

LAPORAN TAHUNAN PELAKSANAAN TATA KELOLA TERINTEGRASI 2024

2024 Annual Report of
Integrated Corporate Governance
Implementation

**Konglomerasi Keuangan OCBC di Indonesia
PT Bank OCBC NISP Tbk sebagai Entitas Utama**

OCBC Financial Conglomerate in Indonesia
PT Bank OCBC NISP Tbk as Main Entity

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1 Pendahuluan

Preface

Dalam rangka menciptakan sektor keuangan yang tumbuh secara berkelanjutan dan stabil, serta memiliki daya saing yang tinggi, perlu penerapan tata kelola yang baik di sektor jasa keuangan. Adanya Lembaga Jasa Keuangan (LJK) yang memiliki hubungan kepemilikan dan/atau pengendalian di berbagai sektor jasa keuangan telah meningkatkan kompleksitas transaksi dan interaksi antar LJK dalam Konglomerasi Keuangan ("KK") sehingga diperlukan penerapan Tata Kelola yang terintegrasi.

PT Bank OCBC NISP Tbk (selanjutnya disebut "Bank" atau "OCBC") merupakan Entitas Utama ("EU") dalam KK OCBC di Indonesia dengan anggota perusahaan terelasi yaitu PT Great Eastern Life Indonesia ("GELI"), PT OCBC Sekuritas Indonesia ("PTOS"), dan PT Great Eastern General Insurance ("GEGI") yang wajib menerapkan Tata Kelola Terintegrasi secara komprehensif sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK").

Laporan tahunan pelaksanaan tata kelola terintegrasi tahun 2024 terdiri atas:

1. Laporan Penilaian Sendiri Pelaksanaan Tata Kelola Terintegrasi selama Tahun 2024.

OCBC telah menyusun dan menyampaikan kepada OJK sesuai batas waktu yang ditentukan Laporan Penilaian Sendiri (*Self-Assessment*) Pelaksanaan Tata Kelola Terintegrasi untuk periode Januari-Juni dan Juli-Desember 2024.

2. Struktur KK dan Struktur Konglomerasi yang Lebih Luas.

Hubungan OCBC dengan PTOS, GELI, dan GEGI dalam struktur KK OCBC di Indonesia.

3. Struktur Kepemilikan Saham pada KK OCBC di Indonesia.

Pihak-pihak yang menjadi pemegang saham dari LJK dalam KK OCBC di Indonesia sampai dengan pemegang saham pengendali terakhir.

4. Struktur Kepengurusan pada EU dan LJK.

Pihak-pihak yang menjadi pengurus pada OCBC, PTOS, GELI, dan GEGI dalam KK OCBC di Indonesia.

To create sustainable and stable growth, as well as having high competitiveness in financial sector, the implementation of Good Corporate Governance (GCG) is necessary. The existence of Financial Services Institutions (FSIs) with ownership and/or control relationship in various financial services sectors has increased the complexity of transactions and interactions among FSIs in the Financial Conglomerate (FC), therefore the Integrated Corporate Governance is needed.

PT Bank OCBC NISP Tbk (hereinafter referred to as "Bank" or "OCBC") is the Main Entity ("ME") of OCBC FC in Indonesia with sister companies as members namely PT Great Eastern Life Indonesia ("GELI"), PT OCBC Sekuritas Indonesia ("PTOS"), and PT Great Eastern General Insurance ("GEGI") required to implement comprehensive Integrated Governance in accordance with the Financial Services Authority Regulation ("POJK")

2024 Annual Report of Integrated Corporate Governance Implementation consists of:

1. 2024 Self-Assessment Reports on the Integrated Governance

OCBC has prepared and timely submitted to OJK the Self-Assessment Reports on the Integrated Governance Implementation for the period of January-June and July-December 2024.

2. FC Structure and Wider Conglomerate Structure.

Relationships between OCBC with PTOS, GELI, and GEGI in OCBC FC in Indonesia.

3. Share Ownership Structure in OCBC FC in Indonesia.

The shareholders of FSIs in the OCBC FC in Indonesia up to the ultimate controlling shareholders.

4. Management Structure in the ME and FSIs.

The Management of OCBC, PTOS, GELI, and GEGI in OCBC FC in Indonesia.

<p>5. Kebijakan Transaksi Intra-Grup</p> <p>Kebijakan Transaksi Intra-Grup yang memuat kebijakan untuk mengidentifikasi, mengelola, dan memitigasi transaksi intra-grup.</p>	<p>5. Intra-Group Transaction Policy</p> <p>Intra-Group Transaction Policy to identify, manage and mitigate intra-group transactions.</p>
<p>6. Laporan Tahunan Pelaksanaan Tata Kelola OCBC tahun 2024</p> <p>Laporan Tahunan Pelaksanaan Tata Kelola Terintegrasi selain memuat informasi sebagaimana dimaksud pada angka 1 sampai dengan 5 di atas, memuat pula cakupan Laporan Pelaksanaan Tata Kelola Bank sebagaimana diatur dalam ketentuan mengenai Penerapan Tata Kelola bagi Bank Umum.</p>	<p>6. Annual Report on the Implementation of OCBC's Corporate Governance Year 2024</p> <p>In addition to the information as referred to in number 1 to 5 above, the Annual Report on the Implementation of Integrated Corporate Governance also includes the scope of the implementation on the Bank's Governance Report as stipulated in the Implementation of Good Corporate Governance for Commercial Banks.</p>

2 **Laporan Penilaian Sendiri Pelaksanaan Tata Kelola Terintegrasi Tahun 2024**

2024 Integrated Governance Implementation Self Assessment Report

OCBC sebagai EU melakukan penilaian sendiri (*self-assessment*) atas penerapan Tata Kelola Terintegrasi dengan memperhatikan signifikansi dan/atau materialitas suatu permasalahan terhadap Penerapan Tata Kelola Terintegrasi pada KK dan sesuai dengan Peraturan OJK. Penilaian Penerapan Tata Kelola Terintegrasi dilakukan secara komprehensif dan terstruktur meliputi 7 (tujuh) faktor penilaian Penerapan Tata Kelola Terintegrasi, yaitu:

1. Pelaksanaan tugas dan tanggung jawab Direksi EU.
2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris EU .
3. Tugas dan tanggung jawab Komite Tata Kelola Terintegrasi (Komite TKT).
4. Tugas dan tanggung jawab Satuan Kerja Kepatuhan Terintegrasi (SKKT).
5. Tugas dan tanggung jawab Satuan Kerja Audit Intern Terintegrasi (SKAIT).
6. Penerapan Manajemen Risiko Terintegrasi.
7. Penyusunan dan pelaksanaan Pedoman Tata Kelola Terintegrasi.

