



<p><b>LAMPIRAN IV</b> SURAT EDARAN BANK INDONESIA NOMOR 15/15/DPNP TANGGAL 29 April 2013 PERIHAL PELAKSANAAN <i>GOOD CORPORATE GOVERNANCE</i> BAGI BANK UMUM</p>	<p><b>APPENDIX IV</b> BANK INDONESIA CIRCULAR LETTER NOMOR 15/15/DPNP DATED 29 April 2013 CONCERNING THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE FOR COMMERCIAL BANK</p>
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**LAPORAN PENILAIAN SENDIRI (*SELF ASSESSMENT*) PELAKSANAAN *GOOD CORPORATE GOVERNANCE* (GCG) /  
THE SELF ASSESSMENT REPORT OF THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE (GCG)**

Nama Bank/Bank's Name : PT. Bank CTBC Indonesia  
Posisi/Position : 31 Desember 2017

<b>Hasil Penilaian Sendiri (<i>Self Assessment</i>) Pelaksanaan GCG/ The Self Assessment Result of The Implementation of GCG</b>		
	<b>Peringkat/ Rating</b>	<b>Definisi Peringkat / Rating Definition</b>
<b>Individual</b>	<b>2</b>	<p>Mencerminkan Manajemen Bank telah melakukan penerapan <i>Good Corporate Governance</i> yang secara umum baik. Hal ini tercermin dari pemenuhan yang memadai atas prinsip-prinsip <i>Good Corporate Governance</i>. Apabila terdapat kelemahan dalam penerapan prinsip <i>Good Corporate Governance</i>, maka secara umum kelemahan tersebut kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank.</p> <p>Reflect that Bank Management in general has conducted good implementation of Good Corporate Governance. This is reflected in the fulfill of which has been quite adequate on the principles of Good Corporate Governance. If there are weaknesses in the implementation of the principles of Good Corporate Governance, in general these weaknesses are insignificant and can be resolved normally by the Bank management.</p>
<b>Konsolidasi/ Consolidation</b>		
<b>Analisis/Analysis</b>		



<p><b><u>Identifikasi Permasalahan :</u></b></p>	<p><b><u>Problems Identification :</u></b></p>
<p><b>A. Risiko Kredit</b></p> <p>1. Pada Nota Reklasifikasi ke EW 2 tanggal 23 Februari 2016, Persetujuan hanya dilakukan oleh C-SCO3 dan tidak terdapat wakil pada sisi bisnis. Selain itu Jaminan yang digunakan hanya berupa <i>inventory</i> yang diikat secara fiducia senilai Rp 10 M, hal tersebut tidak sesuai dengan Prosedur Kredit untuk Kredit Korporasi.</p> <p><u>Selesai</u> : Bank telah merevisi prosedur penilaian agunan berupa piutang, <i>Post Dated Cheque</i> (PDC), dan persediaan.</p> <p>2. Penetapan jumlah sampling minimum Account Receivable (A/R) Jumlah sampling <i>Account Receivable</i> (A/R) yang harus diperiksa (kesesuaian antara data <i>real</i> di lapangan dan data antara list A/R yang dijaminan debitur kepada Bank) secara berkala belum ditentukan atau dibuat prosedur (dalam hal ini terkait dengan penentuan jumlah minimum sampling) dengan Bank.</p> <p><u>Selesai</u> : Jumlah sampling A/R yang dipersyaratkan, tertuang dalam <i>Term &amp; Condition</i> pada setiap pengajuan debitur. Bank telah menambahkan analisis justifikasi pemilihan jumlah <i>sample</i> pada <i>Credit Proposal</i>.</p> <p>3. Pada “Kebijakan Inti Kredit Korporasi (KIKK) ver. 2016 pada PART 1440</p>	<p><b>A. Credit Risk</b></p> <p>1. In the Notification of Reclassification to EW2 dated February 23, 2016, the approval was made only by C-SCO3 and there was no representative from the business side. In additio to that, the colateral used was only in form of inventory bound by fiduciary in the amount of IDR10 B, the foregoing is not in compliance with the Credit Procedures for Corporate Credit.</p> <p><u>Completed</u> : Bank has revised the procedure of appraisal collateral in form of receivable, <i>Post Dated Cheque</i> (PDC), and inventory.</p> <p>2. Determinig the Minimum Sample Size of Account Receivable (A/R) Number of samples Account Receivable (A / R) to be checked (suitability between real data in field and data between A / R list guaranteed by debtor to Bank) periodically not yet determined or made procedure (in this case related to determination of minimum sampling) With the Bank</p> <p><u>Completed</u> : The number of A / R samples required, set forth in Term &amp; Condition on each debtor submission. The bank has added a justification analysis of the selection of sample quantities on the Credit Proposal.</p> <p>3. On "Corporate Core Credit Policy (CCCP) ver. 2016 on PART 1440 Credit</p>
<p><i>Restructuring</i>”, belum dijelaskan mengenai pelaksanaan Kredit Restrukturisasi kepada kredit Pihak Terkait. Bank perlu memasukkan ketentuan mengenai hal tersebut dikarenakan pada PBI</p>	<p>Restructuring ", has not been explained about the implementation of Restructuring Credit for the Related Party credits. The Bank needs to include a provision on the matter as it is in PBI. 14/15 / PBI / 2012 Concerning Asset Quality Rating for</p>



