

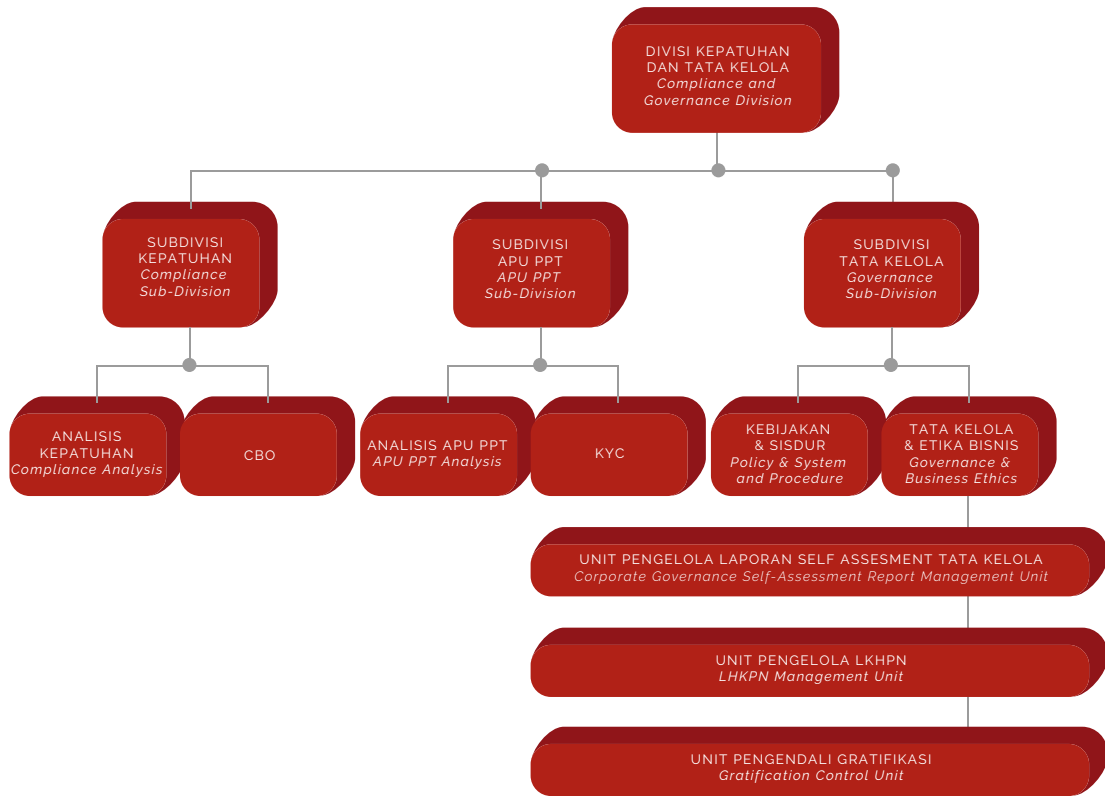
FUNGSI KEPATUHAN

COMPLIANCE FUNCTION



STRUKTUR ORGANISASI KEPATUHAN

COMPLIANCE ORGANIZATION STRUCTURE



Pembentukan Satuan Kerja Kepatuhan oleh Direktur yang membawahkan Kepatuhan diatur dalam Peraturan Otoritas Jasa Keuangan Nomor 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum. Satuan Kerja Kepatuhan wajib bersifat independen dan hanya bertanggung jawab langsung kepada Direktur Kepatuhan.

The establishment of the Compliance Unit by the Director in charge of Compliance is regulated in the Financial Services Authority Regulation Number 46/POJK.03/2017 concerning the Implementation of the Compliance Function of Commercial Banks. The Compliance Unit must be independent and only report directly to the Compliance Director.

