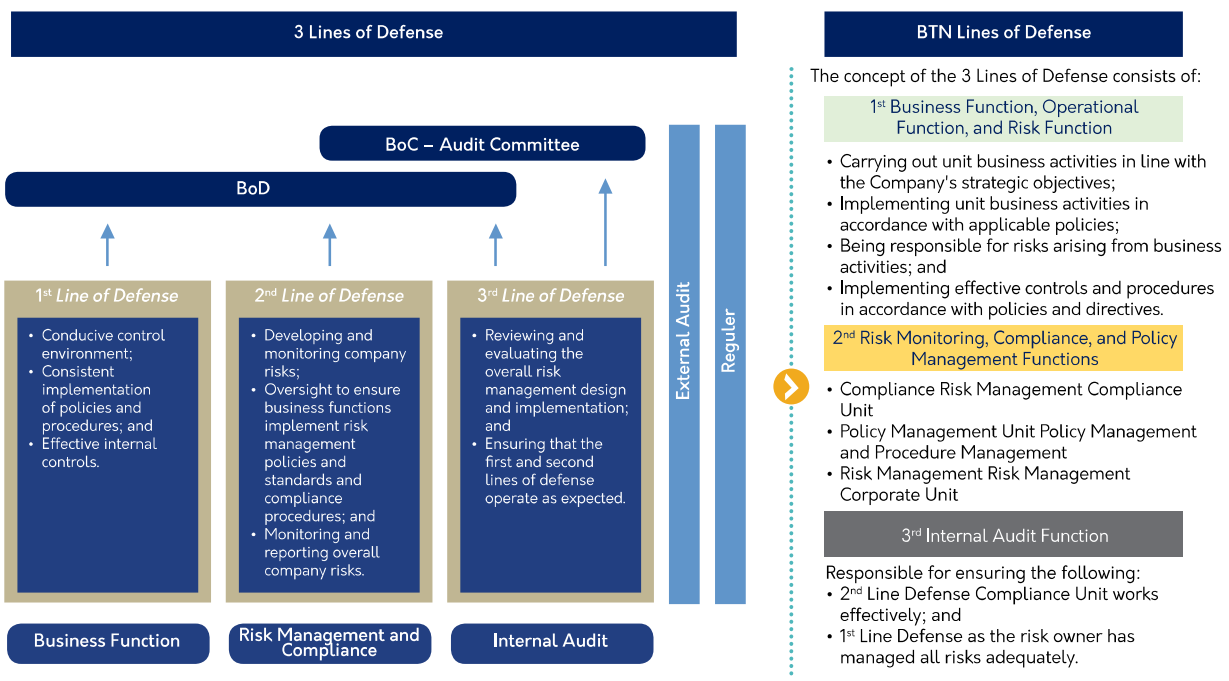


The establishment of a reliable and effective internal control system is the responsibility of all operational units and supporting units, as well as the Internal Audit Unit. This process can be described as follows:



Risk Management Unit (RMU)

The Risk Management Unit serves as a unit directly under the responsibility of the Director overseeing the Risk Management function. This unit leads the risk management function and operates independently from Operational Units, which are risk-taking units, Internal Audit Units, and Compliance Units. The Company's risk governance based on GCG principles is realized through the involvement of all organs in risk management. This can be seen from the organizational structure of the Company's risk management.

The Risk Management Unit (RMU) at Bank BTN is led by a Division Head who reports directly to the Director of Risk Management. Currently, the Risk Management Unit consists of 4 (four) divisions, including the Enterprise & ESG Risk Management Division, Digital & Operations Risk Management Division, Wholesale Credit Risk Division, and Retail Credit Risk Division.

