



Program Pengembangan Kompetensi Sekretaris Perusahaan Tahun 2024

Corporate Secretary Competency Development Program 2024

Tanggal/Date	Penyelenggara/Organizer	Workshop/Training/Seminar
January 11, 2024	OJK Institute - Online	Online Seminar "Connecting the Dots"
February 22, 2024	OJK Institute - Online	Online Seminar "Outlook Economic and Financial 2024"
March 28, 2024	OJK Institute - Online	Online Seminar "The Role of the Taxonomy for Sustainable Finance in Indonesia (TKBI) in Promoting the Energy Transition Towards Indonesia's Net Zero Emissions"
May 2, 2024	OJK Institute - Online	Online Seminar "How to Prevent Accounting Fraud in Financial Sector"
June 11, 2024	OJK Institute - Online	Online Seminar "Building Trust for Insurance Industry via Emphaty in Claims Management"
July 10, 2024	ICSA - Jakarta	Workshop "Implementation and Deepening of Law Number 27 of 2022 on the Protection of Personal Data"

UNIT AUDIT INTERNAL

Unit Audit Internal (UAI) dibentuk sesuai dengan ketentuan POJK No. 56/POJK.04/2015 ("POJK 56/2015") tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal. Keberadaan organ UAI bertujuan untuk membantu manajemen dalam mengelola Perseroan dengan memantau dan mengevaluasi efektivitas sistem pengendalian internal Perseroan. Dalam menjalankan tugas dan tanggung jawabnya, UAI berperan sebagai mitra strategis bagi manajemen terutama dalam memberikan keyakinan (*assurance*) yang independen dan objektif serta menyediakan jasa konsultasi yang dapat memberikan nilai tambah bagi unit-unit kerja *counterpart* dan meningkatkan kinerja operasional Perseroan.

Piagam Unit Audit Internal

Dalam melaksanakan tugas dan tanggung jawabnya, seluruh auditor internal Perseroan wajib berpedoman pada Piagam Unit Audit Internal yang telah disahkan oleh Direksi atas persetujuan Dewan Komisaris melalui surat keputusan No. 026/SOP/III/2017 tanggal 17 Maret 2017. Secara umum, Piagam Unit Audit Internal Perseroan memuat prinsip-prinsip dan praktik profesional auditor internal, struktur dan kedudukan di dalam organisasi, wewenang, tugas dan tanggung jawab, fungsi dan ruang lingkup penugasan.

Tugas dan Tanggung Jawab

Aktivitas audit internal yang dilakukan oleh UAI mencakup area kantor pusat dan di cabang-cabang. Agar pelaksanaan audit di semua objek senantiasa berjalan efektif, maka UAI dibantu oleh 2 (dua) divisi di bawahnya yang masing-masing menjalankan tugas dan tanggung jawab sebagai berikut:

INTERNAL AUDIT UNIT

The Internal Audit Unit (IAU) was established in accordance with the provisions of Financial Services Authority Regulation No. 56/POJK.04/2015 ("POJK 56/2015"), which governs the establishment and preparation of the Internal Audit Unit Charter. The IAU's presence aims to assist management in managing the Company by monitoring and evaluating the effectiveness of its internal control system. In carrying out its duties and responsibilities, the IAU acts as a strategic partner to management, particularly in providing independent and objective assurance and consulting services that add value to counterpart units and improve the Company's operational performance.

Internal Audit Unit Charter

In discharging their duties, all internal auditors of the Company shall be guided by the Internal Audit Charter that was approved by the Board of Directors upon the Board of Commissioners' approval based on Decree No. 026/SOP/III/2017 dated March 17, 2017. In general, the Charter of the Company's Internal Audit Unit contains the principles and professional practices of internal auditors, the structure and position within the organization, authority, duties and responsibilities, functions, and the scope of assignments.