PROFIL KEPALA SATUAN KERJA KEPATUHAN

PROFILE OF THE HEAD OF COMPLIANCE WORK UNIT

Nama	Moch. Nadjib, 57 tahun
Jabatan	Pemimpin Divisi Kepatuhan & Tata Kelola
Menjabat sejak	12 Agustus 2019
SK Jabatan	058/225/DIR/HCP/KEP
Pengalaman menjabat	Pemimpin Divisi Bisnis Syariah (2015-2019)
Background pendidikan	Magister Manajemen
Telah lulus sertifikasi	Level-4 Program Sertifikasi Manajemen Risiko

Name	Moch. Nadjib, 57 years old
Position	Head of Compliance & Governance Division
Served since	August 12, 2019
A Position Decree	058/225/DIR/HCP/KEP
Experience in office	Head of Sharia Business Division (2015-2019)
Educational background	Masters in Management
Certification	Level-4 Risk Management Certification Program

PERSONEL SATUAN KERJA KEPATUHAN

NO	JABATAN	JUMLAH PERSONEL
1	Pemimpin Sub Divisi	3
2	Senior Analis	6
3	Analis	4
4	Junior Analis	9

TUGAS DAN TANGGUNG JAWAB SATUAN KERJA KEPATUHAN

1. Mewujudkan terlaksananya budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank;
2. Mengelola risiko kepatuhan yang dihadapi oleh Bank
 - Risiko kepatuhan yang dihadapi
 - Jenis dan signifikansi pelanggaran yang dilakukan
 - Frekuensi pelanggaran yang dilakukan/track record kepatuhan Bank
 - Potensi risiko kepatuhan yang diperkirakan akan dihadapi ke depan
 - Tindak lanjut dan mitigasi risiko kepatuhan yang telah dilaksanakan
 - Komparasi laporan kepatuhan
 - Laporan khusus Direktur Kepatuhan;
3. Memastikan agar kebijakan, ketentuan, sistem, dan prosedur serta kegiatan usaha yang dilakukan oleh Bank telah sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku dalam rangka melaksanakan prinsip kehati-hatian
 - Pemantauan Perkembangan Tingkat Kesehatan Bank
 - Penyampaian peraturan perundang-undangan, peraturan Bank Indonesia/peraturan Otoritas Jasa Keuangan, Surat Edaran Bank Indonesia/Surat Edaran Otoritas Jasa Keuangan
 - Memberikan pendapat dan rekomendasi atas usulan atau permohonan persetujuan dari divisi terkait yang ditujukan kepada Direksi;
4. Memastikan Kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan/Bank Indonesia dan/atau otoritas pengawas lain yang berwenang
 - Pemantauan Pelaksanaan Tugas SKAI;
 - Pemantauan pelaksanaan perjanjian dan komitmen dengan Bank Indonesia/Otoritas Jasa Keuangan dan dengan pihak ekstern lainnya;
 - Pemantauan Kepatuhan pelaporan ke Bank Indonesia/Otoritas Jasa Keuangan dan pihak ekstern lain;
 - Kewajiban penerapan tata kelola bagi Bank umum.

KEGIATAN KEPATUHAN 2019

1. Melakukan pemantauan terhadap tingkat Kepatuhan pada masing – masing Kantor Cabang melalui *Compliance Checklist* oleh *Compliance Branch Officer* (CBO) Cabang, selain itu juga melakukan koordinasi rutin dengan CBO kantor pusat terkait kendala dan permasalahan yang dihadapi di Cabang;

COMPLIANCE WORK UNIT PERSONNEL

NO	POSITION	TOTAL PERSONNEL
1	Sub-Division Head	3
2	Senior Analyst	6
3	Analyst	4
4	Junior Analyst	9

DUTIES AND RESPONSIBILITIES OF THE COMPLIANCE WORK UNIT

1. Realizing the implementation of Compliance culture at all levels of the Bank's organization and business activities;
2. Managing compliance risks faced by the Bank
 - Compliance risks faced
 - The type and significance of violations committed
 - Frequency of violations committed/track record of Bank compliance
 - Potential compliance risks that are expected to be faced in the future
 - Follow up and mitigation of compliance risks that have been implemented
 - Comparison of compliance reports
 - Special report on Compliance Director;
3. Ensuring that the policies, provisions, systems, and procedures as well as business activities carried out by the Bank are in accordance with the provisions and regulations in force in order to implement the precautionary principle
 - Monitoring the Development of Bank Soundness
 - Submission of laws and regulations, Bank Indonesia regulations/Financial Services Authority regulations, Bank Indonesia Circular Letter/Financial Services Authority Circular
 - Provide opinions and recommendations on proposals or requests for approval from the relevant divisions addressed to the Directors;
4. Ensuring Bank Compliance with commitments made by the Bank to the Financial Services Authority/Bank Indonesia and/or other authorized supervisory authorities
 - Monitoring the Implementation of Duties of SKAI;
 - Monitoring the implementation of agreements and commitments with Bank Indonesia/the Financial Services Authority and with other external parties;
 - Monitoring compliance of reporting to Bank Indonesia/ Financial Services Authority and other external parties;
 - Obligatory to implement governance for commercial banks.