Penilaian dilakukan dengan mengevaluasi struktur, proses, dan hasil pada masing-masing faktor penilaian. Penilaian sendiri (*self-*

OCBC, as ME, carried out a self-assessment of the implementation of Integrated Governance taking into account the significance and/or materiality of issues regarding the Implementation of Integrated Governance in the FC in accordance with POJK. Self-assessment was carried out comprehensively and structured, covering 7 (seven) evaluation factors for the Integrated Governance, namely:

1. Implementation of duties and responsibilities of the Board of Directors of ME (BOD ME).
2. Implementation of duties and responsibilities of the Board of Commissioners of ME (BOC ME).
3. Duties and responsibilities of the Integrated Governance Committee (IGC).
4. Duties and responsibilities of the Integrated Compliance Working Unit (ICWU).
5. Duties and responsibilities of the Integrated Internal Audit Working Unit (IIAWU).
6. Implementation of Integrated Risk Management.
7. Preparation and implementation of Integrated Governance Guidelines.

Assessment was done by evaluating the structure, process, and outcome of each assessment factor. Self-assessment of the

assessment) terhadap Penerapan Tata Kelola Terintegrasi dilakukan secara berkala (Semesteran). Berdasarkan hasil penilaian tersebut, EU menyusun Laporan Penilaian Sendiri Pelaksanaan Tata Kelola Terintegrasi yang ditandatangani oleh Presiden Direktur EU dan Direktur Kepatuhan EU.

Implementation of Integrated Governance was conducted periodically (semiannual). Based on self-assessment result, the ME prepared Integrated Governance Self-Assessment Report, signed by the President Director and Compliance Director of ME.

Berikut kesimpulan Laporan Penilaian Pelaksanaan Tata Kelola Terintegrasi untuk posisi 31 Desember 2024, antara lain:

Below are the conclusions of the Integrated Governance Implementation Assessment Report for the period of 31 December 2024:

Struktur Tata Kelola

Corporate Governance Structure

1. Struktur Direksi EU telah memenuhi ketentuan yang berlaku dan memadai untuk melaksanakan tugas dan tanggung jawabnya. Kecukupan struktur meliputi jumlah anggota, integritas dan kompetensi. Kecukupan infrastruktur dalam hal kebijakan dan prosedur terkait Direksi EU juga telah memadai.
2. Struktur Dewan Komisaris EU telah memenuhi ketentuan yang berlaku dan memadai untuk melaksanakan tugas dan tanggung jawabnya. Kecukupan struktur meliputi jumlah anggota, jumlah Komisaris Independen, integritas, dan kompetensi. Kecukupan infrastruktur dalam hal kebijakan dan prosedur serta pelaksanaan tugas dan tanggung jawab Dewan Komisaris EU telah memadai pula.
3. Struktur Komite TKT telah memenuhi ketentuan yang berlaku dan memadai untuk melaksanakan tugas dan tanggung jawabnya. Kecukupan struktur meliputi jumlah anggota, jumlah Komisaris Independen yang mewakili dan ditunjuk dari LJK, serta integritas dan kompetensi. Kecukupan infrastruktur dalam hal kebijakan, prosedur, serta tugas dan tanggung jawab Komite TKT juga telah memadai.
4. EU telah memiliki SKKT yang independen dengan satuan kerja operasional. Pelaksanaan tugas kepatuhan terintegrasi dilakukan oleh Satuan Kerja Kepatuhan yang didukung oleh sumber daya yang telah memenuhi persyaratan yang ditetapkan.
5. EU telah memiliki SKAIT yang independen dari fungsi operasional dan memiliki sumber daya anggota SKAIT yang berkualitas dan telah memenuhi persyaratan yang ditetapkan.
6. EU telah memiliki struktur organisasi manajemen risiko yang memadai untuk mendukung penerapan manajemen risiko

1. The structure of the BOD ME has met the applicable regulations and is adequate to carry out its duties and responsibilities. Adequacy of structure includes number of members, integrity and competence of the BOD ME. The adequacy of infrastructure in terms of policies and procedures related to the BOD ME is also adequate.
2. The structure of the BOC ME has met applicable regulations and is adequate to carry out its duties and responsibilities. Adequacy of structure includes number of members, number of Independent Commissioners, integrity, and competence. The adequacy of infrastructure in terms of policies and procedures as well as the implementation of duties and responsibilities of the BOC ME is also adequate.
3. The IGC structure has met the applicable regulations and is adequate to carry out its duties and responsibilities. Adequacy of structure includes total members, number of Independent Commissioners who represent the FSIs, as well as integrity and competence. The adequacy of infrastructure in terms of policies, procedures, as well as the duties and responsibilities of IGC is also adequate.
4. The ME has ICWU which is independent from the operational working unit (risk taking unit). The implementation of integrated compliance function is carried out by the Regulatory Compliance Division supported with adequate resources which have met the stipulated requirements.
5. The ME has IIAWU which is independent from the operational function and its members have met the stipulated requirements.
6. The ME has adequate Risk Management organization structure to support integrated risk management implementation, which

terintegrasi yaitu Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) dan Komite Manajemen Risiko Terintegrasi (KMRT). Infrastruktur dalam hal kebijakan dan prosedur telah tersedia antara lain yaitu Kebijakan Manajemen Risiko Terintegrasi, Kebijakan Profil Risiko Terintegrasi, Kebijakan Pelaksanaan Manajemen Risiko Terintegrasi, Kebijakan Manajemen Permodalan Terintegrasi, Kebijakan Transaksi Intra-Grup, dan Prosedur Pengelolaan Permodalan Terintegrasi. Kebijakan-kebijakan dan prosedur tersebut telah disetujui oleh Direksi EU dan Dewan Komisaris EU, serta telah dilakukan kaji ulang secara berkala dan disampaikan kepada pihak terkait di EU dan kepada masing-masing LJK.

7. EU telah memiliki Pedoman Tata Kelola Terintegrasi yang meliputi Kerangka Tata Kelola Terintegrasi bagi EU dan bagi LJK. Terdapat pula Piagam Korporasi yang merupakan perjanjian antara EU dan LJK yang mengatur tentang tugas dan tanggung jawab EU dan LJK.

Proses Tata Kelola

1. Tugas dan tanggung jawab Direksi EU telah dilaksanakan secara efektif antara lain dengan mengarahkan, memantau, dan mengevaluasi pelaksanaan Pedoman Tata Kelola Terintegrasi, serta menindaklanjuti temuan audit dan rekomendasi dari SKAIT, auditor eksternal, hasil pengawasan OJK dan hasil pengawasan otoritas lainnya. Direksi EU telah melakukan kaji ulang Pedoman Tata Kelola Terintegrasi pada Semester 2-2023 dan telah menyampaikannya kepada masing-masing LJK. Kaji ulang berikutnya akan dilakukan pada tahun 2026.
2. Pengawasan Dewan Komisaris EU atas pelaksanaan tugas dan tanggung jawab Direksi EU dilakukan antara lain melalui Rapat Dewan Komisaris EU. Persetujuan atas kaji ulang Pedoman Tata Kelola Terintegrasi juga telah dilakukan pada Semester 2-2023.
3. Komite TKT telah mengevaluasi pelaksanaan TKT paling sedikit melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi kepatuhan secara terintegrasi antara lain di dalam Rapat-rapat Komite TKT. Komite TKT telah pula memberikan rekomendasi kepada Dewan Komisaris EU untuk penyempurnaan Pedoman Tata Kelola Terintegrasi.

consists of Integrated Risk Management Working Unit (IRMWU) and Integrated Risk Management Committee (IRMC). The adequacy of infrastructure in term of policies are also adequate which consist of Policies of Integrated Risk Management, Integrated Risk Profile, Implementation of Integrated Risk Management, Integrated Capital Management, Intra-Group Transaction, and Integrated Capital Management Procedures. Those policies and procedure have been approved by the Board of Directors of ME and the Board of Commissioners of ME, reviewed regularly, as well as circulated to related parties in the ME and to each FSI.