No. 14/15/PBI/2012 Tentang Penilaian Kualitas Aset Bank Umum, Bab VI, Pasal 57 memuat mengenai perlakuan restrukturisasi kredit kepada Pihak Terkait.

Selesai : Bank telah menambahkan ketentuan perlakuan restrukturisasi kredit kepada Pihak Terkait sesuai PBI No. 14/15/PBI/2012 di prosedur untuk Restrukturisasi Kredit.

### **B. Risiko Operasional**

#### **a. Form Aplikasi Pembukaan Deposito**

Pada form Aplikasi Deposito terdapat pernyataan *Terms and Conditions* terkait dengan pembukaan Deposito di bagian belakang form. Nasabah perlu untuk benar-benar memahami poin-poin pada *Terms and Conditions* tersebut terutama untuk klausul terkait risiko dan tanggung jawab.

Selesai : Bank telah menambahkan klausul tersebut pada halaman depan Form Aplikasi Deposito dan *Terms and Conditions* dibelakang form Aplikasi Deposito halaman 1/2 (bank).

#### **b. Pemantauan keamanan data nasabah**

Bank melakukan kerjasama dengan pihak ketiga dalam penyelenggaraan pekerjaan pencetakan, pengamplopan sampai dengan pengiriman dokumen (rekening giro) kepada nasabah bank, sejak 2 Februari 2015.

Namun sejak awal kerjasama bank belum pernah melakukan pemeriksaan terhadap pihak ketiga tersebut, Bank seharusnya memiliki SOP pemeriksaan terhadap pihak ketiga yang mengelola data nasabah dan secara rutin melakukan pemeriksaan terhadap pihak ketiga tersebut termasuk didalamnya *hardware* yang digunakan,

Commercial Banks, Chapter VI, Article 57 contains credit restructuring treatment to Related Parties.

Completed: The Bank has added the terms of treating the credit restructuring to the Related Parties in accordance with Bank Indonesia Regulation (PBI) no. 14/15 /PBI/2012 in the procedure for Credit Restructuring.

### **B. Operational Risk**

#### **a. Deposit Opening Application From**

In the Deposit Application form there is a Terms and Conditions statement related to the opening of the Deposit at the back of the form. The Customer needs to fully understand the Terms and Conditions points particularly for risk and responsibility clauses.

Completed: The Bank has added the clause on the front page of the Deposit Application Form and Terms and Conditions behind the Deposit Application Form of page 1/2 (bank).

#### **b. Monitoring of customer data security**

The Bank cooperates with third party in the implementation of printing jobs, up to delivery of documents (checking accounts) to bank customers, since February 2, 2015.

