama Name	Pelatihan, Workshop, Konferensi, Seminar Training, Workshop, Conference, Seminar	Penyelenggara Organizer	Tempat & Waktu Venue & Date
1	Rudyanto Gunawan	Performance Management System	Internal J Trust Bank	Jakarta, 5 Januari 2018 Jakarta, 5 January 2018
2	Rudyanto Gunawan	Workshop Direktorat Business 2018	Internal J Trust Bank	Jakarta, 19 Januari 2018 Jakarta, 19 January 2018
4	Rudyanto Gunawan	Workshop Fitur E-Money	Internal J Trust Bank	Jakarta, 10 Agustus 2018 Jakarta, 10 August 2018
4	Rudyanto Gunawan	Sosialisasi Aplikasi Rencana Bisnis Bank Revisi (RBBR) - Earning & Capital Socialization of Revised Bank Business Plan Application Revisi (RBBR) - Earning & Capital	Internal J Trust Bank	Jakarta, 21 Desember 2018 Jakarta, 21 December 2018

Selain dari yang disebutkan di atas, Sekretaris Perusahaan senantiasa mengikuti/ menghadiri sosialisasi peraturan-peraturan baru dari OJK dan BEI.

4.4.3. Pelaksanaan tugas Sekretaris Perusahaan

Dalam melaksanakan kegiatannya, Sekretaris Perusahaan berpedoman pada POJK No.35/POJK.04/2014 dan SOP Corporate Secretary. Sekretaris Perusahaan PT Bank JTrust Indonesia Tbk telah melaksanakan tugasnya, dengan uraian singkat pelaksanaan tugas sebagai berikut:

- Mengikuti perkembangan industri keuangan - perbankan dan pasar modal khususnya peraturan perundang-undangan yang berlaku di bidang keuangan - perbankan dan pasar modal.
- Memberikan masukan kepada Direksi dan Dewan Komisaris untuk mematuhi ketentuan peraturan perundang-undangan yang berlaku di perbankan dan pasar modal.
- Membantu Direksi dan Dewan Komisaris dalam pelaksanaan tata kelola perusahaan yang baik, yang meliputi:
 - Keterbukaan informasi kepada masyarakat, termasuk ketersediaan informasi pada Situs Web Emiten atau Perusahaan Publik;
 - Menyampaikan laporan kepada Otoritas Jasa Keuangan tepat waktu;
 - Penyelenggaraan dan dokumentasi Rapat Umum Pemegang Saham;
 - Penyelenggaraan dan dokumentasi rapat Direksi dan/atau Dewan Komisaris;
 - Pelaksanaan program orientasi terhadap perusahaan bagi Direksi dan/atau Dewan Komisaris.
- Sebagai penghubung antara Emiten atau Perusahaan Publik dengan Otoritas Jasa Keuangan dan pemangku kepentingan lainnya.
- Sebagai fasilitator dalam pelaksanaan tanggung jawab sosial perusahaan dan lingkungan (*Corporate Social Responsibility/CSR*).

In addition to the above, the Corporate Secretary will always follow/attend the socialization of new regulations from FSA and IDX.

4.4.3. Task Implementation of the Corporate Secretary

In conducting its activities, Corporate Secretary complies to Regulation of Financial Services Authority No. 35/POJK.04/2014 and Standard Operating Procedure for Corporate Secretary. The corporate secretary of PT Bank JTrust Indonesia Tbk has performed its duties, the following is a brief description of its task implementation:

- Following the development of the financial industry - banking and capital markets particularly the applicable legislations in the financial - banking and capital markets sectors.
- Providing recommendations to the Board of Directors and the Board of Commissioners to comply to the applicable regulations in banking and capital markets.
- Assisting the Board of Directors and the Board of Commissioners in the implementation of good corporate governance, including:
 - Disclosure of information to the public, including the availability of information on the website of the Company;
 - Submitting reports to the Financial Services Authority in a timely manner;
 - Implementation and documentation of the General Meeting of Shareholders;
 - Implementation and documentation of the Board of Commissioners and or Board of Directors meetings;
 - Implementation of the orientation program to the company for the Board of Directors and/ or Board of Commissioners.
- As a liaison between the Issuer or Public Company with the Financial Services Authority and other stakeholders.
- As the facilitator in the implementation of Corporate Social Responsibility (CSR).

6. Melakukan fungsi komunikasi dalam rangka membangun citra dan reputasi perusahaan serta membangun *goodwill* keluar perusahaan, menjaga konsistensi pesan dan citra yang ingin disampaikan kepada masyarakat, serta menjaga agar informasi yang disampaikan tidak melanggar hukum.
 7. Mengkoordinir pelaksanaan *office of the board* yang mencakup:
 - a. Memastikan ketersediaan informasi dalam pengambilan keputusan Direksi dan Dewan Komisaris.
 - b. Memastikan kehadiran peserta rapat agar kuorum dapat tercapai sehingga keputusan yang dihasilkan *legitimate* dan kredibel.
 - c. Memastikan fungsi sekretariat perusahaan dalam mengadministrasikan pelaksanaan dokumentasi keputusan rapat dan kearsipan korporat.
 8. Melaksanakan tugas sesuai dengan prinsip kehati-hatian (*Prudential Banking*).
 9. Melaksanakan tugas dan bertanggung jawab penuh sesuai pedoman dan prosedur.
6. Perform the communication function in order to build the company's image and reputation as well as developing goodwill out of the company, maintaining the consistency of message and image to be conveyed to the public, as well as ensuring that information submitted does not violate the law.
 7. Coordinating the implementation of office of the board, including:
 - a. Ensuring the availability of information in the decision making of the Board of Directors and the Board of Commissioners.
 - b. Ensuring the attendance of meeting participants in order to achieve the quorum, allowing legitimate and credible decisions.
 - c. Ensuring the function of the corporate secretary to administer the implementation of meeting results documentation and corporate archiving.
 8. Implementing the tasks in accordance with the prudence principles (Prudential Banking).
 9. Fully implement its duties and responsibilities in accordance with the guidelines and procedures.

BAB V PENERAPAN MANAJEMEN RISIKO TERMASUK SISTEM PENGENDALIAN INTERN

CHAPTER V Risk Management and Internal Control System Implementation

5.1. Penerapan Manajemen Risiko

PT Bank JTrust Indonesia Tbk telah menerapkan manajemen risiko berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan (POJK) Nomor 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan (SEOJK) Nomor 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko Bagi Bank.

Penerapan manajemen risiko dan tata kelola Bank (*Good Corporate Governance*) yang tepat dan sehat akan memiliki peran dalam meningkatkan nilai tambah dan memberikan gambaran yang komprehensif mengenai potensi risiko dan kerugian Bank di masa mendatang yang disesuaikan dengan kompleksitas serta kondisi internal bank.

Untuk mencapai tujuan di atas, maka diperlukan adanya budaya sadar risiko (*risk awareness*) dan kemampuan teknis yang memadai daripada seluruh unit kerja di J Trust Bank, dimana hal ini menjadi tanggung jawab dan melibatkan seluruh unit kerja di J Trust Bank.

Efektivitas penerapan tata kelola dan kerangka kerja manajemen risiko oleh PT Bank JTrust Indonesia Tbk meliputi 4 (empat) pilar yaitu:

a. Pengawasan aktif Direksi dan Dewan Komisaris

Dewan Komisaris dan Direksi bertanggung jawab atas efektivitas penerapan manajemen risiko di Bank serta memastikan penerapan manajemen risiko telah memadai sesuai dengan karakteristik, kompleksitas dan profil risiko Bank. Pengawasan aktif Dewan Komisaris meliputi antara lain:

- (1) Menyetujui kebijakan Manajemen Risiko termasuk strategi dan kerangka Manajemen Risiko yang ditetapkan sesuai dengan tingkat risiko yang diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) Bank;
- (2) Melakukan evaluasi terhadap kebijakan dan implementasi manajemen risiko yang dilakukan oleh Direksi.
- (3) Menyelenggarakan Rapat Berkala dengan Direksi untuk mengevaluasi pencapaian tindak lanjut setiap rencana kerja (*action plan*);

5.1. Risk Management Implementation

PT Bank JTrust Indonesia Tbk has implemented risk management based on Regulation of Financial Services Authority No. 18/POJK.03/2016 dated March 16, 2016 on the application of Risk Management for Commercial Banks, and Financial Services Authority Circular Letter No. 34/SEOJK.03/2016 dated September 1, 2016 on Risk Management Implementation for Commercial Banks.

Implementation for Appropriate and sound management of risk and governance of the Bank (*Good Corporate Governance*) will have a role in increasing the added value and provide a comprehensive picture of the potential risks and losses of the Bank in the future adjusted to the complexity and internal conditions of the bank.

To achieve the above objectives, it is necessary to create a risk awareness culture and adequate technical competence of the entire unit in Bank JTrust Indonesia, which is the responsibility of and involving all the work units at JTrust Bank Indonesia.

The effectiveness of the governance and risk management framework implementation by PT Bank JTrust Indonesia Tbk includes four (4) pillars, namely:

a. Active supervision of the Board of Directors and Board of Commissioners

The Board of Commissioners and Board of Directors are responsible for the effectiveness of risk management at the Bank and ensure the implementation of adequate risk management in accordance with the characteristics, complexity, and risk profile of the Bank. Active supervision by the Board of Commissioners include, among others:

- (1) To approve the risk management policy, including strategies and risk management framework established in accordance with the level of risk taken (*risk appetite*) and risk tolerance of the Bank;
- (2) To evaluate the policies and the implementation of risk management performed by the Board of Directors.
- (3) Holding Regular Meeting with the Board of Directors to evaluate the achievement of the follow-up of each action plan;

- (4) Memastikan rekomendasi setiap Laporan Hasil Audit (LHA) Satuan Kerja Audit Internal dan Eksternal telah ditindaklanjuti.

Sedangkan Direksi bertugas menentukan arah kebijakandan strategi manajemen risiko secara komprehensif, termasuk implementasinya, serta memastikan bahwa risiko yang material dan dampaknya telah ditindaklanjuti. Direksi juga bertanggung jawab untuk menumbuhkembangkan budaya dan kesadaran akan risiko di seluruh jajaran unit kerja. Pengawasan aktif Direksi, di antaranya meliputi:

- (1) Menyusun kebijakan, strategi, dan kerangka Manajemen Risiko dengan memperhatikan tingkat risiko yang diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) Bank;
- (2) Memantau, mengevaluasi, dan memastikan Rencana Bisnis Bank, strategi dan *action plan* telah dilakukan sesuai rencana melalui rapat/pertemuan berkala;
- (3) Memastikan Standar Operasional Prosedur (SOP), Kebijakan dan Prosedur telah dipahami dan dilaksanakan;
- (4) Memastikan dan melaksanakan langkah perbaikan atau rekomendasi dari Satuan Kerja Audit Internal dan Eksternal telah dilaksanakan dengan efektif;
- (5) Mengembangkan budaya manajemen risiko dan meningkatkan kesadaran risiko pada seluruh jenjang organisasi.

Dalam rangka pengawasan dan pengelolaan risiko Bank serta penerapan Tata Kelola yang baik, Dewan Komisaris dibantu oleh Komite Pemantau Risiko (*Risk Monitoring Committee*) di tingkat Komisaris dan di tingkat Direksi dibantu oleh Komite Manajemen Risiko (*Risk Management Committee*).

- (4) Ensure that any recommendations the Audit Report (LHA) of the Internal and External Audit Unit have been followed up.

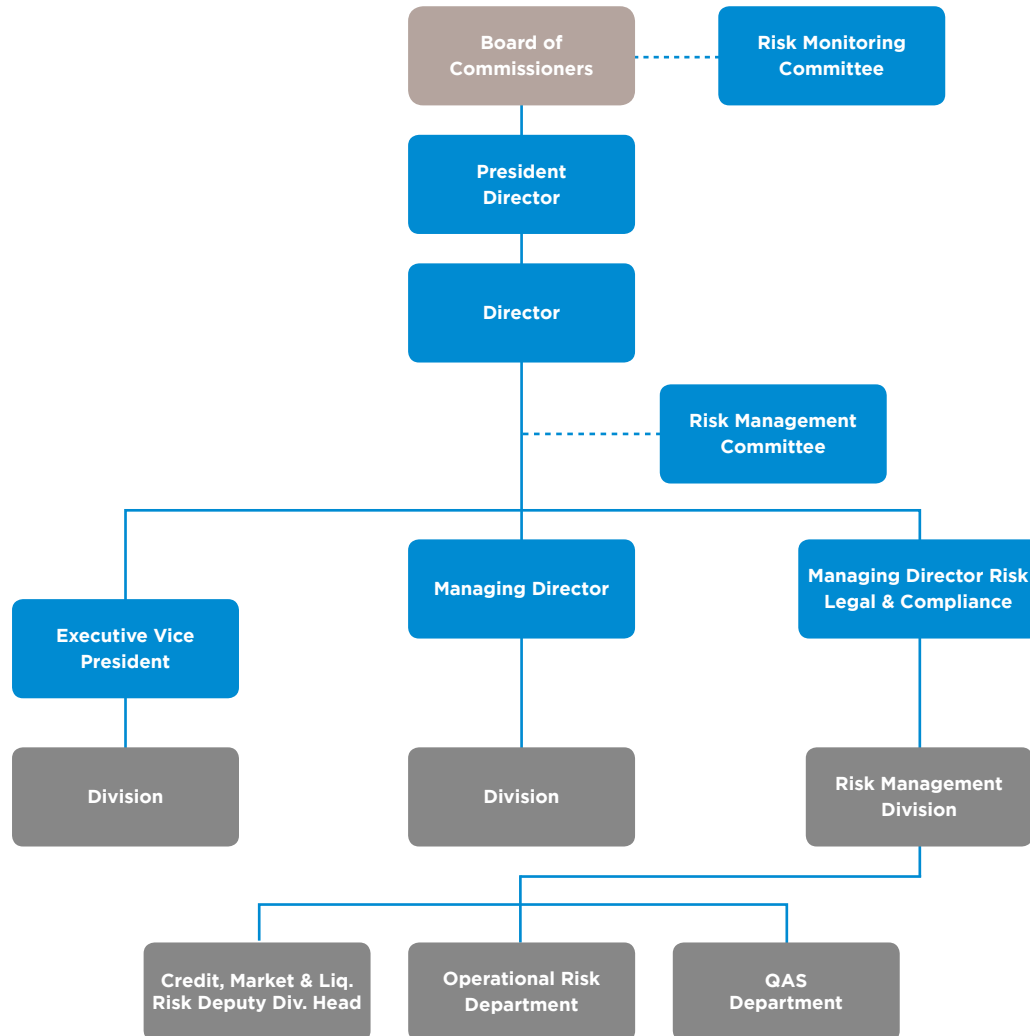
Meanwhile, the Board of Directors is in charge of determining the direction of policies and strategies of risk management comprehensively, including implementation, and to ensure that all material risks and the impacts have been followed up. The Board of Directors is also responsible to foster the risk culture and awareness throughout the ranks of the working unit. Active supervision of the Board of Directors, includes:

- (1) Formulate risk management policies, strategies, and framework by taking into account the level of risk taking (*risk appetite*) and risk tolerance of the Bank;
- (2) Monitor, evaluate and ensure the Bank's business plan, strategy, and action plan has been carried out as planned through regular meeting;
- (3) Ensuring the Standard Operating Procedures (SOP), Policies and Procedures have been understood and implemented;
- (4) To ensure and implement corrective measures or recommendations of the Internal and External Audit Unit had been implemented effectively;
- (5) Develop a risk management culture and raise risk awareness at entire levels of the organization.

In regard of risk supervision and management of the Bank and the implementation of Good Corporate Governance, the Board of Commissioners is assisted by the Risk Oversight Committee and the Board of Directors is assisted by the Risk Management Committee.

Berikut Struktur Organisasi Manajemen Risiko pada PT Bank JTrust Indonesia Tbk:

The following is the Organizational Structure of Risk Management at PT Bank JTrust Indonesia Tbk:



Struktur Organisasi Manajemen Risiko

1. Komite Pemantau Risiko

Uraian mengenai Komite Pemantau Risiko dapat dilihat pada Bab III Kelengkapan dan Pelaksanaan Tugas Komite-Komite PT Bank JTrust Indonesia Tbk.

2. Komite Manajemen Risiko

Uraian mengenai Komite Manajemen Risiko dapat dilihat pada Bab III Kelengkapan dan Pelaksanaan Tugas Komite-Komite PT Bank JTrust Indonesia Tbk.

3. Satuan Kerja Manajemen Risiko (SKMR)

SKMR berada di bawah Direktur Risiko, Legal & Kepatuhan merupakan satuan kerja yang independen terhadap satuan kerja bisnis/operasional. SKMR mempunyai fungsi

Risk Management Organizational Structure

1. Risk Monitoring Committee

Description on the Risk Monitoring Committee can be viewed at Chapter III Structure and Implementation of Committee's Duties of PT Bank JTrust Indonesia Tbk.

2. Risk Management Committee

Description on the Risk Management Committee can be viewed at Chapter III Structure and Implementation of Committee's Duties of PT Bank JTrust Indonesia Tbk.

3. Risk Management Work Unit (SKMR)

The SKMR is under the Director of Risk, Legal & Compliance, which is a working unit independent from business/operational work units. SKMR has the function to identify, assess, monitor, and

mengidentifikasi, mengukur, memantau dan mengendalikan risiko untuk meminimalkan potensi maupun dampak dari berbagai jenis risiko yang dihadapi di dalam kegiatan serta proses bisnis.

Struktur organisasi SKMR terdiri dari 3 (tiga) unit kerja yaitu unit kerja risiko kredit, risiko pasar & likuiditas, unit Kerja risiko operasional, dan unit kerja QAS.

Tugas dan tanggung jawab SKMR meliputi:

- a. Memberikan masukan kepada Direksi dalam penyusunan, kebijakan, strategi dan kerangka manajemen risiko.
- b. Mengembangkan prosedur dan alat untuk identifikasi, pengukuran, pemantauan dan pengendalian risiko.
- c. Melakukan pemantauan atas strategi manajemen risiko yang telah disetujui oleh Direksi.
- d. Pemantauan posisi/eksposur risiko secara keseluruhan dan jenis risiko.
- e. Penerapan *stress testing* untuk mengetahui dampak implementasi kebijakan dan strategi manajemen risiko.
- f. Melakukan kajian risiko atas usulan produk dan/atau aktivitas baru.
- g. Melakukan *review* dan rekomendasi limit risiko dari usulan unit kerja bisnis dan operasional.
- h. Menyusun dan menyampaikan laporan profil risiko kepada Komite Manajemen Risiko secara berkala untuk disampaikan kepada Direksi dan Otoritas Jasa Keuangan (OJK).
- i. Menyusun laporan Kewajiban Penyediaan Modal Minimum (KPMM) dan *Internal Capital Adequacy Assessment Process* (ICAAP) secara berkala untuk disampaikan kepada Direksi dan OJK.

b. Kecukupan kebijakan dan prosedur manajemen risiko serta penetapan limit risiko

Penerapan manajemen risiko di PT Bank JTrust Indonesia Tbk telah dituangkan dalam beberapa kebijakan dan prosedur, antara lain Kebijakan Umum Manajemen Risiko (KUMR). KUMR sebagai ketentuan tertinggi dalam memberikan arahan kebijakan pengelolaan dan pengendalian risiko dalam rangka mengamankan PT Bank JTrust Indonesia Tbk atas risiko yang dihadapi dalam aktivitas bisnisnya. Penetapan limit dikelola dalam kegiatan usaha dan produk dan telah disesuaikan tingkat risiko yang akan diambil (*risk appetite*) dan limit tersebut ditinjau secara berkala untuk menyesuaikan terhadap perubahan kondisi yang terjadi.

control risks and to minimize the potential impact of the various types of risks in business process.

The SKMR organizational structure consists of 3 (three) work units, namely the credit risk, market risk & liquidity risk unit; operational risk unit, and QAS unit.

Duties and responsibilities of the SKMR include:

- a. Providing input to the Board of Directors in the risk management preparation, policy, strategy, and framework.
- b. Developing procedures and tools for the identification, measurement, monitoring and control of risk.
- c. Conducting monitoring of the risk management strategy, which have been approved by the Board of Directors.
- d. Monitoring the overall risk position/exposure and type of risk.
- e. Implementing stress testing to determine the impact of the implementation of risk management policies and strategies.
- f. Conducting risk assessment on the proposed new products and/or activities.
- g. Conducting a review and recommendation of risk limits of proposals by the business and operations work units.
- h. Preparing and submitting risk profile reports to the Risk Management Committee regularly to be submitted to the Board of Directors and the Financial Services Authority (FSA).
- i. Preparing reports on the Capital Adequacy Ratio (CAR) and the Internal Capital Adequacy Assessment Process (ICAAP) regularly to be submitted to the Board of Directors and FSA.

b. Sufficiency of policies, procedures, and limit setting as guidelines in the implementation of risk management

The implementation of risk management in PT Bank JTrust Indonesia Tbk has been prepared under policies and procedures, among others such a General Policy of Risk Management (KUMR). KUMR as the highest policy to provide direction and control policy of risk management in order to secure the PT Bank JTrust Indonesia Tbk in its business activities. Limit determination is managed on business activities and products and adjusted the level of risk to be taken (*risk appetite*) and the limits are reviewed periodically to adjust to changing conditions.

c. Kecukupan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko serta sistem informasi manajemen risiko

Proses penerapan manajemen risiko yang meliputi identifikasi, pengukuran, pemantauan, pengelolaan dan pengendalian terhadap kedelapan jenis risiko yaitu risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko kepatuhan, risiko strategik, risiko hukum, dan risiko reputasi.

- 1) Identifikasi
Identifikasi risiko dilakukan mencakup seluruh aktivitas bisnis dalam rangka menganalisis sumber dan kemungkinan timbulnya risiko beserta dampaknya.
- 2) Pengukuran
Pengukuran risiko dimaksudkan agar Bank mampu menghitung eksposur risiko yang melekat pada kegiatan usaha, dan diperkirakan dampak terhadap permodalan.
Salah satu pengukuran risiko tercermin dalam Laporan Profil Risiko triwulanan.
- 3) Pemantauan
Pemantauan risiko dilakukan antara lain dengan cara mengevaluasi limit transaksi *treasury* serta efektivitas proses manajemen risiko.
- 4) Pengendalian
Pengendalian risiko antara lain dengan memberikan tindak lanjut atas risiko yang bersifat *high* (aktivitas yang berisiko tinggi).

d. Sistem pengendalian intern yang menyeluruh

Pengendalian internal telah dilakukan oleh Satuan Kerja Audit Intern untuk menilai pelaksanaan proses dan sistem manajemen risiko pada aktivitas fungsional yang memiliki eksposur risiko. Selain itu adanya pemisahan fungsi yang jelas antara unit kerja operasional (*risk taking unit*) dengan unit kerja yang melaksanakan fungsi pengendalian risiko (*risk management unit*).

Penerapan manajemen risiko di PT Bank JTrust Indonesia Tbk telah dituangkan dalam beberapa kebijakan dan prosedur, di antaranya Kebijakan Umum Manajemen Risiko (KUMR). KUMR sebagai ketentuan tertinggi dalam memberikan arahan kebijakan pengelolaan dan pengendalian risiko dalam rangka mengamankan PT Bank JTrust Indonesia Tbk atas risiko yang dihadapi dalam aktivitas bisnisnya.

Beberapa upaya yang telah dilakukan Manajemen dalam melakukan penerapan Manajemen Risiko, antara lain:

- a. Melakukan pengkinian kebijakan, dan prosedur disesuaikan dengan regulasi yang berlaku.
- b. Melakukan pengukuran Tingkat Kesehatan Bank dengan pendekatan *Risk Based Bank*

c. Sufficiency of identification, measurement, monitoring and risk control processes, as well as risk management information system

The process of risk management includes the identification, assessment, monitoring, management, and control of the eight risks, namely the credit risk, market risk, liquidity risk, operational risk, compliance risk, strategic risk, legal risk, and reputation risk.

- 1) Identification
Risk identification is conducted by covering entire business activities in order to analyze the source and possible risks and their impact.
- 2) Measurement
Risk has the objective to enable the Bank to calculate the risk exposure inherent in business activities, and the estimated impact on capital. One of the risk assessments is reflected in the quarterly Risk Profile Report and Risk Control Self Assessment (RCSA) Reports.
- 3) Monitoring
Risk monitoring is conducted among others by evaluating the limit of treasury transactions and the effectiveness of the risk management process.
- 4) Control
Risk control, among others, is by providing follow-up on risks in high category.

d. Comprehensive Internal Control System

Internal control has been carried out by the Internal Audit Unit to assess the implementation of risk management processes and systems in functional activities with risk exposure. In addition, there is a clear separation of functions between the operational units (*risk-taking units*) with units that carry out the functions of risk management (*risk management unit*).

The implementation of risk management in PT Bank JTrust Indonesia Tbk has been prepared under policies and procedures, among others such as a General Policy of Risk Management (KUMR). KUMR as the highest policy to provide direction and control policy of risk management in order to secure the PT Bank JTrust Indonesia Tbk in its business activities.

The following is a number of efforts carried out by the Management in the implementation of Risk Management, among others:

- a. Updating the policies and procedures adapted to the prevailing regulations.
- b. Assessing the Bank Soundness Level through the Risk Based Bank Rating (RBBR) approach,

Rating (RBBR), dengan menggunakan 4 cakupan penilaian yaitu Laporan Profil Risiko, Laporan hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola, aspek Rentabilitas dan Permodalan.

- c. Dalam upaya meningkatkan kompetensi pegawai Bank dalam hal Manajemen Risiko, Manajemen secara berkelanjutan mengikutsertakan pegawai Bank dalam Sertifikasi Manajemen Risiko, sehingga dapat memenuhi ketentuan yang berlaku.
- d. Pemenuhan KPMM sesuai Profil Risiko atau ICAAP (*Internal Capital Adequacy Assessment Process*) sesuai dengan ketentuan Regulasi terbaru.

Penilaian Profil Risiko

Penilaian Profil Risiko sesuai dengan Peraturan Otoritas Jasa Keuangan Nomor 4/ POJK.3/2016 tanggal 27 Januari 2016 tentang Penilaian Tingkat Kesehatan Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan Nomor No.14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum, dilakukan terhadap risiko yang melekat (*inherent risk*) dan kualitas penerapan manajemen risiko melalui proses *self assessment* pada seluruh aktivitas bisnis bank yang mencakup 8 (delapan) jenis risiko yaitu Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Strategik, dan Risiko Kepatuhan.

Risiko Inheren merupakan risiko yang terkandung dalam aktivitas Bank, sementara **Kualitas Penerapan Manajemen Risiko** merupakan kemampuan Bank dalam mengendalikan risiko dalam aktivitas tersebut. Kedua penilaian tersebut diperlukan untuk menentukan gambaran umum risiko Bank, yang kerap disebut **Profil Risiko**. Sebagai panduan dalam mengelola kedelapan jenis risiko tersebut, PT Bank JTrust Indonesia Tbk memiliki Kebijakan Umum Manajemen Risiko (KUMR) yang senantiasa diperbarui/disesuaikan secara periodik sesuai ketentuan yang berlaku.

Untuk dapat mengidentifikasi, mengukur, memantau dan mengendalikan seluruh jenis risiko yang melekat (*Inherent Risk*) pada Bank, maka diperlukan bentuk struktur organisasi pengelolaan yang sesuai dengan ukuran, kompleksitas, kemampuan Bank serta tujuan dan kebijakan PT Bank JTrust Indonesia Tbk melalui penyusunan Laporan Profil Risiko secara triwulanan oleh Satuan Kerja Manajemen Risiko sesuai dengan ketentuan Otoritas Jasa Keuangan.

Berikut ini hasil pengukuran atas Profil Risiko PT Bank JTrust Indonesia Tbk berdasarkan Risiko Inheren dan Kualitas Penerapan Manajemen Risiko periode triwulan IV Desember 2018 dibandingkan dengan periode triwulan III September 2018:

using 4 assessment scopes, namely the Risk Profile Report, Good Corporate Governance Report, Profitability Aspect, and Capital.

- c. In an effort to improve the competence of Bank employees in terms of Risk Management, the Management continuously engage employees in the Risk Management Certification, so as to meet the applicable provisions.
- d. Fulfillment of CAR ICAAP (*Internal Capital Adequacy Assessment Process*) in accordance with the latest Regulation.

Risk Profile Assessment

Risk Profile Assessment in accordance with the Regulation of the Financial Services Authority No. 4/ POJK.3/2016 dated January 27, 2016 on the Soundness Level Assessment of Commercial Banks and Circular Letter No. 14/SEOJK.03/2017 on the Application of Risk Management for Commercial Banks refers to inherent risk and the quality of risk management through self-assessment in all of Bank's business activities which covers the 8 (eight) risks, namely the Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Compliance Risk, Strategic Risk, Legal Risk, and Reputation Risk.

Inherent Risk is a risk inherent to banking business activities, while the Quality of Risk Management Implementation is the ability of the Bank to control risks in the activities. Both assessments are required to establish the general risk description of the Bank, commonly named Risk Profile. As the guidelines to manage the eight type of risks, PT Bank JTrust Indonesia Tbk has the General Policy of Risk Management (KUMR), which is continuously updated/ adapted in accordance with the prevailing regulations.

In order to identify, measure, monitor, and control all types of the Bank's attached risks (*Inherent Risk*), the management organizational structure that is in accordance with the size, complexity, and the ability of the Bank, as well as the objectives and policies of PT Bank JTrust Indonesia Tbk is required through the preparation of the quarterly Consolidated Risk Profile by the Risk Management Unit in accordance with the provisions of Bank Indonesia.

The following is the assessment result on the Risk Profile of PT Bank JTrust Indonesia Tbk based on Inherent Risk and the Quality of Risk Management Implementation in the 4th Quarter in December 2018, compared to the 3rd Quarter in September 2018:

Profil Risiko Risk Profile	Desember 2018 December 2018			September 2018 September 2018		
	Peringkat Risiko Inheren Inherent Risk Rating	Peringkat Kualitas Manajemen Risiko Risk Management Quality Rating	Peringkat Tingkat Risiko Risk Level Rating	Peringkat Risiko Inheren Inherent Risk Rating	Peringkat Kualitas Manajemen Risiko Risk Management Quality Rating	Peringkat Tingkat Risiko Risk Level Rating
Risiko Kredit Credit Risk	Moderate To High	Marginal	4	Low To Moderate	Fair	2
Risiko Pasar Market Risk	Low To Moderate	Satisfactory	2	Low To Moderate	Satisfactory	2
Risiko Likuiditas Liquidity Risk	Low To Moderate	Satisfactory	2	Low To Moderate	Satisfactory	2
Risiko Operasional Operational Risk	Moderate	Fair	3	Low To Moderate	Satisfactory	2
Risiko Hukum Legal Risk	Moderate To High	Fair	3	Moderate To High	Satisfactory	3
Risiko Strategik Strategic Risk	Moderate	Fair	3	Low To Moderate	Satisfactory	2
Risiko Kepatuhan Compliance Risk	Moderate	Fair	3	Moderate	Fair	3
Risiko Reputasi Reputation Risk	Low To Moderate	Satisfactory	2	Low To Moderate	Satisfactory	2
Peringkat Komposit Composite Rating	Moderate	Fair	3	Low To Moderate	Satisfactory	2

Dengan melihat peringkat komposit risiko inheren berada pada posisi Moderate dan Kualitas Penerapan Manajemen Risiko pada posisi *Fair*, maka peringkat Profil Risiko per Desember 2018 adalah peringkat 3 (tiga) yang mempunyai *trend* risiko menurun dibandingkan peringkat periode September 2018.