7. The ME already has Integrated Governance Charter which consists of Integrated Governance for ME and FSIs. There is also Corporate Charter, an agreement between the ME and FSIs which regulates the duties and responsibilities of the ME and FSIs.

Corporate Governance Process

1. The duties and responsibilities of the BOD ME have been carried out effectively, among others by directing, monitoring and evaluating the implementation of the Integrated Governance Charter, as well as followed up of audit findings and recommendations from IIAWU, external auditor, the supervisory results of OJK and other authorities. The BOD ME has reviewed the Integrated Governance Charter in Semester 2-2023 and circulated it to each FSI. The next review will be done in 2026.
2. The BOC ME oversights on the implementation of the BOD ME's duties and responsibilities is carried out among others through the Board of Commissioners of ME meeting. Approval on the evaluation of the Integrated Governance Charter has been carried out in Semester 2 – 2023.
3. The IGC has evaluated the implementation of Integrated Governance at least through the assessment of the adequacy of internal control and the implementation of the integrated compliance function, among others, in the IGC meetings. IGC has also provided recommendations to the BOC ME for the improvement of the Integrated Governance Charter.

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| <p>4. SKKT telah melakukan pemantauan dan evaluasi pelaksanaan Fungsi Kepatuhan pada masing-masing LJK antara lain melalui rapat koordinasi triwulanan dan <i>assurance</i> secara berkala atas pelaksanaan fungsi kepatuhan dan penerapan tata kelola di masing-masing LJK.</p> | <p>4. ICWU has carried out its function to monitor the implementation of the compliance function in each FSI through FSI Quarterly Update, coordination meetings, implementation of assurance and discussion of the results of assurance on the implementation of the compliance function and the governance implementation in each FSI.</p> |
| <p>5. SKAIT telah melakukan pemantauan yang memadai atas kinerja Satuan Kerja Audit Intern masing-masing LJK.</p> | <p>5. IIAWU has carried out adequate monitoring of the Internal Audit Working Unit performance of each FSI.</p> |
| <p>6. SKMRT secara aktif melakukan koordinasi dengan satuan kerja yang melaksanakan fungsi manajemen risiko pada masing-masing LJK terkait pelaksanaan manajemen risiko terintegrasi dalam KK. EU dan masing-masing LJK telah menyepakati kerangka acuan kerja atau <i>terms of reference</i> (TOR) terkait penerapan Manajemen Risiko Terintegrasi untuk memperkuat proses tata kelola manajemen risiko dalam KK serta meningkatkan pengawasan EU terhadap pelaksanaan manajemen risiko di LJK. Unit Kerja APU-PPT EU juga telah memberikan pemahaman penerapan program APU-PPT pada Unit Kerja/Fungsi APU-PPT di masing-masing LJK.</p> | <p>6. IRMWU actively coordinates with the Risk Management Working Unit in each FSIs regarding the implementation of integrated risk management in the FC. ME and each FSI have agreed on terms of reference (TOR) related to the implementation of Integrated Risk Management to strengthen risk management governance processes in FC and to increase supervision of ME on the implementation of risk management at FSIs. The ME has also provided an understanding of AML-CFT implementation to AML-CFT Unit in each FSI.</p> |
| <p>7. Pelaksanaan proses Tata Kelola Terintegrasi oleh EU dan LJK telah mengacu pada Pedoman TKT dan Piagam Korporasi.</p> | <p>7. The implementation of the Integrated Governance process by ME and FSIs is in accordance with the Integrated Governance Charter.</p> |

Hasil Tata Kelola

1. Pedoman Tata Kelola Terintegrasi telah dikaji ulang pada Semester 2-2023. Direksi EU telah memastikan bahwa temuan audit dan rekomendasi dari SKAIT, auditor eksternal, hasil pengawasan OJK, dan hasil pengawasan otoritas lainnya terhadap LJK telah ditindak lanjuti oleh LJK dalam KK.
2. Hasil rapat Dewan Komisaris EU, Direksi EU, Komite TKT, dan KMRT telah dituangkan dalam risalah rapat dan didokumentasikan dengan baik, termasuk pengungkapan secara jelas *dissenting opinions* (bila ada) beserta alasannya yang terjadi dalam rapat-rapat tersebut. Rekomendasi hasil pengawasan Dewan Komisaris EU atas pelaksanaan tugas dan tanggung jawab Direksi EU, penerapan Tata Kelola Terintegrasi, dan hasil evaluasi Pedoman Tata Kelola Terintegrasi oleh Dewan Komisaris EU telah disampaikan kepada Direksi EU, antara lain melalui rapat Dewan Komisaris EU. Dewan Komisaris EU

Corporate Governance Outcome

1. Integrated Governance Charter has been reviewed in Semester 2-2023. The BOD ME has ensured that all audit findings and recommendations from IIAWU, external auditors, OJK and other authorities supervision results towards the FSIs have been followed up by FSIs in the FC.
2. The results of the BOC ME, the BOD ME, IGC, and IRMC meetings have been stated in the minutes of the meetings and are well documented, including clear disclosure of dissenting opinions (if any) along with the reasons that occurred in the meetings. Recommendations on the results of supervision by BOC ME on the implementation of the duties and responsibilities of BOD ME, the implementation of Integrated Governance, and the evaluation results of the Integrated Governance Charter by BOC ME has been submitted to BOD ME, among others

membentuk Komite Tata Kelola Terintegrasi pada tahun 2015.