COMPLIANCE ACTIVITY 2019

1. Monitor the level of Compliance at each Branch Office through the Compliance Checklist by the Compliance Branch Officer (CBO) of the Branch, while also coordinating regularly with the CBO of the head office regarding the constraints and problems encountered at the Branch;

2. Monitoring atas profil Risiko Kepatuhan Kantor Cabang Bank Jatim;
 3. Menyelenggarakan bimbingan teknis gratifikasi bersama Komisi Pemberantasan Korupsi (KPK);
 4. Mengevaluasi capaian Program Pemberantasan Korupsi terintegrasi kabupaten/kota terutama terkait kegiatan optimalisasi pendapatan daerah pada pemerintah kabupaten/kota di Jawa Timur;
 5. Sharing informasi kepada kantor cabang, Divisi dan Direksi atas peraturan-peraturan baru OJK dan BI melalui media group Whatsapp Jatim *Smart Compliance*;
 6. Melakukan pemantauan terhadap tingkat Kepatuhan pada masing-masing Kantor Cabang melalui *Compliance Checklist* oleh *Compliance Branch Officer* (CBO) Cabang.
 7. Melakukan roadshow ke kantor cabang untuk mendorong pemahaman dan pelaksanaan fungsi kepatuhan dan budaya kepatuhan terhadap ketentuan yang berlaku dalam kegiatan operasional dan non operasional Bank;
2. Monitoring over the profile of Bank Jatim Branch Office Compliance Risk;
 3. Organizing technical guidance on gratification with the Corruption Eradication Commission (KPK);
 4. Evaluating the achievements of the integrated district/city Corruption Eradication Program, especially related to the activities of optimizing regional income at the district/city government in East Java;
 5. Sharing information to branch offices, divisions and directors on new OJK and BI regulations through the Whatsapp Jatim Smart Compliance media group;
 6. Monitor the level of compliance at each branch office through the Compliance Checklist by the Branch Compliance Officer (CBO).
 7. Conduct roadshows to branch offices to encourage understanding and implementation of the compliance function and culture of compliance with applicable regulations in Bank operational and non-operational activities;

INDIKATOR KEPATUHAN

Dalam rangka pelaksanaan prinsip kehati-hatian, kegiatan operasional Bank tahun 2019 tidak menyimpang dari ketentuan yang berlaku. Hal tersebut tercermin dari rasio keuangan yang terdiri dari 11 parameter (*benchmark*) yang ditetapkan OJK per Desember 2019 sebagaimana tercantum di bawah ini:

PEMANTAUAN RASIO KEUANGAN BANK JATIM

No	Rasio	Kriteria	Nilai Rasio (%)
1	Kewajiban Penyediaan Modal Minimum (KPMM)	>8%	21.77
2	Aset Produktif Bermasalah dan Aset Non Produktif Bermasalah terhadap Total Aset Produktif dan Aset Non Produktif.	-	1.91
3	Aset Produktif Bermasalah terhadap Total Aset Produktif.	<2.5%	2.09
4	Cadangan Kerugian Penurunan Nilai (ckpn) atas Aset Keuangan terhadap Aset Produktif.	-	1.50
5	NPL gross	< 5%	2.77%
6	NPL net	-	0.71%
7	Return On Asset (ROA)	>1.22%	2.73
8	Return On Equity (ROE)	> 12%	18.00
9	Net Interest Margin (NIM)	>5%	6.11
10	Biaya Operasional terhadap Pendapatan Operasional (BOPO)	<94%	71.40

INDICATOR OF COMPLIANCE

In the framework of implementing the precautionary principle, the Bank's operational activities in 2019 do not deviate from applicable regulations. This is reflected in the financial ratio that consists of 11 parameters (benchmarks) set by the FSA as of December 2019 as listed below:

MONITORING OF BANK JATIM FINANCIAL RATIOS

no	Ratio	criteria	Ratio value (%)
1	Minimum Capital Requirement (KPMM)	>8%	21.77
2	Problematic Earning Assets and Problematic Non-Earning Assets for Total Earning Assets and Non-Earning Assets.	-	1.91
3	Problematic Earning Assets for Total Earning Assets.	<2.5%	2.09
4	Allowance for Impairment Losses (ckpn) of Financial Assets to Earning Assets.	-	1.50
5	Gross NPL	< 5%	2.77%
6	Net NPL	-	0.71%
7	Return On Asset (ROA)	>1.22%	2.73
8	Return On Equity (ROE)	> 12%	18.00
9	Net Interest Margin (NIM)	>5%	6.11
10	Operating Costs to Operating Income (BOPO)	<94%	71.40

No	Rasio	Kriteria	Nilai Rasio (%)
11	Loan to Deposit Ratio (LDR)	>75<105%	63.34
12	Rasio Intermediasi Makroprudensial (RIM)	>80<92%	67.93
13	Posisi Devisa Netto (PDN)	20%	< 1.33%

Dari 11 parameter (*benchmark*) yang ditetapkan OJK, rata-rata rasio Tingkat Kesehatan Bank Tahun 2019 menunjukkan rasio Bank yang "SEHAT" dan tidak ada pelanggaran yang signifikan terhadap ketentuan OJK maupun peraturan perundang-undangan lainnya yang berlaku.

PENERAPAN PROGRAM ANTI PENCUCIAN UANG DAN PENCEGAHAN PENDANAAN TERORISME

Menunjuk POJK No. 12/POJK.01/2012 tanggal 21 Maret 2017 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di Sektor Jasa Keuangan, serta dengan diterbitkannya Undang – Undang Nomor 8 tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang serta Undang-Undang Nomor 9 Tahun 2013 tentang Pencegahan dan Pemberantasan Tindak Pidana Pendanaan Terorisme, maka telah dilakukan aktivitas antara lain:

No	Program Kinerja	Realisasi
1	Melaksanakan kewajiban pelaporan kepada PPAK Laporan Transaksi Keuangan Tunai (LTKT)	Telah melaporkan sebanyak 2410 LTKT pada bulan Desember 2019
2	Melaksanakan kewajiban pelaporan kepada PPAK Laporan Transaksi Keuangan <i>Transfer</i> Dana dari dan keluar negeri (LTKL)	Telah melaporkan sebanyak 182 LTKL pada bulan Desember 2019
3	Melaksanakan kewajiban pelaporan kepada PPAK Laporan Transaksi Keuangan Mencurigakan (LTKM)	Telah melaporkan sebanyak 8 LTKM pada bulan Desember 2019
4	Melaksanakan kewajiban pelaporan kepada PPAK pelaporan data nasabah dalam bentuk Sistem Informasi Pengguna Jasa Terpadu (SIPESAT)	Data SIPESAT Triwulan IV dikirimkan pada bulan Januari 2020.
5	Memantau pelaksanaan <i>Single Customer Number</i> dengan melaksanakan penggabungan terhadap nasabah yang memiliki lebih dari 1 (satu) CIF dengan target 10% dari total data yg harus dimerge per bulan.	Terdapat 9.106 data nasabah yang di merge pada bulan Desember 2019
6	Melaksanakan pendataan terhadap nasabah - nasabah yang dikategorikan dalam <i>Politically Exposed Person</i> (PEP)	Terdapat pendataan terhadap 13.794 Nasabah yang tergolong sebagai PEP pada bulan Desember 2019
7	Pencocokan data nasabah terhadap daftar teroris yang diterbitkan oleh otoritas berwenang	Pencocokan data nasabah terhadap daftar teroris yang diterbitkan oleh otoritas berwenang terakhir pada tanggal 23 Desember 2019
8	Melaksanakan pemantauan profil karyawan setiap 3 bulan sekali	Tidak Terdapat Karyawan yang Sedang dalam Pemantauan pada Triwulan IV Tahun 2019

no	Ratio	criteria	Ratio value (%)
11	Loan to Deposit Ratio (LDR)	>75<105%	63.34
12	Macroprudential Intermediation Ratio (RIM)	>80<92%	67.93
13	Net Open Position (NOP)	20%	< 1.33%

Of the 11 parameters (benchmarks) set by the FSA, the average ratio of Bank Soundness in 2019 shows the ratio of "HEALTHY" Banks and there are no significant violations of the FSA provisions or other applicable laws and regulations.