Rincian penilaian dari kedelapan Risiko Triwulan IV Tahun 2018 adalah sebagai berikut:

1. Risiko Kredit

Peringkat komposit Risiko Kredit adalah Moderate to High (4) di triwulan IV tahun 2018 dengan *trend* meningkat dibandingkan triwulan III tahun 2018, penjelasan mengenai meningkatnya peringkat risiko kredit ini adalah:

- Memburuknya kualitas kredit (kredit kualitas rendah dan NPL) di triwulan III dan IV 2018 bila dibandingkan triwulan II tahun 2018, dan pengendalian atau mitigasi risiko kredit dinilai belum memadai untuk menekan potensi kerugian risiko kredit.
- Di akhir bulan Desember 2018 Bank telah melakukan strategi penjualan kredit bermasalah melalui skema asuransi dengan PT Asuransi Sinar Mas sebesar Rp1.047 miliar sehingga diperoleh angka rasio NPL Gross dan NPL Nett masing-masing sebesar 4,26% dan 3,12%.
- Kualitas Penerapan Manajemen Risiko (KPMR) dinilai belum memadai, namun Bank telah melakukan beberapa perbaikan sebagai berikut:
 - Perbaikan tata kelola (GCG) kredit meliputi:

Referring to the inherent risk rating, which is in the position of Moderate and the Quality of Risk Management in the Fair position, then the Risk Profile as of December 2018 is in the Rank 3 (three) which has a risk trend of declining compared to the September 2018 ranking.

Details of the assessment of the eight Risks for Quarter IV of 2018 are as follows:

1. Credit Risk

The Credit Risk composite rank was Moderate to High in the fourth quarter of 2018 with increasing trend compared to the third quarter of 2018; the explanation on the increase in credit risk rank is:

- Declining loan quality (low loan quality and NPL) in the third and fourth quarter of 2018 compared to the second quarter of 2018, and credit risk mitigation and control are seen inadequate to curb credit risk loss potential.
- At the end of December 2018 the Bank has made non performing loan sales strategy through insurance scheme with PT Asuransi Sinar Mas of Rp1,047 billion to gain Gross NPL and Net NPL ratio of 4.26% and 3.12% respectively.
- Risk Management Implementation Quality is seen inadequate, but the Bank has made some improvements as follows:
 - The improvement of credit GCG covers:

- Meningkatkan kompetensi SDM dengan memperkuat standarisasi penerimaan SDM dan evaluasi SDM bidang perkreditan,
 - Meningkatkan disiplin proses perkreditan dengan perkuatan control (*risk*, kepatuhan dan *governance*) dari RATEK dan keputusan kredit, monitoring kualitas kredit melalui forum KKR, menyusun *Tools* KKR (identifikasi awal kredit bermasalah/*early loan problem identification, loan problem mitigation progress*), dan perbaikan disiplin dari kontrol *Loan Maintenance (post disbursement control)*
 - Meningkatkan disiplin dalam organisasi dengan penetapan yang jelas dan transparan terkait organisasi, *Key Performance Indicator* (KPI) individu sehingga produktivitas dan kualitas dapat terjaga, penajaman *tools* evaluasi kinerja, penyampaian kinerja unit kerja terkait perkreditan secara periodik kepada Direksi (pertanggungjawaban pencapaian kinerja, SDM, dan penegakan sanksi & disiplin).
- 2) Pelaksanaan kaji ulang dan penetapan provisi kredit, biaya administrasi kredit, dan denda untuk seluruh Debitur J Trust Bank.
 - 3) Pelaksanaan monitoring kredit dengan melakukan pemantauan dan pengawasan Debitur yang berpotensi masalah atau telah terekspos masalah sehingga Bank dapat mengetahui secara dini (*early warning signal*) permasalahan yang dihadapi Debitur yang berpotensi menyebabkan Debitur tidak dapat memenuhi kewajibannya kepada Bank.
 - 4) Pembentukan Unit Kerja Khusus (*Team Task Force*) *Loan Monitoring* yang akan melakukan *monitoring* dan menyusun *action plan* penanganan kredit kualitas rendah.
 - 5) Pelaksanaan kaji ulang dan pengkinian Formulir Memo Pembukuan Fasilitas Kredit (MPFK) sehingga Bank dapat mengetahui historikal fasilitas yang dimiliki oleh Debitur.
- Increasing HR competence by strengthening HR acceptance standard and evaluation of HR on credit,
 - Increasing credit process discipline by strengthening control(*risk*, compliance, and *governance*) from RATEK and credit decision, monitoring loan quality through KKR forum, setting KKR Tooles (*early loan problem identification, loan problem mitigation process*), and discipline improvement from Loan Maintenance (*post disbursement control*)
 - Increasing organization discipline with clear and transparent setting related to organization, Key Performance Indicator of individuals to ensure productivity and quality, sharpen performance evaluation tools, submission of working unit performance related to credit regularly to the Board of Directors (responsibility of performance achievement, HR, and sanction and discipline).
2. Review and setting of credit provision, credit administration fees, and penalties to all J Trust Bank debtors.
 3. Monitoring credit by watching and supervising Debtors who potentially have problems or been exposed to problems so Bank can do early warning signal of problems faced by the Debtors which may cause Debtors not to pay to the Bank.
 4. Forming of Team Task Force Loan Monitoring which will monitor and set action plan of low loan quality
 5. Review and update of Credit Facility Bookkeeping Memo Form so that the Bank can know facility history owned by Debtors.

2. Risiko Pasar

Risiko Inheren untuk Risiko Pasar berada pada posisi *Low to Moderate* (2), tidak berubah dari posisi September 2018, dengan beberapa langkah pengelolaan risiko pasar adalah sebagai berikut:

2. Market Risk

Inherent Risk for Market Risk in Low to Moderate (2) position, unchanged from September 2018, with several market risk management steps as follows:

- a. Melakukan perbaikan terhadap struktur komposisi aktiva produktif dan non produktifnya agar lebih menguntungkan posisi Bank.
- b. Mengupayakan pengelolaan struktur kewajiban bank (*liabilities*) dalam meningkatkan sumber pendanaan jangka panjang, dengan jalan memberikan suku bunga yang menarik dan kompetitif pada deposito tiga bulan hingga satu tahun.
- c. Meningkatkan Dana Pihak Ketiga (DPK) dengan jangka waktu panjang.
- d. Menerapkan *floating rate* pada pemberian kredit jenis tertentu, sehingga risiko penurunan suku bunga tidak membebani Bank dan sebaliknya juga tidak akan membebani debitur jika suku bunga meningkat.
- e. Memonitor perkembangan harga pasar (*market pricing*) sekaligus memperkokoh kebijakan *pricing* aktiva maupun pasiva melalui forum rapat *Assets Liability Committee* (ALCO) dengan membahas beberapa perhitungan penting seperti *cost of money*, *base lending rate* dan perhitungan lainnya. Dengan demikian, setiap permasalahan yang terjadi di dalam Bank khususnya yang berkaitan dengan risiko suku bunga dapat diantisipasi sedini mungkin.
- f. Melakukan monitoring atas likuiditas, aktivitas dan *risk limit* Divisi Treasury & Capital Markets secara harian dan melaporkannya kepada Direksi.

3. Risiko Likuiditas

Peringkat komposit Risiko Likuiditas adalah *Low To Moderate* (2) adalah sama dengan periode sebelumnya di triwulan III tahun 2018 dengan salah satu indikator rasio LCR per triwulan IV tahun 2018 sebesar 126.02% (di atas batas minimal ketentuan OJK sebesar 100%) dan akses pendanaan dari *Interbank Call Money* cukup memadai untuk meng-cover kebutuhan pendanaan bank jangka pendek.

Beberapa strategi dan pengelolaan risiko likuiditas sebagai berikut:

- a. Melakukan portofolio investasi ke arah investasi yang lebih likuid.
- b. Menurunkan konsentrasi deposito inti dan mengganti dengan dana retail sehingga menjadi lebih *sustainable* (berkesinambungan).
- c. Mendorong bertumbuhnya jumlah investasi dana-dana murah atau nasabah kategori *low cost fund*.
- d. Meningkatkan efektivitas pengelolaan *gap* likuiditas (*maturity gap*, *proyeksi cash flow*) untuk mengantisipasi risiko likuiditas sedini mungkin.

- a. Making improvement to the structure of productive and non-productive assets composition to benefit the Bank's position.
- b. Striving to manage the Bank's liability structure by improving the long-term source of fund by way of offering attractive and competitive interest rates on the three months to one year term deposits.
- c. Increasing the long term Third Party Fund (DPK).
- d. Applying floating rate on certain types of loans, so that the risk of a decline in interest rates does not burden the Bank and vice versa will not burden the debtor if interest rates rise.
- e. Monitoring the development of market pricing and at the same time strengthening the pricing policy of assets and liabilities through the Asset Liability Committee (ALCO) forum meeting to discuss various key formulations, such as cost of money, base lending rate and other calculations. Thus, any problems that occur in the Bank, particularly with regard to interest rate risk can be anticipated as early as possible.
- f. Monitoring liquidity, activities and risk limits of the Treasury & Capital Markets Division on a daily basis and reporting to the Board of Directors.

3. Liquidity Risk

The composite rating of Liquidity Risk is Low To Moderate (2) is the same as the previous period in the third quarter of 2018 with one indicator of the LCR ratio per quarter IV of 2018 amounting to 126.02% (above the minimum limit of OJK provisions of 100%) and access to funding from Interbank Call Money is sufficient to cover short-term bank funding needs.

Some strategies and management of liquidity risk are as follows:

- a. Setting investment portfolio toward more liquid investments.
- b. Lowering concentration of core depositors and replacing it with a more sustainable retail funding.
- c. Encouraging growth of number of low cost investment funds or customer funds in low cost category.
- d. Improving the effectiveness of managing liquidity gap (*maturity gap*, *projected cash flow*) in anticipating liquidity risk early.

- e. Meningkatkan kerja sama dengan Bank Lain agar dapat memanfaatkan fasilitas *Call Money* maupun Repo Surat Berharga intern bank.

Bank berupaya meningkatkan efektivitas pengelolaan *gap* likuiditas (*maturity gap* dan proyeksi arus kas) untuk mengantisipasi risiko likuiditas sedini mungkin, dan juga mengendalikan risiko likuiditas khususnya pada saat kondisi *stress*.

Bank juga telah menyusun *Contingency Funding Plan*, selain juga senantiasa memelihara kemampuannya dalam melakukan akses ke pasar uang dengan terus membina hubungan dengan bank koresponden. Untuk mendeteksi risiko likuiditas, Bank telah mempunyai *Standard Operation Procedure LCP (Liquidity Contingency Plan)*, dan melakukan pemantauan likuiditas secara harian untuk dilaporkan kepada Direksi.

4. Risiko Operasional

Peringkat komposit Risiko Operasional adalah Moderate (3) dengan *trend* tetap dibandingkan periode triwulan sebelumnya, dan beberapa langkah pengelolaan risiko operasional adalah sebagai berikut:

- a. Bank telah membentuk *Quality Assurance (QA)* di bawah Risk Management Division sebagai *second line of defence*. Fungsi dari QA adalah memastikan bahwa unit kerja di cabang telah melaksanakan transaksi operasional sesuai dengan ketentuan internal yang berlaku, serta melakukan *review & menyempurnakan* ketentuan internal.
- b. Untuk melakukan identifikasi kejadian risiko yang terjadi di Cabang serta memiliki dampak kerugian, maka pemantauan dilakukan menggunakan *Irregularity Risk Report*.
- c. Melakukan pencatatan atas data kerugian yaitu *Loss Event Database* dimana data tersebut digunakan sebagai salah satu parameter dalam pengukuran Profil Risiko Operasional.
- d. Bank telah menerapkan *Risk & Control Self Assessment (RCSA)* yang merupakan metodologi untuk identifikasi sumber-sumber risiko, yang digunakan untuk mengukur tinggi rendahnya risiko, memantau *trend* tingkat risiko, serta mengendalikan dan mitigasi risiko. Pelaksanaan Identifikasi melalui RCSA diterapkan pada seluruh unit kerja.
- e. Melakukan peninjauan ulang dan penyempurnaan atas *Standard Operation Procedure* masing-masing unit kerja secara berkala.
- f. Melakukan Penetapan batas kewenangan dalam melakukan transaksi operasional.

- e. Increasing cooperation with other banks for securing Call Money and Securities Repo internal bank facilities.

The Bank seeks to increase the effectiveness of managing liquidity gap (*maturity gap* and cash flow projections) in anticipating liquidity risk early, and also controlling the liquidity risk, especially under stress conditions.

The Bank has also prepared a *Contingency Funding Plan*, as well as its ability to continue maintain access to the money market by continue building relationships with correspondent banks. To detect liquidity risk, The Bank has maintained a *LCP (Liquidity Contingency Plan) Standard Operation Procedure* and monitoring of daily liquidity, to be reported to the Board of Directors.

4. Operational Risk

The composite rating of Operational Risk is Moderate (3) with a fixed trend compared to the previous quarter, and several operational risk management steps are as follows:

- a. The Bank has formed *Quality Assurance (QA)* under the Risk Management Division as a second line of defence. The QA function is to ensure that working units in branches have run operational transactions according to existing internal provisions, and make review & improve internal provisions.
- b. To identify the risk occurrences occurring in the Branch as well as to have a loss impact, the monitoring is performed using the *Irregularity Risk Report*.
- c. Recording of data loss is *Loss Event Database* where the data is used as one of the parameters in the measurement of Operational Risk Profile.
- d. The Bank has implemented *Risk & Control Self Assessment (RCSA)* which is a methodology for identifying risk sources, which is used to measure high risk, monitor risk level trends, and control and mitigate risk. Implementation of Identification through RCSA is applied to all work units.
- e. Perform regular review and refinement of *Standard Operation Procedure* of each work unit.
- f. Establishing limits of authority in performing operational transactions.

- g. Setiap adanya produk ataupun aktivitas baru Bank selalu dilakukan kajian risiko sesuai dengan ketentuan dari regulator.
- h. Peningkatan kualitas sumber daya manusia dengan meningkatkan frekuensi pelatihan internal maupun eksternal di bidang perkreditan, pemasaran produk dan motivasi kerja.
- i. Pengelolaan risiko operasional juga dilakukan dengan memperkuat keamanan dan keandalan teknologi informasi, sehingga kegagalan sistem maupun *human error* dapat ditekan.
- j. Melakukan peningkatan pada IT *Security System* untuk seluruh sistem yang ada pada Bank.
- k. Memastikan ketersediaan *Disaster Recovery Plan* (DRP) yang diuji secara berkala sebagai antisipasi jika terjadi gangguan IT.
- l. Meningkatkan fungsi pengawasan internal melalui Divisi Audit Internal yang membawahi *Credit Audit Department, Head Office & Regional Audit Departement, IT Audit Department*, dan *Anti Fraud* sebagai upaya memperkuat sistem pengendalian intern.
- m. Bank telah memiliki *Business Continuity Plan* (BCP) dimaksudkan untuk minimalisasi risiko, menangani dampak dari gangguan/bencana, serta percepatan proses pemulihannya agar kegiatan operasional dan pelayanan kepada nasabah tetap dapat berjalan dengan baik.

5. Risiko Hukum

Peringkat komposit Risiko Hukum di peringkat Moderate to High (4), dengan *trend* risiko menurun dibandingkan periode triwulan III tahun 2018 di peringkat Moderate (3) yang disebabkan karena adanya impact atas gugatan kasus Antaboga dimana 2 Kantor Cabang Bank di Surabaya telah dilakukan eksekusi lelang oleh Pengadilan Negeri Surabaya.

Bank telah melakukan tindakan-tindakan untuk mengurangi risiko kerugian dengan melakukan langkah-langkah sebagai berikut:

1. Mengajukan gugatan perlawanan (*partij verzet*) kepada pengadilan Surabaya untuk mengangkat sita atas aset milik Bank.
2. Berkoordinasi dengan pembeli aset Bank untuk mengajukan upaya perlawanan (*darden verzet*) untuk mengangkat sita atas milik Bank yang telah dibeli oleh pihak ketiga tersebut.
3. Bank juga telah melakukan pengiriman surat kepada pengadilan Surabaya, kantor BPN Surabaya dan Kantor Lelang Surabaya untuk memohon pencabutan sita dan penundaan lelang.

- g. In any existence of new products or activities of the Bank is always conducted risk assessment in accordance with the provisions of the regulator.
- h. Improving the quality of human resources by increasing the frequency of internal and external training in the fields of credit, product marketing, and work motivation.
- i. Operational risk management is also done by strengthening the security and reliability of information technology, so that system failure and human error can be suppressed.
- j. Improving the IT *Security System* for all existing systems in The Bank.
- k. Ensure availability of *Disaster Recovery Plan* (DRP) that is tested periodically in anticipation in case of IT interruption.
- l. Improve internal control function through Internal Audit Work Unit which oversees Credit Audit Department, Head Office & Regional Audit Department, IT Audit Department, and Anti Fraud Department as an effort to strengthen the internal control system.
- m. The Bank has a *Business Continuity Plan* (BCP) intended to minimize risks, address the impact of disruption/disaster, and accelerate the recovery process so that operational activities and services to customers can still run well.

5. Legal Risk

The composite rank of Legal Risk was in Moderate to High (4), with declining risk trend compared to the period of third quarter of 2018 in Moderate (3) rank caused by the impact of Antaboga lawsuit in which 2 Branches in Surabaya have been executed to be auctioned by Surabaya District Court.

The Bank has performed actions to reduce risk of losses by making such steps:

1. Filing counter lawsuits (*partij verzet*) to the Surabaya court to lift confiscation on Bank assets.
2. Coordinating with the buyers of Bank assets to do counter lawsuits (*darden verzet*) to lift confiscation on Bank assets that have been bought by the third parties.
3. The Bank also sent letters to the Surabaya court, Surabaya's BPN office, and Surabaya Auction Office to request for revocation of confiscation and delay of auction.

Rencana Bank ke depannya untuk memitigasi risiko gugatan penjualan atas aset Bank lainnya adalah sebagai berikut :

- a) Melakukan penjualan aset kepada pihak ketiga.
- b) Melakukan pelaporan pidana atas penggunaan informasi palsu pada persidangan sebelumnya. Saat ini sedang dalam proses pemanggilan saksi yang diduga terkait dengan perkara dimaksud di Polda Jawa Timur.
- c) Mengajukan upaya perlawanan lainnya.

Pengelolaan Risiko Hukum dilakukan antara lain:

- a. Melakukan peninjauan kembali (*review*) atas dokumen hukum, perjanjian maupun kontrak-kontrak dengan pihak ketiga.
- b. Inventarisasi atas kasus-kasus hukum yang terjadi termasuk didalamnya memantau perkembangan dari setiap kasus hukum yang ada. Penanganan kasus hukum disusun berdasarkan skala prioritas dan seluruh perkembangannya terpantau dengan baik dan selalu dilaporkan kepada Manajemen untuk ditindaklanjuti melalui penyelesaian yang mengandung potensi risiko hukum paling sedikit.
- c. Fungsi Corporate Legal & Compliance Division yang memiliki peranan penting dalam memberikan analisa/*review* dari sudut pandang legal terkait dengan produk atau aktivitas baru Bank, memberikan masukan dari sisi hukum akibat adanya perubahan regulasi, melakukan *review* atas perjanjian-perjanjian yang dibuat antara Bank dengan pihak ketiga, selain itu juga menangani permasalahan hukum yang terkait dengan litigasi.

6. Risiko Strategik

Peringkat komposit Risiko Strategik adalah Moderate (3) dengan *trend* risiko menurun dibandingkan periode triwulan sebelumnya dikarenakan adalah pencapaian dari target kinerja triwulan IV tahun 2018 dinilai *Moderate* dari rasio keuangan yaitu ROA, ROE, Rugi Tahun Berjalan dan CAR.

Beberapa langkah yang dilakukan untuk mengantisipasi risiko ini antara lain:

- a. Penyusunan Rencana Bisnis Bank untuk periode tahun 2019-2021 yang digunakan sebagai pedoman oleh Manajemen dan karyawan.
- b. Melakukan pemantauan atas kinerja keuangan dengan membandingkan antara realisasi dengan sasaran/*target* yang ingin dicapai oleh Bank sesuai dengan Rencana Bisnis Bank tersebut.

The Bank's plan going forward to mitigate risks on lawsuits on the sales of other Bank assets are as follows:

- a) Making asset sales to third parties.
- b) Making criminal report on the use of false information in the previous court hearings. Currently witnesses related to the cases are summoned to the East Java Police.
- c) Submitting other counter efforts.

The management of the Legal Risk is conducted by, among others:

- a. Re-evaluating legal documents, agreements, or contracts with third parties.
- b. Inventorying of legal cases including monitoring the progress of each legal case. The handling of legal cases is based on a priority scale and all developments are well monitored and are always reported to Management for follow-up through a solution containing the least potential legal risk.
- c. The function of Corporate Legal & Litigation Division which has an important role in providing analysis/*review* from legal point of view related to new product or activity of Bank, giving legal input due to regulation change, reviewing agreements made between Bank and third party, while also addressing legal issues related to litigation.

6. Strategic Risk

The composite rating of Strategic Risk is Moderate (3) with the declining risk trend compared to the previous quarter due to the achievement of performance target in the fourth quarter of 2018 as Moderate from financial ratios namely ROA, ROE, Current Year Loss and CAR.

Some of the steps taken to anticipate this risk are, among others:

- a. Preparation of the 2019-2021 period Bank Business Plan to be used as the guidelines by the management and employees.
- b. Monitoring the financial performance by comparing the achievements with the established objectives/targets in the Bank's Business Plan.

- c. *Planning Performance Division* yang secara rutin melakukan pemantauan berkala (*performance review*) atas pencapaian kinerja dari tiap divisi/kantor wilayah/cabang/capem dan Bank secara keseluruhan.
- d. Merevisi pengkinian atas strategi yang ingin dicapai sesuai dengan perkembangan kondisi internal maupun eksternal, sehingga akan menjadi realistis dengan pencapaian sasaran Bank.

7. Risiko Kepatuhan

Peringkat komposit Risiko Kepatuhan berada di peringkat *Moderate* (3) peringkat ini tetap dari periode sebelumnya, dan Bank telah melakukan pengelolaan risiko kepatuhan antara lain:

- a. Menyempurnakan & *monitoring* Kebijakan Kepatuhan dan Kebijakan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme.
- b. Pemantauan terhadap pengkinian data nasabah dan penerapan *single* CIF serta penanganan rekening pasif/*dormant*.
- c. Pelaksanaan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU dan PPT) sesuai dengan Peraturan Otoritas Jasa Keuangan, dan Bank secara rutin melakukan sosialisasi kepada unit-unit terkait melalui *Corporate Legal & Compliance Division*.
- d. Penyusunan Laporan Kepatuhan kepada pihak Internal maupun Eksternal.
- e. Peningkatan fungsi kepatuhan untuk melakukan uji kepatuhan atas setiap regulasi, baik ketentuan internal maupun eksternal.

8. Risiko Reputasi

Peringkat komposit Risiko Reputasi adalah *Low To Moderate* (2) peringkat ini sama dengan periode sebelumnya dengan pertimbangan bank dapat mengelola pemberitaan negatif melalui kegiatan *brand image*, promosi produk yang diberitakan di media masa dalam rangka penguatan *Corporate Image*.

Pengelolaan risiko reputasi dilakukan dengan cara:

- a. Pemantauan terhadap publikasi media, yang bekerja sama dengan jasa pihak ketiga oleh *Corporate Secretary*.
- b. Melakukan pemantauan terhadap keluhan nasabah melalui Operation & Credit Administration Division guna menangani keluhan dengan segera, serta melakukan optimalisasi fungsi *Call Center* dalam penanganan keluhan nasabah.
- c. Dalam upaya pelaksanaan manajemen risiko, Bank secara aktif menjalankan program *Corporate Social Responsibility* dan aktivitas

- c. Formed the Performance Planning Division, which routinely conducts regular performance review on the achievement of each division/regional office/branch/Sub Branch and the Bank in a comprehensive manner.
- d. Revise and update strategies in accordance with the development of internal and external conditions, to ensure the objectives and strategies to achieve the determined targets remain realistic.

7. Compliance Risk

The Compliance Risk composite rating is ranked Moderate (3), stayed from the previous period, and the Bank has conducted the compliance risk management, among others:

- a. Developing and monitoring of the Compliance Policy and the Anti-Money Laundering and Combating the Financing of Terrorism Policy.
- b. Monitoring of customer data update and implementing single CIF, as well as handling of the passive/*dormant* account.
- c. Implementing the Anti-Money Laundering and Combating Terrorism Financing Program in accordance and as mandated in Bank Indonesia regulation. PT Bank JTrust Indonesia Tbk routinely conducts disseminations to the relevant units through the Compliance & Legal Division.
- d. Preparation of the Compliance Report to Internal as well as External parties.
- e. Improving the compliance function to perform the compliance test of each regulations, both internally as well as external provisions.

8. Reputation Risk

The Reputation Risk composite rating was Low To Moderate (2), the same as the previous period with the consideration that the Bank can manage negative news through brand image activities, product promotions reported in the media in order to strengthen Corporate Image.

The management of the reputation risk is conducted by the following methods:

- a. Monitoring of media publications by the Corporate Secretary working closely with third-party services.
- b. Monitoring of customer complaints through the Product & Networking Management Division on timeliness of complaint handling, as well as optimizing the function of Call Center in handling customer complaints.
- c. In the effort of risk management implementation, the Bank actively performs the Corporate Social Responsibility program

sosial lainnya, *public expose*, membangun relasi dengan media, dan *gathering* dengan nasabah.

- d. Reputasi dan dukungan pemegang saham baru secara profesional membantu manajemen dalam rangka meningkatkan reputasi dan kepercayaan masyarakat melalui peningkatan kinerja yang lebih baik dan program-program kerja yang berimplikasi langsung pada pengelolaan risiko reputasi.

Evaluasi atas Efektivitas Sistem Manajemen Risiko

Tinjauan atas efektivitas penerapan Manajemen Risiko pada keempat pilar sistem manajemen risiko telah dilakukan secara memadai yang meliputi:

- a. Perumusan Tingkat Risiko
Perumusan *risk appetite* dan *risk tolerance* sudah memadai dan selaras dengan tujuan strategis dan bisnis bank yang ditetapkan dalam RBB. Parameter *risk tolerance* secara *bankwide* didokumentasikan dalam ketentuan internal di *Risk Appetite Statement & Risk Tolerance* PT. Bank JTrust Indonesia Tbk.
- b. Kecukupan pengawasan aktif oleh Dewan Komisaris dan Direksi
Kecukupan pengawasan aktif oleh Dewan Komisaris dan Direksi, termasuk pelaksanaan kewenangan dan tanggung jawab Dewan Komisaris dan Direksi dinilai memadai. Dewan Komisaris telah membentuk Komite Pemantau Risiko, antara lain:
 1. Mengevaluasi dan menganalisis kecukupan kebijakan manajemen risiko secara berkala.
 2. Mengevaluasi dan menganalisa laporan profil risiko secara triwulanan dan Tingkat Kesehatan Bank secara semesteran.
 3. Mengawasi dan mengevaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko.
- c. Alat Organisasi Manajemen Risiko
Alat organisasi yang mendukung penerapan Manajemen Risiko secara efektif dinilai memadai dengan wewenang dan tanggung jawab yang jelas dalam setiap kegiatan usaha, antara lain:
 1. Dalam mengelola risiko kredit ada pemisahan petugas pinjaman, antara Unit Bisnis dan Unit *Credit Risk Review*. Delegasi wewenang diatur dalam ketentuan internal tentang Komite Kredit (KK) dan Batas Wewenang Memutus Kredit (BWMK) dan dievaluasi secara rutin oleh pejabat yang berwenang.
 2. Dalam pengelolaan risiko pasar dan likuiditas, fungsi manajemen risiko terdiri dari Divisi Treasury & Capital Market, Divisi Operasi & Credit Administration dan Divisi Manajemen Risiko.

and other social activities, public expose, building relationship with the media, and organizing customer gathering.

- d. The reputation and support from the new shareholders in a professional manner have provided and assisted the management in improving the reputation and public confidence through performance improvement and work programs, which directly impact the management of reputation risk.

Evaluation on the Effectiveness of the Risk Management System

A review of the effectiveness of Risk Management implementation on the four pillars of the risk management system has been adequately conducted which includes:

- a. Formulation of Risk Level
The formulation of risk appetite and risk tolerance is adequate and in line with the strategic and business objectives of the bank set out in RBB, and RKAP. Bankwide risk tolerance parameters are documented in the internal terms of Risk Appetite Statement & Risk Tolerance of PT Bank J Trust Indonesia Tbk.
- b. Adequacy of active supervision by the Board of Commissioners and the Board of Directors
The adequacy of active supervision by the Board of Commissioners and the Board of Directors, including the exercise of the authority and responsibilities of the Board of Commissioners and the Board of Directors is considered adequate. The Board of Commissioners has established the Risk Monitoring Committee to, among others:
 1. Evaluate and analyze the adequacy of risk management policies on a regular basis.
 2. Evaluate and analyze quarterly risk profile reports and Bank Rating semi-annually.
 3. Supervise and evaluate the performance of the Risk Management Committee and Risk Management Working Unit.
- c. Risk Management Organization Tool
Organizational tools that support the implementation of Risk Management are effectively assessed with clear authority and responsibility in every business activity, including:
 1. In managing credit risk there is separation of loan officer, between Business Unit and Credit Risk Review Unit. Delegation of authority is governed in the internal provisions of the Credit Committee (KK) and the Limit of Authority to Declare Credit (BWMK) and regularly evaluated by authorized officials.
 2. In the management of market risk and liquidity, the risk management function consists of the Treasury & Capital Market Division, Operations & Administration Credit Division, and Risk Management Division.

3. Dalam pengelolaan risiko operasional terdapat pemisahan tugas dan wewenang pembuat, pemeriksa, penandatanganan (segregasi tugas dan *dual control*) terhadap pelaksanaan semua kegiatan operasional di unit kerja.
4. Untuk mengembangkan kompetensi dalam Manajemen Risiko, adalah wajib bagi Dewan Komisaris, Direksi, dan juga pejabat sampai empat tingkat di bawah Direksi untuk mengikuti pelatihan sertifikasi Manajemen Risiko. Selain itu, *refreshment* kepada Sumber Daya Manusia juga dilakukan secara rutin.

d. Sistem Informasi

Dukungan sistem informasi untuk penerapan manajemen risiko dinilai cukup memadai, antara lain persetujuan transaksi dan delegasi wewenang di sistem informasi *Core Banking*, pelaksanaan Liquidity Risk Report secara harian, pelaksanaan *Credit Daily Report* secara harian, pelaksanaan *Risk Control Self Assessment* (RCSA) dalam pengukuran risiko operasional, sistem *Compliance Report Monitoring* (CRM) sebagai *reminder* ke unit kerja pelapor dan Direksi mengenai kewajiban penyampaian Laporan kepada Regulator.

5.2. Penerapan Sistem Pengendalian Internal (*Internal Control System*)

1. Pengendalian keuangan dan operasional, serta kepatuhan terhadap peraturan perundang-undangan lainnya

Untuk dapat mengelola Bank secara efektif dan efisien serta sebagai dasar kegiatan operasional yang sehat dan aman, diperlukan adanya Sistem Pengendalian Internal (SPI).

Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan Nomor 38/POJK.03/2016 tanggal 1 Desember 2016 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan Nomor 35/SEOJK.03/2017 tanggal 07 Juli 2017 perihal Pedoman Standar Sistem Pengendalian Intern bagi Bank Umum, mewajibkan Bank untuk menerapkan Sistem Pengendalian Intern secara efektif terhadap seluruh kegiatan usaha dan operasional pada seluruh jenjang organisasi Bank.