3. Hasil Tata Kelola Terintegrasi telah sesuai dengan ketentuan yang berlaku dan memadai. Hal ini tercermin dari evaluasi pelaksanaan Tata Kelola Terintegrasi paling sedikit melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi kepatuhan secara terintegrasi. Rekomendasi penyempurnaan Pedoman Tata Kelola Terintegrasi telah diberikan Komite TKT dan telah disetujui Dewan Komisaris EU. Hasil rapat Komite TKT telah pula dituangkan dalam risalah rapat dan didokumentasikan dengan baik, termasuk pengungkapan secara jelas *dissenting opinions* (jika ada) beserta alasannya.
4. SKKT telah menyusun dan menyampaikan Laporan Pelaksanaan Tugas dan Tanggung Jawab kepada Direktur yang membawahkan Fungsi Kepatuhan EU. Laporan hasil *assurance* penerapan Tata kelola pada masing-masing LJK telah disampaikan dalam rapat Direksi EU, Komite TKT, dan Dewan Komisaris EU.
5. Hasil pemantauan atas pelaksanaan audit intern pada masing-masing LJK telah berjalan memadai dan telah dilaporkan kepada Direksi EU dan Dewan Komisaris EU. SKAIT telah bertindak obyektif dan independen dalam melakukan pemantauan pelaksanaan audit intern kepada LJK melalui Laporan SKAIT, serta memberikan catatan untuk perbaikan kepada SKAI pada LJK jika dinilai perlu. Rekomendasi hasil audit secara umum telah sesuai dengan permasalahan dan dapat digunakan sebagai acuan.
6. Penilaian Profil Risiko Terintegrasi KK OCBC di Indonesia dinilai sangat baik dan efektif sesuai dengan karakteristik dan kompleksitas usaha KK, dimana risiko inheren dapat dikelola dengan sangat baik di tingkat yang rendah dan didukung oleh kualitas penerapan manajemen risiko terintegrasi yang sangat memadai. Pengawasan aktif Dewan Komisaris EU dan Direksi EU terhadap pelaksanaan kebijakan dan strategi manajemen risiko dilakukan secara efektif melalui pelaporan yang diberikan oleh Satuan Kerja Manajemen Risiko Terintegrasi secara berkala maupun yang sifatnya *ad-hoc* apabila terjadi kejadian risiko yang signifikan.
7. EU dan LJK dalam KK telah menerapkan prinsip-prinsip tata kelola yang baik sesuai dengan Pedoman Tata Kelola Terintegrasi

through BOC ME meetings. BOC ME formed IGC in 2015.

3. The Integrated Governance outcomes were in accordance with the applicable regulations and adequate. This was reflected in the evaluation of the implementation of Integrated Governance at least through the adequacy of internal control and the implementation of the integrated compliance function assessment. Recommendations for the improvement of the Integrated Governance Charter had been made and approved by the BOC ME. The results of the IGC meeting have been recorded in the minutes of the meetings and are well documented, including the clear disclosure of dissenting opinions (if any) along with the reasons.
4. ICWU has prepared and submitted the Implementation of Duties and Responsibilities Report to the ME's Director in charge of the Compliance Function. Assurance Result Report on the implementation of Governance in each FSI has been presented in the BOD ME, IGC, and BOC ME meetings.
5. Monitoring results of the implementation of internal audit at each FSI have been adequate and has been reported to the BOD ME and BOC ME. IIAWU has acted objectively and independently in monitoring the implementation of internal audit at FSIs through IIAWU report and provide recommendation for improvement to IAWU of FSIs if deemed necessary. The audit recommendations are generally in line with the problem and can be used as a reference.
6. Integrated Risk Profile Assessment of OCBC FC in Indonesia is considered very good and effective in accordance with the characteristics and complexity of the business of the FC. Inherent risk can be managed very well at a low level and is supported by a very adequate quality of integrated risk management implementation. The BOC ME and BOD ME's active supervision on the implementation of risk management policies and strategies is carried out effectively by the Integrated Risk Management Unit through regular or ad-hoc report in the event of a significant risk event occurs.
7. The ME and FSIs have implemented good governance principles in accordance with the Integrated Governance Charter and the

dan ketentuan yang mengatur tentang Penerapan Tata Kelola pada masing-masing LJK.

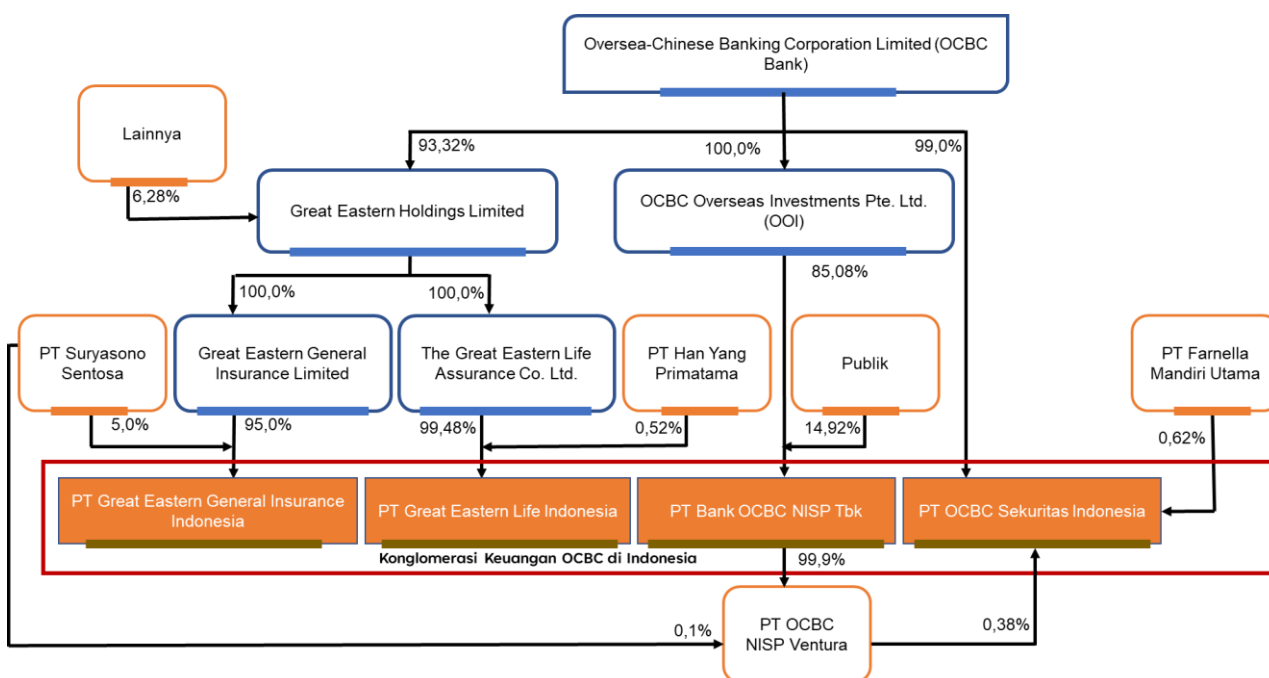
provisions governing the Implementation of Corporate Governance in each FSI.

Berdasarkan penilaian sendiri Tata kelola Terintegrasi yang dilakukan oleh EU, peringkat pelaksanaan TKT untuk posisi 31 Desember 2024 adalah **1** (satu) yaitu KK dinilai telah melakukan Penerapan Tata Kelola Terintegrasi dengan **Sangat Baik**. Hal ini tercermin dari pemenuhan yang sangat memadai atas Penerapan Prinsip TKT. Apabila terdapat kelemahan dalam Penerapan TKT, secara umum kelemahan tersebut tidak signifikan dan dapat segera dilakukan perbaikan oleh EU dan/atau LJK.

Based on Integrated Governance Self-Assessment conducted by ME, the implementation of the Integrated Governance as of 31 December 2024 is rated 1 (one) or **Very Good**. This is reflected in the very adequate fulfillment of the implementation of the Integrated Governance Principles. Should there be any weaknesses in the Integrated Governance Principles, generally those weaknesses are not significant and can be immediately corrected by the ME and/or FSIs.