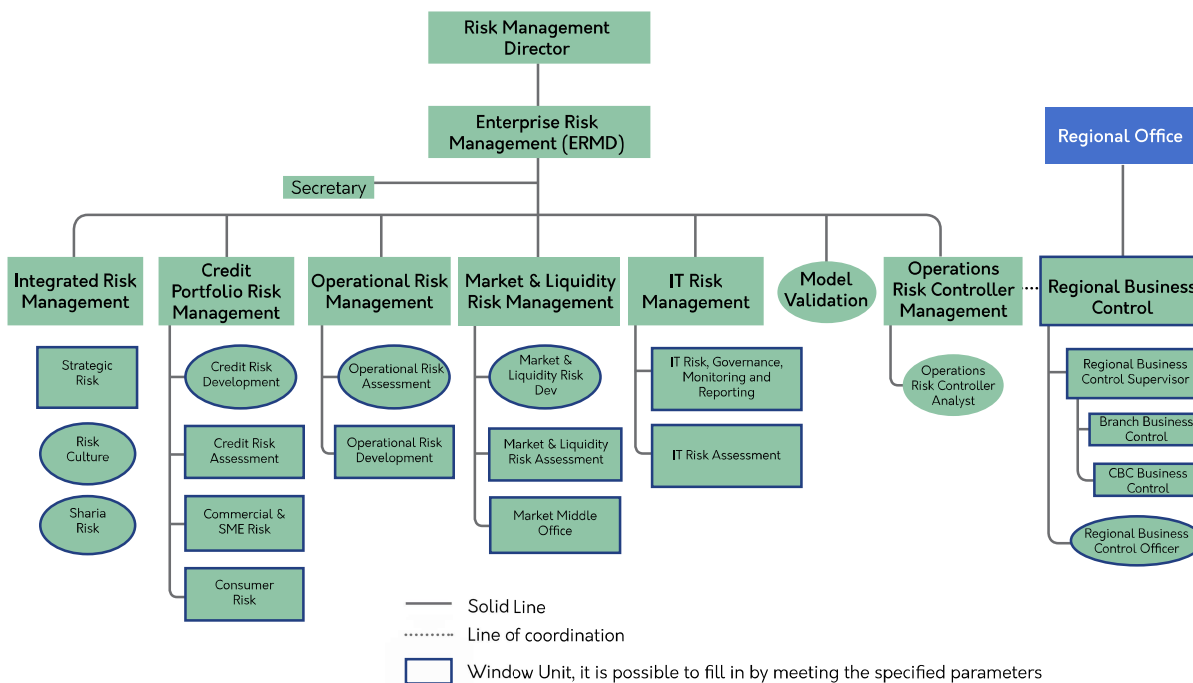
The Enterprise & ESG Risk Management Division consists of the following departments, such as ESG Department, Integrated Risk Management Department, Credit Portfolio Risk Management Department, Market & Liquidity Management Department, and Model Validation Department.

The Enterprise & ESG Risk Management Division comprises the ESG Division, Integrated Risk Management Department, Credit Portfolio Risk Management Department, Market & Liquidity Management Department, and Model Validation. The Digital & Operations Risk Management Division consists of the Fraud Risk Management Department, Digital Risk Management Department, Operational Risk Management Department, Regional Operational Risk Control Department, and Operational Risk Control Department. Meanwhile, the Wholesale Credit Risk Division and Retail Credit Risk Division adhere to the four eyes principle and are included in the 1.5 line of model.

The Board of Commissioners, through the Risk Monitoring Committee meeting, and the Board of Directors, through the Risk Management Committee meeting, are responsible for ensuring that risk management implementation in the Company is adequate according to the characteristics, complexity, and risk profile faced. Both committees actively engage in the risk management process to mitigate Company risks, adhering to the Quality of Risk Management Implementation (QRMI) standards. These standards cover aspects of risk governance, risk management frameworks, risk management processes, adequacy of management information systems, and adequacy of internal control systems.

As of December 31, 2023, the Organizational Structure of the Enterprise & Risk Management Division is as follows:

Organizational Structure of Enterprise Risk Management Division



In December 2023, the Board of Commissioners approved Phase I organizational structure changes related to strengthening digital banking capabilities, which were implemented in January 2024. Consequently, the Risk Management Work Unit under the Director of Risk Management is as follows:

Organizational Structure of Enterprise & ESG Risk Management Division

