

## KEBIJAKAN ANTI FRAUD

Dalam rangka mencegah terjadinya kasus-kasus penyimpangan operasional pada Bank, khususnya *fraud* yang dapat merugikan nasabah atau Bank, serta merujuk pada Peraturan Otoritas Jasa Keuangan nomor 39/POJK.03/2019 tanggal 19 Desember 2019 perihal Penerapan Strategi *Anti Fraud* bagi Bank Umum maka diperlukan suatu peningkatan efektivitas pengendalian internal sebagai upaya meminimalkan risiko termasuk menerapkan strategi anti fraud.

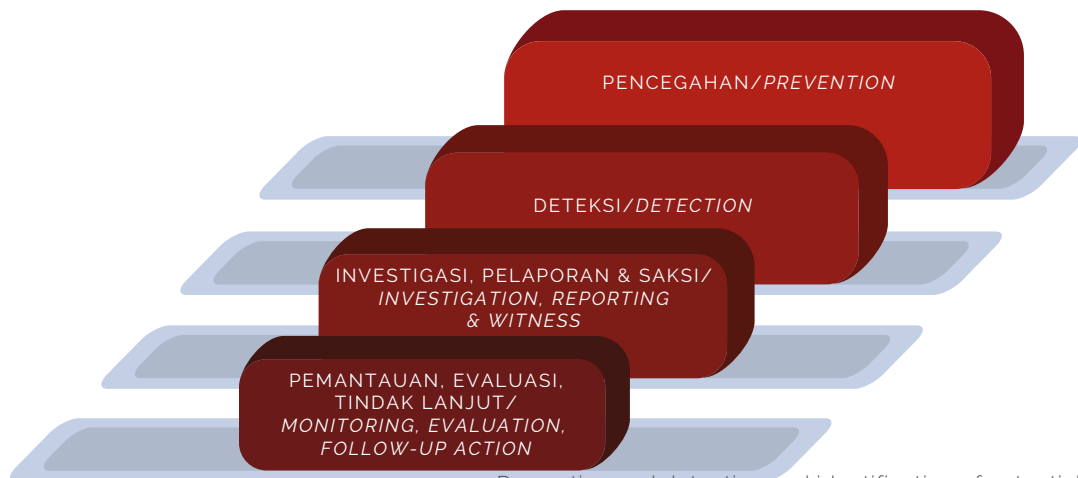
Penerapan sistem pengendalian *fraud* telah dilakukan sesuai dengan pedoman strategi *anti fraud* sesuai Surat Keputusan Direksi Nomor 050/119/KEP/DIR/AI tanggal 29 Juni 2012 tentang Buku Pedoman Penerapan Strategi *Anti Fraud*. Setiap kejadian *fraud* menjadi perhatian khusus dalam penyelesaian kasusnya. Pihak Manajemen Bank mengharuskan seluruh jajaran terkait dalam lingkungan internal Bank mempunyai kepedulian terhadap anti fraud. Kepedulian anti fraud diupayakan secara berkesinambungan dalam bentuk *zero tolerance* terhadap fraud.

## ANTI-FRAUD POLICY

In order to prevent cases of operational irregularities at the Bank, especially fraud that can harm customers or the Bank, and refer to the Regulation of Financial Services Authority No. 39/POJK.03/2019 dated December 19, 2019 regarding the Application of Anti-Fraud Strategy for Commercial Banks, it is necessary an increase in the effectiveness of internal control in an effort to minimize the risk of fraud including implementing an anti-fraud strategy.

The implementation of the fraud control system has been carried out in accordance with the anti-fraud strategy guidelines in accordance with the Board of Directors Decree No. 050/119/KEP/DIR/AI dated June 29, 2012 concerning the Guidelines for Implementing the Anti-Fraud Strategy. Every fraud incident becomes a special concern in the resolution of the case, the Bank Management requires that all related parties within the Bank's internal environment have anti-fraud concerns. Anti-fraud awareness is continuously pursued in the form of zero tolerance towards fraud.