But since the beginning of cooperation the bank has never conducted an examination of third party. The Bank should have a SOP of the inspection of a third party who manages the customer's data and routinely checks against such third parties including the hardware used, hardware security access and third party personnel as well as the procedures for deleting customer data.



<p>akses keamanan <i>hardware</i> dan personil pihak ketiga serta tata cara penghapusan data nasabah.</p> <p><u>Selesai</u> : Bank telah melakukan kunjungan pemeriksaan terhadap pihak ketiga yang mengelola data nasabah secara periodik. Bank telah menyampaikan laporan hasil kunjungan tersebut.</p> <p>c. Proses Penagihan Bulanan. Prosedur Departemen Operasi menyatakan bahwa laporan konsolidasi tagihan akan dikirimkan ke Perusahaan setiap bulan untuk menagih pembayaran, sementara pada pelaksanaannya tagihan tersebut dikirim ke Account Officer terlebih dahulu tidak langsung dikirim kepada Perusahaan.</p> <p><u>Selesai</u> : Mulai November 2017, Consumer Lending Group (CLG) telah menginformasikan nama PIC dan alamat email kepada Operation Group. Oleh karena itu Operation Group telah mengirimkan tagihan bulanan ke PIC perusahaan, dengan tembusan Account Officer, Team Leader dan Collections.</p> <p>d. Verifikasi ID Salah satu dokumen utama untuk <i>Salary Loan</i>, saat ini adalah ID asli pemohon (KTP / e-KTP) yang diperiksa oleh Sales Officer (Karyawan <i>Outsource</i>). Namun proses pemeriksaan hanya sebatas memeriksa apakah ID fotokopi sesuai dengan dokumen asli.</p>	<p><u>Completed</u>: Bank has conducted inspection visits to third parties who manage customer data periodically. The Bank will report the results of the visit.</p> <p>c. Monthly Billing Process. The Operation Department Procedure states the consolidation collection reports shall be sent to the Company every month for getting payment, whilst the practice it is sent to the Account Officer first instead of to the Company.</p> <p><u>Completed</u>: Startirig on November 2017, Consumer Lending Group (CLG) has informed PIC name and email id to Operation Group. Therefore Operation Group has sent the monthly billing to PIC in the company, cc. Account Officer, Team Leader and Collections.</p> <p>d. ID Verification As one of the primary document for Salary Loan, currently the applicant's original ID (KTP/e-KTP) that checked by the Sales Officer (Outsource Employee), However the process/requirement is limited to check whether the copy ID is in line with the original one.</p>
<p><u>Tindak lanjut</u>: CLG dan RCCD akan mempelajari rekomendasi untuk meminta akses ke Dukcapil.</p> <p><u>Target Penyelesaian</u>: 30 Juni 2018.</p>	<p><u>Follow Up</u>: CLG and RCCD will studying the recommendation to access request of Dukcapil.</p> <p><u>Completion Target</u>: 30 June 2018.</p>