3 Struktur Konglomerasi Keuangan, Struktur Konglomerasi yang Lebih Luas, serta Struktur Kepemilikan Saham pada Konglomerasi Keuangan OCBC di Indonesia

Financial Conglomerate Structure, Wider Conglomerate Structure, and Share Ownership Structure of OCBC Financial Conglomerate in Indonesia



Catatan: Per 31 Desember 2024

Penjelasan:

Komposisi kepemilikan saham pada:

1. OCBC (sebagai EU), mayoritas sahamnya atau 85,08% saham dimiliki oleh OCBC Overseas Investment Pte. Ltd. (OOI) (Singapura) dan 14,92% saham dimiliki oleh masyarakat.
2. PT Great Eastern Life Indonesia (GELI) sebagai LJK terelasi, mayoritas sahamnya atau 99,48% saham dimiliki oleh Great Eastern Life Assurance Company Limited (Singapura) dan 0,52% saham dimiliki oleh PT Han Yang Primatama (Indonesia).
3. PT OCBC Sekuritas Indonesia (PTOS) sebagai LJK terelasi, mayoritas sahamnya atau 99,9% saham dimiliki oleh OCBC Bank (Singapura), 0,62% saham dimiliki oleh PT Farnella Mandiri Utama, dan 0,38% saham dimiliki oleh PT OCBC NISP Ventura.
4. PT Great Eastern General Insurance Indonesia (GEGI) sebagai LJK terelasi, mayoritas sahamnya atau 95,0% saham dimiliki oleh Great Eastern General Insurance Limited (Singapura) dan 5,0% saham dimiliki oleh PT Suryasono Sentosa.

Note: As of 31 December 2024

Explanation:

Composition of share ownership in:

1. OCBC (as the ME), majority of its shares or 85.08% are owned by OCBC Overseas Investment Pte. Ltd. (OOI) (Singapore) and 14.92% shares are owned by public.
2. PT Great Eastern Life Indonesia (GELI) as a related FSI, the majority of its shares or 99.48% shares are owned by Great Eastern Life Assurance Company Limited (Singapore) and 0.52% shares are owned by PT Han Yang Primatama (Indonesia).
3. PT OCBC Sekuritas Indonesia (PTOS) as a related FSI, majority of its shares or 99.9% shares are owned by OCBC Bank (Singapore), 0.62% shares are owned by PT Farnella Mandiri Utama, and 0.38% shares are owned by PT OCBC NISP Ventura.
4. PT Great Eastern General Insurance Indonesia (GEGI) as a related FSI, the majority of its shares or 95.0% shares are owned by Great Eastern General Insurance Limited (Singapore) and 5.0% shares are owned by PT Suryasono Sentosa.

4 Struktur Kepengurusan pada Entitas Utama dan Lembaga Jasa Keuangan

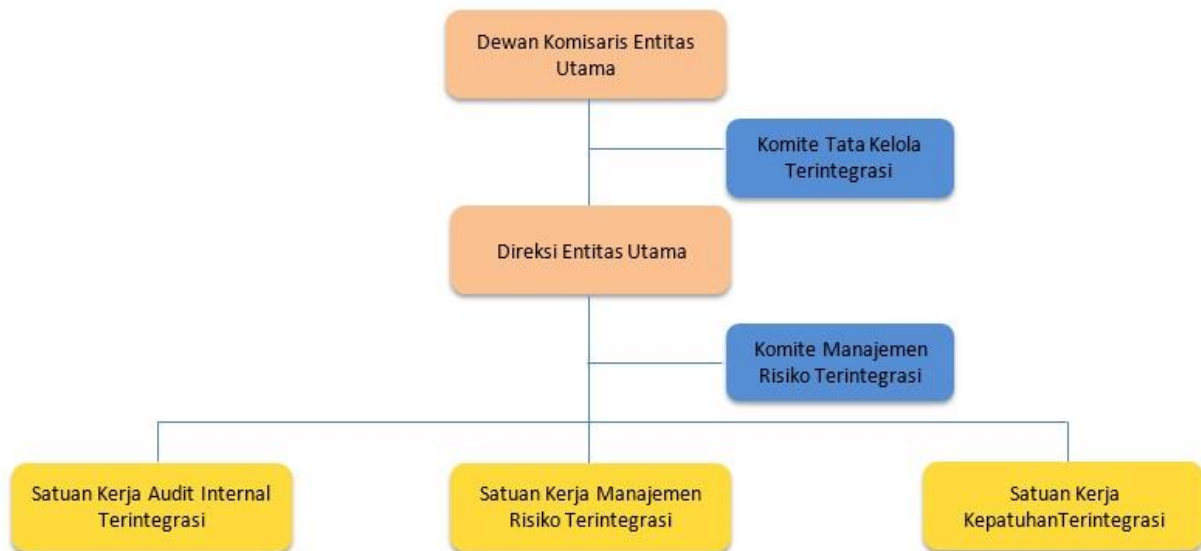
Management Structure in Main Entity and Financial Services Institutions

STRUKTUR KEPENGURUSAN PADA EU DALAM KK OCBC DI INDONESIA

Struktur Kepengurusan pada KK OCBC di Indonesia yaitu, OCBC sebagai EU dengan GELI, PTOS, dan GEGI sebagai pihak terelasi saling bekerja sama dalam memenuhi dan menerapkan Tata Kelola Terintegrasi dengan baik dan sesuai dengan ketentuan yang berlaku. Untuk memenuhi hal tersebut, EU dalam KK OCBC di Indonesia memiliki struktur kepengurusan dalam rangka menerapkan dan sekaligus memastikan penerapan Tata Kelola Terintegrasi. Struktur kepengurusan KK OCBC di Indonesia, yaitu sebagai berikut:

MANAGEMENT STRUCTURE OF THE ME IN THE OCBC FC IN INDONESIA

The management structure of the OCBC FC in Indonesia, namely, OCBC as the ME with GELI, PTOS, and GEGI as related parties, work together to fulfill and implement Integrated Governance properly and in accordance with applicable regulations. To fulfill this, the ME in the OCBC FC in Indonesia has a management structure in order to implement and at the same time ensure the implementation of Integrated Governance. The management structure of the OCBC FC in Indonesia is as follows:



DEWAN KOMISARIS EU

Dewan Komisaris EU bertanggung jawab untuk melakukan pengawasan atas penerapan tata kelola terintegrasi dalam KK dan memastikan penerapan manajemen risiko terintegrasi sesuai dengan karakteristik dan kompleksitas usaha KK.

Struktur Dewan Komisaris EU per 31 Desember 2024 adalah sebagai berikut:

THE BOARD OF COMMISSIONERS OF ME

BOC ME is responsible for supervising the implementation of integrated governance in the FC and ensuring the implementation of integrated risk management in accordance with the characteristics and business complexity of the FC.