Sistem Pengendalian Internal (*Internal Control System*) merupakan suatu mekanisme pengendalian yang ditetapkan oleh Direksi dengan persetujuan Dewan Komisaris secara berkesinambungan (*on going basis*) dalam rangka pencapaian tujuan perusahaan.

3. In operational risk management there is a separation of duties and authority of maker, examiner, signer (task segregation and dual control) on the implementation of all operational activities in the work unit.
4. To develop competencies in Risk Management, it is mandatory for the Board of Commissioners, Board of Directors, and also officials up to four levels under the Board of Directors to attend the Risk Management certification training. In addition, refreshment to Human Resources is also done routinely.

d. Information Systems

Information system support for risk management implementation is considered sufficient, including transaction approval and delegation of authority in Core Banking information system, daily Liquidity Risk Report implementation, daily Credit Daily Report implementation, Risk Control Self Assessment (RCSA) implementation in operational risk measurement, Compliance Report Monitoring (CRM) system as reminder to reporting unit regarding the obligation to submit the Report to the Regulator.

5.2. Implementation of Internal Control System

1. Financial and operational controls, and compliance with other laws and regulations

To be able to manage the Bank effectively and efficiently and as a basis for safe and healthy operational activities, an Internal Control System is required.

Regulation from Financial Services Authority No. 18/POJK.03/2016 dated March 16, 2016 concerning Application of Risk Management for Commercial Banks, Regulation of Financial Services Authority No. 38/POJK.03/2016 dated December 1, 2016 regarding Risk Management Implementation in Use of Information Technology by Commercial Bank and Circular Letter of the Financial Services Authority No. 35/SEOJK.03/2017 dated July 7, 2017 concerning Guidelines for Standards of Internal Control System for Commercial Bank, requires the Bank to apply the Internal Control System effectively to all business and operational activities at all levels of the Bank's organization.

Internal Control System is a control mechanism established by the Board of Directors with the approval of the Board of Commissioners on an ongoing basis in the context of achieving the company's objectives.

Penerapan Sistem Pengendalian Internal secara efektif akan membantu Bank dalam:

- a. Menjaga dan mengamankan harta kekayaan Bank.
- b. Menjamin tersedianya informasi dan laporan yang lebih akurat.
- c. Meningkatkan kepatuhan Bank terhadap ketentuan dan peraturan perundang-undangan yang berlaku.
- d. Mengurangi dampak keuangan/risiko terjadinya kerugian, penyimpangan termasuk kecurangan/*fraud*, dan pelanggaran terhadap prinsip kehati-hatian.
- e. Meningkatkan efektivitas organisasi dan efisiensi biaya.

Untuk keperluan di atas PT Bank JTrust Indonesia Tbk telah mengadopsi prinsip Pengendalian Internal berdasarkan COSO Model dengan 5 (lima) komponen yang harus dikendalikan sebagai berikut:

1) **Control Environment (CE)**

CE adalah himpunan standar, ketentuan, proses dan struktur organisasi yang memberikan dasar untuk melaksanakan SPI bagi seluruh organisasi. BOD dan Manajemen melaksanakan *Tone At The Top* atas pentingnya SPI termasuk standar berperilaku. CE terdiri dari nilai-nilai integritas dan etika organisasi, parameter yang memungkinkan BOD dan Manajemen untuk melaksanakan pengendalian operasional perusahaan, efektivitas struktur organisasi, tugas individu, hambatan kinerja, insentif, dan hukuman untuk mendorong akuntabilitas kinerja, yang dihasilkan CE akan berdampak luas pada SPI secara keseluruhan.

2) **Risk Assessment (RA)**

RA melibatkan proses yang dinamis dan berulang untuk mengidentifikasi dan menilai risiko yang dapat mempengaruhi pencapaian tujuan perusahaan, sehingga RA membentuk dasar untuk menentukan bagaimana risiko akan dikelola. RA juga mengharuskan manajemen untuk mempertimbangkan dampak dari kemungkinan perubahan dalam lingkungan eksternal dan dalam model bisnis yang dapat membuat SPI tidak efektif. Risiko didefinisikan sebagai kemungkinan bahwa suatu peristiwa akan terjadi dan akan mempengaruhi pencapaian tujuan perusahaan.

3) **Information Communication (IC)**

IC diperlukan perusahaan untuk Pelaksanaan SPI dalam rangka mendukung pencapaian tujuan perusahaan. Manajemen memperoleh atau menghasilkan dan menggunakan bentuk informasi yang relevan dan berkualitas, baik sumber internal dan eksternal untuk mendukung komponen lain dari SPI. Komunikasi harus dilakukan secara

The implementation of the Internal Control System will effectively assist the Bank in:

- a. Maintain and secure the Bank's assets.
- b. Ensure more accurate information and reports are available.
- c. Improve the Bank's compliance with prevailing laws and regulations.
- d. Reduce financial impact/risk of loss occurrence, irregularities including fraud, and violation of prudential principles.
- e. Improve organizational effectiveness and cost efficiency.

For the above purposes PT Bank J Trust Indonesia Tbk has adopted the principle of Internal Control under the COSO Model with 5 (five) components to be controlled as follows:

1) **Control Environment (CE)**

CE is the set of standards, provisions, processes and organizational structures that provide the basis for implementing the SPI for the entire organization. BOD and Management implement *Tone At The Top* for the importance of SPI including standards of conduct. CE consists of integrity values and organizational ethics, parameters enabling BOD and Management to implement enterprise operational controls, organizational structure effectiveness, individual tasks, performance barriers, incentives and penalties to foster performance accountability, produced by CE will have broad impact on SPI overall.

2) **Risk Assessment (RA)**

RA involves a dynamic and repeatable process to identify and assess risks that may affect the achievement of company objectives, so that RA forms the basis for determining how risk will be managed. RA also requires management to consider the impact of possible changes in the external environment and in business models that can make the SPI ineffective. Risk is defined as the possibility that an event will occur and will affect the achievement of company goals.

3) **Information Communication (IC)**

IC is required by the Company for Implementation of SPI in order to support the achievement of corporate objectives. Management obtains or generates and uses relevant and quality information forms, both internal and external sources to support other components of the SPI. Communication should be done continuously, by

kontinyu, dengan cara memberikan, berbagi dan memperoleh informasi yang diperlukan. Komunikasi Internal adalah sarana yang informasinya disebarluaskan ke seluruh organisasi, mengalir ke atas, bawah dan rekan kerja dalam *level* yang sama dimana memungkinkan pribadi untuk menerima pesan yang jelas dari manajemen demikian sebaliknya. Komunikasi Eksternal terdiri dari dua aktivitas, yaitu memungkinkan menerima informasi eksternal yang relevan, dan memberikan informasi kepada pihak eksternal.

4) Monitoring Activities

Monitoring terdiri dari Evaluasi Berkelanjutan (*Ongoing Evaluation*), Evaluasi Terpisah (*Separate Evaluation*), atau kombinasi keduanya digunakan untuk memastikan apakah masing-masing dari lima komponen SPI, adalah Hadir (*Present*) dan Berfungsi (*Functioning*). Evaluasi Berkelanjutan dibangun kedalam bisnis proses pada *level* berbeda yang memberikan informasi terkait dengan kesalahan/kelalaian pada kesempatan pertama. Evaluasi Terpisah dilakukan secara periodik akan bervariasi pada lingkup dan frekuensi tergantung kepada hasil *risk assessment*, efektivitas dari Evaluasi Berkelanjutan dan pertimbangan lain manajemen. Temuan dari hasil Evaluasi dicatat dan dikomunikasikan kepada Manajemen.

5) Control Activities (CA)

CA adalah arahan manajemen yang ditetapkan melalui Kebijakan dan Prosedur untuk mengurangi risiko terhadap pencapaian tujuan perusahaan. CA dilakukan di semua tingkat organisasi, pada berbagai tahap dalam proses bisnis, dan semua Informasi Teknologi (IT). CA dapat berupa *control preventive* atau *detective* yang sifatnya dapat dilakukan secara manual dan otomatis seperti otorisasi, persetujuan, verifikasi, rekonsiliasi, dan laporan kinerja bisnis. Pemisahan Tugas (*Segregation of Duties*) dapat digunakan sebagai pembangunan dan pengembangan CA. Ketika Pemisahan Tugas tidak dapat dijalankan, manajemen harus memilih dan mengembangkan kegiatan pengendalian alternatif.

Masing-masing komponen terkait satu sama lain, harus dikendalikan secara terpadu (*integrated*) dan tanggung jawab implementasinya menjadi tanggung jawab semua unit kerja dengan tujuan penerapannya sebagai berikut:

1. *Strategic*, Rencana Bisnis Bank telah dimengerti, sejalan dan didukung oleh semua unit kerja.
2. *Operation*, berjalan dengan efektif dan efisien dalam menggunakan sumber daya manusia dan prasarana.

providing, sharing and obtaining the necessary information. Internal Communication is a means by which information is disseminated throughout the organization, flowing up, down and coworkers on the same level that allows the person to receive a clear message of management vice versa. External communication consists of two activities, which allow receiving relevant external information, and providing information to external parties.

4) Monitoring Activities

Monitoring consists of Ongoing Evaluation, Separate Evaluation, or a combination of both is used to ascertain whether each of the five SPI components is Present and Functioning. Sustainable Evaluation is built into business processes at different levels that provide information related to mistakes/omissions at the first opportunity. Separate Evaluations conducted periodically will vary in scope and frequency depending on the outcome of the risk assessment, the effectiveness of the Sustainable Evaluation and other management considerations. Findings from Evaluation results are recorded and communicated to the Management.

5) Control Activities (CA)

CA is the direction of management established through Policies and Procedures to reduce risks to the achievement of corporate objectives. CA is conducted at all levels of the organization, at various stages in business processes, and all Information Technology (IT). CA can be either manual or automatic detective or detective control such as authorization, approval, verification, reconciliation, and business performance reports. Segregation of Duties can be used as development and development of CA. When the Task Segregation is unworkable, management must select and develop alternative control activities.

Each component is related to each other, must be controlled in an integrated manner and its implementation responsibilities are the responsibility of all work units with the aim of implementing as follows:

1. Strategy, the Bank Business Plan has been understood, in line and supported by all work units.
2. Operation, running effectively and efficiently in the use of human resources and infrastructure.

3. *Reporting*, akurat dan dapat dipercaya.
4. *Compliance*, aktivitas dan transaksi telah tunduk dengan ketentuan serta hukum.

2. Tinjauan atas Efektivitas Sistem Pengendalian Internal

Selama tahun 2018 rata-rata *Audit Rating* secara *bank wide* sebagai berikut:

No	Risk Owner	Audit Rating			Penjelasan Explanation
		2017	2018	Rating	
1	Cabang Branch	75,37	75,20	SATISFACTORY	SPI pada Cabang sudah cukup baik, walaupun masih diperlukan peningkatan dan penyempurnaan/ <i>corrective action</i> terhadap penerapan SOP, Sistem dan SDM. SPI of Branches has been implemented quite well, but still need improvement/corrective action to the SOP, Systems and Human Resources.
2	Divisi Kantor Pusat (Non Kredit) Head Office Division (Non Kredit)	76,49	78,82	SATISFACTORY	SPI sudah berjalan cukup baik, namun masih perlu penyempurnaan terbatas pada SOP dan Kepatuhan SDM dalam penyelenggaraan operasional. SPI has been implemented quite well, but still need limited improvement to the SOP and human resources compliance in the administration of operations.
3	Divisi Kredit Credit Division	73,24	70,13	FAIR	SPI pada semua unit Kredit masih terdapat kelemahan di komponen SPI (5 Komponen) dan harus dilakukan penyempurnaan/ <i>corrective action</i> terhadap SOP, Sistem dan SDM. SPI of all units of Credit. There were many weaknesses in the various components of SPI (5 Components) and corrective action should be performed to the SOP, Systems and Human Resources.

Secara umum selama tahun 2018 sudah terjadi peningkatan terhadap proses sistem pengendalian intern, namun dalam beberapa hal masih diperlukan peningkatan kembali seperti penyesuaian SOP sejalan dengan perkembangan bisnis dan proses aktivitas operasional, disiplin proses dan peningkatan kompetensi dari SDM yang ada sejalan dengan adanya potensi risiko dari aktivitas dan produk baru.

Upaya yang telah dilakukan untuk meningkatkan Sistem Pengendalian Internal antara lain:

1. Melakukan reorganisasi Bank yang disesuaikan dengan Rencana Bisnis Bank.
2. Melakukan *review* dan penyesuaian kembali terhadap SOP yang ada.
3. Melakukan *assessment* terhadap pejabat maupun karyawan, yang ditindak lanjuti dengan pembekalan *training* dan sertifikasi.
4. Menerapkan *reward & punishment secara fair*.
5. Melakukan sosialisasi secara berkesinambungan terhadap *corporate value* J Trust Bank melalui rapat budaya (*morning briefing*).

3. Reporting, accurate and reliable.
4. Compliance, activities and transactions are subject to terms and laws.

2. Overview of the Effectiveness of Internal Control Systems

During the year 2018 the average Audit Rating bankwide as follows:

In general, during 2018, there has been an increase in the internal control system process, but in some cases there is still a need for improvements such as SOP adjustment in line with business development and operational process processes, process discipline and competency enhancement of existing human resources in line with the potential risks of the activity and new products.

Efforts that have been made to improve the Internal Control System include:

1. Reorganize the Bank in accordance with the Bank's Business Plan.
2. Reviewing and re-adjusting to existing SOP.
3. Perform assessment of officials and employees, followed up with training and certification training.
4. Apply reward & punishment fairly.
5. Conducting continuing socialization of the corporate value of J Trust Bank through cultural meetings (morning briefing).

BAB VI PENYEDIAAN DANA, RENCANA STRATEGIS BANK, TRANSPARANSI DAN PENGUNGKAPAN ASPEK LAINNYA

CHAPTER VI Provision of Funds, Strategic Plan of the Bank, Transparency, and the Disclosure of Other Aspects

A. Penyediaan Dana Kepada Pihak Terkait (*Related Party*) dan Penyediaan Dana Besar (*Large Exposure*)

Penyediaan dana kepada pihak terkait (*Related Party*) dan debitur inti (individu atau grup) per posisi tanggal 31 Desember 2018, dengan tabel sebagai berikut:

No.	Penyediaan Dana Provision of Fund	Jumlah Total	
		Debitur Debtor	Nominal (jutaan million Rupiah)
1.	Kepada Pihak Terkait To Related Party *)	21	143.313
2.	Kepada Debitur Inti To Key Debtors: - Individu Individual - Group	25	3.250.481
		21	2.752.881
		4	497.600

Keterangan:

*) Jumlah Penyediaan Dana Kepada Pihak Terkait termasuk:

- Pinjaman kepada Pejabat Eksekutif Bank yang diberikan dalam rangka Kredit Karyawan PT Bank JTrust Indonesia Tbk dengan total sebanyak 20 debitur, total pinjaman yang diberikan sebesar Rp10,613 juta.
- Pinjaman kepada PT Olympindo Multi Finance dengan *outstanding* per 31 Desember 2018 sebesar Rp132.700 juta.

Note:

*) Number of funds provision to related parties include:

- Loan to the Bank's Executive Officers which is given under employee loan PT Bank JTrust Indonesia Tbk with the total of 20 debtors, with given loan limit as much as Rp10,613 million.
- Loans to PT Olympindo Multi Finance with an outstanding of Rp132,700 million as of December 31, 2018

Sesuai dengan Peraturan Bank Indonesia, penyediaan dana kepada pihak terkait (*Related Party*) dan debitur/group inti telah dilaporkan secara tertib termasuk Debitur yang terdapat pelampauan BMPK beserta Laporan Pelaksanaan *Action Plan*/Rencana Tindakan Penyelesaiannya.

Proses kredit telah melalui Rapat Teknis, atau proses seleksi dari Human Capital Division dan mendapatkan persetujuan dari Direksi terutama pinjaman kepada Pejabat Eksekutif Bank untuk memitigasi berbagai kemungkinan yang timbul sebelum pemberian penyediaan dana kepada debitur. Dalam setiap pengambilan keputusan penyediaan dana telah diputuskan bersama dalam Rapat Komite Kredit sesuai Batas Wewenang Memutus Kredit (BWMK) dan menerapkan *Four Eyes Principle* dimana keputusan kredit didasarkan pada rekomendasi dari Bisnis Unit terkait dan *Credit Risk Reviewer* yang diharapkan dapat menghasilkan kredit yang berkualitas dan dapat mencapai target yang ditentukan. Khusus ketentuan Bank Indonesia tentang Batas Maksimum Pemberian Kredit (BMPK) selalu diinformasikan dalam Nota Analisa Kredit (NAK) dengan berpedoman pada Memo tentang jumlah Modal Bank yang dikeluarkan setiap bulan oleh Satuan Kerja Manajemen Risiko.

A. Provision of Funds to Related Party and Large Exposures

The provision of funds to Related Party and core debtor/group position as of December 31, 2018 in the following table:

In accordance to Bank Indonesia Regulation, the provision of funds to related party and key debtors/group have been reported in an orderly manner, including loans that exceed the BMPK along with Action Plan Performance Report/Solution Action Plan.

The loan process has passed the Technical Meeting in order to mitigate various possibilities that may arise prior to the provision of funds to the debtors. Each decision making of fund provision is a result of joint decision in the Credit Committee Meeting in line with Credit Limit Decision Authority (BWMK) and implementing the Four Eyes Principle where the credit decision is based on the recommendation from the related Business Unit and Credit Risk Reviewer with the expectation of obtaining quality credit and accomplish the determined target. Particularly for Bank Indonesia provision on Maximum Credit Disbursement Limit (BMPK), the Credit Analysis Note (NAK) is always informed, based on the Memo on Bank's Capital, which is published each month by the Risk Management Work Unit.

Bank telah memiliki kebijakan internal mengenai mekanisme pemantauan penyediaan dana dengan memperhatikan penyebaran/diversifikasi portfolio dengan pembagian pengelolaan pada masing-masing Bisnis Unit berdasarkan segmentasi kredit, yaitu segmen *Retail Business* yang terbagi menjadi *SME Business*, *Consumer Business*, *Micro Business*, *Corporate & Commercial Business*, dan *Linkage Business*.

PT Bank JTrust Indonesia Tbk telah menetapkan kebijakan internal mengenai limit penyediaan dana sesuai dengan Peraturan Bank Indonesia No.7/3/PBI/2005 tanggal 20 Januari 2005 serta perubahannya dengan Peraturan Bank Indonesia No.8/13/PBI/2006 tanggal 5 Oktober 2006 tentang Batas Maksimum Pemberian Kredit, dan berdasarkan Memorandum Prosedur No.31.12/M.Dir-MRD/JTRUST/VIII/2015 tanggal 31 Agustus 2015 Perihal Batas Maksimum Pemberian Kredit (BMPK) dan Pengelolaan Debitur Group, yang menegaskan kembali bahwa ketentuan BMPK dan *InHouse Limit* BMPK terbagi menjadi:

- Untuk 1 (satu) Peminjam secara individu dan merupakan pihak tidak terkait 80% x (20% x Modal Bank).
- Untuk 1 (satu) Kelompok Peminjam: 80% x (25% x Modal Bank).
- Untuk Badan Usaha Milik Negara (BUMN) untuk tujuan Pembangunan: 80% x (30% x Modal Bank).
- Untuk Pihak Terkait: 80% x (10% x Modal Bank).

Penyediaan Dana kepada Pihak Terkait dipertegas kembali melalui Memorandum Prosedur No.31.13/M.Dir-MRD/JTRUST/VIII/2015 tanggal 31 Agustus 2015 Perihal Penyediaan Dana Kepada Pihak Terkait.

B. Rencana Strategis Bank

Bank pada tahun 2017 menetapkan rencana strategis Bank untuk rencana jangka panjang (*corporate plan*) dan rencana jangka menengah dan pendek (*business plan*) yang kemudian dikoreksi pada bulan Oktober 2018 seperti tercantum dalam tabel di bawah ini:

Aktivitas Activities	Jangka Pendek Short-Term	Jangka Menengah Medium-Term	Jangka Panjang Long-Term
	1 Tahun 1 Year	3 Tahun 3 Year	10 Tahun 10 Year
Total Aset Rp 17,59 T Total Assets Rp 17,59 T	√		
Total Loan Rp 11,03 T	√		
Volume DPK Rp 13,71 T Third Party Fund Rp 13,71 T	√		
Rugi sebelum pajak Rp 941,17 M Loss before tax Rp 941,17 M	√		
Rasio NIM 2.33% NIM Ratio 2.33%	√		
Rasio LDR 80.45% LDR Ratio 80.45%	√		
Rasio CAR 14.98% CAR Ratio 14.98%	√		
NPL Gross di bawah 4.40% NPL Gross under 4.40%	√		

The Bank already has the internal policy on monitoring fund provision mechanism, which consider the diversification of the portfolios by dividing the management to each Business Unit according to its credit segmentation, such as Business Retail segment that is divided into the SME Business, Consumer Business, Micro Business, Corporate & Commercial Business, and Linkage Business.

PT Bank JTrust Indonesia Tbk has established the internal policy on fund provision limit in accordance with Bank Indonesia Regulation No. 7/3/PBI/2005 dated January 20, 2005 as well as amendment to Bank Indonesia Regulation No. 8/13/PBI/2006 dated October 5, 2006 on Maximum Limit of Credit Disbursement, and based on the Memorandum of Procedure No. 31.12/M.Dir-MRD/JTRUST/VIII/2015 dated August 31, 2015 on Maximum Limit of Credit Disbursement (BMPK) and the Management of Debtor Group, which re-emphasize that BMPK provision and In-house Limit BMPK is divided into:

- For 1 (one) Individual Borrower and is a Non Related Party 80% x (20% x Bank capital).
- For 1 (one) Borrower Group: 80% x (25% x Bank capital).
- For State Owned Enterprises (SOEs) for Development purposes: 80% x (30% x Bank capital)
- For the Related Party: 80% x (10% x Bank capital).

Fund provision to Related Parties is re-emphasized through the Memorandum of Procedure No. 31.13/M.Dir-MRD/JTRUST/VIII/2015 dated August 31, 2015 on the Provision of Funds to Related Parties.

B. Bank's Strategic Plan

In 2017, the Bank established the Bank's strategic plan for the long term plan (*corporate plan*) and medium and short term plan (*business plan*), which was later corrected in October 2018, as listed in the table below:

Aktivitas Activities	Jangka Pendek Short-Term	Jangka Menengah Medium-Term	Jangka Panjang Long-Term
	1 Tahun 1 Year	3 Tahun 3 Year	10 Tahun 10 Year
Memperkuat struktur permodalan Strengthening the capital structure		√	
Pertumbuhan aset mencapai Rp 20,99 T Assets Growth Rp 20,99 T		√	
Total Loan Rp 12,16 T		√	
Volume DPK Rp 16,78 T Third Party Fund Volume Rp 16.78 T		√	
Pertumbuhan laba operasional > Rp 240.5 M Operating profit growth > Rp240.5 M		√	
Optimalisasi jaringan kantor Optimization network offices		√	
Penerapan GCG yang sehat GCG Implementation		√	
Penghimpunan Dana dan Pengembangan produk berbasis teknologi untuk meningkatkan CASA menjadi 23%-24% Fund raising and technology-based product development to increase CASA to 23%-24%			√
Pertumbuhan Kredit pada segmen Business Linked (melalui JTO), SME dan Consumer Credit growth in the Business Linked segment (through JTO), SME and Consumer			√
Peningkatan <i>Fee Based Income</i> / Fee Based Income Increase			√
Fokus Menjadi Bank BUKU 2 Terbaik Focus on Becoming the Best BOOK 2 Bank			√

Penjelasan:

1.1. Target Jangka Pendek

Target Bank jangka pendek direfleksikan dalam uraian RBB untuk 1 (satu) tahun ke depan atau khusus pembahasan tahun 2018:

- Bank memproyeksikan volume total aset menjadi Rp17,59 triliun atau meningkat 2,42% dari posisi 31 Desember 2017 sebesar Rp17,17 triliun. Kenaikan pada sisi pasiva disebabkan adanya pertumbuhan dana pihak ketiga sebesar Rp806 miliar. Sedangkan pada posisi aktiva, pertumbuhan terdapat pada surat berharga sebesar Rp739,53 miliar;
- Total Loan dalam RBB 2018 diproyeksikan turun sebesar -3,82% dari 31 Desember 2017 sebesar Rp11,47 triliun menjadi sebesar Rp11,03 triliun. Adanya asumsi penurunan kualitas kredit pada tahun 2018, dimana atas kredit kualitas rendah PT Bank JTrust Indonesia, Tbk menerapkan kebijakan "exit" atau penurunan *outstanding* kepada kredit komersial, corporate dan multifinance. Bank tetap berupaya memperbaiki profil risiko komposit sehingga persyaratan minimal CAR dapat lebih rendah, dan permodalan bank dapat dipergunakan untuk melakukan ekspansi bisnis ke depan secara terus berkesinambungan tanpa meninggalkan prinsip *prudential banking* atau kehati-hatian.
- Total simpanan Dana Pihak Ketiga (DPK) diproyeksikan meningkat sebesar Rp13,71 triliun, atau meningkat 6,2% dari posisi 31 Desember 2017 sebesar Rp12,90 triliun dengan

Notes:

1.1. Short Term Target

Bank's short term targets are reflected in the RBB description for the next 1 (one) year or 2018 special discussion:

- The bank projected total asset volume to Rp17.59 trillion or an increase of 2.42% from December 31, 2017 of Rp17.17 trillion. The increase in liabilities was due to the growth of third party funds amounting to Rp806 billion. While on the asset position, the growth is in securities of Rp739.53 billion;
- Total Loan in RBB 2018 is projected to decline by -3.82% from December 31, 2017 of Rp11.47 trillion to Rp11.03 trillion. There is an assumption of a decline in credit quality in 2018, where PT Bank JTrust Indonesia, Tbk implemented an "exit" policy on low quality loans or a decrease in outstanding to commercial, corporate and multi-finance credit. The Bank continued to improve its composite risk profile so that the minimum CAR requirements can be lower, and bank capital can be used to continuously expand business in the future without leaving the principle of prudential banking.
- Total Third Party Funds (TPF) deposits is projected to increase Rp13.71 trillion, or 6.2% from December 31, 2017 of Rp12.90 trillion with composition of CASA of 13.19% in December

komposisi CASA 13,19% pada Desember 2017 dan diproyeksikan menjadi 13,20% pada Desember 2018;

- d. Target laba sebelum pajak tahun 2018 diproyeksikan rugi sebesar Rp941,17 miliar mengalami penurunan yang *significant* bila dibandingkan posisi laba sebesar Rp 121,53 miliar pada 31 Desember 2017 sebagai akibat pembentukan CKPN Kredit atas kredit kualitas rendah yang meningkat dan beberapa kasus legal selama tahun 2018.
- e. Pengembangan dan pertumbuhan CASA melalui inovasi produk berbasis teknologi seperti pengembangan *internet & mobile banking* diharapkan dapat membantu pencapaian COF yang pada akhirnya dapat meningkatkan NIM menjadi 2,33%.
- f. Rasio LDR diproyeksikan dalam RBB 2018 turun menjadi 80,45% dari sebelumnya 88,87% sejalan dengan penurunan *outstanding* kredit.
- g. Kecukupan Modal Minimum tahun 2018 diproyeksikan 14,98% untuk memberi ruang ekspansi kredit pada tahun 2019 kepada JTrust Olympindo sebagai *sister company*, kredit consumer dan SME.
- h. Rasio *Non Performing Loan (NPL) Gross* pada 31 Desember 2017 sebesar 2,94% dan diproyeksikan memburuk sebesar 4,40% pada tahun 2018 sebagai akibat dari meningkatnya kredit kualitas rendah pada tahun 2018. Strategi manajemen untuk mengurangi portofolio kredit NPL melalui transfer aset NPL pada tahun 2019 guna menurunkan rasio *NPL Gross & Net*.

1.2. Target Jangka Menengah

Target Jangka Menengah didefinisikan sebagai sasaran yang hendak dicapai dalam kurun waktu sampai 3 (tiga) tahun ke depan, di antaranya:

- a. Memiliki struktur permodalan yang mampu mendukung pertumbuhan bisnis di tengah persaingan pasar yang ketat dengan prioritas mengandalkan pertumbuhan modal organik, disamping upaya penambahan modal eksternal yang relevan dengan kondisi permodalan Bank dalam bentuk Pinjaman Subordinasi.
- b. Pertumbuhan aset yang mengutamakan kualitas, dan diproyeksikan mencapai angka Rp20,99 triliun pada akhir tahun 2020.
- c. Fokus pada ekspansi kredit SME dan Retail Banking melalui optimalisasi infrastruktur, pengembangan program untuk bisnis SME, *Trade Finance & Consumer Banking*, dan rekrutment *Sales Force* untuk bisnis Retail sehingga diharapkan pada akhir tahun 2020 total *loan* mencapai Rp12,16 triliun.

2017; and projected to be 13.20% in December 2018;

- d. The target of profit before tax in 2018 is projected at a loss of Rp(941.17) billion, a significant decrease from the profit of Rp121.53 billion as of December 31, 2017 as a result of the formation of loan provisions for increasing low quality credit and several legal cases during 2018.
- e. CASA development and growth through technology-based product innovation such as internet & mobile banking development is expected to help achieve COF which in turn can increase the NIM to 2.33%;
- f. The ratio of LDR was projected in RBB 2018 to decrease to 80.45% from 88.87% previously in line with the decrease in outstanding credit;
- g. The Minimum Capital Adequacy in 2018 is projected at 14.98% to provide loan expansion space in 2019 to JTrust Olympindo as a sister company, and commercial and SME credit expansion;
- h. The gross non-performing loan (NPL) ratio at December 31, 2017 was 2.94% and projected to deteriorate by 4.40% in 2018 as a result of increasing low quality credit. The Management strategy is to reduce NPL loan portfolio through NPL asset transfer in 2019 to reduce Gross & Net's NPL ratio.

1.2. Medium Term Target

Medium term targets are defined as targets to be achieved within the period of up to 3 (three) years ahead, including:

- a. Having a capital structure capable of supporting business growth in the midst of a tight competitive market with priority relying on organic capital growth, in addition to efforts to increase external capital relevant to the Bank's capital condition in the form of Subordinated Loans.
- b. Asset quality growth, and projected reached Rp20.99 trillion in the end of 2020;
- c. Focus on SME and Retail Banking credit expansion through infrastructure optimization, program development for SME, Trade Finance & Consumer Banking businesses, and recruitment of Sales Force for Retail businesses so that by the end of 2020 the total loan will reach Rp12.16 trillion.