Duties and Responsibilities

The Internal Audit Unit (IAU) conducts internal audits at both the headquarters and branch offices. To ensure the effective implementation of audits across all entities, the IAU is supported by two (2) divisions under its purview, each with the following tasks and responsibilities:

1. Divisi Independent Control Unit (ICU)

Divisi ICU bertugas dan bertanggung jawab untuk melakukan pemeriksaan harian atas pelaksanaan kegiatan operasional di kantor-kantor cabang. Oleh karenanya, Divisi ICU menempatkan sekurang-kurangnya satu orang staff-nya di setiap kantor cabang. Untuk memastikan objektivitas hasil pengawasan, Divisi ICU melakukan rotasi staf antar-cabang secara berkala.

2. Divisi Internal Audit

Divisi ini bertugas melakukan pemeriksaan secara berkala terhadap transaksi yang sedang berjalan maupun yang sudah selesai dilakukan beserta dokumen dan data pendukungnya. Ruang lingkup pemeriksaan Divisi Internal Audit mencakup seluruh kegiatan operasional Perseroan, kepatuhan terhadap Pedoman Standar Operasional Perseroan (SOP) dan peraturan-peraturan yang ditetapkan oleh Pemerintah (yang berlaku umum).

1. Independent Control Unit (ICU) Division

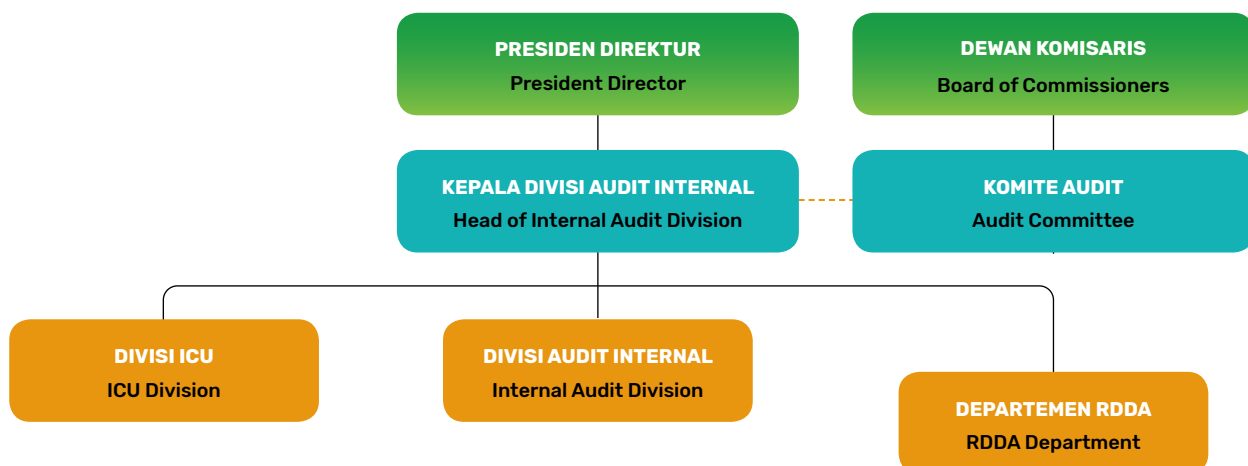
The ICU division is in charge and responsible for conducting daily inspections over the implementation of operational activities at branch offices. Therefore, the ICU Division places a minimum of one staff member in each branch office. Then, in order to ensure the objectivity of surveillance results, the ICU Division regularly rotates staff between branches.

2. Internal Audit Division

This division is in charge of conducting periodic examinations of ongoing and completed transactions, along with supporting documents and data. The scope of the Internal Audit Division's examinations covers all of the Company's operational activities, compliance with the Company's Standard Operating Guidelines (SOP) and regulations set by the Government (which are generally accepted).