The structure of the BOC ME as of 31 December 2024 was as follows:

No.	Nama Name	Jabatan Position
1.	Pramukti Surjaudaja	Presiden Komisaris President Commissioner

2.	Helen Wong	Komisaris Commissioner
3.	Lai Teck Poh	Komisaris Commissioner
4.	Na Wu Beng	Komisaris Commissioner
5.	Jusuf Halim	Komisaris Independen Independent Commissioner
6.	Betti S. Alisjahbana	Komisaris Independen Independent Commissioner
7.	Rama P. Kusumaputra	Komisaris Independen Independent Commissioner
8.	Nicholas Tan	Komisaris Independen Independent Commissioner

Struktur Dewan Komisaris EU per 28 Mei 2025 adalah sebagai berikut: The BOC ME structure as of 28 May 2025 is as follows:

No.	Nama Name	Jabatan Position
1.	Pramukti Surjaudaja	Presiden Komisaris President Commissioner
2.	Helen Wong	Komisaris Commissioner
3.	Na Wu Beng	Komisaris Commissioner
4.	Hartadi Agus Sarwono	Komisaris Independen Independent Commissioner
5.	Jusuf Halim	Komisaris Independen Independent Commissioner
6.	Betti S. Alisjahbana	Komisaris Independen Independent Commissioner
7.	Nicholas Tan	Komisaris Independen Independent Commissioner

DIREKSI EU

Direksi EU bertanggung jawab untuk memastikan penerapan tata kelola terintegrasi dalam KK dan penerapan manajemen risiko terintegrasi sesuai dengan karakteristik dan kompleksitas usaha KK.

THE BOARD OF DIRECTORS of ME

BOD ME is responsible to ensure the implementation of integrated governance in the FC and the implementation of integrated risk management in accordance with the characteristics and complexity of the FC's business.

Struktur Direksi EU per 31 Desember 2024 adalah sebagai berikut: The BOD ME structure as of 31 December 2024 is as follows:

No.	Nama Name	Jabatan Position
1.	Parwati Surjaudaja	Presiden Direktur President Director
2.	Hartati	Direktur Director
3.	Martin Widjaja	Direktur Director
4.	Andrae Krishnawan W.	Direktur Director
5.	Johannes Husin	Direktur Director
6.	Joseph Chan Fook Onn	Direktur Director
7.	The Ka Jit	Direktur Director
8.	Lili S. Budiana	Direktur Director

Struktur Direksi EU per 8 Mei 2025 adalah sebagai berikut: The BOD ME structure as of 8 May 2025 is as follows:

No.	Nama Name	Jabatan Position
1.	Parwati Surjaudaja	Presiden Direktur President Director
2.	Hartati	Direktur Director
3.	Martin Widjaja	Direktur Director
4.	Andrae Krishnawan W.	Direktur Director
5.	Johannes Husin	Direktur Director
6.	The Ka Jit	Direktur Director
7.	Lili S. Budiana	Direktur Director
8.	Heriyanto	Direktur Director

KOMITE TATA KELOLA TERINTEGRASI (KTKT)

KTKT mempunyai tugas dan tanggung jawab paling sedikit:

1. Mengevaluasi pelaksanaan Tata Kelola Terintegrasi, paling sedikit melalui penilaian kecukupan pengendalian intern dan pelaksanaan fungsi kepatuhan secara terintegrasi.
2. Memberikan rekomendasi kepada Dewan Komisaris EU untuk penyempurnaan Pedoman Tata Kelola Terintegrasi.

Susunan anggota KTKT per 31 Desember 2024 sebagai berikut:

INTEGRATED GOVERNANCE COMMITTEE (IGC)

IGC has at least the following duties and responsibilities:

1. Evaluating the implementation of Integrated Governance, at least through an assessment of the adequacy of internal control and the implementation of an integrated compliance function.
2. Provide recommendations to the BOC ME for the improvement of the Integrated Governance Guidelines.

The composition of IGC members as of 31 December 2024, is as follows:

No.	Posisi dalam Komite Position in the Committee	Posisi di LJK Position in FSI	Nama Name
1.	Ketua merangkap Anggota Chairman concurrently as Member	Komisaris Independen OCBC	Jusuf Halim
2.	Anggota Member	Komisaris Independen OCBC	Rama P. Kusumaputra
3.	Anggota Member	Komisaris Independen OCBC	Nicholas Tan
4.	Anggota Member	Komisaris Independen PTOS	Nancy Effendy
5.	Anggota Member	Komisaris Independen GELI	Washinton Pandapotan Sihombing
6.	Anggota Member	Komisaris Independen GEGI	Mirza Mochtar
7.	Anggota Member	Anggota Dewan Pengawas Syariah OCBC	Mohammad Bagus Teguh Perwira
8.	Anggota Member	Pihak Independen OCBC	Angeline Nangoi

Susunan anggota KTKT per 25 April 2025 sebagai berikut:

The composition of IGC members as of 25 April 2025 is as follows:

No.	Posisi dalam Komite Position in the Committee	Posisi di LJK Position in FSI	Nama Name
1.	Ketua merangkap Anggota Chairman concurrently as Member	Komisaris Independen OCBC	Jusuf Halim
2.	Anggota Member	Komisaris Independen OCBC	Nicholas Tan
3.	Anggota Member	Komisaris Independen PTOS	Nancy Effendy
4.	Anggota Member	Komisaris Independen GEGI	Mirza Mochtar
5.	Anggota Member	Anggota Dewan Pengawas Syariah OCBC	Mohammad Bagus Teguh Perwira
6.	Anggota Member	Pihak Independen OCBC	Angeline Nangoi

KOMITE MANAJEMEN TERINTEGRASI (KMRT)

KMRT memiliki tugas dan tanggung jawab untuk membantu Direksi EU dalam menyusun Kebijakan Manajemen Risiko Terintegrasi, mengawasi pelaksanaan kebijakan serta memberikan rekomendasi mengenai hal-hal yang perlu dilakukan terkait Manajemen Risiko Terintegrasi,

RISIKO INTEGRATED RISK MANAGEMENT COMMITTEE (IRMC)

IRMC has the duties and responsibilities to assist the BOD ME in formulating Integrated Risk Management Policies, overseeing the implementation of policies, and providing recommendations on matters that need to be done related to Integrated Risk Management,

termasuk di dalamnya adalah Penerapan Manajemen Risiko di masing-masing LJK dalam rangka KK.

including the Implementation of Risk Management in each FSI in the context of FC.

Susunan KMRT sebagai berikut:

The composition of the IRMC is as follows:

No.	Posisi dalam Komite Position in the Committee	Posisi di LJK Position in FSI
1.	Ketua Chairperson	Direktur Manajemen Risiko OCBC Risk Management Director of OCBC
2	Wakil Ketua Deputy Chairperson	Direktur Kepatuhan OCBC Compliance Director of OCBC
3.	Anggota Member	Presiden Direktur GELI President Director of GELI
4.	Anggota Member	Direktur Utama PTOS President Director of PTOS
5.	Anggota Member	Presiden Direktur GEGI President Director of GEGI
6.	Anggota Member	<i>Head of Enterprise Risk Management OCBC</i>
7.	Anggota Member	<i>Corporate Credit Risk Management Division Head OCBC</i>
8.	Anggota Member	<i>Market Risk Management Division Head OCBC</i>
9.	Anggota Member	<i>Operational Risk Management Division Head OCBC</i>
10.	Anggota Member	<i>Risk Policy Head OCBC (Secretary)</i>

SATUAN KERJA AUDIT INTERNAL TERINTEGRASI (SKAIT)

SKAI OCBC ditunjuk sebagai SKAIT dalam KK OCBC di Indonesia. SKAIT adalah satuan kerja yang independen dan bertanggung jawab secara langsung kepada Presiden Direktur EU, serta tidak langsung kepada Dewan Komisaris EU. Tugas dan tanggung jawab SKAIT adalah untuk memantau pelaksanaan dan efektifitas pelaksanaan di masing-masing LJK secara terintegrasi dan menyampaikan laporan pelaksanaannya kepada Direktur yang ditunjuk untuk melakukan fungsi pengawasan terhadap KK dan Dewan Komisaris EU, serta Direktur yang membawahkan fungsi kepatuhan EU.

