

**LAPORAN PENILAIAN SENDIRI (SELF ASSESSMENT)
PELAKSANAAN GOOD CORPORATE GOVERNANCE (GCG)**

**SELF ASSESSMENT REPORT
GOOD CORPORATE GOVERNANCE IMPLEMENTATION**

Nama Bank : HSBC Indonesia
Name of Bank : HSBC Indonesia

Posisi : 31 Desember 2015
Position : 31 December 2015

Hasil Penilaian Sendiri (Self Assessment) Pelaksanaan GCG Self Assessment Result of GCG Implementation		
	Peringkat Rating	Definisi Peringkat The Definition of Rating
Individual Individual	Peringkat 2 Rating 2	<p>Mencerminkan Manajemen Bank telah melakukan penerapan GCG yang secara umum baik. Hal ini tercermin dari pemenuhan yang memadai atas prinsip-prinsip GCG. Apabila terdapat kelemahan dalam penerapan prinsip GCG, maka secara umum kelemahan tersebut bersifat kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank.</p> <p><i>Reflects that the Bank's Management in general has implemented well Good Corporate Governance. This is reflected from the adequate compliance of Good Corporate Governance principles. If there are weaknesses in the implementation of Good Corporate Governance principles, in general such weaknesses are less significant and can be settled by normal actions by the Bank's management.</i></p>
Konsolidasi Consolidated		
Analisis Analysis		
<p>Berdasarkan analisis terhadap seluruh kriteria/indikator penilaian GCG, disimpulkan bahwa:</p> <p>Governance Structure</p> <p>Faktor-faktor positif aspek <i>governance structure</i> Bank adalah :</p> <ul style="list-style-type: none"> • Bank telah memiliki Pengurus/ Pimpinan Bank dengan kompetensi yang memadai dan relevan dengan jabatannya untuk menjalankan tugas dan tanggung jawabnya serta mampu mengimplementasikan kompetensi yang dimilikinya dalam pelaksanaan tugas dan tanggung jawabnya. • Selama semester kedua 2015 sampai dengan kwartal pertama 2016, telah terjadi perubahan susunan Pengurus HSBC Indonesia sebagai berikut : <ul style="list-style-type: none"> ▪ Sdr. Blake D Hellam telah disetujui sebagai 	<p>Based on the analysis of all the criteria / indicator of GCC assessment, it is concluded that:</p> <p>Governance Structure</p> <p>The positive factors of Bank's governance structure aspect :</p> <ul style="list-style-type: none"> • The Bank has Bank's Management with adequate competencies which relevant to their position to carry out their duties and responsibilities and able to implement their competencies in the execution of its duties and responsibilities. • During second semester 2015 until first quarter of 2016, the composition of the Bank's Management has changed with the detail as follows : <ul style="list-style-type: none"> ▪ Referring to Otoritas Jasa Keuangan 	