Struktur dan Kedudukan UAI Dalam Organisasi

UAI's Structure and Position in the Organization



Secara struktural, Divisi ICU dan Divisi Internal Audit mempertanggungjawabkan realisasi pelaksanaan auditnya kepada Kepala Unit Audit Internal. Sedangkan, Kepala Unit Audit Internal bertanggung jawab langsung kepada Presiden Direktur. Kendati begitu, Kepala Unit Audit Internal tetap dapat berkomunikasi dengan Dewan Komisaris melalui Komite Audit untuk berkoordinasi terkait implementasi audit dan temuan hasil audit internal maupun eksternal.

Pihak yang Mengangkat/Memberhentikan Kepala Unit Audit Internal

Kepala Unit Audit Internal diangkat dan diberhentikan oleh Presiden Direktur atas persetujuan Dewan Komisaris. Presiden Direktur dapat sewaktu-waktu memberhentikan Kepala Unit Audit, setelah mendapat persetujuan Dewan Komisaris, apabila yang bersangkutan tidak lagi cakap dan/atau tidak kompeten dalam menjalankan tugasnya sebagaimana diatur dalam Piagam Unit Audit Internal.

Structurally, the Internal Control Division (Divisi ICU) and the Internal Audit Division report to the Head of the Internal Audit Unit for the completion of their audit implementations. Meanwhile, the Head of the Internal Audit Unit reports directly to the President Director. However, the Head of the Internal Audit Unit can continue to communicate with the Board of Commissioners through the Audit Committee to coordinate the implementation of internal and external audit findings.

The Party Appointing/Dismissing the Head of Internal Audit Unit

The President Director appoints and dismisses the Head of the Internal Audit Unit, with approval from the Board of Commissioners. The President Director may terminate the Head of the Internal Audit Unit at any time, with the approval of the Board of Commissioners, if the individual is no longer capable and/or competent in carrying out their duties as outlined in the Internal Audit Unit Charter.



Profil Kepala Audit Internal

I Made Darmawan

Warga Negara Indonesia, 52 tahun, domisili di Jakarta

Dasar Penunjukan:

Surat Keputusan Direksi Perseroan No. 075/SMK/V/2024 tertanggal 1 Juni 2024

Riwayat Pendidikan:

Sarjana Akuntansi dari Fakultas Ekonomi Universitas Jayabaya, Jakarta (1995)

Riwayat Karier:

- Kepala Divisi ICU & Audit di PT Oto Multiartha (2024 – saat ini)
- Kepala Unit Kerja Pengendalian Fraud (UKPF) di PT Summit Oto Finance (2019 – 2024)
- Wakil Kepala Divisi Independent Control Unit (ICU) di PT Summit Oto Finance (2012 – 2024)
- Kepala Departemen Independent Control Unit (ICU) di PT Summit Oto Finance (2006 – 2012)
- Team Leader Independent Control Unit (ICU) di PT Oto Multiartha (2002 – 2006)
- Staff Independent Control Unit (ICU) di PT Oto Multiartha (1999 – 2002)
- Internal Audit Staff di PT Bank Dharmala Indonesia (1997 – 1999)
- Internal Audit Staff di PT Bank Danamon Indonesia (1996 – 1997)

Kualifikasi/Sertifikasi Profesi Auditor Internal

Perseroan mendorong keterlibatan aktif seluruh auditor internal untuk mengikuti program sertifikasi yang relevan dengan ruang lingkup audit internal dan/atau manajemen risiko guna mendorong peningkatan kualitas personel audit internal agar senantiasa memenuhi standar profesi auditor internal yang terus meningkat seiring dengan berkembangnya ilmu pengetahuan dan kompleksitas bisnis, serta dalam rangka meningkatkan kemampuannya dalam melaksanakan tugas dan tanggung jawab sebagai auditor internal Perseroan.

Sepanjang tahun 2024, telah dilakukan *Certified Internal Control Professional (CICP)* sebanyak 2 batch yang diikuti oleh auditor internal Perseroan.

Laporan Pelaksanaan Tugas dan Tanggung Jawab UAI Tahun 2024

Divisi Independent Control Unit

Berdasarkan rencana kerja tahun 2024, Divisi Independent Control Unit telah melakukan pemeriksaan di 52 kantor cabang yang meliputi pemeriksaan kegiatan operasional dan kunjungan konsumen kepada 15.252 konsumen.