INTEGRATED INTERNAL AUDIT WORK UNIT (IIAWU)

Internal Audit Division (IAD) OCBC was appointed as IIAWU in the OCBC FC in Indonesia. IIAWU is an independent work unit and is responsible directly to the President Director of the ME, and indirectly to BOC ME. The duties and responsibilities of IIAWU are to monitor the implementation and effectiveness of implementation in each FSI in an integrated manner and submit the implementation report to the Director in charge for oversight function of FC, BOC ME, and Compliance Director of ME.

SATUAN KERJA KEPATUHAN TERINTEGRASI (SKKT)

OCBC sebagai EU telah memiliki Satuan Kerja Kepatuhan Terintegrasi (SKKT). Pelaksanaan tugas kepatuhan terintegrasi dilakukan oleh Divisi Regulatory Compliance di OCBC yang telah memenuhi ketentuan terkait Pelaksanaan Fungsi Kepatuhan bagi Bank Umum, yaitu bersifat independen terhadap satuan kerja operasional (*Risk Taking Unit*) yang tidak terlibat langsung dalam kegiatan operasional Bank. Tugas dan tanggung jawab SKKT paling sedikit adalah untuk memantau dan mengevaluasi pelaksanaan tata kelola dan fungsi kepatuhan pada masing-masing LJK dalam KK.

INTEGRATED COMPLIANCE WORKING UNIT (ICWU)

OCBC as the ME already has an Integrated Compliance Unit (ICWU). The implementation of the integrated compliance duties is carried out by the Regulatory Compliance Division at OCBC which has complied with the provisions related to the Implementation of the Compliance Function for Commercial Banks, which is independent from the operational work unit (Risk Taking Unit) which is not directly involved in the Bank's operational activities. The duties and responsibilities of ICWU at least are to monitor and evaluate the implementation of the corporate governance and compliance function in each FSI in the FC.

**STRUKTUR KEPENGURUSAN PADA LJK
DALAM KK OCBC DI INDONESIA**

**MANAGEMENT STRUCTURE OF FSI IN
OCBC FC IN INDONESIA**

1. OCBC

Susunan pengurus OCBC NISP posisi 31 Desember 2024 dan posisi 28 Mei 2025 seperti tertera pada halaman 11-13 pada laporan ini.

1. OCBC

The composition of OCBC Management as of 31 December 2024 and as of 28 May 2025 as stated on page 11-13 of this report.

2. PTOS

Susunan pengurus PTOS posisi 31 Desember 2024 sebagai berikut:

2. PTOS

The composition of PTOS Management as of 31 December 2024, is as follows:

Dewan Komisaris | The Board of Commissioners

No.	Nama Name	Jabatan Position
1.	He Shaoqin	Komisaris Utama President Commissioner
2.	Nancy Effendy	Komisaris Independen Independent Commissioner

Direksi | The Board of Directors:

No.	Nama Name	Jabatan Position
1.	Betty Goenawan	Direktur Utama President Director
2.	Shiantaraga	Direktur Director

3. GELI

Susunan pengurus GELI posisi 31 Desember 2024 sebagai berikut:

3. GELI

The composition of GELI Management as of 31 December 2024 is as follows:

Dewan Komisaris | The Board of Commissioners

No.	Nama Name	Jabatan Position
1.	Cheong Kwok Leong	Komisaris Commissioner
2.	Wasinthon P. Sihombing	Komisaris Independen Independent Commissioner
3.	Lilies Handayani	Komisaris Independen Independent Commissioner

Direksi | The Board of Directors:

No.	Nama Name	Jabatan Position
1.	Nina	Presiden Direktur President Director
2.	Yungki Aldrin	Direktur Director
3.	Hana	Direktur Director
4.	Roy Hendrata Gozalie	Direktur Director
5.	Sisca	Direktur Director

Susunan pengurus GELI posisi 25 April 2025 sebagai berikut:

The composition of GELI Management as of 25 April 2025 is as follows:

Dewan Komisaris | The Board of Commissioners

No.	Nama Name	Jabatan Position
1.	Choo Nyen Fui	Presiden Komisaris President Commissioner
2.	Gregory Thomas Hingston	Komisaris Commissioner
2.	Ludovicus Sensi Wondabio	Komisaris Independen Independent Commissioner
3.	Mohamad Krisna Sjarif	Komisaris Independen Independent Commissioner

Direksi | The Board of Directors:

No.	Nama Name	Jabatan Position
1.	Nina	Presiden Direktur President Director
2.	Yungki Aldrin	Direktur Director
3.	Hana	Direktur Director
4.	Roy Hendrata Gozalie	Direktur Director
5.	Sisca	Direktur Director

4. GEGI

Susunan pengurus GEGI posisi 31 Desember 2024 sebagai berikut:

4. GEGI

The composition of GEGI Management as of 31 December 2024 is as follows:

Dewan Komisaris | The Board of Commissioners

No.	Nama Name	Jabatan Position
1.	Jimmy Tong Teng Wah	Komisaris Commissioner
2.	Rinie Winarsih	Komisaris Independen Independent Commissioner
3.	Mirza Mochtar	Komisaris Independen Independent Commissioner

Direksi | The Board of Directors:

No.	Nama Name	Jabatan Position
1.	Aziz Adam Sattar	Presiden Direktur President Director
2.	Linggawati Tok	Direktur Director
3.	Andy Soen	Direktur Director

5 Kebijakan Transaksi Intra-Grup

Intra-Group Transaction Policy

Risiko Transaksi Intra-Group adalah risiko akibat ketergantungan suatu entitas baik secara langsung maupun tidak langsung terhadap entitas lainnya dalam satu KK, baik dalam rangka pemenuhan kewajiban perjanjian tertulis maupun tidak tertulis dan baik yang diikuti maupun tidak diikuti perpindahan dana. Dalam rangka memitigasi risiko transaksi intra-group dalam KK, EU telah menyusun Kebijakan Transaksi Intra-Grup yang mengatur bahwa masing-masing LJK dalam KK harus dapat mengidentifikasi, mengelola dan memitigasi transaksi intra-grup.

Intra-Group Transaction Risk is the risk due to the dependency of an entity either directly or indirectly on other entities in one FC, both in the context of fulfilling written and unwritten agreement obligations and whether or not the transfer of funds is followed. In order to mitigate the intra-group risk transactions within the FC, the ME has prepared an Intra-Group Transaction Policy which stipulates that each FSI in the FC must be able to identify, manage and mitigate intra-group transactions.