<p>e. Ketidakkonsistenan Proses Distribusi Penagihan antara Manual Kerja Sales &amp; Prosedur Operasi. Terdapat ketidakkonsistenan antara Manual Kerja Sales &amp; Prosedur Operasi dalam hal Penagihan Bulanan. Dalam Manual Kerja Sales menetapkan, Account Officer (setelah menerima tagihan) harus meneruskan penagihan kepada orang yang berwenang, sedangkan Prosedur Operasi menetapkan bahwa laporan konsolidasi tagihan dikirimkan ke perusahaan setiap bulan untuk menagih pembayaran.</p> <p><u>Tindak lanjut:</u></p> <p>a. Bank akan mengembangkan Sistem Penagihan Bulanan untuk menghasilkan file penagihan yang dienkripsi dengan kata kunci dan secara otomatis dikirim melalui email ke PIC perusahaan dan pihak lain yang berwenang.</p> <p><u>Target Penyelesaian:</u> 31 Maret 2018.</p> <p>b. Bank akan merevisi Prosedur Operasi &amp; Manual Kerja Sales.</p> <p><u>Target Penyelesaian:</u> 30 September 2018.</p> <p>f. Kurangnya keterlibatan dari Pengawas Bisnis <i>Salary Loan</i> (AO Leader/Coordinator/CLG Salary/Corporate Loan Sales Dept. Head) di lapangan untuk memastikan bisnis / operasi perusahaan / koperasi masih berjalan seperti biasa.</p> <p><u>Selesai:</u> Peran dan tanggung jawab (AO Leader/Coordinator/CLG</p>	<p>e. Inconsistency of Billing Distribution Process between the Sales Working Manual &amp; the Operation Procedure. There is inconsistency between the Sales Working Manual &amp; the Operation Procedure in terms of the Monthly Billing. In the Sales Working Manual stipulates the Account Officer (after receiving billing statement) must forward the billing: Statement to the authorized persons, whereas the Operation Procedure stipulates the consolidation collection reports shall be sent to the company every month for getting payment.</p> <p><u>Follow Up:</u></p> <p>a. The Bank will enhancement a Monthly Billing System to generate encrypted billing files with password and automatically sent via email to PIC company and other authorized parties.</p> <p><u>Completion Target:</u> 31 March 2018.</p> <p>b. Bank will revise Operation Procedure &amp; Working Manual.</p> <p><u>Completion Target:</u> 30 September 2018.</p> <p>f. The lack of involvement from the Salary Loan Business supervisor (AO Leader/Coordinator/CLG Salary/Corporate Loan Sales Dept. Head) in the field to ensure the company/cooperative's business &amp; operation are still normally run as usual.</p> <p><u>Completed:</u> The general role and responsibility of AO Leader/Coordinator/Sales Head had been defined in job</p>
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<p>Salary/Corporate Loan Sales Dept. Head) telah didefinisikan dalam deskripsi pekerjaan masing-masing level supervisor tertentu.</p> <p>g. Proses Transfer domestik dilakukan tidak sesuai dengan peraturan internal bank dikarenakan kurangnya kesadaran risiko dari staf bersangkutan. Bank disarankan untuk mensosialisasikan kembali Prosedur &amp; Manual Kerja / Peraturan Penting lainnya untuk memastikan semua staf operasional Bank memiliki kesadaran risiko.</p> <p><u>Selesai:</u> Bank telah melakukan pelatihan mengenai Prosedur &amp; Manual Kerja / Peraturan penting lainnya kepada seluruh staf Cabang Bandung RM, ARM dan Front Office.</p> <p><b>C. Risiko Hukum</b> Bank diminta untuk melakukan review terhadap semua PK dan jaminannya untuk menghindari tuntutan hukum dimasa mendatang serta untuk memperkuat posisi Bank di mata hukum.</p> <p><u>Selesai:</u> Bank telah melakukan review terhadap seluruh dokumen kredit (PK dan jaminan) bekerjasama antara Legal Korporasi dengan external lawyer dan semua hasil review telah dietujui oleh Manajemen Bank.</p> <p><b>D. Penerapan APU-PPT</b> a. Dalam Prosedur Internal Bank terkait Penerapan Program APU dan PPT belum mencantumkan nomor-nomor surat Kepala PPATK mengenai tata cara pelaporan.</p> <p><u>Selesai :</u></p>	<p>description of each particular supervisor level.</p> <p>g. The Domestic transfer process is not performed in accordance with the internal rules of the bank due to lack of awareness of the risks of the staff concerned. Banks are encouraged to re-socialize Working Procedures &amp; Manuals / Other Regulations to ensure all operational staff of the Bank are aware of the risks.</p> <p><u>Completed:</u> The Bank has conducted training on Work Procedures / Manual / Other important regulations to all staff of Bandung Branches RM, ARM and Front Office.</p> <p><b>C. Legal Risk</b> Banks are required to review all FA and its guarantees to avoid future lawsuits and to strengthen the Bank's position in the eyes of the law.</p> <p><u>Completed:</u> The Bank has reviewed all credit documents (FA and guarantees) in collaboration between Legal Corporation and external lawyer and all review results have been approved by the Bank Management.</p> <p><b>D. Implementation of AML-CFT</b> a. In the Bank Internal Procedure related to the Implementation of APU and PPT Program has not included the letter number of Head of PPATK regarding the reporting procedure.</p> <p><u>Completed:</u> The Bank has included the letter numbers</p>
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<p>Bank telah mencantumkan nomor-nomor surat Kepala PPATK dimaksud di dalam Prosedur APU&amp;PPT terkait.</p> <p>b. Integritas Data CBS – SmartAML Terdapat 2 transaksi tunai pada bulan Januari 2017 yang terdapat di Oracle, namun tidak terdapat dalam sistem SmartAML. Tidak terjaganya integritas data dapat menyebabkan kemungkinan tidak terlapornya transaksi tunai secara lengkap ke PPATK.</p> <p><u>Selesai:</u> Ke-2 transaksi tunai yang disebutkan di dalam temuan, nilainya dibawah Rp. 500 juta, sehingga memang tidak perlu dilaporkan ke PPATK. Untuk transaksi tunai dengan nilai Rp. 500 juta atau lebih, semuanya telah dilaporkan ke PPATK.</p> <p>Namun demikian, Bank telah memperbaiki penyebab tidak tertariknya ke dalam sistem SmartAML terhadap ke-2 transaksi tunai dimaksud.</p> <p>c. Tidak Terdapat Proses Rekonsiliasi – Interface Bank tidak melakukan rekonsiliasi terhadap proses interface untuk memastikan integritas data saat melakukan copy data dari source systems ke aplikasi SmartAML.</p> <p><u>Selesai :</u> Bank telah menambahkan proses rekonsiliasi pada aplikasi SmartAML untuk memastikan data yang diambil dari <i>source systems</i> akan sama dengan data yang diterima oleh aplikasi SmartAML.</p>	<p>of the Head of the PPATK referred to in the applicable AML &amp; CFT Procedures.</p> <p>b. CBS – SmartAML Data Integrity There are 2 cash transactions in January 2017 contained in Oracle, but not in the SmartAML system. Inadequate data integrity may result in non-reported cash transactions that should be reported to PPATK.</p> <p><u>Completed:</u> The 2 cash transactions mentioned in the findings are below IDR 500 million, so it does not need to be reported to PPATK. For cash transactions with a value of IDR 500 million or more, all have been reported to PPATK.</p> <p>However, the Bank has checked the reasons for its disinterest in the SmartAML system against those 2 cash transactions and has been corrected.</p> <p>c. Absense of Reconciliation Process – Interface The Bank does not reconcile the interface process to ensure data integrity when copying data from source systems to SmartAML applications.</p> <p><u>Completed:</u> The Bank has added a reconciliation process to the SmartAML app to ensure that data retrieved from source systems will be the same as the data received by the SmartAML app.</p>
<p><b><u>Kekuatan Pelaksanaan GCG :</u></b></p> <p>Bank telah memiliki Struktur dan infrastruktur tata kelola Bank yang memadai yang diperlukan</p>	<p><b><u>Strength of GCG Implementation:</u></b></p> <p>The Bank has structures and infrastructures of Bank Good Governance which required in the process of implementation of GCG principle to</p>