- d. Sejalan dengan rencana ekspansi kredit pada tahun 2020 bank memproyeksikan pertumbuhan dana pihak ketiga menjadi sebesar Rp16,78 triliun, beberapa strategi akan dilakukan seperti menurunkan tingkat suku bunga deposito dengan meluncurkan produk dan program baru untuk meningkatkan dana murah, seperti peluncuran *Internet Banking* ritel, *Virtual Account*, *Mobile Banking*, *SMS Banking*, bekerjasama dengan pihak ketiga untuk inklusi keuangan (*financial inclusion*) dengan meluncurkan produk: *financial education program*, *micro saving*, *micro insurance*, *micro lending*, dan mempertahankan segmen *mass affluent* (komunitas *chinese* sebagai nasabah utama) melalui layanan prioritas *banking*, sehingga diharapkan dapat menambah jumlah CIF atau nasabah baru.
- e. Pencapaian positif perolehan Laba Operasional sebesar Rp240,5 miliar. Melalui perbaikan pada peningkatan pendapatan bunga surat berharga dan kredit, serta penurunan biaya dana, diproyeksikan pendapatan bunga bersih akan terus meningkat sampai Tahun 2020. Beberapa kasus hukum yang harus membentuk cadangan kerugian menjadi salah satu faktor timbulnya kerugian Bank, diharapkan kerugian tersebut dapat ditekan secara maksimal pada tahun tahun berikutnya dan Bank dapat kembali tumbuh serta perolehan laba kembali normal sejalan dengan target ekspansi untuk tahun 2019 sampai dengan tahun 2020.
- f. Mengoptimalkan jaringan kantor yang ada melalui relokasi kantor, perubahan status, dan melakukan penutupan kantor. Dengan adanya pengaturan lokasi jaringan kantor yang strategis akan mendukung kinerja bisnis dan meningkatkan *market share* dalam menggarap potensi bisnis daerah selain biaya operasional menjadi efisien dan efektif.
- g. Menerapkan tata kelola perusahaan dengan baik dan menjadikannya budaya organisasi dengan komitmen dan keterlibatan dari seluruh aspek organisasi mulai dari Pemegang Saham Pengendali, Dewan Komisaris, Direksi, dan seluruh level karyawan di Bank.

1.3. Target Jangka Panjang

Target Jangka Panjang didefinisikan sebagai sasaran yang hendak dicapai dalam kurun waktu sampai 10 (sepuluh) tahun ke depan, di antaranya:

- a. Penghimpunan Dana/*Funding* Total simpanan DPK ditargetkan pada tahun 2028 menjadi sebesar Rp52,62 triliun dari Rp12,9 triliun di tahun 2017. Perbaikan *funding mix* dengan melakukan beberapa inovasi dan pengembangan produk yang berbasis

- d. In line with the planned credit expansion in 2020, the bank projects the growth of third party funds to reach Rp16.78 trillion, several strategies will be implemented such as lowering deposit rates by launching new products and programs to increase low-cost funds, such as the launch of retail Internet Banking, Virtual Account, Mobile Banking, SMS Banking, in collaboration with third parties for financial inclusion by launching products: financial education programs, micro saving, micro insurance, micro lending, and maintaining the mass affluent segment (Chinese community as main customers) through priority services banking, so it is expected to increase the number of CIFs or new customers.
- e. Positive achievement on Operating Profit of more than Rp240.5 billion. Through improvements in increasing interest income on securities and credit, as well as decreasing the cost of funds, it is projected that net interest income will continue to increase until 2020. Some legal cases that must form a reserve of losses are a factor in the occurrence of bank losses in the following year and the Bank can grow again and return to normal profit is in line with the expansion target for 2019 until 2020.
- f. Optimizing existing office networks through office relocation, status changes, and office closure. With the arrangement of strategic office network locations will support business performance and increase market share in working on regional business potential in addition to operational costs to be efficient and effective.
- g. Apply good corporate governance and make it an organizational culture with commitment and involvement of all aspects of the organization ranging from Controlling Shareholders, Board of Commissioners, Directors, and all levels of the Bank employee.

1.3. Long Term Targets

Long-term targets are defined as targets to be achieved within the next 10 (ten) years, including:

- a. Funding
The total deposits of DPK are targeted in 2028 to be Rp52.62 trillion from Rp12.9 trillion in 2017. Improvement on funding mix by innovating and developing technology-based products to increase number of accounts. Bank is seeking on profiling CASA (Current Account

teknologi untuk meningkatkan jumlah rekening. Bank mengupayakan profiling terhadap persentase CASA (*Current Account & Saving Account*) secara bertahap sehingga jumlah komposisi CASA di tahun 2028 berkisar antara 23% - 24%.

- b. **Penyaluran Loan/Kredit**
Pada tahun 2028 Bank menargetkan total *outstanding* kredit/*loan* sebesar Rp48,14 triliun dengan fokus terhadap segmen *Business Linked* (melalui JTO), kredit SME dan *Consumer retail*. Melakukan kajian awal untuk pengembangan Produk FinTech dan *Mobile Application* (Android Basis) sebagai alternatif *Channel Customer acquisition*, diharapkan akan memudahkan *Customer* untuk mengajukan pinjaman ke J Trust Bank dan memperluas jangkauan Bank dengan jaringan kantor cabang yang masih terbatas. Memperluas Rencana kerja sama dengan Bank Daerah di Jepang yang memfasilitasi perusahaan Jepang skala SME yang akan berinvestasi di Indonesia.
- c. **Peningkatan Fee Based Income**
Alternatif perolehan pendapatan utama dari pendapatan bunga seiring dengan peningkatan volume bisnis kredit yang memiliki *margin* lebih besar juga melalui *fee based income* dari komisi, transaksi valas, dan *fee* produk dan aktivitas Bank. *Fee based income* diproyeksikan di tahun 2028 sebesar Rp3,0 triliun.
- d. Berdasarkan Kategori BUKU (Bank Umum Kegiatan Usaha) dari Otoritas, Bank berada di BUKU 2. Fokus *positioning* Bank dalam jangka panjang sampai tahun 2028, tetap berada di BUKU 2. Bank berupaya menjadi Bank BUKU 2 yang sehat dan kuat dengan mengutamakan pertumbuhan bisnis yang berkualitas dan Bank berkomitmen untuk mewujudkan:
 - Bisnis yang berkesinambungan/*Business Sustainability*.
 - Penerapan GCG (*Good Corporate Governance*).
 - Permodalan dan Aktiva yang sehat.
 - *Comply* terhadap ketentuan dan regulasi yang berlaku.
 - Penguatan *Corporate Branding*.

C. Transparansi Kondisi Keuangan dan Non Keuangan Bank yang Belum Diungkap Dalam Laporan Lain

Sebagai perusahaan terbuka, PT Bank JTrust Indonesia Tbk telah memberikan informasi secara jelas dan transparan/keterbukaan mengenai kondisi keuangan dan non keuangan Bank kepada para *stakeholders* melalui Publikasi Laporan Keuangan Tahunan, Laporan Keuangan Triwulanan dan Laporan lainnya yang

& Saving Account) percentages gradually so that the amount of CASA composition in 2028 ranges from 23% - 24%.

- b. **Distribution of Loan/Credit**
In 2028, Bank targets total outstanding loans of Rp48.14 trillion, focusing on the Business Linked segment (through JTO), SME and Consumer retail loans. Preliminary studies for the development of FinTech and Mobile Application Products (Android Basis) as an alternative to Channel Customer acquisition are expected to make it easier for customers to apply for loans at J Trust Bank and expand the reach of Banks with limited branch network. Expanding Cooperation Plans with Regional Banks in Japan that facilitate Japanese SME scale companies that will invest in Indonesia.
- c. **Increased Fee Based Income**
The main earning alternative to interest income is in line with the increasing volume of loan business which has a higher margin through fee based income from commissions, forex transactions, and the Bank's product and activity fee. Fee based income is projected in 2028 of Rp3.0 trillion.
- d. Under the BUKU Category (Commercial Bank of Business Activities) from the Authority, the Bank is in BOOK 2. The Bank's positioning focus for the long term until 2028, remains in BOOK 2. The Bank strives to be a healthy and strong middle class Bank with emphasis on quality business growth and the Bank is committed to realizing:
 - Business Sustainability.
 - Implementation of GCG (Good Corporate Governance).
 - Fair Capital and Assets.
 - Comply with applicable terms and regulations.
 - Strengthening Corporate Branding.

C. Transparency of Bank Financial and Non-Financial Conditions Not Yet Revealed in Other Reports

As a public company, PT Bank JTrust Indonesia Tbk has provided disclosure information regarding the Bank's financial and non-financial conditions to stakeholders through the Publication of Annual Financial Statement, Quarterly Financial Statement and other Reports submitted to the regulators such

disampaikan kepada regulator seperti Bank Indonesia (BI), Otoritas Jasa Keuangan (OJK) dan Bursa Efek Indonesia (BEI) serta *stakeholders* lain sesuai dengan ketentuan yang berlaku.

Transparansi Kondisi Keuangan

Publikasi Laporan Keuangan Tahunan setidaknya dimuat dalam 2 (dua) media massa/koran yang berperedaran nasional di Indonesia, dan untuk Laporan Keuangan Triwulanan setidaknya dimuat dalam 1 (satu) media masa/koran yang berperedaran nasional di Indonesia serta disampaikan pada media yang mudah diakses melalui situs *website* www.jtrustbank.co.id.

Disamping mempublikasikan Laporan Keuangan yang dimaksud, PT Bank JTrust Indonesia Tbk juga menyusun dan menyampaikan laporan publikasi dalam bentuk Laporan Tahunan (*Annual Report*). Laporan Tahunan (*Annual Report*) diharapkan dapat menjelaskan transparansi kondisi Bank secara menyeluruh termasuk kepemilikan, kepengurusan, kegiatan operasional, perkembangan usaha dan kinerja Bank kepada masyarakat luas/ publik dalam menjaga kepercayaan masyarakat terhadap Bank.

Laporan Tahunan (*Annual Report*) tersebut cakupan isinya cukup luas, meliputi penjelasan Informasi Umum perusahaan, Laporan Keuangan Tahunan, Opini dari Kantor Akuntan Publik (KAP), transparansi terkait Kelompok Usaha, transparansi laporan kepegawaian, transparansi laporan keuangan sesuai ketentuan PSAK, Eksposur dan Manajemen Risiko dan Informasi lain yang berhubungan dengan Operasional Bank.

Adapun Informasi Umum meliputi: Susunan Pengurus, Rincian Kepemilikan Saham, perkembangan usaha Bank, sasaran, strategi dan kebijakan manajemen, struktur organisasi, aktivitas utama, Teknologi Informasi, jaringan kantor, dan hal-hal penting yang diperkirakan akan terjadi di masa mendatang, jumlah dan struktur SDM. Sedangkan Laporan Keuangan Tahunan adalah laporan keuangan akhir tahun yang merupakan laporan keuangan yang telah diaudit oleh Kantor Akuntan Publik (KAP) beserta opininya.

Transparansi Kondisi Non Keuangan

Transparansi juga harus diterapkan pada informasi mengenai produk-produk Bank maupun produk lembaga keuangan lainnya seperti *bancassurance* yang dijual melalui bank, sehingga nasabah memperoleh informasi yang jelas mengenai manfaat dan risiko serta biaya-biaya yang melekat pada produk-produk tersebut. Transparansi ini dapat berupa informasi dalam bahasa Indonesia yang disampaikan kepada nasabah secara lengkap dan jelas mengenai karakteristik produk baik lisan maupun tulisan. Informasi minimal mencakup nama produk, jenis produk, manfaat dan risiko yang melekat, tatacara penggunaan produk,

as Bank Indonesia (BI), Financial Services Authority (FSA) and the Indonesian Stock Exchange (IDX) as well as other stakeholders in accordance with the applicable regulations.

Transparency of Financial Condition

The publication of the Annual Financial Statement is published at least in 2 (two) mass media/newspapers with national circulation in Indonesia, and the Quarterly Financial Statement is published at least in 1 (one) mass media/newspaper with national circulation in Indonesia and presented in an easily accessible medium via the website www.jtrustbank.co.id.

In addition to publishing the Financial Statements, PT Bank JTrust Indonesia Tbk also prepares and submits reports in form of Annual Report. The Annual Report is expected to explain the overall transparency of the Bank, including ownership, management, operational activities, business development and performance of the Bank to the community/public in maintaining public confidence in the Bank.

The Annual Report contains a wide description, including the General Information of the company, Annual Financial Statement, Opinion of Public Accounting Firm (KAP), transparency regarding Business Group, transparency of staffing report, transparency of financial statements in accordance with GAAP, Exposure and Risk Management, and other Information related with Bank Operations.

General Information contains: Management Composition, Details of Share Ownership, development of the Bank's business, objectives, strategy and policy management, organizational structure, major activities, Information Technology, office networks, and important matters that are expected to occur in the future, the number and structure of HR. Meanwhile the Annual Financial Statement is a year-end financial statement which has been audited by Public Accounting Firm (KAP) with their opinions.

Transparency of Non Financial Condition

Transparency should also apply to information regarding the Bank's products and other financial institutions products such as *bancassurance* that are sold through the bank, ensuring the customers are able to obtain a clear information regarding the benefits and risks and costs inherent in such products. This transparency can be in the form of information in Bahasa Indonesia and conveyed to the customers in a complete and clear manner related to the product characteristics both in oral and written. Minimum information includes the product's name, type, inherent benefits and risks, procedures to utilize the product,

biaya-biaya produk, perhitungan bunga atau bagi hasil dan margin keuntungan, jangka waktu berlakunya produk dan penerbit produk Bank termasuk ada atau tidaknya penjaminan produk. Apabila terdapat perubahan karakteristik produk, Bank segera memberitahukan kepada nasabah. Informasi mengenai produk tersebut disampaikan dengan jelas, benar, dan jujur serta dengan menggunakan media yang mudah dibaca dan diakses oleh nasabah. Informasi mengenai produk yang ditawarkan kepada nasabah maupun non nasabah dapat juga diakses di *website* www.jtrustbank.co.id atau bisa langsung menghubungi Call Center J Trust Bank di J Trust Call di 1500615, Virtual Assistant/ Chatbot dan Live Agent Virtual Assistant.

Bank juga secara berkesinambungan melakukan pengkinian data nasabah, sehingga data pribadi yang disampaikan nasabah kepada Bank juga selain harus transparan juga merupakan data yang terkini, hal ini selain untuk meningkatkan perlindungan terhadap hak-hak pribadi nasabah dalam berhubungan dengan Bank dan juga untuk meminimalisir risiko lainnya yang diakibatkan ketidakbenaran atau ketidakakuratan data nasabah. Bank juga harus meminta persetujuan tertulis dari nasabah jika Bank akan memberikan dan atau menyebarluaskan Data pribadi Nasabah kepada Pihak lain untuk tujuan komersial, kecuali ditetapkan lain oleh peraturan perundang-undangan lain yang berlaku.

Transparansi juga harus dilaksanakan pada penyelesaian pengaduan nasabah yang merupakan salah satu bentuk peningkatan perlindungan nasabah sehingga hak-hak nasabah dalam bertransaksi dengan Bank senantiasa terjamin. Pengaduan nasabah harus segera ditindaklanjuti agar tidak menurunkan reputasi bagi Bank dan dapat menurunkan kepercayaan masyarakat terhadap lembaga perbankan. Bank memiliki waktu 2 (dua) hari kerja untuk penyelesaian pengaduan lisan dan 20 (dua puluh) hari kerja penyelesaian pengaduan tertulis.

Bank memiliki unit dan atau fungsi khusus di bidang pengaduan nasabah yang berada di Kantor Pusat Bank yang menangani dan menyelesaikan pengaduan nasabah yang diterima oleh Kantor Cabang/Capem/ Kantor Kas atau pengaduan nasabah yang masuk melalui J Trust Call 1500615, customercare@jtrustbank.co.id, Virtual Assistant/ Chatbot dan Live Agent Virtual Assistant. Bank wajib mempublikasikan keberadaan unit ini kepada masyarakat. Hasil penanganan dan penyelesaian pengaduan tersebut secara triwulanan harus dilaporkan kepada Otoritas Jasa Keuangan (OJK)/Bank Indonesia (BI). Selain secara triwulanan, juga melaporkan kepada OJK secara tahunan melalui *website* Sistem Informasi Pelaporan Edukasi dan Perlindungan Konsumen (SIPEDULI).

cost of products, the calculation of interest or for the results and profit margins, the period of validity of products and the Bank's product publishers including whether there is product guarantee or not. If there are changes in the product's characteristics, the Bank shall immediately notify the customers. Information regarding the products is conveyed clearly, truthfully, and honestly using media that is easy to read and accessible to customers. Information on products offered to customers and non customers can also be accessed on the website www.jtrustbank.co.id or Call Center J Trust Bank at J Trust Call on 1500615, Virtual Assistant/ Chatbot and Live Agent Virtual Assistant..

The Bank also continuously updates customer data, so that personal data submitted by customers to the Bank is transparent and up-to-date, this is in addition to improve the protection of customers' privacy in touch with the Bank as well as to minimize other risks caused by incorrect or inaccurate customer data. The Bank also must request written consent from the customers if the Bank will provide or disseminate personal data of Customer to another Party for commercial purposes, unless otherwise stipulated by other laws and regulations.

Transparency should also be performed in the settlement of customer complaints, which is a form of increased customer protection so that the rights of customers in making transactions with the Bank are always guaranteed. Customer complaints should be followed up immediately to protect the Bank's reputation risk and public confidence in the banking institutions. The Bank has a period of 2 (two) business days for the settlement of oral complaints and 20 (twenty) days for written complaints.

The Banks shall have a special unit or function for customer complaints at the Head Office which addresses received by Branch/Sub-Branch/Cash Office or customer complaints that enter through J Trust Call 1500615, customercare@jtrustbank.co.id, Virtual Assistant/Chatbot and Virtual Assistant Live Agent. Banks are required to publish the existence of this unit to the public. The results of the handling and settlement of the complaints must be reported on a quarterly basis to the Financial Services Authority (FSA)/Bank Indonesia (BI). In addition to quarterly, it is also reported to OJK on an annual basis through the website of the Education Reporting System and Consumer Protection (SIPEDULI).

Bagi *stakeholder* lainnya seperti pemegang saham dan regulator, situs web J Trust Bank juga telah menyajikan berbagai informasi kondisi non-keuangan lainnya seperti Laporan Pelaksanaan Tata Kelola (GCG), Struktur Pemegang Saham, Kegiatan Perusahaan melalui *Press Release*, Penerimaan Penghargaan, dan lain-lain.

D. Jumlah Penyimpangan (*Internal Fraud*)

Penyimpangan (*Internal Fraud*) adalah *fraud* yang dilakukan oleh Manajemen (anggota Direksi, anggota Dewan Komisaris), Pegawai Tetap, Pegawai Tidak Tetap (*honoror*), dan/ atau Tenaga Kerja Alih Daya/*outsourcing* terkait dengan proses kerja dan kegiatan operasional Bank yang mempengaruhi kondisi keuangan Bank secara signifikan. Maksud mempengaruhi kondisi keuangan Bank secara signifikan adalah jika dampak penyimpangannya > Rp100.000.000,- (seratus juta Rupiah).

Selama tahun 2018 terdapat sejumlah kasus *Internal Fraud* yang dilakukan oleh pegawai Bank (pegawai tetap, pegawai tidak tetap dan *outsourcing*) yang mempengaruhi kondisi keuangan Bank secara signifikan atau dampak penyimpangan > Rp100.000.000,- (seratus juta Rupiah). Adapun rincian jumlah *fraud* sebagaimana tabel berikut:

For other stakeholders such as shareholders and regulators, J Trust Bank's website also provides other various information on non-financial conditions such as GCG, Shareholder Structure, Company Activity through Press Release, Acceptance of Award, and others.

D. Total Internal Fraud

Internal Fraud is irregularity/fraud committed by management (Member of Directors, Board of Commissioners), permanent employees, temporary employees (*honorarium*), and/or Outsourcing Workforce related to work process and the Bank's operations that affect the Bank's financial condition significantly. The meaning of significantly affecting the Bank's financial condition is if the impact of the deviation > Rp100,000,000, - (one hundred million Rupiah).

Throughout 2018, there were a number of internal fraud cases conducted by permanent and non-permanent employees as well as outsourced employees that affected the Bank's financial conditions significantly, or with fraud impact of more than Rp100,000,000 (one hundred million Rupiah). Details on the number of fraud is as follows:

(satuan)

(unit)

Penyimpangan (Internal Fraud) dalam 1 tahun Internal Fraud in 1 Year	Jumlah kasus yang dilakukan oleh The number of cases involving					
	Manajemen Management		Pegawai Tetap Permanent Employee		Pegawai Tidak Tetap dan Outsourcing Non Permanent Employee and Outsourcing	
	Tahun Sebelum-nya Preceding Year (2017)	Tahun Berjalan Running Year (2018)	Tahun Sebelumnya Preceding Year (2017)	Tahun Berjalan Running Year (2018)	Tahun Sebelum-nya Preceding Year (2017)	Tahun berjalan Running Year (2018)
Total <i>fraud</i> Total <i>fraud</i>	-	-	0	1	0	0
Telah diselesaikan Settled	-	-	0	1	0	0
Dalam proses penyelesaian di internal Bank In the process of settlement at internal Bank	-	-	-	-	-	-
Belum diupayakan penyelesaian Settlement not yet commenced	-	-	-	-	-	-
Telah ditindaklanjuti melalui proses hukum Followed up by legal proceedings	-	-	-	-	-	-

Selama tahun 2018 terdapat 1 (satu) kasus *fraud* (penipuan) sebesar Rp 267 juta yang dilakukan oleh Pegawai Tetap. Bank telah melakukan penyelesaian kasus *internal fraud* tersebut sesuai dengan kebijakan perusahaan dan SOP Strategi *Anti Fraud*. Kasus *fraud* tersebut telah dilaporkan kepada OJK sesuai dengan ketentuan yang berlaku.

E. Penerapan Strategi *Anti Fraud*

Bank telah menerapkan Strategi *Anti Fraud* berdasarkan Surat Edaran Bank Indonesia No.13/28/DPNP tanggal 9 Desember 2011 perihal Penerapan Strategi *Anti Fraud* Bagi Bank Umum, yang antara lain meliputi implementasi 4 (empat) Pilar strategi *anti fraud* JTrust Bank yaitu Pencegahan, Deteksi, Investigasi, dan Pelaporan & *Monitoring* tindak lanjut.

Manajemen J Trust Bank telah menetapkan kebijakan *zero tolerance* terhadap *fraud* dengan menetapkan *Anti Fraud Charter* dan semboyan "*No Fraud Tolerance*" pada tanggal 19 April 2012. Bank telah membentuk organisasi *Anti Fraud (Desk Anti Fraud)* di bawah Direktur Utama yang bertugas mengkoordinasi implementasi strategi *anti fraud* J Trust Bank.

Pada tahun 2016 Bank telah mengimplementasikan program-program pada setiap Pilar Strategi *anti fraud* secara berkesinambungan dan konsisten antara lain:

- a. Sosialisasi *anti fraud* secara berkala
- b. Fraud Risk Assessment
- c. Program *Know Your Employee* (KYE)
- d. Implementasi *Whistleblowing system*
- e. Program *Surprise Audit*
- f. Program *Surveillance Audit*
- g. Investigasi kasus
- h. Evaluasi serta *monitoring* tindak lanjut penyelesaian kasus *fraud*

Sistem Pelaporan Pelanggaran (*Whistleblowing System*)

a) Cara penyampaian laporan pelanggaran

Sejak tahun 2012 Bank telah mengimplementasikan *Whistleblowing System* (WBS) yang berfungsi sebagai sarana untuk menerima laporan indikasi *fraud* yang diketahui oleh karyawan di lingkungan kerjanya maupun sarana penerimaan laporan indikasi *fraud* dan atau adanya benturan kepentingan yang diketahui oleh nasabah/rekanan Bank. Sarana WBS Bank antara lain:

- Kotak Pos 99 Jakarta 10000
- Hotline SMS/WhatsApp dikirimkan kepada Nomor: 0813 1504 5555.
- Portal *anti fraud* dengan alamat/address http://10.33.1.57/jtrust_serasi/.
- *Email* dengan alamat *email*: antifraud@jtrustbank.co.id.

In 2018 there was 1 (one) fraud case amounting to Rp267 million made by Permanent Employees. The Bank has completed the internal fraud case in accordance with the Company's policy and the Anti-Fraud Strategy SOP. The fraud case has been reported to the OJK in accordance with applicable regulations

E. Anti Fraud Strategy Implementation

The Bank has implemented the Anti-Fraud Strategy based on Bank Indonesia Circular No. 13/28/DPNP dated December 9, 2011 on the Anti-Fraud Strategy Implementation for Commercial Banks, which includes the implementation of 4 (four) Pillars of anti-fraud strategy of J Trust Bank, namely Prevention, Detection, Investigation, and Reporting & *Monitoring* follow up.

Management of J Trust Bank has established a zero tolerance policy towards fraud by setting the Anti Fraud Charter and the "No Fraud Tolerance" slogan on April 19, 2012. The Bank has established an Anti Fraud Desk under the President Director who is in charge of coordinating the implementation of anti-fraud strategy of J Trust Bank.

In 2016, the Bank has implemented programs on each pillar of anti-fraud strategy continuously and consistently, among others:

- a. Periodic anti fraud dissemination
- b. Fraud Risk Assessment
- c. Know your employee program
- d. Implementation of the whistleblowing system
- e. Surprise audit program
- f. Audit surveillance program
- g. Case investigation
- h. Evaluation and follow-up monitoring on settlement of fraud cases.

Whistleblowing System

a) How to submit a violation report

Since 2012, the Bank has implemented the *Whistleblowing System* (WBS), which serves as a means to receive fraud indication report known by employees in work environment as well as a means of receiving fraud indication report or conflict of interest known by customers/partners of the Bank. WBS Bank infrastructure are, among others:

- Post Office Box 99 Jakarta 10000
- Hotline SMS/WhatsApp sent to the number: 0813 1504 5555.
- Anti fraud portal with the address http://10.33.1.57/jtrust_serasi/
- Email with an address: antifraud@jtrustbank.co.id.

b) Perlindungan bagi pelapor

Manajemen Bank berkomitmen untuk melindungi pelapor *fraud* yang beritikad baik dan akan patuh terhadap segala peraturan perundangan yang terkait serta *best practices* yang berlaku dalam penyelenggaraan Sistem Pelaporan Pelanggaran (*Whistleblowing System*).

Perlindungan yang diberikan kepada pelapor *fraud* meliputi perlindungan Bank terhadap perlakuan yang merugikan seperti pemecatan yang tidak adil, penurunan jabatan/pangkat, diskriminasi dalam segala bentuk, dan catatan yang merugikan dalam arsip pribadi pegawai (*personal file record*). Bahkan sesuai keputusan Manajemen akan memberikan *reward* (dalam bentuk uang penghargaan) bagi karyawan yang dapat memberikan informasi adanya indikasi *fraud* yang diketahuinya.

c) Penanganan pengaduan

Seluruh informasi yang masuk ke dalam WBS Bank JTrust akan dilakukan analisis terlebih dahulu serta pengumpulan bukti-bukti adanya indikasi *fraud*. Dan apabila dari hasil analisis dan bukti-bukti yang ada terindikasi kuat adanya kejadian *fraud*, maka selanjutnya akan dilakukan investigasi lebih lanjut.

d) Pihak yang mengelola pengaduan

WBS JTrust Bank dikelola oleh *Anti Fraud Departement* yang berada di bawah SKAI sehingga setiap pengaduan yang masuk dalam WBS JTrust Bank akan dibuka oleh pejabat *anti fraud* dan diteruskan kepada Direktur Utama untuk mendapatkan tindak lanjut.

e) Hasil dari penanganan pengaduan

Selama tahun 2018 terdapat 6 (enam) laporan indikasi pelanggaran yang masuk ke dalam informasi WBS JTrust Bank untuk dapat dilakukan investigasi khusus.

F. Permasalahan Hukum

- 1) Permasalahan hukum adalah permasalahan **Hukum Perdata** dan **Hukum Pidana** yang dihadapi Bank selama periode tahun laporan dan telah diajukan melalui proses hukum.
- 2) Pengungkapan permasalahan hukum minimal mencakup:
 - a) Jumlah permasalahan hukum perdata dan pidana yang dihadapi dan telah selesai (telah mempunyai kekuatan hukum yang tetap).
 - b) Jumlah permasalahan hukum perdata dan pidana yang dihadapi dan masih dalam proses penyelesaian.

b) Protection on the fraud reporter

The Bank's management is committed to protecting fraud reporter who has good faith and will adhere to all relevant rules and regulations and best practices applicable in the implementation of the Whistleblowing System.

The protection granted to fraud reporter includes Bank protection against adverse treatment such as unfair dismissal, demotion, discrimination in all forms, and harming personal file records. And according to Management's decision, reward will be given (in the form of award money) for employees who can provide information of indication of fraud which is known.

c) Complaint handling

All information entered into the WBS J Trust Bank will be analyzed in advance and the collection of evidence of fraud indications. And if the results of analysis and evidence shows a strong indication of a fraud incident, then further investigation will be performed

d) The party managing the complaint

J Trust Bank WBS is managed by the Anti Fraud Dept. directly under SKAI so that any complaints received in the Bank's WBS will be opened by the anti-fraud authorities and forwarded to the President Director for the follow-up.

e) Result of complaint handling

During 2018 there were 6 (six) reports of indicated violations that went into WBS J Trust Bank that needed a special investigation to be conducted.

F. Legal Issues

- 1) Legal issues are civil and criminal legal issues faced by the Bank over a period of reporting year and have been filed through legal process.
- 2) Disclosure of legal matters includes at least:
 - a) Number of civil and criminal cases faced and settled (with binding legal force).
 - b) Number of civil and criminal cases faced and in the settlement process.

Selama tahun 2018 jumlah permasalahan hukum yang dihadapi J Trust Bank dan telah diajukan melalui proses hukum sebagaimana tabel berikut:

During 2018, the number of civil and criminal cases faced by J Trust Bank which has been filed through legal process, as the following table:

1. Bank Sebagai Tergugat/Terlawan/Terlapor

(satuan)

Permasalahan Hukum Litigation Case	Jumlah Kasus Number of Case	
	Perdata Civil	Pidana Criminal
A. Perkara Bank sebagai Tergugat/Terlawan Case(s) with the Bank as Defendant (Counter Charges)		
Telah selesai (Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) Settled (with binding legal force)	8	-
Dalam proses penyelesaian In settlement process	14	-
B. Perkara Bank sebagai Terlapor Case(s) with the Bank as the Reported		
Telah selesai (Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) Settled (with binding legal force)	-	1
Dalam proses penyelesaian In settlement process	-	-
Total	22	1

1. Bank as Defendant/Reported

(unit)

2. Bank Sebagai Penggugat/Pelawan/Pemohon/ Pelapor

(satuan)

Permasalahan Hukum Litigation Case	Jumlah Kasus Number of Case	
	Perdata Civil	Pidana Criminal
A. Perkara Bank sebagai Penggugat (Gugatan Perlawanan) Case(s) with the Bank as Plaintiff (Counter Charges)		
Telah selesai (Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) Settled (with binding legal force)	2	-
Dalam proses penyelesaian In settlement process	-	-
Total	2	-
B. Perkara Bank sebagai Pemohon tentang Kepailitan Case(s) with the Bank as Bankruptcy Applicant		
Telah selesai (Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) Settled (with binding legal force)	5	-
Dalam proses penyelesaian In settlement process	11	-
Total	16	-
C. Perkara Bank sebagai Pelapor adanya Dugaan Tindak Pidana Case(s) with the Bank as the Reporting Party of Allegation of Criminal Act		
Telah selesai (Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap) Settled (with binding legal force)	-	-
Dalam proses penyelesaian In settlement process	-	3
Total	-	3

2. Bank as Applicant/Reporting Party

(unit)

Permasalahan hukum yang umumnya dihadapi oleh Bank adalah:

- Gugatan Perdata dari Debitur Macet/Nasabah, maupun dari Pihak Ketiga/Pemilik Jaminan;
- Penundaan Kewajiban Pembayaran Utang (PKPU) dan Kepailitan yang diajukan oleh Kreditor Lain, Debitur itu sendiri (Debitur Macet), maupun Bank yang mengajukan terhadap Debitur yang telah berstatus macet kreditnya;
- Laporan adanya tindak Pidana yang berasal dari eksternal Bank ataupun yang melibatkan internal Bank (*Internal Fraud*).