<p>Head of Retail Banking & Wealth Management berdasarkan surat Otoritas Jasa Keuangan No. SR-208/D.03/2015 tanggal 4 November 2015. Sdr. Blake D Hellam telah diangkat secara resmi sebagai Head of Retail Banking & Wealth Management sejak 10 November 2015 berdasarkan Surat Pengangkatan No. IMOHRD 1511137 tanggal 10 November 2015 dan surat pengangkatan tersebut telah disampaikan ke Otoritas Jasa Keuangan pada tanggal 12 November 2015.</p> <ul style="list-style-type: none"> ▪ Sdr. John Rosie telah disetujui sebagai Head of Operations berdasarkan surat Otoritas Jasa Keuangan No. SR-212/D.03/2015 tanggal 18 November 2015. Sdr. John Rosie telah diangkat secara resmi sebagai Head of Operations sejak 20 November 2015 berdasarkan Surat Pengangkatan No. IMOHRD 1511257 tanggal 20 November 2015 dan surat pengangkatan tersebut telah disampaikan ke Otoritas Jasa Keuangan pada tanggal 23 November 2015. ▪ Sdr. Haryanto Suganda telah disetujui sebagai Head of Banking Coverage berdasarkan surat Otoritas Jasa Keuangan No. SR-40/D.03/2016 tanggal 22 Februari 2016. Sdr. Haryanto Suganda telah diangkat secara resmi sebagai Head of Banking Coverage sejak 1 Maret 2016 berdasarkan Surat Pengangkatan No. IMOHRD 1603086 tanggal 29 Februari 2016 dan surat pengangkatan tersebut telah disampaikan ke Otoritas Jasa Keuangan pada tanggal 8 Maret 2016. ▪ Daniel Gareth Hankinson telah mengundurkan diri dari HSBC Indonesia dan mendapatkan penempatan baru di kantor cabang HSBC luar negeri lainnya sejak 1 Maret 2016. <ul style="list-style-type: none"> • Sebagai cerminan pelaksanaan GCG untuk mendukung penerapan manajemen risiko dan pengendalian intern yang baik, Bank telah memiliki Satuan Kerja Audit Internal (SKAI), Satuan Kerja Kepatuhan dan beberapa Komite Inti dan Komite Pendukung berikut di bawah ini: <ul style="list-style-type: none"> ○ Komite Inti terdiri dari: <ul style="list-style-type: none"> ▪ <i>Management Committee (MANCO)</i> ▪ <i>Executive Committee (EXCO)</i> ▪ <i>Risk Management Committee (RMC)</i> ▪ <i>People Committee</i> ▪ <i>HSBC Operations Services & Technology (HOST) Steering Committee</i> 	<p>(OJK) Letter No. SR-208/D.03/2015 dd. 4 November 2015, Blake D Hellam has been approved as Head of Retail Banking and Wealth Management. His formal appointment has been effective since 10 November 2015 based on The Appointment Letter No. IMOHRD 1511137 dd. 10 November 2015 which has been submitted to OJK on 12 November 2015.</p> <ul style="list-style-type: none"> ▪ Referring to Otoritas Jasa Keuangan (OJK) Letter No. SR-212/D.03/2015 dd. 18 November 2015, John Rosie has been approved as Head of Operations. His formal appointment has been effective since 20 November 2015 based on The Appointment Letter No. IMOHRD 1511257 dd. 20 November 2015 which has been submitted to OJK on 23 November 2015. ▪ Referring to Otoritas Jasa Keuangan (OJK) Letter No. SR-40/D.03/2016 dd. 22 February 2016, Haryanto Suganda has been approved as Head of Banking Coverage. His formal appointment has been effective since 1 March 2016 based on The Appointment Letter No. IMOHRD 1603086 dd. 29 February 2016 which has been submitted to OJK on 8 March 2016. ▪ Daniel Gareth Hankinson has resigned from HSBC Indonesia and has new assignment at other HSBC branch outside Indonesia since 1 March 2016. <ul style="list-style-type: none"> • As a reflection of GCG implementation for supporting good risk management implementation and internal control, Bank has established Internal Audit Department, Compliance Department and the following of Primary Committees and Sub-set Committees: <ul style="list-style-type: none"> ○ Primary Committees consist of: <ul style="list-style-type: none"> ▪ Management Committee (MANCO) ▪ Executive Committee (EXCO) ▪ Risk Management Committee (RMC) ▪ People Committee ▪ HSBC Operations Services & Technology (HOST) Steering Committee