Head of Internal Audit Profile

I Made Darmawan

Indonesian citizen, 52 years old, domiciled in Jakarta

Basis of Appointment:

Decree of the Company's Board of Directors No. 075/SMK/V/2024 dated June 1, 2024

Educational Background:

Bachelor Degree of Accounting from Economic Faculty of Jayabaya University, Jakarta (1995)

Career History:

- Head of Internal Audit of PT Oto Multiartha (2024 – present)
- Head of Unit Kerja Pengendalian Fraud (UKPF) of PT Summit Oto Finance (2019 – 2024)
- Deputy Division Head of Independent Control Unit (ICU) of PT Summit Oto Finance (2012 – 2024)
- Departement Head of Independent Control Unit (ICU) of PT Summit Oto Finance (2006 – 2012)
- Team Leader of Independent Control Unit (ICU) of PT Oto Multiartha (2002 – 2006)
- Independent Control Unit (ICU) Staff of PT Oto Multiartha (1999 – 2002)
- Internal Audit Staff of PT Bank Dharmala Indonesia (1997 – 1999)
- Internal Audit Staff of PT Bank Danamon Indonesia (1996 – 1997)

Internal Auditor Professional Qualification/Certification

The Company encourages all internal auditors to actively participate in relevant certification programs related to internal auditing and/or risk management. This initiative aims to improve the quality of internal audit personnel by ensuring that they consistently meet the evolving standards of the internal auditor profession as knowledge advances and business complexity increases. It also serves the purpose of improving their abilities to perform their duties and responsibilities as internal auditors for the Company.

Throughout 2024, a certification was conducted 2 batch Certified Internal Control Professional (CICP), which was attended by the company's internal auditors.

Report on the Implementation of the UAI's Duties for 2024

Independent Control Unit Division

Based on the 2024 work plans, the Independent Control Unit Division has conducted inspections in 52 branch offices, including inspections of operational activities and customer visits to 15,252 customers.

Divisi Internal Audit

Berdasarkan rencana kerja tahun 2024, Divisi Internal Audit telah melakukan kegiatan pemeriksaan yang meliputi 51 kantor cabang, 10 Departemen pada 7 Divisi dan 1 Unit Kerja di Kantor Pusat, wilayah, gudang (*Pool*) dan fungsional lainnya serta kunjungan kepada sebanyak 3.378 konsumen. Sementara kegiatan pemeriksaan yang dilakukan pada sistem informasi telah dilakukan di 30 kantor cabang/regional 6 objek pemeriksaan di kantor pusat yang meliputi pemeriksaan pada *hardware*, *software* dan kepatuhan terhadap aturan yang berlaku di perusahaan.

Internal Audit Division

According to the 2024 work plans, the Internal Audit Division has carried out inspection activities that covered 51 branch offices, 10 Departments in 7 divisions, and 1 Work Units at the Head Office, regions, warehouses (*Pool*), and other functional areas as well as visits to as many as 3,378 customers. Meanwhile, inspection activities conducted on information systems have been executed in 30 branch/regional offices, 6 audited objects at the head office, which include inspections on hardware, software, and compliance with applicable regulations in the Company.

Program Pengembangan Kompetensi Kepala UAI Tahun 2024

UAI Head Competency Development Program 2024

Tanggal Date	Penyelenggara-Tempat Provider – Location	Workshop/training/seminar
24 Januari 2024	Mitra Berdaya- Jakarta	Audit Internal ISO 19011:2018
16 May 2024	IIA, IAI & DIA FEB-UNPAD	Implementasi Governance, Risk & Control Mendefinisikan Kembali Peran & Fungsi Internal Audit
28 June 2024	SPA FEB-UI – Jakarta	Mastering Sustainability Audit: Fostering Transparency, Accountability, and Impact
11 July 2024	IIA – Jakarta	Foresight : Metodologi & Penggunaannya
15 August 2024	SMBCI – Jakarta	Training Investigasi
12-13 September 2024	Hikmah Awdit – Jakarta	Sertifikasi – CICP (Certified Internal Control Professional)
25-26 November 2024	IIA – Jakarta	Performing an Effective Quality Assessment
3 December 2024	LC-OTO – Jakarta	Training ISO 27001