Upaya penyelesaian permasalahan hukum oleh Bank antara lain:

- Menganalisa perkara dan mendiskusikan dengan Tim Legal bersama-sama dengan Unit Bisnis yang berkaitan dengan permasalahan hukum dimaksud;
- Tim Legal secara bersama-sama menentukan apakah perkara akan ditangani oleh Internal Bank ataupun menggunakan jasa *Lawyer* Eksternal dengan persetujuan dari Direksi sesuai dengan ketentuan hukum yang berlaku;
- Memonitor perkembangan penanganan kasus-kasus hukum baik yang ditangani oleh Internal Bank maupun eksternal *lawyer*.

Pokok Perkara/Gugatan dan Status Penyelesaian

Berikut adalah 7 (tujuh) perkara perdata/pidana dengan nilai perkara terbesar yang dihadapi Bank sampai dengan periode 31 Desember 2018:

Legal issues commonly faced by the Bank are:

- Civil Action by bad debts/customers, as well as third party/collateral owner
- Suspension of Payment (PKPU) and Bankruptcy filed by the Other Creditor, the Borrower itself (Bad debt), or the Bank filing against the Debtor having defaulted on credit;
- Criminal Reports from external bank or involving internal bank (internal fraud).

Efforts to resolve legal issues by the Bank include:

- Analyze cases and discuss with the Legal Team together with Business Units related to the legal issues;
- The Legal Team collectively determines whether the case will be handled by the Internal Bank or use the services of an External Lawyer with the approval of the Board of Directors in accordance with applicable law;
- Monitor the progress of legal cases handled by both internal and external lawyers.

Principal Case/Claim and Settlement Status

Here are 7 (Seven) civil/criminal cases with the greatest case value that the Bank faces until 31 December 2018:

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
1	Tuntutan yang dilakukan kepada Bank dilakukan agar Bank mengembalikan dana investasi produk yang dikeluarkan oleh PT Antaboga Delta Sekuritas Indonesia yaitu berupa <i>Discretionary Fund</i> Lawsuit to the Bank for the Bank to recompense investment funds issued by PT Antaboga Delta Sekuritas Indonesia. The product was a Discretionary Fund	Penggugat Plaintiff: Ir. Henry Ruswoto, Dkk Tergugat Defendant: 1. J Trust Bank 2. PT. Antaboga Delta Sekuritas, Tbk.	Materiil: Rp9.158.000.000.- (Pokok Principal) Rp7.205.323.318.- (Bunga Interest) Immaterial: Rp10.000.000.000.- Jumlah Total: Rp26.363.323.318.-	<ul style="list-style-type: none"> • PN: Bank Menang won • PT: Bank Menang won • Kasasi: Bank Menang won

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
2	Tuntutan yang dilakukan kepada Bank dilakukan agar Bank mengembalikan dana investasi produk yang dikeluarkan oleh PT Antaboga Delta Sekuritas Indonesia yaitu berupa <i>Discretionary Fund</i> Discretionary Fund Lawsuit to the Bank for the Bank to recompense investment funds issued by PT Antaboga Delta Sekuritas Indonesia. The product was a Discretionary Fund	Penggugat Plaintiff: Go Linawati, Dkk Tergugat Defendant: 1. J Trust Bank 2. PT. Antaboga Delta Sekuritas, Tbk	Rp35.437.000.000.-(Pokok Principal) Rp5.675.691.668.-(Ganti rugi Compensation) Jumlah Total: Rp41.112.691.668,-	<ul style="list-style-type: none"> • PN: Bank Kalah lose • PT: Bank Kalah lose • Kasasi: Bank Kalah lose • PK: Bank Kalah lose
3	Tuntutan yang dilakukan kepada Bank dilakukan agar Bank mengembalikan dana investasi produk yang dikeluarkan oleh PT Antaboga Delta Sekuritas Indonesia yaitu berupa <i>Discretionary Fund</i> Discretionary Fund Lawsuit to the Bank for the Bank to recompense investment funds issued by PT Antaboga Delta Sekuritas Indonesia. The product was a Discretionary Fund	Penggugat Plaintiff: Wahyudi Prasetyo Tergugat Defendant: 1. J Trust Bank 2. PT.Antaboga Delta Sekuritas, Tbk; Lembaga Penjamin Simpanan (LPS).	Rp66.250.000.000.- (Pokok Principal) Rp2.153.125.000.- (Bunga interest) Rp25.921.600.000.-(Ganti rugi Compensation) Jumlah Total: Rp94.324.725.000.-	<ul style="list-style-type: none"> • PN: Bank Kalah lose • PT: Bank Kalah lose • Kasasi: Bank Kalah lose • PK: Bank Kalah lose
4	Tuntutan yang dilakukan kepada Bank dilakukan agar Bank mengembalikan dana investasi produk yang dikeluarkan oleh PT Antaboga Delta Sekuritas Indonesia yaitu berupa <i>Discretionary Fund</i> Discretionary Fund Lawsuit to the Bank for the Bank to recompense investment funds issued by PT Antaboga Delta Sekuritas Indonesia. The product was a Discretionary Fund	Penggugat Plaintiff: Bunadi Wijaya Gunawan, Dkk Tergugat Defendant: 1. J Trust Bank; 2. PT.Antaboga Delta Sekuritas, Tbk.	Bunadi Wijaya G, dkk Rp22.696.000.000.- (Pokok Principal) Rp10.686.746.433.-(Ganti rugi Compensation) Jumlah Total: Rp33.382.746.433.- Yayasan Slamet Riyadi Rp16.600.000.000.- (Pokok Principal) Rp7.677.458.331.-(Ganti rugi Compensation) Jumlah Total: Rp24.277.458.331.-	PN: Bank Kalah lose PT: Bank Kalah lose Kasasi: Bank Kalah lose PK:Masih Menunggu Putusan dari Mahkamah Agung Awaiting for Supreme Court decision
5	Tuntutan yang dilakukan kepada Bank dilakukan agar Bank mengembalikan dana investasi produk yang dikeluarkan oleh PT Antaboga Delta Sekuritas Indonesia yaitu berupa <i>Discretionary Fund</i> Discretionary Fund Lawsuit to the Bank for the Bank to recompense investment funds issued by PT Antaboga Delta Sekuritas Indonesia. The product was a Discretionary Fund	Penggugat Plaintiff: Cahyadi Candramulia, Dkk Tergugat Defendant: 1. J Trust Bank; 2. PT.Antaboga Delta Sekuritas, Tbk; 3. BANK INDONESIA; 4. BAPEPAM-LK.	Rp12.787.000.000.-(Pokok Principal) Bunga sebesar Interest of 13%-14%	PN: Bank Menang won PT: Bank Menang won Kasasi: Bank Menang won

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
6	<p>Pengajuan SOC (<i>statement of claim/Gugatan</i>) didasarkan pada Putusan Pengadilan Mauritius.</p> <p>Filing SOC (<i>statement of claim/lawsuit</i>) based on the Decision of the Court of Mauritius</p>	<p>Penggugat Plaintiff: Weston, Dkk</p> <p>Tergugat Defendant: 1. JTrust Co.Ltd 2. PT Bank JTrust Indonesia Tbk</p>	USD 115,750,000,-	<ul style="list-style-type: none"> • <i>Strike Out Application</i>: Keseluruhan <i>Striking Out Application</i> yang diajukan oleh BJI untuk melawan Weston telah dikabulkan; • <i>Amended defense (Amendment Application)</i>: Pengadilan Singapura menilai bahwa perubahan (<i>Amendment Application</i>) yang diajukan oleh Weston adalah tidak jelas, dan akan bermasalah jika dibiarkan untuk diubah seperti yang dimohonkan oleh Weston Pengadilan memberikan arahan kepada Weston agar (i) Weston mengubah bagian-bagian tertentu dalam SOC mereka dengan cara yang lebih jelas, dan (ii) agar Weston mengirimkan <i>Draft</i> Perubahan SOC ke Rajah & Tan (R&T) untuk diperiksa dan disetujui, sebelum sidang berikutnya. - Pada tanggal 20 Juli 2018, Weston Capital Advisors. Inc (WCAI) mengajukan pergantian Kuasa Hukum yang awalnya Eugene Thuraisingam LLP menjadi NLC Law Asia LLC, dan pergantian tersebut dapat disetujui oleh Pengadilan dan WCAI juga mengajukan Permohonan Penghentian kasus di Pengadilan Singapura namun masih menunggu keputusan dari Pengadilan Singapura. - Pada tanggal 23 Juli 2018, kuasa Hukum J Trust Bank menginformasikan bahwa Permohonan Penghentian kasus yang diajukan oleh WCAI diterima oleh Pengadilan Singapura, hal ini mengakibatkan klaim WCAI senilai sekitar USD 21 Juta ditarik dari proses di Pengadilan Singapura.

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
				<ul style="list-style-type: none"> • Strike Out Application: The entire Striking Out Application submitted by BJI against Weston has been granted; • Amended defense (Amendment Application): The Singapore court considered that the amendment application submitted by Weston was unclear, and would be problematic if left to be amended as Weston requested. The Court gave Weston directives to (i) Weston alter certain parts of their SOC in a way that more clearly, and (ii) to have Weston send Draft SOC Changes to Rajah & Tan (R & T) for review and approval before the next trial. - On 20 July 2018, Weston Capital Advisors Inc (WCAI) submitted a change of Attorneys from Eugene Thuraisingam LLP to NLC Law Asia LLC, approved by the Court, and WCAI also submitted Request for Termination of the case in Singapore Court but still awaiting for the court's decision. - On 23 July 2018, J Trust Bank attorneys informed that the Request for Termination of the case submitted by WCAI has been approved by the Singapore Court, leading WCAI's claim of USD21 million being withdrawn from the Singapore Court.

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
7	<p>Pada tanggal 2 November 2017, JTrust Bank menerima relaas beserta lampiran gugatan dari FGFL, Weston, dkk yang dalam gugatannya secara garis besar menarik JTrust Bank beserta dengan Tergugat lainnya dan Turut Tergugat;</p> <p>Tuntutan dari FGFL dalam perkara ini terdiri dari 6 (enam) tuntutan (claim) yang berbeda-beda baik nilai gugatan maupun materi gugatannya.</p> <p>On November 2, 2017, J Trust Bank accepts relaas with attachment of suit from FGFL, Weston, et al in its lawsuit drawing out J Trust Bank along with other Defendants and Acts Defendant;</p> <p>The demand of FGFL in this case consists of 6 (six) different claims both in the value of the lawsuit and the material of the lawsuit.</p>	<p>Penggugat Plaintiff:</p> <ol style="list-style-type: none"> 1. First Global Funds Limited PCC (FGFL); 2. Weston International Asset Recovery Company Limited (WIARCO); 3. Weston Capital Advisors Inc (WCAI); 4. Weston International Asset Recovery Corporation Inc (WIARCI); 5. Weston International Capital Limited (WICL); <p>Tergugat Defendant:</p> <p>Tergugat berjumlah 21 pihak, yang di antaranya melibatkan 21 parties, including):</p> <ol style="list-style-type: none"> 1. PT Bank JTrust Indonesia Tbk 2. J Trust Co.Ltd 3. Nobiru Adachi (Komisaris J Trust Bank) 4. Nobuyoshi Fujisawa (Pemegang saham J Trust Bank) 5. Shigeyoshi Asano (Komisaris J Trust Bank) 6. Ahmad Fajar (Komisaris J Trust Bank) 7. Felix I Hartadi (Direktur J Trust Bank) 8. Lembaga Penjamin Simpanan 9. Kartika Wirjoatmodjo (Direktur Utama Bank Mandiri) 10. Fauzi Ichsan (Kepala Eksekutif LPS) 	<p>Claim 1</p> <p>Weston meminta Pengadilan Mauritian untuk menjadikan Tergugat No. 2 hingga No. 11 dan No. 15 bersama-sama dan masing-masing, sebagai tambahan Tergugat ke dalam putusan Pengadilan Mauritius 2015 dan putusan USD 120,000,000 Global Mareva Injunction terkait dengan tindakan-tindakan yang menyiksa (“fautes” dan/atau “fautes lourdes”) tentang kecurangan dan persekongkolan untuk menipu Weston dan kegagalan untuk membayar sebesar USD 128.608.007.</p> <p>Weston requested the Mauritian Court to make Defendant No. 2 to No. 11 and No. 15 together and, respectively, in addition to the Defendant’s Decision of the Court of Mauritius 2015 and the USD120,000,000 Global Mareva Injunction verdict relating to “fautes” and/or “fauteslourdes” acts of fraud and conspiracy to defraud Weston and failure to pay of USD 128,608,007.</p> <p>Claim 2</p> <p>Weston mengklaim bahwa Tergugat 1 hingga 21, bersama-sama dan masing-masing, berkomplot untuk melakukan pencucian uang, dengan maksud untuk menipu Weston, sebagai kreditor Saab (dengan harga di atas USD 200 m). Oleh karena itu, Weston mengklaim ganti rugi sebesar USD 128 juta terhadap semua tergugat.</p> <p>Weston claims that Defendants 1 to 21, together and respectively, conspired to commit money laundering in order to deceive Weston as a Saab creditor (at a cost above USD 200 million). Therefore, Weston claimed compensation of USD 128 million</p>	<ul style="list-style-type: none"> • Pada tanggal 15 Desember 2017, Bank JTrust melalui kuasa hukumnya mengajukan <i>Preliminary Objections</i> (Keberatan Awal) dan berkesempatan untuk mengembangkan argumen dalam Surat Keberatan yang Bank ajukan sebelumnya; Bank JTrust through its legal counsel filed Preliminary Objections and had the opportunity to develop an argument in the Bank’s Objection Letter previously; • Langkah selanjutnya adalah menunggu respons dari Weston terhadap Keberatan Awal yang diajukan tersebut; The next step is to wait for Weston’s response to the proposed Objection;

No	Pokok Perkara Principal Case	Para Pihak The Parties	Nilai Perkara Case Value	Status Penyelesaian Settlement Status
		<p>Turut Tergugat Co-Defendant: Turut Tergugat berjumlah 18 pihak, yang di antaranya melibatkan:</p> <ol style="list-style-type: none"> 1. Ritsuo Ando (Direktur Utama J Trust Bank); 2. Otoritas Jasa Keuangan. <p>Co-Defendants numbers 18 parties, including:</p> <ol style="list-style-type: none"> 1. Ritsuo Ando (President Director of J Trust Bank); 2. Financial Services Authority. 	<p>Claim 3 LPS telah menyembunyikan temuan Brown Report dengan maksud untuk pencucian uang dan menipu Weston dan telah mencegah mereka untuk mengakuisisi BJI. Weston mengklaim USD 94 juta sebagai ganti rugi dari Tergugat 9, 10 dan 11. LPS has hidden the findings of Brown Report with the intent to launder money and deceive Weston and has prevented them from acquiring BJI. Weston claimed USD 94 million in damages from Defendants 9, 10 and 11.</p> <p>Claim 4 Weston telah mengeluarkan biaya yang signifikan dalam mengejar dan melaksanakan putusan Mauritius sehingga menggugat dan meminta kompensasi kepada Tergugat 1 hingga 11, 15 dan 21 bersama-sama dan masing-masing, untuk membayar USD 50 juta. Weston has incurred significant costs in pursuing and implementing the Mauritius ruling so as to sue and request compensation from Defendants 1 through 11, 15 and 21 together and respectively to pay USD50 million.</p> <p>Claim 5 Tuntutan bahwa pembayaran sebesar USD8,000,000 kepada Quinn Emanuel merupakan transaksi fraud oleh karenanya Tergugat 1 hingga 21 bersama-sama dan masing-masing harus membayar USD8,000,000. The claim that the payment of USD8,000,000 to Quinn Emanuel was a fraud transaction for which Defendants 1 through 21 together and each have to pay USD8,000,000.</p> <p>Claim 6 Weston meminta revisi Global Mareva Injunction sebesar USD400,000,000 terhadap Tergugat 1 hingga 11, 15 dan 21 bersama-sama dan masing-masing dan sebesar USD150,000,000 terhadap Penggugat 1 hingga 21, bersama-sama dan masing-masing. Weston requested a revised Global Mareva Injunction of USD400,000,000 against Defendants 1 through 11, 15 and 21 together and respectively and amounting to USD150,000,000 against Plaintiffs 1 to 21, together and respectively..</p>	<ul style="list-style-type: none"> • Bank secara berhati-hati melakukan upaya perlawanan dimana untuk keperluan strategi di pengadilan, perlawanan kepada Weston dilakukan oleh orang perseorangan. • Bank akan tetap berkoordinasi dengan Kuasa Hukum jika terdapat respons dari Weston yang akan menentukan langkah selanjutnya. • The Bank is careful in fighting back due to strategic purposes in court, the resistance to Weston is done by an individual. • The Bank will remain in coordination with the Legal Counsel if there is a response from Weston that will determine the next step.

*) Keterangan | Note:

* PN: Pengadilan Negeri | District Court

* PT: Pengadilan Tinggi | High Court

Pengaruh terhadap Kondisi Perusahaan

Dari perkara penting yang dihadapi J Trust Bank selama tahun 2018 terbagi menjadi 2 (dua) jenis perkara yaitu:

1. Perkara Antaboga:

Merupakan perkara dari masa Bank Century yang sampai saat ini masih dalam proses penyelesaian di pengadilan yang rata-rata sudah sampai tingkat akhir di Mahkamah Agung. Perkara ini butuh pencadangan biaya yang tidak sedikit oleh J Trust Bank maupun JTrust Group itu sendiri. Namun meskipun perkara ini masih berjalan, tidak begitu menimbulkan dampak yang signifikan bagi operasional dan bisnis Bank.

Seiring dengan perkembangan perkara yang sedang berlangsung saat ini, Bank yang sebelumnya di dalam posisi yang kurang menguntungkan karena berdasarkan putusan-putusan Pengadilan yang dalam hal ini Bank dalam keadaan kalah yaitu pada Pengadilan Negeri Surakarta, Pengadilan Negeri Surabaya, dan Pengadilan Negeri Yogyakarta yang mewajibkan Bank untuk mengembalikan dana-dana nasabah Antaboga sesuai dengan tuntutan Para Penggugat di dalam gugatannya. Namun saat ini dengan adanya Putusan Pidana dari Pengadilan Negeri Jakarta Pusat yang menghukum Robert Tantular, Putusan Pidana yang menghukum Hartawan Aluwi, Putusan Perdata di Pengadilan Jakarta Pusat, serta *Legal Action* yang dilakukan oleh Bank melalui gugatan perlawanan pada Pengadilan Negeri Jakarta Selatan yang telah berkekuatan hukum tetap (dalam hal ini Bank menang), beban Bank yang sebelumnya cukup memberatkan, kini Bank memiliki kesempatan untuk keluar dari kewajiban-kewajiban mengembalikan dana-dana nasabah Antaboga berdasarkan putusan-putusan Pengadilan yang sebelumnya memposisikan Bank dalam keadaan kalah. Dengan demikian untuk ke depannya, bisnis Bank akan semakin baik dengan telah tuntasnya perkara lama tersebut.

2. Perkara Weston (perkara luar negeri):

Perkara ini merupakan perkara lama mengenai sengketa surat-surat berharga yang proses penyelesaiannya berada di luar negeri yang berawal dengan adanya gugatan di Mauritius yang diajukan oleh perusahaan Holding Weston Capital, dkk, kemudian berlanjut di Pengadilan New York dan Singapura. Perkara-perkara ini masih berlangsung hingga saat ini.

Meskipun perkara ini masih berjalan, namun tidak begitu menimbulkan dampak yang signifikan bagi operasional dan bisnis Bank, karena perkara berlangsung di luar negeri. Adapun kemungkinan

Influence on Company Conditions

From the important issues faced by J Trust Bank during 2018 is divided into 2 (two) types of cases namely:

1. Antaboga Case:

This case is from Century Bank era which is still in the process of settlement in court which on average has reached the final level in the Supreme Court. This case needs cost reserves that is not small by J Trust Bank and JTrust Group itself. However, although the case is still running, it does not have a significant impact on the Bank's operations and business.

Along with the ongoing progress of the case, the Bank which previously was in a disadvantage position because based on the decisions of the Courts in this case the Bank is in a state of defeat, namely the Surakarta District Court, the Surabaya District Court and the Yogyakarta District Court which requires the Bank to refund Antaboga's clients' funds in accordance with the Plaintiff's claim in its lawsuit. However, this time with the Criminal Decision of Central Jakarta District Court punishing Robert Tantular, Criminal Decision punishing Hartawan Aluwi, Civil Court Decision in Central Jakarta Court, and Legal Action conducted by the Bank through a lawsuit against the South Jakarta District Court which has been enforced (in which case the Bank won), the Bank's previous burden, the Bank now has the opportunity to exit the obligations of returning Antaboga's clients' funds based on Court decisions that previously positioned the Bank in a losing state. Thus for the future, the Bank's business will be better with the completion of the old case.

2. Weston Case (overseas case):

This case is a long-standing case of securities disputes whose overseas settlement process begins with a lawsuit in Mauritius filed by Holding Weston Capital et al., which continued in the courts of New York and Singapore. These cases are still on going until now.

Although this case is still running, but not such a significant impact on the operations and business of the Bank, because the case took place abroad. The possibility of such case may disrupt the

perkara tersebut dapat mengganggu bisnis Bank adalah ketika perkara-perkara yang sedang berlangsung tersebut telah mempunyai Putusan yang berkekuatan hukum. Apabila Bank diputuskan bersalah oleh pengadilan luar negeri maka keputusan tersebut tidak serta merta dapat diterapkan pada Bank di Indonesia. Gugatan baru harus diajukan terhadap Bank pada pengadilan di Indonesia.

Seperti diungkapkan di atas, tidak terdapat perkara yang akan berdampak negatif bagi kondisi keuangan dan kelanjutan usaha J Trust Bank.

Permasalahan hukum yang sedang dihadapi Dewan Komisaris dan Direksi

Di tahun 2018, beberapa anggota Dewan Komisaris dan Direksi menjadi salah satu tergugat dalam perkara dengan Weston di Mauritius. Bank sedang melakukan upaya hukum untuk mengajukan keberatan atas gugatan tersebut dan masih menunggu perkembangan lebih lanjut (kasus no. 7 pada tabel di atas).

G. Penggunaan Pihak Penyedia Jasa Teknologi Informasi/Vendor TI

Berdasarkan Peraturan Otoritas Jasa Keuangan No.38/POJK.03/2016 tanggal 1 Desember 2016, dan Surat Edaran Otoritas Jasa Keuangan No.21/SEOJK.03/2017 tanggal 6 Juni 2017 tentang Penerapan Manajemen Risiko Dalam Penggunaan Teknologi Informasi Oleh Bank Umum, Bank dapat menggunakan jasa pihak lain/pihak penyedia jasa teknologi informasi untuk menyelenggarakan kegiatan teknologi informasi dalam rangka meningkatkan efektivitas dan efisiensi pencapaian tujuan strategis.

Penggunaan pihak penyedia jasa TI menyebabkan Bank memiliki ketergantungan terhadap jasa yang diberikan secara berkesinambungan dan atau dalam periode tertentu yang dapat mempengaruhi timbulnya risiko Bank berupa risiko operasional, kepatuhan, hukum dan reputasi antara lain karena adanya kegagalan penyedia jasa dalam menyediakan jasa, pelanggaran terhadap pengamanan atau ketidakmampuan untuk mematuhi hukum dan peraturan yang berlaku.

a. Proses Pemilihan dan Penentuan Pihak Penyedia Jasa Teknologi Informasi

Secara umum proses pemilihan dan penentuan pihak penyedia jasa teknologi informasi/calon *vendor* TI (terkait dengan kerja sama sistem/program) di PT Bank JTrust Indonesia Tbk meliputi:

- a.1. Mendapatkan sumber informasi calon *vendor* TI dari:
 - Pengalaman sebelumnya dalam berinteraksi dengan calon *vendor*.

business of the Bank is when the ongoing cases have a verdict that is legally binding. If the Bank is found guilty by the foreign court, the decision shall not necessarily be applied to the Bank in Indonesia. A new lawsuit must be filed against the Bank in a court of law in Indonesia.

As noted above, there were no cases that will have a negative impact on the financial condition and continuation of the J Trust Bank business.

Legal issues being faced by the Board of Commissioners and the Board of Directors

In 2018, several members of the Board of Commissioners and the Board of Directors became one of the defendants in the case with Weston in Mauritius. The Bank is conducting legal remedies to file an objection to the lawsuit and is still awaiting further progress (case No. 7 in the table above).

G. Use of Information Technology Vendor

Based on Financial Services Authority Regulation No. 38/POJK.03/2016 dated December 1, 2016, and Financial Services Authority Circular No. 21/SEOJK.03/2017 dated June 6, 2017 on the Implementation of Risk Management in the Use of Information Technology by Commercial Banks, the Bank may use the services of the other party/information technology vendor to organize the activities of information technology in order to improve effectiveness and efficiency in achieving strategic objectives.

The use of IT vendors causes the Bank dependency on services provided in an ongoing basis or within a certain period that can affect the incidence of the Bank risk in form of operational risk, compliance, legal and reputational, among others, for their failure to service providers in providing services, breach of security or inability to comply with the applicable laws and regulations.

a. The Selection and Determination Process of Information Technology Vendor

In general the selection and determination process of information technology vendor (related with system/program cooperation) in PT Bank JTrust Indonesia Tbk include:

- a.1. Obtaining information sources of IT vendors from:
 - Previous experience in interacting with prospective vendors.

- Jaringan perkenalan rekan-rekan sesama IT perbankan.
- *Browsing* di internet.
- Masukan unit bisnis/Divisi/Cabang/internal lainnya.
- Seminar atau pelatihan.

a.2. Kriteria dan dasar pertimbangan dalam menentukan calon *vendor* TI yang akan dipilih:

Memenuhi nilai total tertinggi/maksimal 100 dari gabungan 3 aspek penilaian yaitu:

- Aspek Fungsional, bobot 40% dengan maksimal nilai 40.
- Aspek Teknis, bobot 30% dengan maksimal nilai 30.
- Aspek Finansial, bobot 30% dengan maksimal nilai 30.

a.3. Prosedur permohonan persetujuan calon *vendor* TI yang akan dipilih:

- Melakukan *review* terhadap rencana bisnis tahunan yang berisi daftar proyek yang akan dijalankan, dan menyusun skala prioritas terhadap proyek yang akan dijalankan tersebut.
- Mengumpulkan *requirement*/kebutuhan fungsional dari unit bisnis.
- Mengumpulkan *requirement*/kebutuhan teknis dari Divisi IT.
- Melihat *requirement*/kebutuhan *financial/Budget* dari rencana bisnis tahunan.
- Penyusunan TOR (*Term of Reference*) berdasarkan *requirement* fungsional dan teknis.
- Mengirimkan undangan presentasi beserta TOR kepada beberapa calon *vendor* TI.
- Calon *vendor* TI melakukan presentasi.
- Calon *Vendor* TI mengirimkan *proposal* penawaran berdasarkan TOR.
- Mengundang POC (*Proof of Concept*) calon *vendor* TI (jika dimungkinkan untuk POC).
- Calon *vendor* TI melakukan POC (jika dimungkinkan untuk POC).
- Melakukan penilaian seluruh aspek (nilai total maksimal 100) terdiri dari:
 - Aspek Fungsional (nilai maksimal 40), dinilai oleh unit bisnis sebagai *user*.
 - Aspek Teknis (nilai maksimal 30), dinilai oleh Divisi IT.
 - Aspek Finansial (nilai maksimal 30), dinilai oleh Divisi IT yang menangani *Procurement* IT.

- Introduction network of fellow banking IT.
- Browsing on the internet.
- Input from other business units/divisions/branches/internal.
- Seminars or training.

a.2. Criteria and basic consideration in determining candidates for IT vendors to choose from:

Meeting the highest total value/maximum 100 of the combined 3 aspects of assessment, namely:

- Functional Aspects, weighs 40% with a maximum value of 40.
- Technical Aspects, weighs 30% with a maximum value of 30.
- Financial Aspects, weighs 30% with a maximum value of 30.

a.3 Approval application procedures for prospective vendors to choose from:

- Conducting a review on the annual business plan that contains a list of projects to be executed, and setting priority scale to the projects.
- Gathering requirements/functional needs of the business unit.
- Gathering requirements/technical needs of the IT Division.
- Seeing requirements/financial needs/budget of the annual business plan.
- Preparation of TOR (Terms of Reference) based on the functional and technical requirements.
- Sending invitations and TOR to several prospective IT vendors.
- Candidates for IT vendors making presentations.
- Candidates for IT vendors submitting bid proposals based on the TOR.
- Inviting POC (Proof Of Concept) of prospective IT vendors (if it is possible for POC).
- Candidates for IT vendors doing a POC (if it is possible for POC).
- Assessing all aspects (total maximum value of 100) which consist of:
 - Functional Aspects (maximum value 40), assessed by the business unit as the user.
 - Technical Aspects (maximum value 30), assessed by the IT Division.
 - Financial Aspects (maximum value 30), assessed by the Division of Corporate Secretary (in charge of Procurement Section).

- Penilaian calon *vendor* TI dibahas dalam rapat Komite IT (jika proyek bersifat strategis).
- Komite IT sesuai kewenangannya memberikan rekomendasi kepada Direksi.
- Direksi memberikan persetujuan atau menolak terhadap rekomendasi Komite IT.
- Setelah disetujui Direksi berdasarkan batas kewenangan limit yang berlaku, maka Divisi IT menindaklanjuti proses *engagement vendor* TI selanjutnya, yaitu: Proses *Purchase Order*/pembuatan Surat Perintah Kerja, Kontrak dan lain-lain.

- Assessment of prospective IT vendors is discussed in the IT Committee (if the projects are strategic).
- The IT Committee according to its authority provides recommendations to the Board of Directors.
- The Board of Directors shall approve or reject the recommendation of the IT Committee.
- Once approved by the Board of Directors based on the applicable authorization limit, the Division of Corporate Secretary follows up the next engagement process of IT vendors, namely: Purchase Order/ Work Order manufacture, contract and others processes.

b. Pemantauan/Pengawasan Vendor TI Dalam Vendor Management

Bank wajib memiliki program pemantauan data *vendor* TI secara berkesinambungan dalam *vendor management* untuk memastikan penyedia jasa/*vendor* TI telah melaksanakan pekerjaan/ memberikan jasa sesuai dengan kontrak/perjanjian kerja sama dengan melakukan:

- Pemantauan pencapaian SLA (*Service Level Agreement*) dari *vendor-vendor* TI utama.
- Kunjungan kerja rutin ke lokasi kerja/*data center* dari *vendor* TI utama.
- Permintaan laporan keuangan tahunan (*Audited*) *vendor* TI utama.
- Permintaan hasil audit independen dari lembaga terkait misalnya ISO.
- Rapat berkala dengan *vendor* TI utama.
- Pemantauan *progress* penyelesaian proyek IT secara berkala sesuai prinsip *Project Management*.

Berikut adalah daftar *Vendor* TI yang bekerjasama dengan PT Bank JTrust Indonesia Tbk selama Tahun 2018:

b. Monitoring/Supervising of IT Vendor In Vendor Management

Banks are required to have a data monitoring program of IT vendor in vendor management on an ongoing basis to ensure that IT vendors/service providers have implemented work/provided services in accordance with the contract/ agreement by conducting:

- Monitoring the achievement of SLA (*Service Level Agreement*) from major IT vendors.
- Routine working visit to work site/*data center* of the major IT vendors.
- Requesting for annual financial statements (*Audited*) of major IT vendors.
- Requesting independent audit results of the relevant institutions such as ISO.
- Meeting regularly with major IT vendors.
- Monitoring progress of completion of IT projects on a regular basis according to the principles of Project Management.