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<ul style="list-style-type: none"> ▪ <i>Asset Liabilities Committee (ALCO)</i> ▪ <i>Global Standards In Country- Execution Committee (ICEC)</i> <p>○ Komite Pendukung terdiri dari :</p> <ul style="list-style-type: none"> ▪ <i>Financial Crime Compliance (FCC) Steering Committee</i> ▪ <i>Outsourcing Oversight Committee (OOC)</i> ▪ <i>Wealth Management Oversight Committee (WMOC)</i> ▪ <i>Retail Banking Wealth Management Price Change Forum (RBWM PCF)</i> ▪ <i>Valuation Committee</i> ▪ <i>Business Control Committee</i> ▪ <i>Incentive Committee</i> ▪ <i>Pension Plan Committee</i> <ul style="list-style-type: none"> • Bank telah memiliki kebijakan, sistem dan prosedur penyelesaian mengenai benturan kepentingan yang mengikat setiap pengurus dan pegawai Bank untuk dapat mengidentifikasi dan mengelola konflik kepentingan (<i>conflict of interest</i>) yang terjadi antara kepentingan HSBC. • Mulai tahun buku yang berakhir 31 Desember 2015, HSBC Indonesia telah menunjuk Kantor Akuntan Publik (KAP) Tanudiredja, Wibisana, Rintis & Rekan (a member firm of PricewaterhouseCoopers) untuk bertindak sebagai auditor eksternal/independen untuk memeriksa laporan keuangan maupun proses-proses yang mempengaruhi laporan keuangan HSBC Indonesia. Sebelumnya, Bank menunjuk Kantor Akuntan Publik Siddharta Widjaja & Rekan yang berafiliasi dengan KPMG International sebagai auditor eksternal. • Bank telah memiliki kebijakan, sistem dan prosedur tertulis yang memadai untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar, berikut monitoring dan penyelesaian masalahnya. • Bank memiliki kebijakan dan prosedur mengenai tata cara pelaksanaan transparansi kondisi keuangan dan non keuangan untuk mengungkapkan transparansi kepada regulator ataupun pemangku kepentingan. • Bank telah memiliki rencana strategis Bank didukung sepenuhnya oleh pemilik Bank, antara lain tercermin dari komitmen dan upaya pemilik Bank untuk memperkuat permodalan Bank. 	<ul style="list-style-type: none"> ▪ <i>Asset Liabilities Committee (ALCO)</i> ▪ <i>Global Standards In Country- Execution Committee (ICEC)</i> <p>○ Sub-set Committees consist of :</p> <ul style="list-style-type: none"> ▪ <i>Financial Crime Compliance (FCC) Steering Committee</i> ▪ <i>Outsourcing Oversight Committee (OOC)</i> ▪ <i>Wealth Management Oversight Committee (WMOC)</i> ▪ <i>Retail Banking Wealth Management Price Change Forum (RBWM PCF)</i> ▪ <i>Valuation Committee</i> ▪ <i>Business Control Committee</i> ▪ <i>Incentive Committee</i> ▪ <i>Pension Plan Committee</i> <ul style="list-style-type: none"> • The Bank has policies, systems and procedures for the settlement of the conflict of interest that binds every director and employees of the Bank to be able to identify and manage the conflicts of interest (conflict of interest) that occurs between the interests of HSBC. • Starting financial year that ended 31 December 2015, HSBC Indonesia has appointed Public Accountant Firm (KAP) Tanudiredja, Wibisana, Rintis & Rekan (a member firm of PricewaterhouseCoopers) to act as an external/independent auditor to audit the financial statements as well as processes that affect the financial statements of HSBC Indonesia. Previously the Bank appointed Public Accountant Firm (KAP) Siddharta Widjaja & Rekan, a member firm of KPMG International, as an external auditor. • The Bank has adequate policies, systems and procedures for the provision of funds for related parties and large exposures and its monitoring and resolution of the issues. • The Bank has policies and procedures regarding the procedures for implementing the transparency of financial and non-financial conditions to reveal transparency to regulators or stakeholders. • The Bank has Bank's strategic plan with fully supported by the owners, among others reflected in the commitment and efforts of the owner to strengthen capital of the Bank.
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Faktor-faktor negatif aspek *governance structure* Bank adalah :