SISTEM PENGENDALIAN INTERNAL (SPI)

Sistem pengendalian internal adalah suatu mekanisme pengawasan yang ditetapkan oleh manajemen Perseroan secara berkesinambungan (*on-going basis*) dan melibatkan seluruh elemen Perseroan. Sebagai sebuah proses yang dijalankan oleh seluruh level organisasi Perseroan, maka sistem pengendalian internal wajib diterapkan di seluruh unit kerja dan didesain untuk dapat mengidentifikasi kemungkinan terjadinya suatu kejadian yang dapat mempengaruhi perusahaan, dan untuk mengelola risiko agar tetap berada dalam batas toleransi (*risk appetite*) Perseroan.

Perseroan terus berupaya untuk menerapkan sistem pengendalian internal yang efektif dan menyeluruh baik pada aspek keuangan maupun operasional dengan tujuan untuk meningkatkan efektivitas dan efisiensi pengendalian kelayakan atas laporan keuangan, operasional, serta kepatuhan terhadap peraturan perundang-undangan yang berlaku di Indonesia. Terbentuknya lingkungan pengendalian yang kuat dipercaya akan mampu menciptakan budaya organisasi yang positif.

INTERNAL CONTROL SYSTEM

The internal control system is a supervisory mechanism established by the Company's management on an ongoing basis, involving all elements of the Company. As a process implemented across all levels of the organization, the internal control system must be applied to all work units and is designed to identify potential events that could impact the Company, and to manage risks to ensure they remain within the Company's risk appetite.

The Company continues to strive to implement an effective and comprehensive internal control system in both financial and operational aspects, with the goal of improving the effectiveness and efficiency of controls over the suitability of financial reports, operations, and compliance with applicable Indonesian regulations. Establishing a strong control environment is thought to foster a positive organizational culture.



Ruang lingkup aktivitas pengendalian internal Perseroan meliputi serangkaian aturan, kebijakan, dan prosedur yang dirancang untuk mencapai tujuan dan sasaran strategis sebagai berikut:

- a) Efektivitas dan efisiensi operasional Perseroan;
- b) Pengamanan aset Perseroan;
- c) Menjamin keandalan dan ketersediaan laporan yang akurat; dan
- d) Meningkatkan kepatuhan/kesesuaian terhadap peraturan-peraturan dan ketentuan yang berlaku.

Pengawasan oleh Manajemen dan Budaya Pengendalian

Dalam kerangka kerja pengendalian internal Perseroan, Dewan Komisaris menjalankan fungsi pengawasan dan pemberian nasihat kepada Direksi terkait efektivitas pelaksanaan sistem pengendalian internal. Selain itu, Dewan Komisaris juga berperan aktif untuk memastikan adanya perbaikan terhadap permasalahan Perseroan yang dapat mengurangi efektivitas sistem pengendalian internal.

Sementara itu Direksi bertanggung jawab atas penetapan kebijakan dan strategi serta prosedur pengendalian internal. Selain itu, Direksi juga bertugas untuk memantau kecukupan dan efektivitas dari sistem pengendalian internal Perseroan termasuk memastikan kepatuhan Perseroan terhadap regulasi yang berlaku.