The following is a list of IT projects and vendors that work with PT Bank JTrust Indonesia Tbk during 2018:

No	Nama Pihak Penyedia Jasa Name of IT Vendor	Alamat Pihak Penyedia Jasa TI Vendor Address	Pihak Terkait (Ya/Tidak) Related Service (Yes/No)	Jasa yang Diberikan Services Provided
1	PT. Dymar Jaya Indonesia	Jakarta	T	Maintenance Host Security Module ATM Switching
2	PT. Mitra Integrasi Informatika	Jakarta	T	Maintenance aplikasi ATM Switching dan Server FT Stratus
3	PT. Anabatic Technologies	Jakarta	T	Maintenance Server AS/400, aplikasi Mimix, aplikasi reporting CR-One
4	PT. Venturium System Indonesia	Jakarta	T	Maintenance aplikasi SWIFT, interface aplikasi SWIFT ke core banking
5	PT. Misys internasional	Jakarta	T	Support aplikasi Opics
6	PT. Aristi Jasadata	Jakarta	T	Maintenance aplikasi Fixed Asset
7	PT. Visionet Data Internasional	Jakarta	T	Maintenance aplikasi Bank Vision, hardware Network dan PBX, hardware Web Teller, hardware SKN, Email Server dan outsourcing DRC

No	Nama Pihak Penyedia Jasa Name of IT Vendor	Alamat Pihak Penyedia Jasa TI Vendor Address	Pihak Terkait (Ya/Tidak) Related Service (Yes/No)	Jasa yang Diberikan Services Provided
8	PT. EDI Indonesia	Jakarta	T	Maintenance aplikasi MPN, interface aplikasi MPN ke core banking
9	PT. KPSG	Jakarta	T	Maintenance aplikasi Human Resouces Information System
10	PT. Karisma Zona Kreatifku	Jakarta	T	Maintenance Website
11	PT. Multipolar Technologies	Jakarta	T	Maintenance hardware IBM core banking Finacle, database Oracle & Websphere, File Server.
12	PT. Tridas Widianara	Jakarta	T	Maintenance aplikasi Anti Money Laundering
13	PT. Aplikanusa Lintasarta	Jakarta	T	Penyedia jaringan antar Cabang/utama
14	PT. Primacom	Jakarta	T	Penyedia jaringan antar Cabang/backup
15	PT. XL Axiata	Jakarta	T	Penyedia jaringan antar Cabang/backup
16	PT. Telkom	Jakarta	T	Penyedia jaringan antar Cabang/backup
17	PT. Sisnet Mitra Sejahtera	Jakarta	T	Sewa Mesin ATM NCR
18	PT. Argenta Adhiloka Pratama	Jakarta	T	Sewa Mesin ATM Diebold
19	PT. Deltasindo Raya Sejahtera	Jakarta	T	Maintenance UPS Powerware
20	PT. Dimension Data Indonesia	Jakarta	T	Penyedia Internet Banking Security Device, Network Redesign.
21	PT. Astra Graphia	Jakarta	T	Maintenance Internet Banking Security Device, pencetakan & distribusi rekening Koran dan pembuatan e-statement
22	PT. Sigma Cipta Caraka	Jakarta	T	Outsourcing Data Center
23	Bloomberg Finance, L.P.	Singapore	T	Sewa Terminal Bloomberg
24	PT. Reuters Services Indonesia	Jakarta	T	Sewa Terminal Reuters
25	PT. Tri Daya Asira	Jakarta	T	Penyedia aplikasi Interface RTGS & SKN ke core banking
26	JTrust System Co Ltd	Tokyo	Y	Penyedia aplikasi Garoon, hardware dan license chromebox
27	PT. Rintis Sejahtera	Jakarta	T	Maintenance jaringan ATM Prima
28	PT. Artajasa	Jakarta	T	Maintenance jaringan ATM Bersama
29	SWIFT SCRL	Jakarta	T	Penyedia jasa Swift
30	PT. Veda Praxis	Jakarta	T	Jasa audit TI dan penetration test
31	PT. Infinetworks	Jakarta	T	Penyedia sistem otentikasi dan token
32	PT. Artha MuliaTrijaya	Jakarta	T	Penyedia License anti virus Symantec
33	PT. CyberindoAditama	Jakarta	T	Penyedia jaringan internet
34	PT. Supra Primatama Nusantara	Jakarta	T	Penyedia jaringan internet
35	PT. LinkNet	Jakarta	T	Penyedia jaringan internet
36	PT. AT&T Global Network	Jakarta	T	Penyedia line SWIFT
37	Infosys Limited	Bangalore	T	Penyedia aplikasi core banking Finacle dan implementasi
38	PT. Persasi	Jakarta	T	Penyedia dan pengembang aplikasi Tableau
39	PT. Qiscus	Jakarta	T	Penyedia aplikasi dan pengembang Internal Messenger Jtrust-U
40	PT. Sprint Asia	Jakarta	T	Penyedia jasa aplikasi virtual assistance melalui media chatting
41	PT. Blue Power Technology	Jakarta	T	Penyedia jasa cloud service untuk Jtrust U
42	PT. Solmit Bangun Indonesia	Bandung	T	Penyedia dan pengembang aplikasi RBBR

H. Informasi Lain yang Terkait dengan Tata Kelola Bank

a) Intervensi pemilik/pemegang saham

Selama tahun 2018 tidak ada intervensi dari pemegang saham.

b) Perselisihan intern Bank yang mengganggu operasional dan/atau kelangsungan usaha Bank

Selama tahun 2018 tidak terdapat perselisihan intern Bank yang mengganggu operasional dan/atau kelangsungan usaha Bank.

c) Permasalahan yang timbul sebagai dampak kebijakan remunerasi pada Bank

Selama tahun 2018 tidak ada permasalahan yang timbul sebagai dampak dari kebijakan remunerasi pada Bank.

H. Other Information Related to Good Corporate Governance

a) Interventions of owners/shareholders

During 2018 there were no interventions from shareholders.

b) Bank internal disputes that disrupt the Bank's operational and/or business operations

During 2018 there were no internal bank disputes that interfered with the Bank's operational and/or business operations.

c) Issues arising from the impact of the Bank's remuneration policy

During 2018 there were no problems arising as a result of the Bank's remuneration policy.

BAB VII PEMBERIAN DANA UNTUK KEGIATAN SOSIAL DAN KEGIATAN POLITIK

CHAPTER VII Donation for Social and Political Activities

7.1 Pemberian Dana Untuk Kegiatan Sosial

Pemberian dana untuk Kegiatan Sosial merupakan bentuk implementasi dari program tanggung jawab sosial perusahaan (*Corporate Social Responsibility/CSR*) dari PT Bank JTrust Indonesia Tbk. yang diyakini nantinya dapat menciptakan kondisi masyarakat yang lebih baik dan kondusif, serta mampu menanggapi berbagai perubahan dalam kehidupan masyarakat yang pada akhirnya akan menciptakan hubungan yang saling bermanfaat dan menguntungkan antara PT Bank JTrust Indonesia Tbk. dengan masyarakat luas.

PT Bank JTrust Indonesia Tbk. dalam melaksanakan kegiatan operasional senantiasa berusaha menciptakan suasana yang lebih harmonis dengan masyarakat di sekitar khususnya dan masyarakat luas pada umumnya sehingga diharapkan dapat menjadi perusahaan yang terus diminati, serta disukai oleh masyarakat. Terciptanya lingkungan dalam masyarakat yang aman, nyaman, dan dinamis diyakini sebagai kondisi ideal bagi perkembangan dan kelangsungan dunia usaha di manapun.

Dilandasi suatu pemikiran bahwa perusahaan adalah bagian dari suatu masyarakat di sekitarnya, maka PT Bank JTrust Indonesia Tbk. menyadari bahwa sebagai perusahaan yang memiliki tanggung jawab sosial untuk mengembangkan dan memberdayakan kehidupan masyarakat di sekitarnya, melalui program “J Trust Peduli” yang fokus membantu masyarakat dalam bidang pendidikan, kesehatan, sosial, keagamaan, lingkungan hidup, dan tanggap darurat terhadap setiap bencana alam.

5 (Lima) Pilar CSR PT Bank JTrust Indonesia Tbk.

Guna mewujudkan hal tersebut, maka PT Bank JTrust Indonesia Tbk. melakukan berbagai upaya dengan memerhatikan 5 (lima) pilar *Corporate Social Responsibility/CSR* sebagai prinsip dan dasar dalam pelaksanaan kegiatan terkait di lapangan. Adapun kelima pilar CSR PT Bank JTrust Indonesia Tbk. adalah sebagai berikut:

- **Building Human Capital**

Secara internal, Bank berupaya untuk menciptakan sumber daya manusia yang andal. Sedangkan secara eksternal, Bank senantiasa berupaya melakukan pemberdayaan masyarakat, utamanya melalui *community development*.

7.1. Donation for Social Activities

Donation for Social Activities represents the implementation of Corporate Social Responsibility (CSR) program of PT Bank JTrust Indonesia Tbk. which is believed to be able to create better and conducive society, and be able to respond to various changes in people's lives that will ultimately create mutually beneficial relationships between PT Bank JTrust Indonesia Tbk. and the wider community.

PT Bank JTrust Indonesia Tbk in carrying out its operational activities has always been trying to create a more harmonious atmosphere with the community in particular and with public in general so as to become a preferable organization continuously in demand. The creation of a safe, comfortable and dynamic society is believed to be an ideal condition for the development and sustainability of a business in any location.

Based on the idea that the Bank is a part of its surrounding society, PT Bank JTrust Indonesia Tbk realizes its social responsibility to develop and empower the life of the surrounding community through “JTrust Peduli” program that focuses on helping people in education, health and humanity, social and religion, environment, and emergency response to natural disaster.

5 (Five) Pillars of CSR of PT Bank JTrust Indonesia Tbk

In order to realize the above matter, PT Bank JTrust Indonesia Tbk has made various efforts by considering 5 (five) pillars of Corporate Social Responsibility (CSR) as its principle and basis in the implementation of these activities on field. The five pillars are as follows:

- **Building Human Capital**

Internally, the Bank seeks to produce qualified human resources. While externally, the Bank always strives to empower the community, mainly through community development.

- **Strengthening Economies**

Bank berupaya mendapatkan laba dengan memerhatikan kepentingan dan kesejahteraan ekonomi komunitas, khususnya di lingkungan sekitar perusahaan beroperasi.

- **Assessing Social Tension**

Bank senantiasa akan menjaga keharmonisan dengan masyarakat, khususnya masyarakat sekitar supaya tidak menimbulkan konflik.

- **Encouraging Good Governance**

Dalam menjalankan bisnisnya, Bank senantiasa menjalankan praktik *Good Corporate Governance* (GCG) dengan baik dan sesuai dengan peraturan yang berlaku.

- **Protecting The Environment**

Bank senantiasa berupaya menjaga kelestarian lingkungan dan alam sekitarnya guna terwujudnya bumi yang layak huni bagi generasi anak-cucu kelak.

Program dan Kegiatan CSR Tahun 2018

Sepanjang tahun 2018 PT Bank JTrust Indonesia Tbk. terus berperan serta dalam membangun masyarakat melalui kerangka pelaksanaan program CSR, dengan rincian penyaluran dana yang fokus pada kegiatan di bidang pendidikan, kesehatan dan kemanusiaan, serta sosial dan keagamaan.

1. Pendidikan

- Sesuai dengan Peraturan Presiden Republik Indonesia (Perpres) No.82 Tahun 2016 tentang Strategi Nasional Keuangan Inklusif (SNKI) dalam rangka peningkatan literasi dan inklusi keuangan terhadap masyarakat, PT Bank JTrust Indonesia Tbk. menyelenggarakan kegiatan edukasi berupa **“Edukasi Gerakan Ayo Menabung”** yang dilaksanakan pada tanggal 23 Oktober 2018, bertempat di SD Yasporbi I Jl. Deposito - Jakarta Selatan. Kegiatan ini bertujuan sebagai edukasi pengenalan mengenai transaksi perbankan dan simulasi kegiatan operasional di dalam bank (*Mini Bank*). Biaya yang dikeluarkan untuk kegiatan ini adalah sebesar Rp4.500.000 (Empat Juta Lima Ratus Ribu Rupiah).
- Sebagai salah satu wujud kepedulian **PT Bank JTrust Indonesia Tbk. terhadap Keselamatan Berkendara**, PT Bank JTrust Indonesia Tbk. menyerahkan helm standar SNI kepada Anggota Koperasi Serba Usaha Susu Bendera (PT Frisian Flag Indonesia) di Jl. Raya Bogor - Jakarta Timur pada tanggal 25 Juli 2018. Penyerahan helm ini bertujuan memberikan edukasi kepada karyawan PT Frisian Flag

- **Strengthening Economies**

The Bank seeks profit by taking into account the interests and economic welfare of the community, particularly in the environment where the Bank operates.

- **Assessing Social Tension**

The Bank will always maintain harmony with the community, specifically the surrounding community so as to avoid any conflict.

- **Encouraging Good Governance**

In conducting its business, the Bank always performs well-implemented Good Corporate Governance (GCG) and in accordance with applicable regulations.

- **Protecting The Environment**

The Bank always strives to preserve the environment and its natural surroundings in order to realize a livable earth for future generations.

CSR Programs and Activities in 2018

During 2018 PT Bank JTrust Indonesia Tbk continues to participate in building communities through the framework of CSR program implementation, particularly donation which focuses on education, health and humanity, social and religious activities.

1. Education

- In line with the Presidential Decree of Indonesia No. 82/2016 on Financial Inclusion National Strategy in increasing financial literacy and inclusion to the society, PT Bank JTrust Indonesia Tbk. held educational activities called “Education on Let’s Save Movement” held on 23 October 2018 in SD Yasporbi I Jl. Deposito - South Jakarta. The activity aims as an introductory education on banking transaction and operating activity simulation in a bank (Mini Bank). The expense for this activity was Rp4,500,000 (Four Million Five Hundred Thousand Rupiah).
- As part of care of PT Bank JTrust Indonesia Tbk. on Driving Safety, PT Bank JTrust Indonesia Tbk. handed over SNI-standard helmets to the Members of Serba Usaha Cooperative of Susu Bendera (PT Frisian Flag Indonesia) on Jl. Raya Bogor - East Jakarta on 25 July 2018. The helmet handing over was aimed to providing education to employees of PT Frisian Flag Indonesia through the Employee Benefit Program (EBP) on driving safety to reduce

Indonesia melalui program *Employee Benefit Program* (EBP) tentang keselamatan berkendara sehingga dapat menekan angka kecelakaan lalu lintas yang akhirnya dapat meningkatkan produktivitas kerja.

2. Kesehatan dan Kemanusiaan

Program rutin PT Bank JTrust Indonesia Tbk. dalam kegiatan CSR di bidang Kesehatan dan Kemanusiaan adalah penyelenggaraan **Kegiatan Donor Darah** yang bekerja sama dengan Palang Merah Indonesia (PMI) cabang Kota Tangerang. Kegiatan tersebut diselenggarakan sebanyak dua kali, yaitu belokasi di Ruang Candi Prambanan - Hotel Grand Sahid Jaya pada tanggal 8 Agustus 2018 dan di Ruang Serbaguna Sakura - Gedung Sahid Sudirman Center lantai 35 pada tanggal 5 Desember 2018. Kegiatan Donor Darah selalu diadakan rutin setiap tahunnya, dengan peserta donor darah berasal dari internal Bank, Karyawan Grand Sahid Jaya Hotel serta karyawan dari Perusahaan yang berkantor di lingkungan Gedung Sahid Sudirman Center - Jakarta. Dana yang dibutuhkan untuk kegiatan di atas adalah sebesar Rp11.906.800 (Sebelas Juta Sembilan Ratus Enam Ribu Delapan Ratus Rupiah).

3. Sosial dan Keagamaan

Bentuk kegiatan program CSR dalam bidang Sosial dan Keagamaan yang dijalankan oleh PT Bank JTrust Indonesia Tbk. pada tahun 2018 adalah berupa:

- **Pelaksanaan Kegiatan Natal 2017** yang dilaksanakan di Ruang Auditorium Sahid Sudirman Residence Room A lantai 5 pada tanggal 5 Januari 2018. Kegiatan tersebut didahului oleh kegiatan donasi kepada Panti Bhakti Luhur yang berfokus dalam memberikan perawatan terhadap sekitar 30 anak-anak berkebutuhan khusus. Untuk kegiatan ini, manajemen Bank memberikan bantuan uang tunai sebesar Rp57.043.500 (Lima Puluh Tujuh Juta Empat Puluh Tiga Ribu Lima Ratus Rupiah).
- **Pemberian Santunan bagi Anak Yatim Piatu di Daerah Jakarta dan Sekitarnya**, bekerja sama dengan Yayasan Al-Fajr - Panti Yatim Indonesia dan berlokasi di Jl. Tebet Barat IV No. 4 Jakarta Selatan. Kegiatan tersebut dilaksanakan pada tanggal 31 Mei 2018, bertepatan dengan Bulan Suci Ramadhan 1439 H. Manajemen Bank memberikan santunan berupa alat-alat tulis, makanan kering, dan uang tunai. Seluruh kebutuhan dana yang diperlukan dalam kegiatan tersebut adalah sebesar Rp41.772.000 (Empat Puluh Satu Juta Tujuh Ratus Tujuh Puluh Dua Ribu Rupiah).

the number of traffic accidents which can create work productivity.

2. Health and Humanity

PT Bank JTrust Indonesia Tbk routine program in CSR activities in Health and Humanity is the conduct of Blood Donor activities in collaboration with Indonesian Red Cross (PMI) Tangerang branch. This activity is held twice which was located in the Prambanan Temple Room - Grand Sahid Jaya Hotel on August 8, 2018 and in the Multipurpose Room Sakura - Gedung Sahid Sudirman Center, 35th floor on December 5, 2018. Blood Donor Activities are held routinely every year, with blood participants coming from internal banks, employees of Grand Sahid Jaya Hotel and employees from companies with offices in Gedung Sahid Sudirman Center - Jakarta. The funds needed for the above activities amount to Rp11,906,800 (Eleven Million Nine Hundred Six Thousand Eight Hundred Rupiah).

3. Social and Religion

CSR program activities in Social and Religion conducted by PT Bank JTrust Indonesia Tbk in the year 2018 are as follows:

- **Christmas Activities 2017** held at Auditorium Sahid Sudirman Residence Room A-5th floor on January 5, 2018. The activity was preceded by a donation activity to the Panti Bhakti Luhur which focused on providing care for around 30 children with special needs. For this activity, the Bank's management provided cash assistance amounting to Rp57,043,500 (Fifty Seven Million Forty Three Thousand Five Hundred Rupiah).
- **Donation to orphans in Jakarta and its surrounding areas**, in collaboration with Al-Fajr Foundation which is held at Jl. Tebet Barat IV No.4 South Jakarta. The event was held on May 31, 2018, to celebrate the Holy Month of Ramadhan 1439 H. The Management of Bank provides donation in the form of stationery, dry food and cash. The total expenses incurred for such activities are amounting to Rp41,722,000 (Forty One Million Seven Hundred Seventy Two Thousand Rupiah).

- **Pemotongan Hewan Kurban Dalam Rangka Memperingati Hari Raya Idul Adha 1439 H**, PT Bank JTrust Indonesia Tbk. turut memeriahkan dan mendukung kegiatan rutin keagamaan tersebut yang dilaksanakan bertepatan dengan Hari Raya Idul Adha pada tanggal 24 Agustus 2018, berlokasi di Masjid Al-Hikmah, Jln. Dr. Soetomo Surabaya. Lokasi tersebut dipilih dikarenakan masih dalam lingkungan kantor J Trust Bank cabang Surabaya - Darmo. Dalam acara pemotongan hewan kurban tersebut, Manajemen Bank menyumbangkan satu ekor sapi dengan harga senilai Rp27.000.000 (Dua Puluh Tujuh Juta Rupiah).
- **Pemberian Santunan bagi Korban Bencana Palu - Donggala**, PT Bank JTrust Indonesia Tbk. turut bersimpati atas kejadian Tsunami, Likuifaksi, dan Gempa dahsyat yang meluluhlantakkan Palu, Sigi, dan Donggala, Sulawesi Tengah pada 28 September 2018. Melalui lembaga Aksi Cepat Tanggap (ACT), Manajemen beserta Karyawan PT Bank JTrust Indonesia Tbk. memberikan bantuan sebesar Rp10.000.000 (Sepuluh Juta Rupiah) yang diserahkan pada 19 November 2018.
- **Slaughtering of sacrificial animals in commemoration of Eid al-Adha 1439 H** where PT Bank JTrust Indonesia Tbk participates and supports the routine religious activities, which is held to celebrate Eid al-Adha on August 24, 2018, located at Masjid Al-Hikmah, Jl. Dr. Soetomo, Surabaya. The location was chosen because it was still in the J Trust Bank branch of Surabaya - Darmo. During the sacrificial animal slaughtering event, the Bank's management donated a cow at a price of Rp27,000,000 (Twenty Seven Million Rupiah).
- **Donation for Disaster Victims in Palu - Donggala**, PT Bank JTrust Indonesia Tbk. sympathize with devastating Tsunami, soil liquefaction and Earthquake in Palu, Sigi and Donggala, Central Sulawesi on September 28, 2018. Through the Aksi Cepat Tanggap (ACT), Management and Employees of PT Bank JTrust Indonesia Tbk provide assistance in the amount of Rp10,000,000 (Ten Million Rupiah) submitted on November 19, 2018.

Rencana CSR tahun 2019

Untuk tahun 2019, Bank akan menerapkan Kebijakan CSR dengan fokus pada kegiatan 5 (lima) pilar CSR PT Bank JTrust Indonesia Tbk. sebagaimana yang telah diuraikan sebelumnya. Adapun rencana program CSR pada tahun 2019 terdapat beberapa kegiatan yang masih merupakan pelaksanaan pada tahun-tahun sebelumnya. Namun, ada beberapa kegiatan yang cukup besar dan direncanakan akan dijalankan sesuai dengan kemampuan perusahaan.

Rencana program kegiatan CSR pada tahun 2019 meliputi:

- Donor darah
- Santunan Anak Yatim
- Donasi terhadap korban Bencana Alam di Indonesia
- Kegiatan Kurban
- Sumbangan untuk berbagai kegiatan sosial, pendidikan, lingkungan yang menganut asas manfaat, lestari, dan berkelanjutan (*sustainability*)
- Edukasi kepada nasabah dan/atau masyarakat mengenai produk dan jasa layanan perbankan.

Kegiatan tanggung jawab sosial PT Bank JTrust Indonesia Tbk. pada tahun 2019 akan disesuaikan dengan kemampuan keuangan serta potensi risiko lainnya, dengan tidak mengurangi kewajiban sebagaimana yang ditetapkan dalam ketentuan peraturan perundang-undangan serta peraturan Otoritas Jasa Keuangan yang terkait dengan kegiatan usaha Perseroan.

CSR Plans in 2019

In 2019, the Bank will implement CSR Policy with a focus on the activities of 5 (five) pillars of CSR of PT Bank JTrust Indonesia Tbk as described above. For CSR program plan in 2019, there are some activities continuing from previous years. However, a number of activities are significant in scale and are planned to continue in accordance with the Bank's ability.

CSR program plans in 2019 include:

- Blood donors
- Donations for orphans
- Donations to victims of natural disasters in Indonesia
- Sacrificial Activities
- Donations for various social, educational, environmental activities that embrace the principles of benefit, continuity and sustainability,
- Education to customers and/or public regarding banking products and services.

Social responsibility activities of PT Bank JTrust Indonesia Tbk in 2019 will be adjusted to the financial ability and also other potential risks, without prejudice to the obligations set forth in the provisions of the laws and regulations of Financial Services Authority related to the Bank's business activities.

7.2 Pemberian Dana Untuk Kegiatan Politik

Sebagaimana tahun-tahun sebelumnya, selama tahun 2018 PT Bank JTrust Indonesia Tbk. tidak pernah melakukan kegiatan politik atau memberikan sumbangan dana untuk kegiatan politik.

7.2 Donation for Political Activities

Similar to prior years, during 2018 PT Bank JTrust Indonesia Tbk has never been involved in political activities or made donations for political activities.

No	Nama Kegiatan Politik Name of Political Activities	Jumlah Total (Rp)
NIHIL		

BAB VIII PENERAPAN PEDOMAN TATA KELOLA PERUSAHAAN TERBUKA

CHAPTER VIII Implementation of Public Company Governance Guidelines

Sebagai Perusahaan Terbuka, PT Bank JTrust Indonesia Tbk wajib memenuhi Pedoman Tata Kelola Perusahaan Terbuka yang diatur dalam Peraturan Otoritas Jasa Keuangan (POJK) Nomor 21/POJK.04/2015 tanggal 16 November 2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka, dan Surat Edaran Otoritas Jasa Keuangan (SEOJK) Nomor 32/SEOJK.04/2015 tanggal 17 November 2015 tentang Pedoman Tata Kelola Perusahaan Terbuka.

Pedoman Tata Kelola Perusahaan Terbuka memuat praktik tata kelola perusahaan yang baik sesuai dengan praktik internasional mencakup **5 (lima) aspek**, dan **8 (delapan) prinsip** tata kelola perusahaan yang baik, serta **25 (dua puluh lima) rekomendasi** penerapan aspek dan prinsip tata kelola perusahaan yang baik berdasarkan pendekatan “Comply or Explain”. Penerapan di PT Bank JTrust Indonesia Tbk adalah sebagai berikut:

As a Public Company, PT Bank JTrust Indonesia Tbk is required to comply with the Public Company Governance Guidelines set in the Financial Services Authority Regulation (POJK) No. 21/POJK.04/2015 dated November 16, 2015, on the Implementation of Public Company Governance Guidelines and Circular Letter of Financial Services Authority (SEOJK) No. 32/SEOJK.04/2015 dated November 17, 2015, on Public Company Governance Guidelines.

Public Company Governance Guidelines covers good corporate governance practices in line with international practices comprising 5 (five) aspects, and 8 (eight) good corporate governance principles, and 25 (twenty five) recommendations for implementing good corporate governance aspects and principles based on the “Comply or Explain” approach. Implementation in PT Bank JTrust Indonesia Tbk is as follows:

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
<p>1. Hubungan Perusahaan Terbuka Dengan Pemegang Saham Dalam Menjamin Hak-Hak Pemegang Saham.</p> <p>Listed Company Relationships With Shareholders In Ensuring Shareholder Rights.</p>	<p>Prinsip 1: Meningkatkan Nilai Penyelenggaraan Rapat Umum Pemegang Saham (RUPS).</p> <p>Principle 1: Increase the Value of General Shareholders' Meeting (GMS).</p>	<p>1.1 Perusahaan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (<i>voting</i>) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan pemegang saham.</p> <p>1.1 The Listed Company has technical or voting procedures either in an open or closed method, which prioritizes the independence and interests of shareholders.</p>	<p><i>Comply.</i></p> <ul style="list-style-type: none"> - Semua keputusan diambil berdasarkan musyawarah untuk mufakat. Dalam hal keputusan berdasarkan musyawarah untuk mufakat tidak tercapai, maka keputusan diambil dengan suara setuju lebih dari ½ (satu per dua) bagian dari jumlah suara yang dikeluarkan secara sah dalam rapat. - Apabila suara yang setuju dan yang tidak setuju berimbang, maka Pimpinan rapat akan menentukan. - Prosedur teknis pengumpulan suara (<i>voting</i>) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan pemegang saham, diatur dalam Kebijakan Rapat Direksi. <p><i>Comply.</i></p> <ul style="list-style-type: none"> - All decisions are made based on deliberate consensus. In the case that deliberate consensus is not reached, then the decision is made by voting of more than ½ (half) part of voting rights legally made in the meeting. - If the number of agree and disagree votes are equal, then the meeting's Chairman has the right to make decision. - Technical procedure for votings both in open or closed doors prioritize independence, and shareholders' interests, regulated in the Meetings Policy of Board of Directors.

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>1.2 Seluruh anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan.</p> <p>1.2 All members of the Board of Directors and members of the Board of Commissioners of the Public Company are present at the Annual GMS.</p>	<p><i>Comply.</i></p> <ul style="list-style-type: none"> - Rapat Umum Pemegang Saham Tahunan (RUPS Tahunan) merupakan hirarki tertinggi dalam organisasi perusahaan yang mempunyai kewenangan yang tidak diberikan kepada Dewan Komisaris atau Direksi Perseroan dalam batas-batas yang ditentukan dalam Undang-Undang RI No. 40 Tahun 2007 tentang Perseroan Terbatas dan Anggaran Dasar Perseroan Pasal 19. - Dengan demikian Seluruh Anggota Direksi dan anggota Dewan Komisaris hadir dalam RUPS Tahunan. - Apabila ada Anggota Direksi dan anggota Dewan Komisaris berhalangan hadir dalam RUPS Tahunan maka ybs harus memberitahukan secara tertulis atas ketidakhadirannya dengan alasan yang jelas. <p><i>Comply.</i></p> <ul style="list-style-type: none"> - Annual General Meeting of Shareholders (Annual GMS) is the highest hierarchy in company organizations that has authority not given to the Board of Commissioners or Board of Directors of the Company within the limits specified in Law No. 40 of 2007 concerning Limited Liability Companies and the Company's Articles of Association Article 19. - Thus all Members of the Board of Directors and members of the Board of Commissioners are present at the Annual GMS. - If there are Members of the Board of Directors and members of the Board of Commissioners unable to attend the Annual GMS, then they must notify in writing of their absence for obvious reasons.
		<p>1.3 Ringkasan risalah RUPS tersedia dalam Situs Web Perusahaan Terbuka paling sedikit selama 1 (satu) tahun.</p> <p>1.3 Summary of minutes of the GMS is available on the Listed Company Website for at least 1 (one) year.</p>	<p><i>Comply.</i></p> <p>Ringkasan risalah RUPS tersedia dalam Situs Web PT Bank JTrust Indonesia Tbk paling sedikit selama 1 (satu) tahun.</p> <p><i>Comply.</i></p> <p>The Summary of Minutes of GMS is on the Website of PT Bank JTrust Indonesia for at least 1 (one) year.</p>
	<p>Prinsip 2: Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor</p> <p>Principle 2: Improve the Quality of Communication between Listed Company and Shareholders or Investors</p>	<p>2.1 Perusahaan Terbuka memiliki suatu kebijakan komunikasi dengan pemegang saham atau investor.</p> <p>2.1 A Listed Company maintains a communication policy with shareholders or investors.</p>	<p><i>Comply.</i></p> <p>PT Bank JTrust Indonesia Tbk memiliki kebijakan komunikasi dengan pemegang saham atau investor.</p> <p><i>Comply.</i></p> <p>PT Bank JTrust Indonesia Tbk maintains a communication policy with shareholders or investors.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>2.2 Perusahaan Terbuka mengungkapkan kebijakan komunikasi Perusahaan Terbuka dengan pemegang saham atau investor dalam Situs Web.</p> <p>2.2 A Listed Company discloses its communication policy with shareholders or investors in the Website.</p>	<p><i>Comply.</i> PT Bank JTrust Indonesia Tbk telah mengungkap-kan kebijakan komunikasi Perseroan dengan pemegang saham atau investor dalam Situs <i>Website</i>.</p> <p><i>Comply.</i> PT Bank JTrust Indonesia Tbk has disclosed its communication policy with shareholders or investors in the Website.</p>
<p>2. Fungsi dan Peran Dewan Komisaris.</p> <p>The Function and Role of the Board of Commissioners.</p>	<p>Prinsip 3: Memperkuat Keanggotaan dan Komposisi Dewan Komisaris.</p> <p>Principle 3: Strengthening the Membership and Composition of the Board of Commissioners.</p>	<p>3.1 Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perusahaan Terbuka.</p> <p>3.1 Determination of the number of members of the Board of Commissioners considering the conditions of the Listed Company.</p>	<p><i>Comply.</i></p> <ul style="list-style-type: none"> - Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perusahaan Terbuka, serta mengacu kepada Peraturan Otoritas Jasa Keuangan (POJK) No. 55/POJK.03/ 2016 tentang Penerapan Tata Kelola Bagi Bank Umum. - Jumlah komposisi Dewan Komisaris adalah sebagai berikut: <ul style="list-style-type: none"> • Anggota Dewan Komisaris 4 (empat) orang, termasuk 2 (dua) orang Komisaris Independen dan 1 (satu) orang Komisaris Utama. • Anggota Dewan Komisaris yang berdomisili di Indonesia sebanyak 3 (tiga) orang, 1 (satu) orang berkewarganegaraan Jepang namun berdomisili di Jepang. • Jumlah anggota Komisaris Independen adalah 50% dari jumlah keseluruhan anggota Dewan Komisaris. <p><i>Comply.</i></p> <ul style="list-style-type: none"> - Determination on the number of members of the Board of Commissioners considers the condition of the Public Company, and refers to the Financial Services Authority Regulation (POJK) No. 55/POJK.03/2016 concerning Implementation of Governance for Commercial Banks. - The composition of Board of Commissioners is as follows: <ul style="list-style-type: none"> • Members of the Board of Commissioners were 4 (four) people, including 2 (two) Independent Commissioners and 1 (one) President Commissioner. • Members of the Board of Commissioners who are domiciled in Indonesia are 3 (three) people, 1 (one) is a Japanese national and is domiciled in Japan. • The number of Independent Commissioners is 50% of the total number of members of the Board of Commissioners.