### Empat Pilar Sistem Pengendalian Fraud Four Pillars of Fraud Control System



Tindakan pencegahan dan deteksi serta identifikasi terhadap potensi-potensi risiko kerawanan merupakan *early warning* system terhadap jalannya proses operasional. Identifikasi temuan yang berindikasi *fraud*, diimplikasikan dalam kebijakan dan mekanisme *whistleblowing*. Melalui mekanisme ini diharapkan mendeteksi secara dini atas terjadinya suatu pelanggaran dan dapat meningkatkan tingkat partisipasi pegawai, nasabah dan *stakeholder* lain dalam melaporkan suatu pelanggaran dan digunakan sebagai peringatan dini atas kemungkinan terjadinya suatu pelanggaran di Bank Jatim. Indikasi awal *fraud* berasal dari beberapa sumber yaitu *whistleblower* melalui *hotline* yang telah disediakan Bank, *Surprise Audit*, *Surveillance Audit* dan *General Audit*. Informasi awal tersebut kemudian dilakukan audit pendahuluan berupa penggalian informasi, pengujian bukti awal dan tambahan, pemeriksaan saksi.

Apabila dari audit pendahuluan tidak diperoleh cukup bukti sebagai tindakan *fraud* maka investigasi dihentikan, dan jika diperoleh cukup bukti sebagai tindakan *fraud*, maka dibuat laporan awal *fraud* yang dikirim ke Direktur Utama dan Dewan Komisaris. Kemudian dilakukan audit khusus dan dilakukan pemantauan, evaluasi serta pelaporan sesuai ketentuan yang berlaku. Mekanisme *whistleblower* dilaksanakan langsung oleh Pemimpin Divisi Audit Intern dan 2 Pemimpin Sub Divisi sebagai pengendalian mutu. Pegawai yang terlibat kasus kecurangan dikenakan sanksi sesuai Pedoman *Reward & Punishment* Bank

Prevention and detection and identification of potential risks of vulnerability is an early warning system for the operational process. Identification of findings that indicate fraud, is implied in the whistleblowing policy and mechanism. Through this mechanism it is expected to detect early on the occurrence of a violation and can increase the level of participation of employees, customers and other stakeholders in reporting a violation and be used as an early warning of the possibility of a violation in the East Java Bank. Early indications of fraud came from several sources, namely whistleblowers through the hotline provided by the Bank, Surprise Audit, Surveillance Audit and General Audit. The initial information is then conducted a preliminary audit in the form of extracting information, testing initial and additional evidence, examining witnesses.

If from the preliminary audit there is not enough evidence as an act of fraud, the investigation is stopped, and if sufficient evidence is obtained as an act of fraud, an initial report of fraud is sent to the President Director and the Board of Commissioners. Then a special audit is conducted and monitoring, evaluation and reporting are carried out in accordance with applicable regulations. The whistleblower mechanism is implemented directly by the Head of the Internal Audit Division and 2 leaders of the Subdivisions as quality control. Employees involved in fraud cases are subject to sanctions in accordance with the Bank Jatim Reward & Punishment Guidelines in force

Jatim yang berlaku di antaranya surat peringatan, demosi hingga pemutusan hubungan kerja tergantung jenis pelanggaran yang telah dilakukan dan kerugian yang dialami. Dalam tiga tahun terakhir tidak terjadi kasus yang terbukti *fraud*.

Bank Jatim akan terus berupaya untuk meningkatkan pemahaman dan kepedulian pegawai dan pihak lain untuk melaporkan tindak pelanggaran melalui sarana *whistleblower* sehingga diharapkan mampu mewujudkan lingkungan kerja yang bersih dan berintegritas serta perbaikan penerapan Strategi *Anti Fraud* (SAF). Atas hal tersebut telah dilakukan langkah-langkah berikut:

1. Melakukan program Strategi *Anti Fraud* (SAF), antara lain *surprise audit* (Operasional & Kredit).
2. Melakukan sosialisasi terkait penerapan strategi *anti fraud* dan *whistleblowing system* pada saat *exit meeting* hasil audit dan pegawai termasuk pegawai baru.
3. Pemberian materi terkait penerapan strategi anti fraud dan *whistleblowing system* pada jadwal pendidikan program promosi pegawai.
4. Pengembangan sistem Strategi *Anti Fraud* (SAF).
5. Penandatanganan deklarasi *Anti fraud* oleh Manajemen yang baru dan penandatanganan Pakta Integritas Kepatuhan oleh seluruh Pegawai Bank Jatim.
6. Divisi Human Capital melakukan strategi dalam upaya melaksanakan program *Know Your Employee*.
7. Melakukan monitoring dan update Buku Pedoman Pelaksanaan (BPP) dalam aplikasi BPP, sehingga BPP beserta *update*-nya dapat diakses langsung oleh seluruh pegawai.
8. Mempercepat proses di Tim Hukuman Jabatan dalam pemberian *punishment* dan tindakan-tindakan sementara pada pegawai bermasalah sehingga menimbulkan efek jera serta melakukan pemantauan proses pemberian punishment pada pegawai bermasalah oleh Tim Hukuman Jabatan.
9. Divisi Human Capital tetap meminta rekomendasi Divisi Audit Intern dalam pelaksanaan pengangkatan, promosi dan pemberhentian (*resign*) pegawai.
10. Bank akan melakukan evaluasi dengan pembagian kuesioner terkait pemahaman pegawai terkait *Anti Fraud* dan akibat terjadinya *fraud*.
11. Bank akan membuat brosur/poster yang bertemakan tentang pemberitahuan bahaya *fraud* dan *Hotline Whistleblowing*.

Sebagai upaya untuk lebih mengoptimalkan pelaksanaan GCG, Divisi Audit Intern terus berupaya mewujudkan *no fraud* melalui penyelenggaraan pembelajaran/pelatihan kepada Auditor khususnya terkait investigasi untuk meningkatkan kompetensi, keterampilan dan kecakapan dalam bertugas.

including warning letters, demotion to termination of employment depending on the type of violation that has been committed and the loss suffered. In the last three years there have been no cases of proven fraud.

Bank Jatim will continue to strive to increase the understanding and concern of employees and other parties to report violations through whistleblower facilities so that they are expected to be able to create a clean and integrity work environment and improve the application of the Anti-Fraud Strategy (SAF). For this, the following steps have been taken:

1. Undertake Anti-Fraud Strategy (SAF) program, including surprise audit (Operational & Credit).
2. Conducting socialization related to the implementation of anti-fraud strategy and whistleblowing system at the exit meeting results of the audit and employees including new employees.
3. Provision of material related to the implementation of anti-fraud and whistleblowing systems in the employee promotion program education schedule.
4. Development of an Anti-Fraud Strategy system.
5. The signing of the Anti-fraud declaration by the new Management and the signing of the Compliance Integrity Pact by all Bank Jatim Employees.
6. Divisi Human Capital melakukan strategi dalam upaya melaksanakan program Know Your Employee
7. Melakukan monitoring dan update Buku Pedoman Pelaksanaan (BPP) dalam aplikasi BPP, sehingga BPP beserta *update*-nya dapat diakses langsung oleh seluruh pegawai..
8. Speed up the process of the Position Punishment Team in the provision of punishment and temporary actions on troubled employees so as to create a deterrent effect and monitor the process of providing punishment to problem employees by the Position Punishment Team.
9. The Human Capital Division continues to request recommendations from the Internal Audit Division for the appointment, promotion and retention of employees.
10. The Bank will conduct an evaluation by distributing questionnaires related to employee understanding related to Anti-Fraud and the consequences of fraud.
11. The bank will create a brochure/poster with the theme of notification of the dangers of fraud and the Whistleblowing Hotline.

In an effort to further optimize the implementation of GCG, the Internal Audit Division continues to realize no fraud through the implementation of learning/training to the Auditor, especially related to investigations to improve competence, skills and skills in the task.