Pengendalian internal di Perseroan berfokus pada 3 (tiga) area utama, yaitu:

Pengendalian Keuangan

Dalam pengendalian aspek keuangan, Perseroan telah menerapkan sistem kebijakan akuntansi dan informasi yang memadai guna mencegah kemungkinan terjadinya *fraud* atau deviasi atas transaksi keuangan yang berpotensi merugikan Perseroan di kemudian hari. Untuk itu, Perseroan telah mengambil langkah-langkah pengendalian pada aspek keuangan, antara lain sebagai berikut:

1. Menerapkan pemisahan fungsi, tugas, dan tanggung jawab secara jelas agar setiap orang dalam jabatannya tidak memiliki peluang untuk melakukan dan/atau menyembunyikan kesalahan atau penyimpangan akuntansi/keuangan;
2. Menyusun kebijakan, prosedur, sistem operasional, dan standar akuntansi yang diperbarui (*update*) secara berkala;
3. Menerapkan sistem pemantauan berjenjang untuk memastikan bahwa transaksi-transaksi keuangan yang dilakukan dan dicatat sudah benar-benar dilakukan sesuai prosedur dan alur yang berlaku serta sudah dilakukan dengan sepengetahuan pihak yang berwenang;

The Company's internal controls include a series of rules, policies, and procedures designed to achieve the following strategic goals and objectives:

- a) The effectiveness and efficiency of the Company's operations;
- b) Safeguarding the Company's assets;
- c) Ensure the reliability and availability of accurate reports; and
- d) Improve compliance/conformity with the applicable regulations and provisions.

Supervision by Management and Control Culture

Within the framework of the Company's internal control, the Board of Commissioners performs its oversight and advisory functions, providing guidance to the Board of Directors regarding the effectiveness of internal control implementation. Additionally, the Board of Commissioners actively ensures the resolution of Company issues that may diminish the effectiveness of the internal control system.

Meanwhile, the Board of Directors is responsible for establishing policies, strategies, and internal control procedures. The Board of Directors is also tasked with monitoring the adequacy and effectiveness of the Company's internal control system, including ensuring the Company's compliance with applicable regulations.

The internal control of the Company focuses on three (3) main areas:

Financial Control

In controlling the financial aspects, the Company has implemented an adequate accounting and information system to prevent the possibility of fraud or deviations in financial transactions that could potentially harm the Company in the future. To that end, the Company has taken control measures on financial aspects, among others, as follows:

1. Implement a clear segregation of functions, duties, and responsibilities so that everyone in their position does not have the opportunity to commit and/or hide accounting/financial errors or irregularities;
2. Develop policies, procedures, operational systems, and accounting standards that are updated regularly;
3. Implement a tiered review system to ensure that the financial transactions performed and recorded have actually been conducted in accordance with applicable procedures and flows as well as have been done with the knowledge of the competent authorities;

4. Menggunakan *software* akuntansi yang sudah terakreditasi unggul untuk meminimalisir terjadinya *human error*;
5. Melakukan pengendalian aset fisik, antara lain melalui pengamanan aset, catatan dan dokumentasi serta akses terbatas terhadap program aplikasi.

Pengendalian Operasional

Terkait pengendalian aspek operasional, Perseroan telah melakukan penilaian tingkat kepatuhan pada setiap fungsi atau unit-unit kerja terhadap kebijakan dan prosedur yang relevan, pedoman operasional, petunjuk pelaksanaan, instruksi kerja, dan dokumen acuan lainnya. Sebagai bagian dari upaya pengendalian, Perseroan juga melakukan pemantauan atau telaah berkala terhadap perangkat kebijakan internal yang dimiliki untuk memastikan bahwa prosedur dan kebijakan tersebut sudah mengakomodir perkembangan regulasi dan dinamika bisnis yang terjadi.