<p>dalam proses pelaksanaan prinsip GCG untuk menghasilkan <i>outcome</i> yang sesuai dengan harapan <i>stakeholders</i> Bank.</p> <p>Bank telah memiliki efektivitas proses pelaksanaan prinsip <i>Good Corporate Governance</i> (GCG) yang memadai yang didukung oleh Struktur dan infrastruktur tata kelola Bank yang baik sehingga menghasilkan <i>outcome</i> yang sesuai dengan harapan <i>stakeholders</i> Bank.</p> <p>Bank telah memiliki kualitas <i>outcome</i> yang memadai yang memenuhi harapan <i>stakeholders</i> Bank yang merupakan hasil proses pelaksanaan prinsip GCG yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank.</p> <p>Dalam hal terdapat kelemahan-kelemahan pada 3 aspek diatas, secara umum kelemahan tersebut kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank.</p> <p style="text-align: center;"><b><u>Kesimpulan</u></b></p> <p>Berdasarkan analisis terhadap seluruh kriteria/indikator penilaian terlampir, disimpulkan bahwa:</p> <p><b>A. Governance Structure</b></p> <ul style="list-style-type: none"> <li>- Faktor-faktor positif aspek <i>governance structure</i> Bank : Sebagian besar aspek <i>governance structure</i> Bank telah mencukupi sesuai dengan struktur dan infrastruktur tata kelola Bank yang dipersyaratkan, namun masih terdapat kelemahan yang tercermin dalam faktor-faktor negative aspek <i>governance structure</i> Bank.</li> <li>- Faktor-faktor negatif aspek <i>governance structure</i> Bank adalah terdapat kelemahan-</li> </ul>	<p>produce outcomes that match the expectations of Bank's stakeholders.</p> <p>The Bank has had an effective process on the implementation of the Principles of Good Corporate Governance (GCG), which supported by good structure and infrastructure of the Bank's Good Governance, so to produce outcomes that correspond to the expectations of stakeholders Bank's.</p> <p>The Bank has an adequate quality outcome that meets the expectations of bank's stakeholders which is the result of the process of implementation of GCG principle that supported by adequate structure and infrastructure of Bank's governance.</p> <p>In the case of any weaknesses in the above 3 aspects, the weaknesses in general is less significant and can be resolved with normal action, by the Bank's management.</p> <p style="text-align: center;"><b><u>Conclusion</u></b></p> <p>Based on the analysis of all the criteria / indicators attached assessment, concluded that:</p> <p><b>A. Governance Structure</b></p> <ul style="list-style-type: none"> <li>- Positive factors on aspect of Bank's <i>governance structure</i>: Most aspects of the Bank's governance structure are sufficient in accordance with the required Bank governance structure and infrastructure, but there are still weaknesses reflected in the negative aspects of the Bank's governance structure.</li> <li>- Negative factors on aspect of Bank's <i>governance structure</i> are in the followins</li> </ul>
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kelemahan sebagai berikut:

- Ketidakkonsistenan Proses Distribusi Penagihan antara Manual Kerja Sales & Prosedur Operasi.

**B. Governance Process**

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

Sebagian besar aspek *governance process* Bank telah efektif sesuai dengan efektivitas proses pelaksanaan prinsip *Good Corporate Governance (GCG)* yang dipersyaratkan, namun masih terdapat kelemahan yang tercermin dalam faktor-faktor negatif aspek *governance process* Bank.

- Faktor-faktor negatif aspek *governance process* Bank adalah terdapatnya kelemahan sebagai berikut:
  - Verifikasi ID.

**C. Governance Outcome**

- Faktor-faktor positif aspek *governance outcome* Bank :

Sebagian besar faktor positif aspek *governance outcome* Bank telah memenuhi kualitas *outcome* yang memenuhi harapan *stakeholders* Bank, namun terdapat kelemahan yang tercermin dalam faktor-faktor negatif aspek *governance outcome* Bank, dimana kelemahan tersebut telah selesai diperbaiki.

weakness:

- Inconsistency of Billing Distribution Process between the Sales Working Manual & the Operation Procedure.

**B. Governance Process**

- Positive factors on aspect of Bank's governance process:

Most aspects of the Bank's governance process have been effective in accordance with the effectiveness of the required Good Corporate Governance (GCG) implementation process, but there are still weaknesses reflected in the negative factors of the Bank's governance process.

- Negative factors of Bank governance process are the following weakness:
  - ID Verification.

**C. Governance Outcome**

- Factors positive aspects of governance outcomes Bank:

Governance aspects of the Bank has adequate outcome in accordance with quality outcomes that meet the expectations of stakeholders Bank, but there are weaknesses reflected in the negative factors of Bank governance outcome, where the vulnerability is being repaired.



Frank Huang

Presiden Direktur / President Director



Fantina Repi

Direktur Kepatuhan / Compliance Director



Liliana Tanadi

Direktur Director




Peter Lien

Direktur / Director



Inayat Hisyam

Direktur / Director



Lasmintono

Direktur / Director