IMPLEMENTATION OF THE ANTI-MONEY LAUNDERING AND PREVENTION OF TERRORISM FUNDING PROGRAM

Pointed POJK No. 12/POJK.01/2012 dated 21 March 2017 concerning the Implementation of the Anti Money Laundering and Prevention of Terrorism Funding Program in the Financial Services Sector, as well as with the issuance of Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes and Law Number 9 In 2013 concerning the Prevention and Eradication of Terrorism Funding Crimes, activities have been carried out including:

No	Work Program	Realization
1	Carry out reporting obligations to the PPAK Cash Transaction Report (LTKT)	A total of 2410 LTKTs were reported in December 2019
2	Carry out reporting obligations to the PPAK Financial Transaction Report on Fund Transfers from and abroad (LTKL)	Has reported 182 LTKL in December 2019
3	Carry out reporting obligations to the PPAK Suspicious Financial Transaction Report (LTKM)	Have reported as many as 8 LTKM in December 2019
4	Carry out reporting obligations to PPAK reporting customer data in the form of an Integrated Service User Information System (SIPESAT)	SIPESAT Data for Quarter IV is sent in January 2020.
5	Monitor the implementation of the Single Customer Number by conducting a merger of customers who have more than 1 (one) CIF with a target of 10% of the total data that must be appeared per month	There were 9,106 customer data merged in December 2019
6	Carry out data collection on customers who are categorized in Politically Exposed Person (PEP)	There were data collection on 13,794 customers classified as PEP in December 2019
7	Matching customer data against a list of terrorists issued by the competent authority	Matching customer data to the list of terrorists published by the last authority on December 23, 2019
8	Carry out employee profile monitoring every 3 months	There were no employees currently being monitored in the fourth quarter of 2019

No	Program Kinerja	Realisasi
9	Melaksanakan review dan mengkinikan BPP APU PPT diselaraskan dengan perkembangan regulasi eksternal	Belum Dilaksanakan Pengkinian BPP APUPPT di Tahun 2019

No	Work Program	Realization
9	Carry out a review and update the BPP APU PPT aligned with the development of external regulations	Not Upgraded APUPPT BPP in 2019

PENYAMPAIAN LAPORAN HARTA KEKAYAAN PENYELENGGARA NEGARA (LHKPN)

PEDOMAN LHKPN

Kewajiban pelaporan mengacu pada Undang-Undang Nomor 30 Tahun 2002 tentang Komisi Pemberantasan Tindak Pidana Korupsi yang berwenang untuk melakukan pendaftaran dan pemeriksaan terhadap LHKPN.

Tata Cara Pelaporan mengacu pada Peraturan Komisi Pemberantasan Korupsi (KPK) Nomor 07 Tahun 2016 tentang Tata Cara Pendaftaran, Pengumuman dan Pemeriksaan Harta Kekayaan Penyelenggara Negara.

Pasal 1 angka 2 UU No. 20/2001 tentang Perubahan atas UU Nomor 31/1999 tentang Pemberantasan Tindak Pidana Korupsi (UU Tipikor). Kebijakan Internal Bank Jatim diatur dalam Pedoman Pelaksanaan Laporan Harta Kekayaan Pejabat Negara (BPP LHKPN) nomor 057/401/DIR/KPT/KEP tanggal 31 Desember 2018.

PENERAPAN LHKPN

Kebijakan Internal Bank Jatim diatur dalam Pedoman Pelaksanaan Laporan Harta Kekayaan Pejabat Negara (BPP LHKPN) nomor 057/401/DIR/KPT/KEP tanggal 31 Desember 2018.

Penunjukan Divisi Kepatuhan & Tata Kelola sebagai Admin Instansi dan Divisi Human Capital sebagai Admin Unit Kerja diatur dalam SK Direksi nomor 056/286/DIR/KPT/SK tanggal 11 Desember 2017 tentang Unit Pengelola LHKPN.