- Tidak memiliki Dewan komisaris dan Dewan Direksi pada struktur organisasi HSBC Indonesia, hal ini dikarenakan status HSBC Indonesia merupakan Kantor Cabang HSBC yang beroperasi di Indonesia, akan tetapi HSBC Indonesia memiliki Pengurus/ Pimpinan Bank yang bertanggung jawab atas pelaksanaan kinerja HSBC Indonesia. Pemimpin tertinggi adalah *Country Manager & Chief Executive* dengan 8 (delapan) *Head of Businesses* termasuk Direktur yang membawahkan Fungsi Kepatuhan dan Direktur Manajemen Risiko. Pengurus ini setara dengan tugas dan tanggung jawab Direksi perusahaan di Indonesia. Para pengurus secara efektif melaksanakan tugas dan kewajibannya setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan. Sedangkan fungsi Dewan Komisaris selaku pengawas dilaksanakan oleh *Regional Head HSBC Asia Pacific*.
- Tidak terdapat Komite Audit, Komite Pemantau Risiko, Komite Nominasi dan Remunerasi pada struktur organisasi HSBC Indonesia. Namun demikian sebagai cerminan pelaksanaan GCG untuk mendukung penerapan manajemen risiko dan pengendalian intern yang baik, Bank telah memiliki Satuan Kerja Audit Internal (SKAI), Satuan Kerja Kepatuhan dan beberapa Komite Inti dan Komite Pendukung sebagaimana dijelaskan diatas.