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>3.2 Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</p> <p>3.2 Determination of the composition of members of the Board of Commissioners takes into account the diversity of skills, knowledge, and experience required.</p>	<p><i>Comply.</i> Penentuan komposisi 4 (empat) orang anggota Dewan Komisaris Bank memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman sejalan dengan kriteria utama dengan mempertimbangkan integritas, kompetensi, profesionalisme dan reputasi keuangan yang memadai sesuai dengan persyaratan uji kemampuan dan kepatutan (<i>Fit and Proper Test</i>) yang telah ditetapkan oleh Otoritas Jasa Keuangan (OJK).</p> <p><i>Comply.</i> Determination of the composition of 4 (four) members of the Board of Commissioners of the Bank paying attention to the diversity of expertise, knowledge and experience in line with the main criteria by considering integrity, competency, professionalism and sufficient financial reputation in accordance with the fit and proper test determined by the Financial Services Authority (OJK).</p>
	<p>Prinsip 4: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.</p> <p>Principle 4: Improve the Quality of Implementation of Duties and Responsibilities of the Board of Commissioners.</p>	<p>4.1 Dewan Komisaris mempunyai kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Dewan Komisaris.</p> <p>4.1 The Board of Commissioners has a self assessment policy to assess the performance of the Board of Commissioners.</p> <p>4.2 Kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Perusahaan Terbuka.</p> <p>4.2 The self assessment policy to assess the performance of the Board of Commissioners is disclosed through the Annual Report of the Listed Company.</p>	<p><i>Comply.</i></p> <ul style="list-style-type: none"> - Pihak yang melakukan <i>assessment</i> terhadap kinerja Dewan Komisaris adalah pemegang saham (<i>shareholder</i>). - Tahapan proses untuk menilai kinerja Dewan Komisaris dilakukan langsung oleh Pemegang Saham (<i>shareholder</i>) mayoritas. - Indikator yang digunakan untuk menilai kinerja Dewan Komisaris adalah <i>Key Performance Indicator (KPI)</i> yang disusun dan dinilai langsung oleh pemegang saham (<i>shareholder</i>) mayoritas. <p><i>Comply</i></p> <ul style="list-style-type: none"> - The party conducting assessment on the performance of the Board of Commissioners is shareholders. - Stages of the process to assess the performance of the Board of Commissioners are carried out directly by majority Shareholders. - The indicator used to assess the performance of the Board of Commissioners is the Key Performance Indicator (KPI) which is compiled and assessed directly by majority shareholders. <p><i>Comply.</i> Kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Bank.</p> <p><i>Comply</i> Self assessment policy to assess the performance of the Board of Commissioners are disclosed through the Bank's Annual Report.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>4.3 Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.</p> <p>4.3 The Board of Commissioners has policies related to the resignation of members of the Board of Commissioners if they are involved in financial crimes.</p> <p>4.4 Dewan Komisaris atau Komite yang menjalankan fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses Nominasi anggota Direksi.</p> <p>4.4 The Board of Commissioners or the Committee performing the Nomination and Remuneration functions shall establish a succession policy in the process of Nomination of members of the Board of Directors</p>	<p><i>Comply.</i> Kebijakan terkait Dewan Komisaris untuk mengundurkan diri diatur dalam pasal 14.8 hingga pasal 14.12 Anggaran Dasar Perusahaan. Pengunduran diri tersebut wajib ditindaklanjuti dengan RUPS. Selain itu dalam hal terjadi pelanggaran anggota Dewan Komisaris, RUPS juga diberikan hak untuk memberhentikan Dewan Komisaris sewaktu-waktu (dalam hal ini misalnya adanya pelanggaran atau kejahatan keuangan yang dilakukan oleh anggota Dewan Komisaris yang bersangkutan).</p> <p><i>Comply.</i> Policies related to the right of members of the Board of Commissioners to resign are regulated in Articles 14.8 to 14.12 of the Company's Articles of Association. Such resignation shall be followed up by the GMS. In addition, in the event of any violation of the members of the Board of Commissioners, the GMS is also given the right to discharge the Board of Commissioners at any time (in this case, for example, financial crime committed by member of the Board of Commissioners).</p> <p><i>Comply.</i> Dewan Komisaris melalui Komite Remunerasi & Nominasi yang menjalankan fungsi Nominasi dan Remunerasi menyusun Kebijakan suksesi dalam proses Nominasi anggota Direksi yang telah diatur dalam Piagam Komite Nominasi & Remunerasi tercantum pada tugas, tanggung jawab dan wewenang.</p> <p><i>Comply.</i> The Board of Commissioners through the Remuneration & Nomination Committee which runs the Nomination and Remuneration function has designed succession policy in the Nomination process of members of Board of Directors as stated in the Charter of Nomination & Remuneration Committee in the task, role and authority.</p>
<p>3. Fungsi dan Peran Direksi. Function and Role of Directors.</p>	<p>Prinsip 5: Memperkuat Keanggotaan dan Komposisi Direksi.</p> <p>Principle 5: Strengthening the Membership and Composition of the Board of Directors.</p>	<p>5.1 Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektivitas dalam pengambilan keputusan.</p> <p>5.1 Determination of the number of members of the Board of Directors takes into consideration the conditions of the Listed Company and the effectiveness of decision making.</p>	<p><i>Comply.</i> Penentuan jumlah anggota Direksi sebagaimana mengacu kepada ketentuan Peraturan perundang-undangan yang berlaku, dimana berdasarkan POJK No.33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik. dimana masing-masing anggota Direksi sudah membidangi sesuai dengan komposisi masing-masing.</p> <p><i>Comply.</i> Determination of the number of members of the Board of Directors refers to the provisions of applicable laws and regulations, which are based on POJK No.33/POJK.04/2014 concerning Directors and Board of Commissioners of Issuers or Public Companies, where each member of the Board of Directors has been in charge according to their respective composition.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (<i>Comply or Explain</i>) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>5.2 Penentuan komposisi anggota Direksi memperhatikan keberagaman, keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</p> <p>5.2 Determination of the composition of the members of the Board of Directors takes into account the diversity, expertise, knowledge, and experience required.</p> <p>5.3 Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</p> <p>5.3 Members of the Board of Directors in charge of accounting or finance have expertise and/or knowledge in accounting.</p>	<p><i>Comply.</i> Komposisi anggota Direksi Perusahaan memiliki latar belakang yang beragam atas keahlian, pengetahuan dan pengalaman yang dibutuhkan. Hal tersebut dapat dilihat dari profil masing-masing Direksi, keberagaman Direksi tersebut dibutuhkan Perusahaan dalam rangka memperkaya budaya dan dapat mengisi kesenjangan serta kekosongan yang mungkin terjadi.</p> <p><i>Comply.</i> Composition of members of the Company's Board of Directors has a diverse background for the expertise, knowledge and experience needed. This can be seen from the profile of each Board of Directors, the diversity of Directors is needed by the Company in order to enrich the culture and can fill gaps and emptiness that might occur.</p> <p><i>Comply.</i> Direktur Keuangan Perusahaan yaitu Bapak Helmi Arief Hidayat adalah lulusan S2 Adm. Bisnis UNKRIS, beliau juga seorang ahli dalam keuangan dan mempunyai pengalaman kerja sejak tahun 2003-2009 menjabat sebagai Kepala Divisi Keuangan Bank Akita dan tahun 2010 menjabat sebagai kepala Divisi Keuangan Bank Nobu.</p> <p><i>Comply.</i> The Company's Finance Director is Mr. Helmi Arief Hidayat, a Master of Business Administration of UNKRIS, who is also a financial expert with work experience since 2003-2009 as Head of Finance Division of Bank Akita and in 2010 as head of Finance Division of Nobu Bank.</p>
	<p>Prinsip 6: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.</p> <p>Principle 6: Improve the Quality of Duties and Responsibilities of the Board of Directors.</p>	<p>6.1 Direksi mempunyai kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Direksi.</p> <p>6.1 The Board of Directors has its own assessment policy to assess the performance of the Board of Directors.</p>	<p><i>Comply.</i> Setiap tahun Direksi melaporkan hasil kinerjanya untuk tahun berjalan dalam RUPS tahunan Bank. Selain itu Bank melakukan penilaian kinerja Direksi melalui pengisian kertas kerja <i>Self Assessment</i> Penerapan Tata Kelola untuk faktor penilaian tugas dan tanggung jawab Direksi.</p> <p><i>Comply.</i> Each year the Board of Directors reports its performance results for the current year in the Bank's annual GMS. In addition, the Bank conducts a performance assessment of the Board of Directors through the completion of the Self Assessment Working Paper on the Implementation of Good Corporate Governance for the assessment of the duties and responsibilities of the Board of Directors.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>6.2 Kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.</p> <p>6.2 The self assessment policy to assess the performance of the Board of Directors is disclosed through the Public Company's annual report.</p> <p>6.3 Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.</p> <p>6.3 The Board of Directors has a policy related to the resignation of members of the Board of Directors if involved in financial crimes.</p>	<p><i>Comply.</i> Kebijakan penilaian sendiri (<i>self assessment</i>) untuk Penilaian realisasi kinerja Direksi pada tahun berjalan diungkapkan dalam Laporan Tahunan Bank.</p> <p><i>Comply.</i> Self-assessment policy for the evaluation of the performance of the Board of Directors in the current year is disclosed in the Bank's Annual Report.</p> <p><i>Comply.</i> Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.</p> <p><i>Comply.</i> The Board of Directors has a policy related to the resignation of members of the Board of Directors if involved in financial crimes.</p>
<p>4. Partisipasi Pemangku Kepentingan.</p> <p>Participation of Stakeholders.</p>	<p>Prinsip 7: Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.</p> <p>Principle 7: Improve the Aspects of Corporate Governance through Stakeholder Participation.</p>	<p>7.1 Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya <i>insider trading</i>.</p> <p>7.1 Public Company has a policy to prevent insider trading.</p>	<p><i>Comply.</i> Kebijakan mencegah <i>insider trading</i> diatur dalam Etika Korporasi PT Bank JTrust Indonesia Tbk.</p> <p><i>Comply.</i> The policy to prevent insider trading is set in the Corporate Ethics of PT Bank JTrust Indonesia Tbk.</p>
		<p>7.2 Perusahaan Terbuka memiliki kebijakan anti korupsi dan <i>anti fraud</i>.</p> <p>7.2 Public Company has anti-corruption and anti-fraud policies.</p>	<p><i>Comply.</i> Bank telah memiliki kebijakan anti korupsi dan anti <i>fraud</i> yang dituangkan dalam SOP Strategi Anti Fraud yang ditetapkan berdasarkan Surat Keputusan Direksi PT Bank JTrust Indonesia Tbk No.03.06/S. Kep-Dir-AFD/JTrust/XII/2015 tanggal 3 Desember 2015 tentang Revisi Ke-2 Standar Operasional Prosedur (SOP) Strategi Anti Fraud PT Bank JTrust Indonesia Tbk.</p> <p><i>Comply.</i> The Bank has the anti-corruption and anti-fraud policy set in a SOP of Anti Fraud Strategy as stipulated in the Decision Letter of the Board of Directors of PT Bank JTrust Indonesia Tbk No.03.06/S. Kep-Dir-AFD/JTrust/XII/2015 dated December 3, 2015, on the 2nd Revision of Standard Operational Procedure (SOP) of Anti Fraud Strategy of PT Bank JTrust Indonesia Tbk.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
		<p>7.3 Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau <i>vendor</i>.</p> <p>7.3 A Listed Company has a policy on the selection and upgrading of suppliers or vendors.</p>	<p><i>Comply.</i> Perusahaan memiliki kebijakan tentang seleksi pemasok atau <i>vendor</i> yang diungkapkan dalam bagian kebijakan dan seleksi <i>vendor</i> pada laporan tahunan ini melalui unit kerja <i>procurement</i>.</p> <p><i>Comply.</i> The company has a policy regarding the selection of suppliers or vendors disclosed in the vendor's policy and selection section on this annual report through the procurement work unit.</p>
		<p>7.4 Perusahaan Terbuka memiliki kebijakan untuk pemenuhan hak-hak kreditur.</p> <p>7.4 A Listed Company has a policy to meet the rights of creditors.</p>	<p>Perusahaan menerapkan dan menghargai hak-hak kreditur dengan memperlakukan persamaan (<i>equal treatment</i>) kepada seluruh kreditur, pelaksanaan hak dan kewajiban tepat waktu, dan tidak ada informasi perusahaan yang disembunyikan (<i>disclose</i>).</p> <p>The company applies and respects the rights of creditors by making equal treatment to all creditors, implementing rights and obligations on time, and no company information is hidden (<i>disclose</i>).</p>
		<p>7.5 Perusahaan Terbuka memiliki kebijakan sistem <i>whistleblowing</i>.</p> <p>7.5 Listed Company has a whistleblowing system policy.</p>	<p><i>Comply.</i> Perusahaan sudah memiliki kebijakan <i>whistleblowing</i> sebagaimana diungkapkan pada bagian Anti Fraud dan Anti Korupsi.</p> <p><i>Comply.</i> The company has a whistleblowing policy as disclosed in the Anti-Fraud and Anti-Corruption section.</p>
		<p>7.6 Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.</p> <p>7.6 Public Company has a long term incentive policy for the Board of Directors and employees.</p>	<p><i>Comply.</i> Bank telah membuat kebijakan terkait pemberian insentif jangka panjang berdasarkan Surat Keputusan Direksi No. 02.03/S.Kep-Dir-HCD/ JTRUST/X/2017 tanggal 02 Oktober 2017 tentang Penetapan Material Risk Taker (MRT), di antaranya mengatur para pihak yang ditetapkan sebagai MRT yaitu Dewan Komisaris, Direksi, dan Executive Vice President (EVP). Bank masih mengkaji kebijakan terkait dengan kebijakan pemberian insentif jangka panjang bagi karyawan, dan akan dibuatkan kebijakannya dengan mempertimbangkan Rencana Bisnis Bank di tahun 2019.</p> <p><i>Comply.</i> The Bank has made a policy related to providing long-term incentives based on the Decree of the Board of Directors No. 02.03/S.Kep-Dir-HCD/JTRUST/X/2017 dated October 02, 2017, concerning the Determination of Material Risk Taker (MRT), among others regulating the parties designated as MRT, namely the Board of Commissioners, Board of Directors and Executive Vice President (EVP). The Bank is still reviewing policies related to long-term incentives policy for employees, and such policy will be made by considering the Business Plan of the Bank in 2019.</p>

Aspek Aspect	Prinsip Principle	Rekomendasi Recommendations	Penerapan di PT Bank JTrust Indonesia Tbk (Comply or Explain) Implementation in PT Bank JTrust Indonesia Tbk (Comply or Explain)
5. Keterbukaan Informasi. Information Disclosure.	Prinsip 8: Meningkatkan Pelaksanaan Keterbukaan Informasi. Principle 8: Improve the Implementation of Information Disclosure.	8.1 Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain Situs Web sebagai media keterbukaan informasi. 8.1 Public Company utilizes the extensive use of information technology besides the Website as a tool for information disclosure.	<i>Comply.</i> Selain melalui Situs <i>Website</i> , Perseroan juga menggunakan media social seperti Facebook, Instagram, YouTube dan Linke dll sebagai media keterbukaan informasi Perseroan. <i>Comply.</i> In addition to Website, the Company also uses social media such as Facebook, Instagram, YouTube and LinkedIn as a media for the Company's information disclosure.
		8.2 Laporan Tahunan Perusahaan Terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka paling sedikit 5% (lima persen), selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka melalui pemegang saham utama dan pengendali. 8.2 Public Company's Annual Report discloses the ultimate beneficial owner in its shareholding structure at least 5% (five per cent), besides disclosing the ultimate beneficial owner in the share ownership go Public Company through major shareholders and controllers. 8.2 Public Company's Annual Report discloses the ultimate beneficial owner in its shareholding structure at least 5% (five per cent), besides disclosing the ultimate beneficial owner in the share ownership go Public Company through major shareholders and controllers.	<i>Comply.</i> Komposisi pemegang saham publik telah diungkapkan dalam Laporan Tahunan Perseroan. <i>Comply.</i> The composition of public shareholders has been disclosed in the Annual Report of the Company.

Laporan Hasil Penilaian Sendiri (Self Assessment) Penerapan Tata Kelola Bank

- Penerapan Tata Kelola membutuhkan penilaian untuk melihat sejauh mana perkembangan terhadap prinsip-prinsip tata kelola yang telah dilaksanakan oleh PT Bank JTrust Indonesia Tbk. Penilaian tersebut juga bermanfaat untuk melihat sejauh mana kualitas penerapan tata kelola secara berkesinambungan ke dalam proses bisnis.
- PT Bank JTrust Indonesia Tbk secara rutin/berkala telah melaksanakan Penilaian Sendiri (*self assessment*) Penerapan Tata Kelola sesuai dengan ketentuan Otoritas Jasa Keuangan yang mengharuskan bahwa Bank melakukan penilaian sendiri secara internal (*internal self assessment*) terhadap penerapan tata kelola.

Report on the Self Assessment Results of the Bank's GCG Implementation

- GCG implementation requires assessment to observe the extent of progress toward the implementation of GCG principles at PT Bank JTrust Indonesia Tbk. Such assessment is also beneficial to observe the extent of sustainable GCG implementation quality in the business process.
- PT Bank JTrust Indonesia Tbk routinely/periodically performs self-assessment on the GCG Implementation in line with the regulations of Financial Service Authority which require the Bank to perform their own internal self-assessment toward GCG implementation.

- Laporan Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Bank dikelompokkan dalam 5 (lima) kategori peringkat yaitu Peringkat 1 (Sangat Baik), Peringkat 2 (Baik), Peringkat 3 (Cukup Baik), Peringkat 4 (Kurang Baik), dan Peringkat 5 (Tidak Baik). Urutan peringkat yang lebih kecil mencerminkan penerapan tata kelola yang lebih baik.
- Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Bank Tahun 2018 adalah:
 - Result of Self-Assessment Report on the Bank's GCG Implementation is grouped into 5 (five) ranking categories, namely Rank 1 (Very Good), Rank 2 (Good), Rank 3 (Fairly Good), Rank 4 (Less Satisfactory), and Rank 5 (Poor). Lower ranking order reflects a better GCG implementation.
 - Result of Self Assessment of GCG Implementation in 2018:

Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Semester I/Posisi Juni 2018
Result of the Self-Assessment of GCG Implementation in First Semester/June 2018

	Peringkat Rank	Definisi Peringkat Rank Definition
Individual	3	Cukup Baik Fairly Good

Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola Semester II/Posisi Desember 2018
Result of the Self-Assessment of GCG Implementation in Second Semester/December 2018

	Peringkat Rank	Definisi Peringkat Rank Definition
Individual	3	Cukup Baik Fairly Good

Hasil penilaian sendiri (*Self Assessment*) Peringkat Faktor Tata Kelola oleh Bank untuk **Semester II/Posisi Desember 2018** adalah **Peringkat 3 (Cukup Baik)**, sedangkan hasil penilaian Peringkat Faktor Tata Kelola oleh Bank untuk **Semester I/Posisi Juni 2018** adalah **Peringkat 3 (Cukup Baik) telah sesuai** dengan hasil penilaian OJK atas Peringkat Komposit (*rating*) Tingkat Kesehatan Bank.

The Self Assessment Rating of Governance Factors by the Bank for the Second Semester/Position in December 2018 is Rank 3 (Fairly Good), while the results of Rating of Governance Factors by the Bank for the First Semester/Position in June 2018 is Rank 3 (Fairly Good), in accordance with the results of the OJK's assessment of the Composite Rating of Bank's Health Level.

- Berikut disampaikan Laporan Hasil Penilaian Sendiri (*Self Assessment*) Individual Penerapan Tata Kelola PT Bank JTrust Indonesia Tbk untuk Posisi Desember 2018:
- The following is the Report on the Individual Self-Assessment Results of the Bank's GCG Implementation of PT Bank JTrust Indonesia, Tbk. for the position of December 2018:

Hasil Penilaian Sendiri (*Self Assessment*) Penerapan Tata Kelola
Result of the Self-Assessment of GCG Implementation

	Peringkat Rank	Definisi Peringkat Rank Definition
Individual	3	Cukup Baik Fairly Good
Konsolidasi Consolidation	---	(jika ada subsidiary company) (if there are company subsidiaries)

Analisis | Analysis

Berdasarkan Peraturan Otoritas Jasa Keuangan Nomor 55/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan Nomor 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum, Bank telah melakukan *Self Assessment* Penerapan Tata Kelola Bank dengan hasil sebagai berikut:

A. Kekuatan Penerapan Tata Kelola Bank

1. **Governance structure** adalah struktur kewenangan berikut persyaratan pejabat yang ada di Bank sesuai dengan yang dipersyaratkan oleh peraturan perundangan yang berlaku.

Implementasi *governance structure* dapat disampaikan beberapa hal sebagai berikut:

- Jumlah, integritas dan kompetensi anggota Direksi, Dewan Komisaris serta Komite di bawah Dewan Komisaris telah memenuhi ketentuan yang berlaku. Berdasarkan hasil keputusan Rapat Umum Pemegang Saham (RUPS) Luar Biasa tanggal 20 September 2018 jumlah anggota Dewan Komisaris Bank adalah 4 (empat) orang, sedangkan jumlah anggota Direksi Bank adalah 6 (enam) orang.
- Kantor Akuntan Publik (KAP) telah memenuhi aspek legalitas serta standar profesional akuntan publik untuk melakukan audit laporan keuangan Bank/Perseroan.
- Bank terus menyusun dan merevisi atas Kebijakan dan Standar Operasional Prosedur sesuai kebutuhan Bank yang dapat mudah diakses oleh seluruh pegawai melalui sarana/media komunikasi email maupun aplikasi internal Bank yang tersedia, antara lain: Kebijakan dan Prosedur Perkreditan, Kebijakan dan Prosedur Bidang Human Capital, Kebijakan dan Prosedur Kepatuhan Bank, dan lain sebagainya.
- Teknologi Sistem Informasi cukup memadai untuk mengakomodir kebutuhan/proses bisnis Bank maupun sistem informasi manajemen dan pelaporan yang akurat dan tepat waktu (meminimalisir penggunaan data manual) dengan implementasi *New Core Banking System (Finacle)*.
- Untuk memonitor dan mengimplementasikan pemberian penghargaan (*reward*) untuk unit kerja/PIC yang telah bekerja secara luar biasa/berprestasi dan sanksi (*punishment*) kepada karyawan yang tidak hanya terbatas atas hasil pemeriksaan/temuan *Internal Control* oleh SKAI, Anti Fraud Department, dan Quality Assurance (QA) di bawah Risk Management Division, maka PT Bank JTrust Indonesia Tbk telah membentuk Komite *Reward & Punishment* berdasarkan Memo Persetujuan Direksi No.21.01/MEMO/SKMR/IX/2018 tanggal 21 September 2018 yang menggantikan Komite Internal Control yang ada sebelumnya.
- Bank telah melakukan evaluasi dan perubahan struktur organisasi Kantor Pusat dalam rangka penerapan prinsip-prinsip tata kelola yang baik yang disesuaikan/dikiniakan dengan rencana, perkembangan dan kebutuhan bisnis Bank ke depan serta ketentuan eksternal yang berlaku. Telah ditetapkan dengan SK Direksi No. 24.04/S.Kep-DIR-HCD/JTRUST/X/2018 tanggal 24 Oktober 2018 yang berlaku efektif tanggal 01 November 2018.

Based on the Regulation of Financial Services Authority No. 55/POJK.03/2016 and Circular Letter of Financial Services Authority No. 13/SEOJK.03/2017 on the Implementation of Good Corporate Governance for Commercial Banks, the Bank has conducted Self Assessment of Banking Governance Implementation with the following results:

A. Strengths of Banking Governance Implementation

1. **Governance Structure:**

Governance structure is the structure of authority as well as prevailing laws and regulations.

Implementation of governance structure is, among others, as follows:

- The number, integrity and competency of members of the Board of Directors, Board of Commissioners and Committees under the Board of Commissioners have met the applicable regulations. Based on the results of the Extraordinary General Meeting of Shareholders (GMS) dated September 20, 2018, the number of members of the Bank's Board of Commissioners is 4 (four), while the number of members of the Board of Directors of the Bank is 6 (six).
- Public Accounting Firm/KAP has met the legal requirements and professional standards of public accountant to audit the financial statements of the Company.
- The Bank continues to draft and revise Procedure Operational Policies and Standards in accordance with the Bank's needs, accessible to all employees through e-mail communication facilities and other internal Bank applications, including: Credit Policies and Procedures, Human Capital Policies and Procedures, Bank Compliance Policies and Procedure, etc.
- Information System Technology is sufficient to accommodate the needs/business processes of the Bank as well as accurate and timely management and reporting information systems (minimizing the use of manual data) with the implementation of New Core Banking System (Finacle).
- To monitor and implement rewards for work units/PICs that have extraordinary/high achieving works and sanctions (punishment) to employees that are not only limited to the results of Internal Control examinations/findings by SKAI, Anti Fraud Department, and Quality Assurance (QA) under the Risk Management Division, PT Bank JTrust Indonesia Tbk has established a Reward & Punishment Committee based on the Memo of Directors' Approval No.21.01/MEMO/SKMR/IX/2018 dated 21 September 2018 which replaces the previous Internal Control Committee.
- The Bank has evaluated and changed the organizational structure of the Headquarters in order to implement good governance principles that are adjusted/updated with the Bank's plans, developments and business needs in the future as well as applicable external provisions. It has been determined by the Directors Decree No. 24.04/S.Kep-DIR-HCD/JTRUST/X/2018 dated October 24, 2018 which was effective on November 1, 2018.

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2. Governance Process adalah pengaturan mengenai tugas, wewenang dan tanggung jawab unit dan pejabat bank dalam menjalankan bisnis dan operasional perbankan.

Implementasi *governance process* dapat disampaikan beberapa hal sebagai berikut:

- Dewan Komisaris dan Direksi serta Komite-Komite di bawahnya telah menjalankan tugas, fungsi dan tanggung jawabnya, antara lain:
 - Dewan Komisaris melakukan pengawasan/ memberikan saran dan arahan kepada Direksi, memantau dan mengevaluasi pelaksanaan kebijakan strategis, mengingatkan Direksi untuk menindaklanjuti semua temuan audit internal dan eksternal, serta tidak terlibat dalam pengambilan keputusan yang berkaitan dengan kegiatan operasional.
 - Komite-Komite di bawah Dewan Komisaris dan di bawah Direksi melaksanakan tugas dan tanggung jawab yang memadai.
 - Dewan Komisaris dan Direksi tidak pernah masuk dalam ranah Benturan Kepentingan, serta tidak merangkap jabatan baik sebagai anggota Dewan Komisaris, Direksi, ataupun sebagai Pejabat Eksekutif pada bank, perusahaan dan/atau lembaga lain.
- Dalam rangka melaksanakan prinsip-prinsip dasar Tata Kelola yang baik, telah dibentuk dan diangkat Komite-Komite di bawah Direksi antara lain: Komite Manajemen Risiko, Komite Pengarah Teknologi Informasi, Komite Asset & Liability (ALCO), Komite *Human Capital*, Komite Produk & Aktivitas Baru (PAB), Komite *Reward & Punishment* yang menggantikan Komite *Internal Control*, Komite Kredit, dan Komite Kebijakan Perkreditan.
- Satuan Kerja Manajemen Risiko dan Satuan Kerja Kepatuhan sebagai lini pertahanan kedua (*second line of defence*), serta SKAI/Internal Audit sebagai lini pertahanan ketiga (*third line of defence*) telah bekerja secara independen dan berpedoman pada ketentuan yang berlaku, yang dalam pelaksanaannya berkoordinasi melalui forum yang telah dibentuk yaitu "*Governance, Risk, & Compliance (GRC)*".
- Satuan Kerja *Quality Assurance (QA)* Department di bawah Risk Management Division secara berkesinambungan meningkatkan kualitas *internal control* di seluruh kantor cabang dan memastikan kesesuaian transaksi operasional serta memberikan rekomendasi perbaikan sesuai dengan kebijakan dan SOP yang berlaku.
- Bank berupaya menurunkan tingkat pelanggaran menjadi lebih baik dan menghindari pelanggaran dalam upaya membangun Budaya Kepatuhan, serta kegiatan operasional bank berjalan secara independen sesuai ketentuan yang berlaku tanpa intervensi dari Pemegang Saham (*shareholder*) atau para pemangku kepentingan (*stakeholder*) lainnya.
- Penunjukan Kantor Akuntan Publik sesuai prosedur yang berlaku, melaksanakan tugasnya secara independen dan proses transparansi Laporan Keuangan Publikasi senantiasa dilakukan dan disajikan dengan baik.
- Secara berkesinambungan Bank melaksanakan peningkatan kompetensi dan kualitas SDM melalui *Training*, Seminar, *Workshop*, uji kompetensi/sertifikasi manajemen risiko (berkelanjutan) dan uji kompetensi/sertifikasi kepatuhan Bank, *service quality awareness*, revitalisasi program *corporate culture engagement*, dan implementasi *Performance Management System* menilai KPI karyawan.

2. Governance Process:

Governance Process is the arrangement of task, authority and responsibility of units and bank officials in running business and banking operations.