PELAKSANAAN LAPORAN LHKPN

Pengelola LHKPN Unit pengelola LHKPN : Divisi Kepatuhan & Tata Kelola Admin Instansi : Pemimpin Divisi Human Capital (ex-officio) Admin Unit Kerja : Pemimpin Sub Capital (ex-officio)
Penyelenggara Negara (PN) atau Wajib Lapo : Pejabat Negara yang menjalankan fungsi eksekutif, legislatif, atau yudikatif dan pejabat lain yang fungsi dan tugas pokoknya berkaitan dengan penyelenggaraan Negara atau pejabat publik lainnya sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.
Dewan Komisaris dan Direksi wajib menyampaikan LHKPN pada KPK yang dikoordinir oleh Divisi Kepatuhan dan Tata Kelola.

SUBMISSION OF STATE OFFICIAL'S WEALTH REPORT (LHKPN)

LHKPN GUIDELINES

Reporting obligations refer to Law Number 30 Year 2002 concerning the Corruption Eradication Commission that has the authority to conduct registration and examination of LHKPN.

Reporting Procedures refer to the Corruption Eradication Commission Regulation (KPK) Number 07 of 2016 concerning Procedures for Registration, Announcement and Examination of State Officials Assets.

Article 1 number 2 of Law no. 20/2001 concerning Amendments to Law Number 31/1999 concerning Eradication of Corruption Crimes (Corruption Law). Bank Jatim Internal Policy is regulated in the Guidelines for Implementing the Statutory Assets of State Officials (BPP LHKPN) number 057/401/DIR/KPT/KEP dated December 31th, 2018.

APPLICATION OF LHKPN

Bank Jatim Internal Policy is regulated in the Guidelines for Implementing the Statutory Assets of State Officials (BPP LHKPN) number 057/401/DIR/KPT/KEP dated December 31th, 2018.

The appointment of the Compliance & Governance Division as the Agency Admin and the Human Capital Division as the Admin Work Unit is regulated in the Directors' Decree number 056/286/DIR/KPT/SK dated December 11, 2017 concerning the LHKPN Management Unit.

LHKPN REPORT IMPLEMENTATION

<i>LHKPN Manager</i> <i>LHKPN management unit: Compliance & Governance Division</i> <i>Admin Institution: Head of Human Capital (ex-officio) Division</i> <i>Admin Work Unit: Leader of Sub Capital (ex-officio)</i>
<i>State Official (PN) or Mandatory Report: State Official who carries out executive, legislative, or judicial functions and other officials whose main functions and duties are related to the administration of the State or other public officials in accordance with the provisions of the applicable laws and regulations.</i>
<i>The Board of Commissioners and Directors are required to submit LHKPN to the KPK which is coordinated by the Compliance and Governance Division.</i>

MEKANISME PELAKSANAAN LHKPN

Wajib Laport bersedia untuk:

1. Melaporkan harta kekayaannya pada saat pertama kali menjabat, mutasi, promosi dan pensiun dalam jangka waktu paling lambat 3 (tiga) bulan terhitung sejak saat pengangkatan pertama/pengangkatan kembali berakhimya jabatan sebagai PN.
2. Menyampaikan LHKPN selama PN menjabat dilakukan secara periodik setiap 1 (satu) tahun sekali atas harta kekayaan yang diperoleh sejak tanggal 1 Januari s/d tanggal 31 Desember paling lambat tanggal 31 Maret tahun berikutnya.

PENGUNGKAPAN LHKPN TAHUN BUKU 2018

Jabatan	Wajib Laport LHKPN	Telah Melaporkan		Belum Melaporkan	
		Jumlah	%	Jumlah	%
Komisaris	4	4	100%	0	
Direksi	7	7	100%	0	

MECHANISM OF LHKPN IMPLEMENTATION

Reporting Party is willing to:

1. Reporting his assets at the first time in office, transfer, promotion and retirement within a period of no later than 3 (three) months from the time of the first appointment/reappointment of his position as PN.
2. Submitting LHKPN during PN held periodically every 1 (one) year on assets acquired from January 1 to December 31st no later than March 31 of the following year.

DISCLOSURE OF LHKPN IN 2018 FISCAL YEAR

Position	LHKPN Reporting Party	Have Submitted Report		Have Not Submitted Report	
		Total	%	Total	%
Commissioner	4	4	100%	0	
Director	7	7	100%	0	