Governance Process

Faktor-faktor positif aspek *governance process* Bank adalah :

- Pimpinan Bank adalah *Country Manager & Chief Executive* dengan 8 (delapan) anggota Pengurus yang terdiri dari *Head of Businesses* termasuk Direktur yang membawahkan Fungsi Kepatuhan dan Direktur Manajemen Risiko. Pengurus secara efektif melaksanakan tugas setelah mendapatkan persetujuan Otoritas Jasa Keuangan. Seluruh Pengurus menetap di Indonesia serta bertanggung jawab penuh atas pelaksanaan kepengurusan Bank.
- Dengan telah memiliki Satuan Kerja Audit Internal (SKAI), Satuan Kerja Kepatuhan dan beberapa Komite Inti dan Komite Pendukung sebagaimana telah dijelaskan diatas, maka efektivitas pengendalian intern dan kerangka kerja manajemen risiko Bank dapat dikelola dengan baik serta setiap permasalahan yang terjadi dapat dikaji dan ditemukan solusi

The negative factors of Bank's *governance structure aspect* :

- The Bank does not have the Board of Commissioners and Board of Directors in the organization structure of HSBC Indonesia. This is because the status of a Branch Office of HSBC Indonesia which operates in Indonesia. However, HSBC Indonesia has Bank's Management that is responsible for the implementation of the performance of HSBC Indonesia. The Top management is Country Manager and Chief Executive assisted by 8 (eight) Head of Businesses, including the Director in charge for Compliance Function and Risk Management Director. The Bank's management is equivalent to the task of responsibilities for the company in Indonesia. The Bank's Management are able to carry out their roles and obligations effectively after obtaining approval from Otoritas Jasa Keuangan. While the function of Board of Commissioner as supervisor is implemented by HSBC's Regional Head Asia Pacific.
- The Bank does not have the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee in the organizational structure of HSBC Indonesia. However, As a reflection of GCG implementation for supporting good risk management implementation and internal control, Bank has established Internal Audit Department, Compliance Department and the Primary Committees and Sub-set Committees as mentioned above.

Governance Process

The positive factors of Bank's *governance process aspect* :

- The Top Management is Country Manager & Chief Executive supported by 8 (eight) Head of Businesses, including the Director in charge for Compliance Function and Risk Management Director. The Bank's Management are able to carry out their roles and obligations effectively after obtaining approval from Otoritas Jasa Keuangan. The Bank's Management stayed in Indonesia and are responsible for the implementation of the management of the Bank.
- Bank has Internal Audit Department, Compliance Department and Primary Committees and Sub-set Committees as mentioned above, therefore, the effectiveness of internal control and risk management framework can be managed by the Bank as well as any problems that occur can be assessed and found to completion solutions.