Identifikasi Transaksi Intra-grup

1. Masing-masing LJK dalam KK harus mengidentifikasi transaksi-transaksi yang dapat dikategorikan sebagai transaksi intra-grup, meliputi:
 - a. Kepemilikan silang antar LJK dalam KK.
 - b. Jaminan, pinjaman, dan komitmen yang diberikan atau diperoleh suatu LJK dari LJK lain dalam KK.
 - c. Eksposur kepada pemegang saham pengendali, termasuk eksposur pinjaman dan *off-balance sheet* seperti jaminan dan komitmen.
 - d. Pembelian atau penjualan aset kepada LJK lain dalam satu KK.

Identification of Intra-group Transactions

1. Each FSI in the FC must identify transactions that can be categorized as intra-group transactions, including:
 - a. Cross ownership between FSIs in FC.
 - b. Collaterals, loans, and commitments given or obtained by a FSI from another FSI in the FC.
 - c. Exposures to controlling shareholders, including loan and off-balance sheet exposures such as guarantees and commitments.
 - d. Purchase or sale of assets to other FSI in one FC.

- | | |
|---|---|
| <ul style="list-style-type: none"> e. Transfer risiko melalui reasuransi kepada LJK lain dalam satu KK; dan/atau f. Transaksi untuk mengalihkan eksposur risiko pihak ketiga di antara LJK dalam satu KK. | <ul style="list-style-type: none"> e. Transfer of risk through reinsurance to other FSI in one FC; and/or f. Transactions to transfer third party risk exposure among FSIs in one FC. |
|---|---|
-
- | | |
|--|--|
| <ol style="list-style-type: none"> 2. Persetujuan transaksi intra-grup yang telah diidentifikasi harus mengikuti prosedur internal yang berlaku di masing-masing LJK. 3. Dalam melakukan identifikasi risiko yang dapat ditimbulkan dari transaksi intra-grup, beberapa faktor berikut harus dipertimbangkan, antara lain: <ul style="list-style-type: none"> a. Benturan kepentingan yang berasal dari transaksi intra-grup. b. Pemenuhan <i>Arm's Length Principle</i> (azas kewajaran transaksi). c. Dampak transaksi kepada kinerja keuangan LJK dalam KK. d. Kepatuhan terhadap undang-undang dan regulasi yang berlaku. | <ol style="list-style-type: none"> 2. Approval of identified intra-group transactions must follow the internal procedures applicable in each FSI. 3. In identifying the risks that may arise from intra-group transactions, the following factors must be considered, such as: <ul style="list-style-type: none"> a. Conflicts of interest from intra-group transactions. b. Fulfillment of the Arm's Length Principle (the principle of fairness of the transaction). c. The impact of transactions to the financial performance of FSI in the FC. d. Compliance with applicable laws and regulations. |
|--|--|

Pengelolaan Transaksi Intra-grup

1. Masing-masing LJK harus menghindari adanya benturan kepentingan dan memenuhi *Arm's Length Principle* dalam pengelolaan transaksi intra-grup. Pengungkapan benturan kepentingan harus mengikuti ketentuan yang berlaku.
2. Masing-masing LJK dalam KK harus menetapkan tingkat risiko transaksi intra-grup yang akan diambil sesuai dengan strategi dan karakteristik bisnis masing-masing LJK dan peraturan perundang-undangan yang berlaku di masing-masing sektor keuangan. Penerapan tingkat risiko transaksi intra-grup dapat dinyatakan melalui *threshold* atau batasan tingkat risiko inheren pada profil risiko.
3. Dalam pengelolaan transaksi intra-grup, harus memenuhi 4 (empat) komponen penerapan manajemen risiko, yaitu (i) tata kelola risiko; (ii) kerangka manajemen risiko yang mencakup kecukupan kebijakan, prosedur, dan penetapan limit; (iii) proses manajemen risiko, kecukupan sumber daya manusia, dan kecukupan sistem informasi manajemen; serta (iv) kecukupan sistem pengendalian risiko.
4. OCBC selaku EU beserta masing-masing LJK dalam KK menyusun laporan profil risiko transaksi intra-grup setiap 6 (enam) bulan untuk diinformasikan kepada Dewan Komisaris EU dan Direksi EU, serta disampaikan kepada OJK.

Intra-group Transaction Management

1. Each FSI must avoid conflicts of interest and comply with the Arm's Length Principle in managing intra-group transactions. Disclosure of conflicts of interest must comply with applicable regulations.
2. Each FSI in the FC must determine the level of intra-group transaction risk to be taken in accordance with the strategy and business characteristics of each FSI and the prevailing laws and regulations in each financial sector. The application of the risk level of intra-group transactions can be expressed through a threshold or limit on the level of inherent risk in the risk profile.
3. In managing intra-group transactions, it must fulfill 4 (four) components of risk management implementation, namely (i) risk management governance; (ii) a risk management framework that includes the adequacy of policies, procedures, and limit setting; (iii) risk management processes, adequacy of human resources, and adequacy of management information systems; and (iv) the adequacy of the risk control system.
4. OCBC as the ME and each FSI in the FC prepare a risk profile report on intra-group transactions every 6 (six) months to be informed to the BOC ME and the BOD ME and submitted to OJK.

5. Masing-masing LJK harus melakukan pencatatan dan menyimpan dokumentasi yang lengkap dan memadai atas transaksi intra-grup yang dilakukan.

Mitigasi Transaksi Intra-grup

1. Pada setiap transaksi intra-grup, masing-masing LJK harus memastikan bahwa transaksi intra-grup tersebut masih sesuai dengan tingkat risiko yang telah ditetapkan. Apabila terjadi benturan kepentingan dan/atau peningkatan risiko yang ditimbulkan dari transaksi intra-grup, masing-masing LJK yang melakukan transaksi tersebut harus melakukan langkah mitigasi untuk meminimalisasi dampak negatif terhadap kinerja KK.
2. Mitigasi transaksi intra-grup dilakukan oleh masing-masing LJK dengan menyiapkan rencana tindak lanjut (*action plan*) untuk mengurangi peningkatan risiko transaksi intra-grup.

Mitigasi transaksi intra-grup harus sejalan dengan peraturan perundang-undangan yang berlaku di masing-masing sektor keuangan.

5. Each FSI must record and maintain complete and adequate documentation of intra-group transactions carried out.

Intra-group Transaction Mitigation

1. In each intra-group transaction, each FSI must ensure that the intra-group transaction is still in accordance with the predetermined risk level. If there is a conflict of interest and/or increased risk arising from intra-group transactions, each FSI which conducts the transaction must take mitigation steps to minimize the negative impact on the performance of the FC.
2. Mitigation of intra-group transactions is carried out by each FSI by preparing an action plan to reduce the increased risk of intra-group transactions.

Mitigation of intra-group transactions must be in line with the prevailing laws and regulations in each financial sector.

INFORMASI PERUSAHAAN

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