The implementation of governance process can be presented here:

- The Board of Commissioners, the Board of Directors and the Committees under the Boards have performed their duties, functions and responsibilities, including:
 - The Board of Commissioners has supervised and provided advice and directives to the Board of Directors, monitored and evaluated the implementation of strategic policies, reminded the Directors to follow up on all internal and external audit findings, and not to engage in any operational decision-making.
 - Committees under the Board of Commissioners and under the Board of Directors have performed their duties and responsibilities to the maximum.
 - The Board of Commissioners and the Board of Directors have never been involved in any Conflict of Interest, nor does it hold concurrent positions as a member of the Board of Commissioners, Board of Directors, or as an Executive Officer at other banks, companies and/or institutions.
- To implement the basic principles of Good Governance, committees under the Board of Directors are formed and appointed, comprising: Risk Management Committee, Information Technology Steering Committee, ALCO Committee, Human Capital Committee, New Products & Activity Committee (PAB), Reward & Punishment Committee which replaced Internal Control Committee, Credit Committee and Credit Policy Committee.
- The Risk Management Unit and the Compliance Unit, as the second line of defence, as well as the Internal Audit Unit, as the third line of defence, have worked independently and guided by the prevailing regulations in coordination with the established forum such as "*Governance, Risk, and Compliance (GRC)*".
- Quality Assurance Unit (QA) Department under the Risk Management Division continuously improves the quality of internal control in all branch offices and ensures the suitability of operational transactions and provides recommendations for improvements in accordance with applicable policies and SOPs.
- The Bank seeks to reduce the level of violations and avoid violations to foster a Culture of Compliance, as well as independent bank operation in accordance with the applicable provisions devoid of any intervention by the Shareholders or other Stakeholders.
- The appointment of the Public Accounting Firm must be in accordance with the applicable procedures and able to perform its duties independently and to produce well- presented Transparent Financial Report.
- The Bank continues to improve competency and quality of Human Resources through Training, Seminars, Workshops, competency testing/risk management certification (ongoing) and competency testing/certification of Bank compliance, service quality awareness, revitalization of corporate culture engagement programs, and implementation of Performance Management System Employee KPI.

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| <ul style="list-style-type: none"> • Penerapan manajemen risiko, proses penyediaan dana kepada pihak terkait (<i>related party</i>) dan penyediaan dana besar (<i>large exposure</i>), serta pengambilan keputusannya dijalankan sesuai kebijakan dan prosedur yang berlaku. • Kebijakan dan SOP <i>Business Continuity Plan</i> (BCP) dan <i>Disaster Recovery Plan</i> (DRP) telah tersedia, serta dilengkapi pula prosedur alternatif pada masing-masing SOP di setiap unit kerja, serta telah dibentuk tim yang melibatkan personil dari masing-masing unit kerja. • Implementasi <i>Compliance Report Monitoring</i> (CRM) kepada seluruh unit Kerja pelaksana pelaporan sebagai upaya meminimalkan sanksi dan denda atas keterlambatan kewajiban pelaporan kepada pihak Regulator (Otoritas Jasa Keuangan/Bank Indonesia). • Satuan Kerja Kepatuhan melakukan <i>gap analysis</i> antara ketentuan Otoritas Jasa Keuangan/Bank Indonesia dan peraturan perundang-undangan yang berlaku dengan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dalam rangka mengidentifikasi adanya dampak terhadap aktivitas operasional Bank dan ketidaksesuaian ketentuan yang dimaksud dapat ditindaklanjuti sebagai pengkinian dan penyempurnaannya oleh unit kerja yang terkait. • Dewan Komisaris dan Direksi melakukan pengawasan dan memastikan terlaksananya penerapan Anti Pencucian Uang Dan Pencegahan Pendanaan Terorisme (APU dan PPT), antara lain dengan mendukung dilakukannya <i>enhance</i> terhadap sistem <i>Smart AML</i> yang telah dimiliki oleh J Trust Bank sehingga dapat berfungsi lebih efektif dan optimal. • Penerapan <i>four-eyes principle</i> dalam proses pemberian kredit, dengan adanya 2 unit yaitu Divisi Bisnis mengajukan usulan <i>proposal</i> kredit, Divisi <i>Credit Risk Reviewer</i> (CRRD) melakukan <i>review proposal</i> dan memutus kredit (mempunyai hak veto atau menolak usulan kredit). • Bank melakukan <i>Risk Control Self Assessment</i> (RCSA) sebagai upaya pengukuran risiko operasional dan risiko lainnya dalam bentuk kuantifikasi atas risiko-risiko yang telah teridentifikasi guna mengetahui potensi kerugian yang dapat ditimbulkan. • Bank telah memiliki <i>Whistle Blowing System</i> (WBS) sebagai salah satu bentuk penerapan strategi <i>anti fraud</i>, dengan sarana pelaporan yang independen dan rahasia melalui media <i>email/portal website</i>, <i>Hotline SMS/WhatsApp</i> dan Kotak Pos. Bank akan melindungi kerahasiaan identitas Pelapor yang beritikad baik, laporan, maupun segala data lain yang terkait dengan laporan yang masuk melalui WBS. • Menilai dan meningkatkan penerapan APU dan PPT sebagai berikut: <ul style="list-style-type: none"> - Pembenahan data <i>mandatory</i> pada <i>core banking system</i>, berkoordinasi dengan Information Technology Division. - Optimalisasi penggunaan sistem <i>Smart AML</i> oleh Cabang, dengan cara melakukan <i>monitoring</i> yang kontinyu setiap bulan kepada seluruh cabang. - <i>Monitoring</i> secara bulanan atas kelengkapan data <i>mandatory</i> terhadap pembukaan <i>Customer Identification Field</i> (CIF) baru. | <ul style="list-style-type: none"> • Implementation of risk management, procedures for provision of funds to related parties and the provision of large funds (<i>large exposure</i>), and decision-making is executed in accordance with applicable policies and regulations. • The Policy and SOP of the Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) are on hand, as well as alternative procedures for each SOP in each work unit, and a Team has been established involving personnel from each work unit. • Implementation of Compliance Report Monitoring (CRM) to all reporting working units in an effort to minimize sanctions and penalties for delay in reporting obligation to the regulator (OJK/BI). • The Compliance Unit conducts a gap analysis between the provisions of the Financial Services Authority/Bank Indonesia and applicable laws and regulations with policies, provisions, systems and procedures that are owned by the Bank in order to identify the impact on the Bank's operational activities and follow up on the provisions in question as an update and improvement by the relevant work unit. • The Board of Commissioners and the Board of Directors supervise and ensure the implementation of Anti Money Laundering and Terrorism Financing Prevention (APU and PPT) by supporting the enhancement of the Smart AML system already owned by J Trust Bank so that it can function more effectively and optimally. • The application of four-eyes principle in the provision of credit disbursement, with 2 units, Business Division unit that submits credit proposal, then the Credit Risk Reviewer Division (CRRD) to review the proposal and decide on the credit (have the right to veto to approve or reject the credit proposal). • The Bank conducts Risk Control Self Assessment (RCSA) to self assess its operational risks and other risks to quantify identified risks and to verify any potential losses. • The Bank has a Whistle Blowing System (WBS) as a form of anti fraud strategy enforcement, with independent and secret reporting tools through email/portal media, Hotline SMS/WhatsApp and Postbox. The Bank protects whistle blower's identity, and safeguards the confidentiality of report, or any other data received through WBS. • Assess and improve the application of APU and PPT as follows: <ul style="list-style-type: none"> - Tidying up mandatory data on core banking system and coordinating with Information Technology Division. - Optimizing the use of Smart AML system by Branched, through continuous monthly monitoring on all branches. - Monthly monitoring of mandatory data comprehensiveness of new opening of Customer Identification Field (CIF). |
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3. Governance Outcome adalah hasil dari penerapan Tata Kelola yang baik dari aspek hasil kinerja maupun cara-cara/praktik-praktik yang digunakan untuk mencapai hasil kinerja tersebut.

Implementasi *governance outcome* dapat disampaikan beberapa hal sebagai berikut:

- Dewan Komisaris memberikan arahan/nasehat kepada Direksi dan melaksanakan pengawasan terhadap operasional bank.
- Di akhir bulan Desember 2018 Bank telah melakukan strategi penjualan kredit bermasalah ke PT. JTrust Investment Indonesia sebesar Rp1.047 miliar sehingga diperoleh penurunan angka rasio *NPL Gross* dan *NPL Nett* masing-masing sebesar 4.26% dan 3.12%.
- Hasil usaha dan kinerja keuangan posisi Desember 2018 adalah rasio *NPL Gross* sebesar 4,26% dan *NPL Nett* sebesar 3.12%, *CAR* sebesar 14,03% (di atas dari ketentuan *CAR* profil risiko minimum 11%) dan penilaian Laporan *Risk Profile* posisi Desember 2018 adalah peringkat 3 (*Moderate*) dengan risiko inheren adalah *Moderate*, dan Kualitas Penerapan Manajemen Risiko adalah *Fair*.
- Dewan Komisaris melakukan pengawasan dan memberikan rekomendasi serta saran kepada Direksi dalam upaya meningkatkan kinerja dan *values* bank dengan tetap memperhatikan prinsip kehati-hatian, melalui Rapat Direksi dan Komisaris (Radirkom dan Rapat *Review* Putusan Rapat Komite Kredit), Rapat Komite di bawah Dewan Komisaris dan melalui surat kepada Manajemen.
- Komite-komite memberikan rekomendasi maupun saran kepada Dewan Komisaris terkait permasalahan pengendalian interen, manajemen risiko dan lainnya yang bermanfaat.
- Secara umum temuan Satuan Kerja Audit Interen (SKAI) maupun auditor eksternal (OJK/BI) telah dibuatkan Daftar Monitoring Tindak Lanjut (DMTL) kepada Divisi/unit kerja maupun Kantor Cabang/Capem/Kas yang terkait dan ditindaklanjuti perkembangan penyelesaiannya.
- Laporan Kepatuhan, Laporan TKB secara semesteran disampaikan kepada Regulator dengan cakupan sesuai ketentuan yang berlaku, dan Laporan Profil Risiko secara triwulanan telah disampaikan kepada pihak Regulator sesuai ketentuan yang berlaku, sedangkan kajian profil risiko bulanan secara internal dilakukan Satuan Kerja Manajemen Risiko (SKMR) dan dilaporkan ke Direksi, disampaikan pula ke Komisaris dan dilakukan pembahasan pada rapat Komite Pemantau Risiko (KPR).
- Upaya pemenuhan kuantitas dan kualitas/kompetensi SDM, serta tahapan pemenuhan kebijakan dan SOP serta sistem dan infrastruktur pendukung, berimbang terhadap berjalannya kegiatan operasional dan bisnis yang memadai sesuai ketentuan, yang dijalankan berdasarkan prinsip kehati-hatian.
- Penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large exposure*) telah dilakukan dengan berpedoman pada ketentuan BMPK, dimana pemberian kredit senantiasa memperhitungkan kemampuan permodalan bank.
- Informasi produk dan jasa serta informasi lainnya antara lain Suku Bunga Dasar Kredit (SBDK), Pengumuman Suku Bunga Penjaminan Lembaga Penjamin Simpanan (LPS) telah disampaikan kepada nasabah secara transparan.

3. Governance Outcome:

Governance Outcome is the result of the implementation of Good Governance in terms of performance outcomes as well as the methods/practices adopted to achieve such performance outcome.

Implementation of governance outcome can be presented as follows:

- The Board of Commissioners gives guidance/advice to the Board of Directors and performs supervision on bank operations.
- At the end of December 2018 the Bank conducted bad asset sales strategy to PT. JTrust Investment Indonesia of Rp1,047 billion to receive a reduction of Gross NPL and Nett NPL ratios at 4.26% and 3.12%, respectively.
- Results and financial performance per December 2018 are Gross NPL ratio of 4.26% and Nett NPL of 3.12%, CAR of 14.03% (above the minimum risk profile CAR at 11%) and the Risk Profile Report per December 2018 is 3 (Moderate) with inherent risk of Moderate, and Risk Management Implementation Quality as Fair.
- The Board of Commissioners oversees and provides recommendations and advice to the Board of Directors in an effort to improve bank performance and values with due observance of prudential principles through the Board of Directors and Commissioners Meeting (Radirkom and Review of RKK Decisions), Committee Meetings under the Board of Commissioners and by letter to Management.
- Committees give recommendation and advice to the Board of Commissioners on internal control issues, risk management, and other beneficial issues.
- In general the findings of the Internal Audit Work Unit (SKAI) and the external auditor (OJK/BI) have made into a Follow-Up Monitoring List (DMTL) for the Division/work unit and Branch/Sub-Branch/Cash Office that are related and followed up in the progress of the settlement.
- Compliance Report, semi-annual TKB Report are submitted quarterly to the Regulator in a coverage based on the applicable provisions, and the Risk Profile Report is quarterly submitted to the Regulator in accordance with applicable provisions, while monthly risk profile review is performed internally by the Risk Management Unit (SKMR) and reported to the Board of Directors, also submitted to the Board of Commissioners and discussed at the Risk Monitoring Committee (KPR) meeting.
- The efforts to meet the quantity and quality/competence of human resources, as well as the phases to comply with policies and SOPs and supporting systems and infrastructure, have made impact on the adequate performance of operational and business activities in accordance with the provisions, which are performed on the basis of prudential principles.
- Provision of funds to related parties and large exposure has been made in accordance with the LLL provisions, whereby lending always takes into account the capital adequacy of banks.
- Product and service information as well as other information including SBDK, Announcement of LPS Guarantee Interest Rate has been submitted to the customer in a transparent manner.

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- Bank telah melaksanakan ketentuan terkait Pengelolaan Pengaduan Nasabah dan Pelaporannya kepada pihak Regulator.
- Penerapan APU dan PPT didukung sistem *Smart AML* yang terus dikembangkan agar semakin terintegrasi dengan *Core Banking System* untuk keperluan proses pemantauan transaksi, kelengkapan informasi profil nasabah (*CIF*), pengukuran profil nasabah berdasarkan risiko, serta Pelaporan kepada regulator sesuai dengan ketentuan dan perundang-undangan yang berlaku.

- The Bank has implemented provisions related to Customer Complaint Management and Reporting to the Regulator.
- APU and PPT implementation is supported by SMART AML system which is continuously developed to be more integrated with Core Banking System for transaction monitoring process, customer profile information (CIF), customer profile measurement based on risk, and Reporting to regulator in accordance with prevailing provisions and regulations.

B. Kelemahan Penerapan Tata Kelola Bank

1. Governance Structure:

- Penunjukan anggota Direksi dan anggota Dewan Komisaris yang baru dari hasil keputusan RUPS Luar Biasa tanggal 20 September 2018 masih terdapat 1 (satu) anggota Direksi dan 1 (satu) anggota Dewan Komisaris yang dalam proses *Fit and Proper Test* oleh OJK.
- Efektif sejak 1 Januari 2019 terdapat kekosongan komposisi jabatan 2 Direktur perseroan berdasarkan Surat Keputusan Sirkuler Dewan Komisaris sebagai pengganti Rapat Dewan Komisaris yang telah menyetujui memberhentikan sementara Bapak Ritsuo Ando dan Bapak Haryanto Budi Purnomo.
- Infrastruktur dan SDM di bidang bisnis dan *supporting* (*Credit Risk Reviewer*, SKMR, dan SKAI) perlu dipersiapkan dengan baik untuk meningkatkan kinerja usaha Bank sehingga proses pemberian kredit dapat dilaksanakan secara *prudent* dan meminimalkan terjadinya kredit bermasalah.
- Dalam mendukung fungsionalitas sistem *Smart AML* dalam penerapan APU dan PPT, kualitas dan kelengkapan data pada sistem *New Core Banking (Finacle)* telah disesuaikan, namun masih tetap diperlukan *review* secara berkesinambungan.

2. Governance Process:

- Secara berkesinambungan Divisi IT perlu melakukan penilaian/*review* menyeluruh atas perkembangan implementasi *New Core Banking System (Finacle)* serta tindak lanjut perbaikan atas kendala/problem implementasi *New Core Banking System (Finacle)* bekerjasama dengan *Vendor* (Infosys) dan Divisi terkait. Dalam tahapan proses *Post Implementation review core banking system* saat ini sedang dilakukan *review* oleh audit independen.
- Belum optimalnya pengendalian risiko kredit antara lain monitoring kredit dan mitigasi risiko kredit terutama kredit kualitas rendah (kolektibilitas 2, 3 dan 5 serta kredit lancar restrukturisasi). Oleh karena itu Bank terus meningkatkan efektivitas fungsi dari *Tim Task Force Loan Monitoring* (Kredit Kualitas Rendah), *Special Asset Management (SAM)*, dan *Credit Risk Reviewer Division* (penerapan *four eyes principle*) dengan meningkatkan kompetensi SDM, meningkatkan disiplin proses dan monitoring hasil dari rencana yang telah ditetapkan.

B. Weakness in Banking Governance Implementation

1. Governance Structure:

- Appointment of new members of the Board of Directors and members of the Board of Commissioners from the resolutions of the Extraordinary GMS on September 20, 2018, there are still 1 (one) member of the Board of Directors and 1 (one) member of the Board of Commissioners in the OJK Fit and Proper Test process.
- As of January 1, 2019 there were vacancies in the position of 2 Directors of the company based on the Circular Decree of the Board of Commissioners as a substitute for the Board of Commissioners Meeting which had agreed to dismiss Mr. Ritsuo Ando and Mr. Haryanto Budi Purnomo.
- Infrastructure and HR in the business and supporting fields (*Credit Risk Reviewers*, SKMR, and SKAI) need to be well prepared to improve the Bank's business performance so that the lending process can be carried out prudently and minimize the occurrence of non-performing loans.
- In supporting the Smart AML system functionality in implementing APU and PPT, the quality and completeness of data on the New Core Banking (*Finacle*) system has been adjusted, but continuous review is still needed.

2. Governance Process:

- The IT Division continuously needs to carry out a comprehensive assessment/*review* of the development of the implementation of the New Core Banking System (*Finacle*) and follow-up improvements to the problems/issues on the implementation of the New Core Banking System (*Finacle*) in collaboration with the Vendors (Infosys) and related Divisions. In the Post Implementation review process the core banking system is currently being reviewed by an independent audit.
- The lack of optimal control of credit risk includes credit monitoring and credit risk mitigation, especially low quality loans (collectibility 2, 3 and 5 and current restructuring loans). Therefore, the Bank continues to improve the effectiveness of the functions of the Task Force Loan Monitoring Team (Low Quality Credit), Special Asset Management (SAM), and Credit Risk Reviewer Division (implementation of the four eyes principle) by improving HR competencies, improving process discipline and monitoring results from predetermined plan.

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| <ul style="list-style-type: none"> • Masih belum optimalnya proses analisa kredit termasuk <i>monitoring</i> kredit serta pemenuhan kelengkapan data, dimana masih terdapat beberapa hal yang tidak dicantumkan/diinformasikan antara lain: <ul style="list-style-type: none"> - Belum dipenuhi Regulasi Eksternal, antara lain: penggunaan Data BMPK tidak terkini, Tanggal <i>BI Checking</i>/Tanggal Surat Permohonan Kredit/Surat Permohonan Kredit tidak dicantumkan dalam NAK, Laporan Keuangan <i>Unaudited</i>, Kelengkapan dokumen yang diwajibkan dalam NAK, tidak diinformasikan <i>BI Checking</i>, tanggal <i>BI Checking</i> terlalu lama; <i>BI Checking</i> pengurus, pemegang saham terdapat kol 2 dan kol 5; agar diperhatikan perhitungan data BMPK pihak terkait. - Belum dipenuhi secara optimal <i>Internal Policy</i>, antara lain: Penetapan Provisi, suku bunga, dan BAK tidak sesuai <i>counter rate</i>; Rasio CCR tidak sesuai dengan ketentuan; Tidak dicantumkan dalam NAK antara lain: penilaian agunan dan tanggal penilaian agunan, Nilai Hak Tanggungan Eksisting, Nomor dan tanggal polis asuransi, asuradur atas agunan, nilai dan jangka waktu pertanggungan; Belum dilakukan penilaian agunan untuk kredit <i>take over</i>; Aktivitas rekening Koran tidak mencantumkan jangka waktu; Agar Bisnis Unit melakukan <i>Customer Profitability Analysis</i> dalam memproses usulan perpanjangan kredit; Agar dapat dipastikan tersedianya informasi mengenai: sumber masalah debitur untuk dilakukan restruktur kredit, dan analisa secara komprehensif atas kemampuan membayar terkini debitur, serta prospek usaha debitur. - Belum dipenuhi aspek keuangan, antara lain: agar memperhatikan profil risiko sesuai informasi & data keuangan khusus dengan <i>Risk Rating "High"</i> dan mempersiapkan mitigasi risikonya berupa: <i>EBITDA</i>: di bawah proyeksi (dengan persentase lebih kecil dari proyeksi), Laba Perusahaan (Profitabilitas): di bawah proyeksi (dengan persentase lebih kecil dari proyeksi); Rasio <i>NPF</i> tidak dicantumkan dalam NAK; Analisa Kebutuhan Modal Kerja: Penentuan proyeksi penjualan agar menggunakan sumber data yang sama sebagaimana tertuang dalam "Tabel Rencana Penjualan" dalam rangka akurasi data yang digunakan; Tersedianya syarat kredit bahwa aset yang di-<i>refinance</i> (peremajaan mesin dan peralatan) agar tercermin pada laporan keuangan calon debitur tahun 2018; Laporan Keuangan tercantum penjualan tahun 2017 menurun dibandingkan tahun 2016; Laporan Keuangan tercantum tahun 2017 perusahaan merugi. - Belum dipenuhi aspek legalitas, antara lain: Legalitas usaha yang diberikan tidak dicantumkan dalam NAK, atau tidak lengkap, atau sudah jatuh tempo pada saat kredit diajukan; - Belum dipenuhi aspek <i>KYC</i>, yaitu pada <i>internet checking</i> agar diperhatikan adanya berita negatif terkait dengan calon debitur. | <ul style="list-style-type: none"> • Credit analysis process is still not optimal, including credit monitoring and fulfillment of data, where there are still a number of things that are not included/notified including: <ul style="list-style-type: none"> - Unfulfilled External Regulations, including: the use of non-current LLL Data, BI Checking Date of Credit Application/Credit Application Letter not included in the NAK, Unaudited Financial Report, Completeness of documents required in the NAK, BI Checking not informed, BI date Checking too long; BI Checking management, shareholders have col 2 and col 5; so that the calculation of related parties' LLL data is considered. - Not optimally fulfilled Internal Policy, among others: Determination of Provisions, interest rates, and BAK does not match the counter rate; The CCR ratio is not in accordance with the provisions; Not included in the NAK including: collateral assessment and date of valuation of collateral, Value of Existing Mortgage Rights, Number and date of insurance policy, insurance on collateral, value and duration of insurance; Collateral valuation has not been conducted for take over credit; The activity of the current account does not include a period of time; So that the Business Unit conducts Customer Profitability Analysis in processing the proposed credit extension; In order to ensure the availability of information about: the source of the debtor's problem to do credit restructuring, and a comprehensive analysis of the debtor's current repayment ability, as well as the debtor's business prospects. - Financial aspects have not been met, among others: to pay attention to risk profiles according to specific financial information & data with "High" Risk Rating and preparing mitigation risks in the form of: <i>EBITDA</i>: below projections (with a smaller percentage than projections), Company Profit (Profitability): below projections (with a smaller percentage of projections); The <i>NPF</i> ratio is not included in the NAK; Working Capital Needs Analysis: Determination of sales projections in order to use the same data source as contained in the "Sales Plan Table" in the context of the accuracy of the data used; Availability of credit terms that refinance assets (rejuvenation of machinery and equipment) to be reflected in the financial statements of prospective debtors in 2018; The financial statements listed for 2017 sales declined compared to 2016; The financial statements listed in 2017 showed the company suffered losses. - The legality aspect has not been fulfilled, among others: The legality of the business provided is not included in the NAK, or is incomplete, or is due when the credit is submitted; - Not yet fulfilled <i>KYC</i> aspects, namely on the internet checking so that there is negative news related to prospective debtors. |
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Analysis | Analysis

- Diperhatikan pemenuhan Bank kepada pihak pengawas (OJK) agar manajemen risiko dalam proses pemberian kredit memadai dan memperhatikan memperhatikan prinsip kehati-hatian antara lain: Analisa fasilitas debitur agar mencakup terkait sumber dana untuk pelunasan fasilitas jangka pendek; *Underlying* penarikan dana agar berdasarkan *underlying* sumber dana jangka pendek; Analisa dan/atau identifikasi terkait proses bisnis debitur berupa kecukupan mitigasi risiko pemberian kredit dari debitur kepada *end user*, kecukupan proses *collection*, kecukupan proses administrasi agunan/BPKB; Dilakukan verifikasi kelayakan *list* piutang yang menjadi *underlying* penarikan fasilitas debitur antara lain pelaksanaan *sampling* atas piutang debitur; Terdapat pelaksanaan *monitoring* atas kesesuaian penggunaan dana.

3. Governance Outcome:

- Kinerja keuangan belum seluruhnya mencapai target RBB 2018 yang ditetapkan sehingga Bank masih belum berkesinambungan menunjukkan kinerja usaha yang membaik dengan membukukan Posisi Rugi Tahun Berjalan 2018 sebesar Rp401,1 miliar dibandingkan per 31 Desember 2017 yang membukukan Posisi Laba sebesar Rp121,5 miliar.
- Masih terdapat Pelampauan BMPK debitur yang penyelesaiannya terus diupayakan oleh top manajemen dengan setiap bulan menyampaikan Laporan Pelaksanaan *Action Plan* Pelampauan BMPK kepada Otoritas Jasa Keuangan.
- Secara umum internalisasi Budaya Kepatuhan dan *risk awareness* setiap karyawan perlu ditingkatkan untuk menghindari potensi pelanggaran dan/atau kejadian pelanggaran berulang.
- Masih terdapat sanksi peringatan/teguran, administrasi dan denda kewajiban membayar terhadap proses dan penyampaian Laporan Rutin Bank kepada Regulator (Otoritas Jasa Keuangan/Bank Indonesia).
- Bank telah menindaklanjuti atas temuan hasil pemeriksaan OJK, dan hasil pemeriksaan audit internal/SKAI. Berdasarkan Daftar *Monitoring Tindak Lanjut* (DMTL) sampai dengan Semester II/2018 masih terdapat sisa temuan hasil pemeriksaan yang belum diselesaikan sebagai berikut:

- Paying attention to the fulfillment of the Bank to the supervisory party (OJK) so that risk management in the credit disbursement process is adequate and paying attention to the prudential principle, among others: Analysis of debtor facilities to include related sources of funds for repayment of short-term facilities; Underlying funds withdrawals based on short-term underlying sources of funds; Analysis and/or identification related to the debtor's business process in the form of adequacy of credit risk mitigation from the debtors to the end users, the adequacy of the collection process, the adequacy of collateral/BPKB administrative processes; Verification of the feasibility of the list of accounts receivable which is the underlying drawdown of debtor facilities, among others, the implementation of sampling of debtor receivables; There is a monitoring implementation of the suitability of the use of funds.

3. Governance Outcome:

- Financial performance has yet to all reach the 2018 RBB target set so that the Bank still does not continue to show improved business performance by posting a Loss of Current Year 2018 of Rp401.1 billion compared to 31 December 2017 which posted a Profit Position of Rp121.5 billion.
- There is still an excess of LLL of debtors whose solution continues to be sought by top management with each month submitting the LLL Excess Action Plan Report to the Financial Services Authority.
- In general, internalization of Culture Compliance and risk awareness of each employee needs to be improved to avoid potential violations and/or recurring violations.
- There are still sanctions for warning/reprimand, administration and penalties for paying the process and submission of Bank Routine Reports to Regulators (Financial Services Authority/Bank Indonesia)..
- The Bank has followed up on the findings of the OJK audit, and the results of the internal audit/SKAI. Based on the Follow-Up Monitoring List (DMTL) until Semester II/2018 there are still remaining findings of the audit results that have not been resolved as follows::

No	DMTL	Penyelesaian Temuan Semester II/2018 Resolutions of Findings Semester II/2018
I.	<p>Temuan Hasil Pemeriksaan OJK:</p> <ul style="list-style-type: none"> - Pemeriksaan pada Kantor Pusat Posisi 30 April 2016 - Pemeriksaan pada Kantor Pusat Posisi 31 Januari 2017 - Pemeriksaan pada Kantor Pusat Posisi 30 November 2017 - Pemeriksaan pada Kantor Pusat Bidang Kredit Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Batam Bidang Kredit Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Palembang Bidang Kredit Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Solo Bidang Kredit Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Makassar Bidang Kredit Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Samarinda Bidang Operasional Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Balikpapan Bidang Operasional Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Cabang Pangkalpinang Bidang Operasional Posisi 31 Januari 2018 - Pemeriksaan pada Kantor Pusat Bidang IT Posisi 31 Januari 2018 <p>OJK Audit Result Findings:</p> <ul style="list-style-type: none"> - Audit on Headquarters 30 April 2016 - Audit on Headquarters 31 January 2017 - Audit on Headquarters 30 November 2017 - Audit on Headquarters in Credit 31 January 2018 - Audit on Batam Branch in Credit 31 January 2018 - Audit on Palembang Branch in Credit 31 January 2018 - Audit on Solo Branch in Credit 31 January 2018 - Audit on Makassar Branch in Credit 31 January 2018 - Audit on Samarinda Branch in Operations 31 January 2018 - Audit on Balikpapan Branch in Operations 31 January 2018 - Audit on Pangkalpinang Branch in Operations 31 January 2018 - Audit on Headquarters in IT 31 January 2018 	<p>100% (86 dari 86 temuan) 85% (44 dari 52 temuan) 95% (86 dari 91 temuan) 38% (25 dari 65 temuan) 30% (6 dari 20 temuan) 52% (12 dari 23 temuan) 33% (6 dari 18 temuan) 46% (12 dari 26 temuan) 83% (38 dari 46 temuan) 71% (22 dari 31 temuan) 86% (60 dari 70 temuan) 16% (3 dari 19 temuan)</p> <p>100% (86 of 86 findings) 85% (44 of 52 findings) 95% (86 of 91 findings) 38% (25 of 65 findings) 30% (6 of 20 findings) 52% (12 of 23 findings) 33% (6 of 18 findings) 46% (12 of 26 findings) 83% (38 of 46 findings) 71% (22 of 31 findings) 86% (60 of 70 findings) 16% (3 of 19 findings)</p>
II.	<p>Temuan Hasil Pemeriksaan Audit Internal/SKAI:</p> <ul style="list-style-type: none"> - Pemeriksaan pada Divisi/Unit Kerja Kantor Pusat tahun 2016 - Pemeriksaan pada Divisi/Unit Kerja Kantor Pusat tahun 2017 - Pemeriksaan pada Divisi/Unit Kerja Kantor Pusat tahun 2018 - Pemeriksaan pada Kantor Cabang/Capem/Kas tahun 2018 <p>Internal Audit/SKAI Result Findings:</p> <ul style="list-style-type: none"> - Audit on Division/Working Unit of Headquarters in 2016 - Audit on Division/Working Unit of Headquarters in 2017 - Audit on Division/Working Unit of Headquarters in 2018 - Audit on Branch/Capem/Cash Office in 2018 	<p>95% (19 dari 20 temuan) 58% (30 dari 52 temuan) 58% (75 dari 130 temuan) 97% (291 dari 300 temuan)</p> <p>95% (19 of 20 findings) 58% (30 of 52 findings) 58% (75 of 130 findings) 97% (291 of 300 findings)</p>

- Selama tahun 2018 terdapat 1 (satu) kasus *fraud* (penipuan) sebesar Rp267 juta yang dilakukan oleh Pegawai Tetap.

Kesimpulan

Berdasarkan analisis Kekuatan dan Kelemahan atas 11 Faktor Penerapan Tata Kelola, dan memperhatikan penilaian terhadap Kualitas Penerapan Manajemen Risiko dalam rangka Profil Risiko Bank, maka penilaian sendiri Penerapan Tata Kelola posisi Desember 2018 adalah peringkat "3 (Cukup Baik)".

- In 2018 there was 1 (one) fraud of Rp267 million performed by Permanent Employee.

Conclusion

Based on the analysis of Strengths and Weaknesses of 11 Factors of Governance Implementation Self Assessment, and considering the assessment to the Risk Management Implementation Quality in Bank's Risk Profile, then the Self Assessment of Governance Implementation per December 2018 was ranked "3 (Fairly Good)".