<p>penyelesaiannya.</p> <ul style="list-style-type: none"> • Dalam hal terjadi benturan kepentingan, Pengurus/ Pimpinan Bank dan Pejabat Eksekutif tidak mengambil tindakan yang dapat merugikan atau mengurangi keuntungan Bank. • Bank telah melakukan identifikasi, pengukuran, monitoring, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada peraturan Bank Indonesia atau Otoritas Jasa Keuangan mengenai Penerapan Manajemen Risiko bagi Bank Umum: • Bank telah menerapkan fungsi audit intern secara efektif pada seluruh aspek dan unsur kegiatan yang secara langsung diperkirakan dapat mempengaruhi kepentingan Bank dan masyarakat • Dalam pelaksanaan audit laporan keuangan Bank, Bank telah menunjuk Akuntan Publik dan KAP yang terdaftar di Bank Indonesia dan telah sesuai dengan peraturan yang berlaku yaitu Kantor Akuntan Publik (KAP) Tanudiredja, Wibisana, Rintis & Rekan (a member firm of PricewaterhouseCoopers) untuk bertindak sebagai auditor eksternal/independen untuk memeriksa laporan keuangan maupun proses-proses yang mempengaruhi laporan keuangan HSBC Indonesia. • Bank telah secara berkala mengevaluasi dan mengkinikan kebijakan, sistem dan prosedur tertulis secara memadai untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar, berikut monitoring dan penyelesaian masalahnya • Bank telah mengungkapkan secara transparan atas kondisi keuangan dan non-keuangan Bank kepada pemangku kepentingan termasuk mengumumkan Laporan Keuangan Publikasi triwulanan, Laporan Tahunan Bank dan Laporan <i>Good Corporate Governance</i> dan melaporkannya kepada Otoritas Jasa Keuangan atau pemangku kepentingan sesuai ketentuan yang berlaku (baik melalui surat kabar maupun <i>homepage</i> Bank yaitu www.hsbc.co.id). • Bank telah menyusun Rencana Bisnis Bank secara realistis, komprehensif, terukur (<i>achievable</i>) dengan memperhatikan prinsip kehati-hatian dan responsif terhadap perubahan internal dan eksternal. Rencana Bisnis Bank tahun 2016 – 2018 telah disampaikan ke Otoritas Jasa Keuangan pada tanggal 30 November 2015. 	<ul style="list-style-type: none"> • In the event of conflict of interest, Bank's Management and Executive Officers do not take actions that could harm or reduce the profit of the Bank. • Bank has made the identification, measurement, monitoring, and control of the Compliance Risk with reference to Bank Indonesia / Otoritas Jasa Keuangan regulation concerning Risk Management Implementation for Commercial Banks: • Bank has implemented internal audit function effectively in all aspects and elements of the activities that are directly expected to affect the interests of the Bank and the public. • For the audit fieldwork of Bank's financial statements, Bank has appointed Public Accountant and Public Accountant Firm registered in Bank Indonesia and in accordance with applicable regulations i.e. Public Accountant Firm (KAP) Tanudiredja, Wibisana, Rintis & Rekan (a member firm of PricewaterhouseCoopers) to act as an external/independent auditor to audit the financial statements as well as processes that affect the financial statements of HSBC Indonesia. • Bank has regularly evaluated and updated the policies, systems and procedures adequately for the provision of funds to related parties and large exposures, and its monitoring and settlement of the issues. • Banks have disclosed transparently on Bank's financial and non-financial conditions to stakeholders including to publish quarterly Financial Statements, the Bank's Annual Report and Good Corporate Governance Report and submitted to Otoritas Jasa Keuangan or stakeholders according to applicable regulations (either through newspapers or Bank's homepages i.e. www.hsbc.co.id). • Bank has prepared Bank's Business Plan realistically, comprehensive, measurable (achievable) by taking into account the prudent principle and responsive to the internal and external changes. Bank's Business Plan for the year of 2016 - 2018 has been submitted to Otoritas Jasa Keuangan on 30 November, 2015.
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<p>Faktor-faktor negatif aspek <i>governance process</i> Bank adalah :</p> <ul style="list-style-type: none"> • Fungsi Dewan Direksi dan Komite – komite yang tidak dimiliki oleh bank telah dan dapat dijalankan fungsinya oleh Pengurus/ Pimpinan Bank dan komite – komite yang dibentuk di tingkat lokal. 	<p>The negative factors of Bank's <i>governance process aspect</i> :</p> <ul style="list-style-type: none"> • Functions of the Board of Directors and its Committees that are not owned by the bank can be carried out by Bank's Management and the existing committees which have been established in Indonesia.
<p>Governance Outcome</p>	<p>Governance Outcome</p>
<p>Faktor-faktor positif aspek <i>governance outcome</i> Bank adalah :</p> <ul style="list-style-type: none"> • Pengurus/ Pimpinan Bank telah mempertanggungjawabkan pelaksanaan tugasnya kepada Kantor Pusat sehingga keberhasilan untuk mencapai visi dan misi Bank dapat dicapai sesuai dengan rencana • Dengan memiliki komite – komite sebagaimana disebutkan diatas maka masing-masing Komite telah melaksanakan fungsinya sesuai ketentuan yang berlaku • Dengan memiliki kebijakan benturan kepentingan maka kegiatan operasional bank bebas dari intervensi pemilik/pihak terkait/pihak lainnya yang dapat menimbulkan benturan kepentingan yang dapat merugikan Bank atau mengurangi keuntungan Bank • Dengan menerapkan manajemen risiko secara efektif yang disesuaikan dengan tujuan, kebijakan usaha, ukuran dan kompleksitas usaha serta kemampuan Bank maka potensial risiko yang akan dihadapi Bank lebih dapat diminimalisir 	<p>The positive factors of Bank's <i>governance outcome aspect</i> :</p> <ul style="list-style-type: none"> • Bank's Management has been accounted for the implementation of their duties to the Head Office so that the success in achieving its vision and mission can be achieved according to the plan. • By having committees as mentioned above, each committee has been carrying out its functions in accordance with the prevailing regulations. • By having a conflict of interest policy, the bank's operations are free from the intervention from the owner / parties / other parties that may pose a conflict of interest that may harm the Bank or reduce Bank's profit. • By applying effective risk management, which is tailored to the objectives, business policy size and complexity of the Bank's business as well as the ability of the potential risks faced by the Bank will be able to be minimized.
<p>Berdasarkan hasil penilaian tersebut diatas, Bank telah melaksanakan prinsip-prinsip GCG dalam semua kegiatan usahanya pada seluruh tingkatan atau jenjang organisasi dan merupakan suatu wujud nyata kami untuk memberikan komitmen yang tinggi terhadap pelaksanaan GCG dalam tata kelola perusahaan dan keseriusan kami untuk mematuhi peraturan perundangan yang berlaku dengan tujuan untuk lebih meningkatkan kinerja, efisiensi serta pelayanan kami kepada pemangku kepentingan.</p>	<p>Based on the above assessment result, The Bank has implemented the principles of GCG in all business activities at all levels of the organization and represents a concrete manifestation of our high commitment to GCG in corporate governance, and our seriousness to comply with applicable legislation with the aim to further improve performance, efficiency, and our service to stakeholders.</p>