Kepatuhan Terhadap Perundang-Undangan

Sebagai perusahaan pembiayaan, Perseroan memastikan penyelenggaraan kegiatan usahanya telah mematuhi ketentuan POJK No. 29/POJK.05/2020 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan Nomor 30/POJK.05/2014 tentang Tata Kelola Perusahaan yang Baik Bagi Perusahaan Pembiayaan serta juga mematuhi perundang-undangan yang berlaku dan regulasi rujukan lainnya. Untuk mencegah terjadinya risiko ketidakpatuhan terhadap regulasi yang berlaku, Perseroan berpartisipasi aktif mengikuti berbagai kegiatan sosialisasi peraturan dan perundang-undangan yang diselenggarakan oleh pihak regulator, khususnya peraturan terkait Industri Jasa Keuangan Non-Bank (IKNB) yang pengawasannya berada di bawah OJK dan Peraturan Pasar Modal.

Pernyataan Direksi dan/atau Dewan Komisaris atas Kecukupan Sistem Pengendalian Internal Tahun 2024

Komitmen untuk menerapkan sistem pengendalian internal secara menyeluruh pada setiap kegiatan usaha diwujudkan dengan memastikan bahwa sistem pengendalian Perseroan telah dilaksanakan secara memadai.

Dalam sistem pengendalian internal, Direksi bertanggung jawab penuh atas terselenggaranya pengendalian internal yang handal dan efektif, serta memastikan terciptanya budaya sadar risiko yang *robust* di antara karyawan dan setiap unit bisnis mengingat implementasi pengendalian internal merupakan sebuah proses yang harus dijalankan bersama oleh Direksi dan seluruh Pejabat Perseroan, Komite-Komite di bawah Direksi, Unit Audit Internal, seluruh karyawan, serta pihak-pihak eksternal.

Sementara itu, Dewan Komisaris dibantu oleh Komite Audit yang bertanggung jawab untuk melakukan pengawasan guna memastikan terlaksananya sistem pengendalian

4. Using accredited accounting software to minimize the potential for human error;
5. Control physical assets, among others through securing assets, records and documentation as well as limited access to application programs.

Operational Control

In terms of controlling operational aspects, the Company assesses the level of compliance of each function or work unit with relevant policies and procedures, operational guidelines, instructions, work instructions, and other reference documents. As part of its control actions, the Company also conducts periodic reviews or studies of its internal policies to confirm that the existing procedures and policies accommodate regulatory developments and business dynamics that occur.

Compliance with Legislation

One of the Company's efforts to prevent reputation risk is to ensure that all business activities carried out by the Company as a finance company have taken into account the provisions of POJK No. 29/POJK.05/2020 concerning Amendments to Financial Services Authority Regulation Number 30/POJK.05/2014 concerning Good Corporate Governance for Financing Companies and compliance with applicable legislation, as well as other reference regulations. To that end, the Company actively participates in various socialization activities of regulations and laws organized by the regulator, especially regulations related to the Non-Bank Financial Services Industry (IKNB) whose supervision is under the OJK and Capital Market Regulations.

Statement of the Board of Directors and/or Board of Commissioners on the Adequacy of the Internal Control System in 2024

Our commitment to implementing a comprehensive internal control system in every business activity is acknowledged by ensuring that the Company's control system has been implemented adequately.

In the internal control system, the Board of Directors is fully responsible for the implementation of reliable and effective internal control, as well as for ensuring the creation of a robust risk-aware culture among employees and each business unit, given that the implementation of internal control is a process that must be conducted by the Board of Directors and all of the Company's Officers, Committees under the Board of Directors, Internal Audit Unit, all employees, as well as external parties.

Meanwhile, the Board of Commissioners is assisted by the Audit Committee responsible for ensuring the implementation of the internal control system in general,



internal secara umum, termasuk mengawasi kebijakan Direksi yang menetapkan pengendalian internal tersebut.

Dengan mempertimbangkan proses pengendalian internal yang berjalan sepanjang tahun 2024, Direksi berpendapat sistem pengendalian internal yang diterapkan di Perseroan sudah memadai atau mencukupi.