Jakarta, 30 Mei 2016



on behalf
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Sumit Dutta
Country Manager & Chief Executive, HSBC Indonesia

**Kesimpulan Umum Hasil Self Assessment
Pelaksanaan Good Corporate Governance
2015**

**General Conclusion Self Assessment Results
Good Corporate Governance Implementation
2015**

Sehubungan dengan pelaksanaan Good Corporate Governance (GCG) di The Hongkong Shanghai Banking Corporation Limited Indonesia ("Bank"), dengan memperhatikan kondisi Bank saat melakukan evaluasi terhadap cakupan pelaksanaan GCG, berikut kesimpulan umum dan peringkat komposit atas hasil self-assessment GCG Bank.

In connection with the implementation of Good Corporate Governance (GCG) at The Hongkong Shanghai Banking Corporation Limited Indonesia (the "Bank"), and considering the condition of the Bank when performing the evaluation of GCG, the following are the general conclusions and composite predicate of the Bank's GCG calculations based on the self-assessment result.

No. No.	Faktor Factor	Peringkat Rating	Keterangan Remarks
1.	<p>Pelaksanaan tugas dan tanggung jawab Dewan Komisaris</p> <p><i>The implementation of roles and responsibilities of the Board of Commissioners</i></p>	2	<p>Pelaksanaan tugas dan tanggung jawab Dewan Komisaris dengan menggunakan struktur organisasi yang ada di Kantor Pusat HSBC.</p> <p><i>The Implementation of roles and responsibilities of the Board of Commissioners is through the existing organizational structure at the Bank Headquarters.</i></p>
2.	<p>Pelaksanaan tugas dan tanggung jawab Direksi</p> <p><i>The implementation of roles and responsibilities of the Board of Directors</i></p>	1	<p>Walaupun Bank tidak memiliki Dewan Direksi, peran direksi telah dilaksanakan oleh Pengurus/ Pimpinan Bank.</p> <p><i>Although the Bank does not have Board of Directors, such roles are carried out by the Bank's Management (HoBs).</i></p>
3.	<p>Kelengkapan dan pelaksanaan tugas Komite</p> <p><i>The completion and the implementation of roles of the committee</i></p>	2	<p>Walaupun Bank tidak memiliki komite-komite tersebut, namun fungsi komite telah dilaksanakan oleh departemen/ unit bisnis yang dimiliki Bank.</p> <p><i>Although the Bank does not have such committees, however, the function of committees has been executed by the department / business units within the Bank.</i></p>
4.	<p>Penanganan kepentingan benturan</p>		<p>Penanganan benturan kepentingan telah memenuhi semua aspek GCG dan langkah –</p>

No. No.	Faktor Factor	Peringkat Rating	Keterangan Remarks
	<i>Conflicts of interest Handling</i>	1	<p>langkah perbaikan telah dilakukan.</p> <p><i>The implementation of conflict of interest has complied with all aspects of the GCG and stages of improvement have been performed.</i></p>
5.	Penerapan fungsi kepatuhan Bank <i>The Implementation of Bank's compliance function</i>	2	<p>Penerapan fungsi kepatuhan telah memenuhi semua aspek GCG. Namun masih terdapat beberapa kelemahan minor.</p> <p><i>The Implementation of compliance function has complied with all aspects of the GCG. However, minor weaknesses are still found.</i></p>
6.	Penerapan fungsi audit intern <i>The Implementation of the internal audit function</i>	2	<p>Untuk melaksanakan fungsi audit internal yang efektif, Bank telah membentuk Unit Audit Internal pada bulan Desember 2011.</p> <p><i>To run an effective internal audit function, the Bank has established Internal Audit Unit in December 2011.</i></p>
7.	Penerapan fungsi audit ekstern <i>The implementation of external audit functions</i>	2	<p>Pelaksanaan audit oleh akuntan publik eksternal sudah sesuai dengan persyaratan yang ditentukan. Namun masih terdapat beberapa kelemahan minor.</p> <p><i>The audit by public accountants have been effective and in accordance with the requirements specified. However, minor weaknesses are still found.</i></p>
8.	Fungsi manajemen risiko termasuk sistem pengendalian intern <i>Risk management functions including internal control system</i>	2	<p>Manajemen sangat efektif dalam memonitor kondisi Bank sesuai dengan prinsip pengelolaan manajemen yang baik dan ketentuan yang berlaku.</p> <p><i>Management is very effective in monitoring on Bank conditions in accordance with sound management principles, and regulations.</i></p>
9.	Penyediaan dana kepada pihak terkait (related party) dan debitur besar (large exposures) <i>Provision of funds to related parties and large exposures</i>	1	<p>Bank telah memiliki kebijakan, sistem dan prosedur tertulis yang up to date dan lengkap untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar.</p> <p><i>Bank has a policy, system and written procedures that are up to date and complete for the provision of funds to related parties and for large exposures.</i></p>

No. No.	Faktor Factor	Peringkat Rating	Keterangan Remarks
10.	<p>Transparansi kondisi keuangan dan non keuangan, laporan pelaksanaan Good Corporate Governance dan pelaporan internal</p> <p><i>Transparency of financial and non financial conditions, Good Corporate Governance Implementation report and internal reporting.</i></p>	2	<p>Bank telah transparan dan menyediakan akses yang mudah dalam menyampaikan informasi keuangan dan non-keuangan kepada publik melalui website bank dan media.</p> <p><i>The Bank has been transparent and provide easy access in providing financial information and non-financial information to the public through the Bank's website and media.</i></p>
11.	<p>Rencana strategis Bank</p> <p><i>The Bank's strategic plan</i></p>	1	<p>Rencana Bisnis Bank (business plan) sesuai dengan visi dan misi Bank serta Rencana Korporasi (corporate plan) Bank.</p> <p><i>The Bank's Business Plan is in accordance with the vision and mission of the Bank and the Corporate Plan.</i></p>
Nilai Komposit Composite Score		2	
Predikat Komposit Composite Predicates		BAIK GOOD	

Pelaksanaan GCG pada Bank berlandaskan kepada aspek transparansi, akuntabilitas, pertanggungjawaban, independensi dan kewajaran didukung oleh komitmen yang sungguh-sungguh dari seluruh Pimpinan dan Pejabat Bank untuk meningkatkan mutu pengelolaan perbankan.

The implementation of GCG in the Bank is based on the aspects of transparency, accountability, responsibility, independence, fairness, supported by a genuine commitment from the Management and all Bank Officers in order to improve the quality of Bank' operation.

Bank telah memberikan informasi yang memadai, jelas, akurat, dan mudah untuk diakses kepada stakeholders, serta telah menerapkan check and balance system dalam pengelolaan Bank. Selain itu Bank juga telah menerapkan prinsip kehati-hatian dan menghindari segala bentuk benturan kepentingan serta menerapkan asas kesetaraan dan kewajaran (equal treatment).

The Bank has provided adequate information with clear, accurate, and easy access to stakeholders, and has implemented a check and balance system for managing the Bank. In addition, the Bank has also implemented prudent banking practices and avoids any forms of conflict of interest by applying the principles of equality and fairness (equal treatment).

Prinsip-prinsip GCG dijadikan sarana untuk mengidentifikasi dan mengantisipasi potensi kerugian yang mungkin dapat terjadi dan memberikan solusi untuk membangun kepercayaan masyarakat dan membawa kestabilan investasi jangka panjang.

Governance practices are used as a means to identify and anticipate the possibility of potential losses that may occur, and provide solutions to build public confidence and bring long-term sustainable investments.

Untuk memenuhi semua aspek GCG, langkah-langkah perbaikan telah dilakukan sehubungan dengan kelemahan minor yang teridentifikasi dalam penanganan benturan kepentingan, pelaksanaan fungsi kepatuhan Bank, pelaksanaan fungsi audit ekstern dan sehubungan dengan pelaporan transparansi keuangan dan kondisi non-keuangan serta rencana strategis.

In order to fulfill all aspects of GCG, corrective actions have been taken in relation to minor weaknesses sought in the implementation of the Compliance function of the Bank, the implementation of the external audit function, and reporting in relation to the transparency of financial & non-financial and strategic plan.

Bank telah melaksanakan prinsip-prinsip GCG dalam semua kegiatan usahanya pada seluruh tingkatan atau jenjang organisasi. Predikat komposit "**Baik**" yang diperoleh Bank merupakan suatu wujud nyata kami untuk memberikan komitmen yang tinggi terhadap GCG dalam tata kelola perusahaan dan keseriusan kami untuk mematuhi peraturan perundangan yang berlaku dengan tujuan untuk lebih meningkatkan kinerja, efisiensi serta pelayanan kami kepada stakeholders.

The Bank has implemented the principles of GCG in all business activities at all levels of the organization. The composite scores of "Good" obtained by the Bank represents a concrete manifestation of our high commitment to GCG in corporate governance, and our seriousness to comply with applicable legislation with the aim to further improve performance, efficiency, and our service to stakeholders.