MANAJEMEN RISIKO

Sebagai perusahaan yang bergerak di industri keuangan, Perseroan menyadari terdapat sejumlah risiko yang tidak terhindarkan dari kegiatan operasional bisnis sehari-hari. Untuk meminimalkan dampak risiko yang mungkin terjadi, Perseroan telah melakukan pengelolaan risiko secara proaktif melalui penerapan kebijakan manajemen risiko dengan model pendekatan *"Three Lines of Defense"* atau Pertahanan Tiga Lapis, serta mengacu pada POJK No. 44/POJK.05/POJK.05/2020 (*"POJK 44/2020"*) tentang Penerapan Manajemen Risiko Bagi Lembaga Jasa Keuangan Non-Bank.

Dalam konteks *Three Lines of Defense*, setiap unit kerja di Perseroan berperan sebagai pertahanan lapis pertama yang bertanggung jawab penuh untuk memastikan adanya lingkungan pengendalian (*control environment*) yang kondusif di unit bisnis mereka sehingga risiko-risiko yang dihadapi oleh setiap fungsi dapat diidentifikasi sejak awal.

Selanjutnya, Unit Kerja Manajemen Risiko berada pada pertahanan lapis kedua sebagai satuan kerja yang memiliki keahlian dan kompetensi memadai untuk memberikan analisis dan laporan-laporan mengenai kecukupan dan efektivitas manajemen risiko.

Terakhir Unit Audit Internal dan auditor eksternal berperan sebagai pertahanan lapis ketiga yang bertugas melakukan tinjauan dan evaluasi terhadap rancang bangun serta implementasi manajemen risiko (termasuk pengendalian internal) secara keseluruhan. Sebagai garda terakhir, Unit Audit Internal dan auditor eksternal juga bertanggung jawab untuk memastikan bahwa pertahanan lapis pertama dan lapis kedua sudah berjalan sesuai dengan yang diharapkan.

Melalui penerapan manajemen risiko yang terukur dan menyeluruh baik di kantor pusat hingga ke level cabang, Perseroan mampu memelihara tingkat *risk adjusted return* yang optimal sesuai dengan *risk appetite* yang diinginkan. Untuk mendukung efektivitas penerapan manajemen risiko, Perseroan juga secara berkesinambungan membangun kepekaan atau kepedulian karyawan terhadap budaya risiko (*risk culture*) agar setiap individu memiliki kemampuan dalam merumuskan *risk tolerance* yang tepat dengan selalu memperhatikan *risk appetite* Perseroan.

including overseeing the Board of Directors' policies that determine these internal controls.

Taking into account the internal control process that has been running throughout 2024, the Board of Directors is of the opinion that the internal control system implemented in the Company is adequate or sufficient.

RISK MANAGEMENT

The Company designs and implements a comprehensive risk management system by managing every risk factor encountered in all operational activities. To support effective risk control, the Company implements an integrated risk management system by adopting *"Three Lines of Defense"* and refers to the provisions of POJK No. 44/POJK.05/2020 (*"POJK 44/2020"*) dated September 2, 2020, concerning the Implementation of Risk Management for Non-Bank Financial Services Institutions.

Within the context of the *Three Lines of Defense*, every work unit of the Company has the role of a first line of defense, which is fully responsible for ensuring a conducive control environment in their business unit so that all potential risks faced by each function could be identified early on.

Furthermore, the Risk Management Work Unit acts as the second line of defense as a work unit that has the appropriate expertise and competency to conduct analysis and make reports on the adequacy and effectiveness of risk management.

Finally, the Internal Audit Unit and external auditor act as the third line of defense, with the task of conducting a review and evaluation of the design and implementation of risk management (including internal control) as a whole. As the last line of defense, the Internal Audit Unit and the external auditor are also responsible for ensuring that the first and second lines of defense are working as expected.

Through the implementation of measurable and comprehensive risk management, both at the head office and the branch level, the Company is able to maintain an optimal level of risk-adjusted return in accordance with the desired risk appetite. To support the effectiveness of risk management implementation, the Company also continuously builds employee sensitivity or awareness of risk culture so that each individual has the ability to formulate the right risk tolerance by always considering the Company's risk appetite.