

MUTUAL **EMPOWERMENT** TO STRENGTHEN **OUR NATION**





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Continuously paving their ways to be the Nation's pride courses through the veins of PT Bank Negara Indonesia Tbk (BNI). Many changes have been surpassed through the means of technology innovation to become a modern and agile Bank despite the overwhelming challenges. Each product developed by BNI is forged with technology by harmonizing stakeholder needs and balance in nature. Moving forward, this commitment continues to be BNI's and stakeholders' standards in making contributions, building the Nation, and supporting the Sustainable Development Goals.

HIGHLIGHTS 2022



Rp61,472 billion
Operating Income



Rp18,312 billion
Net Income



Rp182,934 billion
Sustainable Business
Activities Category
(KKUB) Financing
28.5% from total loans



Rp5 billion
Green bonds
issuance



Financial inclusion
through BNI Agen46
as laku pandai
(Officeless Financial
Services for Inclusive
Finance) program
has reached more
than **5,958** districts
in Indonesia with **20
million** customer
accounts



USD5,000,000
Investment in
sustainability bonds



27,170 people of
BNI employees
52.04% of which
are women



191.67 hours
Average training
hours per employee
per year



Rp1.09 billion
Assistance
disbursement for
nurses and midwives
in handling COVID-19



4.27
(scale of 1-5)
Customer
satisfaction index



2,482 partners
Total fostered
partners



Rp99.75 billion
Expenditure for
communities



17.62 Joule/Rp
Energy Intensity



0.00000000757
(ton CO₂eq)
Emission Intensity



USD355 million,
which is an equivalent
of **Rp5.3 trillion**,
has been injected
into the Sustainability
Linked Loan (SLL)

ESG AWARDS IN 2022



Gold Rank, Asia Sustainability Report Rating 2022

by National Center for
Sustainability Reporting
(NCSR)

BNI was included in the SRI-KEHATI index company

list for the December 2022
- February 2023 period

MSCI index calculates
the environmental, social,
and governance (ESG)
performance with peers in the
Indonesian capital market.
**In the December 2022
period MSCI ESG
Ratings, BNI obtained
the A rating**

BNI was included in the IDX KEHATI ESG Senior Leaders

list of
constituents for the 20
December 2021 - 31 May
2022 period

BNI CGPI score in 2022

91.66

ESG Risk Rating by
Sustainalytics

25.5 Medium Risk

per March 2022

Highly Commanded,
**The Sustainable
Business Awards
(SBA) Indonesia
2020/2021 by Green
Initiatives**

Katadata Green Initiative Awards 2022

by Katadata

The Best Social and Environmental Responsibility (TJSL BUMN) 2022

with
Outstanding Initiatives of
Community Development
Programs



TABLE OF CONTENT

8	Sustainability Performance Overview
11	Sustainability Commitment and Strategy
12	Message from the Board of Directors
16	About BNI
19	Support for Sustainable Development Goals (SDGs)
22	External Initiatives and Association Memberships
24	About the Sustainability Report

01 BNI FOR INDONESIA

29	Digital Banking
31	Sustainable Finance Implementation
36	Financing to Support Infrastructure Development in Indonesia
37	Analysis of Climate Related Financial Risks
38	Environmental, Social, and Governance (ESG) Risk Management
41	Responsibility for Financial Products and/or Services
42	Fair Operating Practices

02 BNI FOR CUSTOMERS

44	Data Security and Customer Privacy Protection
46	Preventing Cybercrime
47	Digitization and Innovation for Customer Convenience
49	Implementation of Human Rights Principles and Response to Customers
50	Access and Accessibility
53	Handling Customer Complaints
56	Customer Satisfaction Survey

03 BNI FOR THE ENVIRONMENT

58	Realizing an Eco-Friendly Bank
59	Efforts to Save Paper
61	Reducing the Impacts of Climate Change through Energy Management and Emissions Reduction
65	Biodiversity and Environmental Conservation

04 BNI FOR THE COMMUNITY

67	Empowering the Micro, Small, and Medium Enterprises (MSMEs)
75	Financial Literacy and Inclusion
77	Supporting the Community Growth
81	Supply Chain and Sound Procurement Practices
82	Measuring the Impacts of Social Investments

05 BNI FOR EMPLOYEES

84	BNI Employees
88	Implementing Fair and Equal Employment Practices
92	Employee Competency Development Program
97	Strengthening Employee Welfare
100	Healthy, Decent, and Safe Working Environment

06 SUSTAINABILITY GOVERNANCE AND STAKEHOLDER ENGAGEMENT

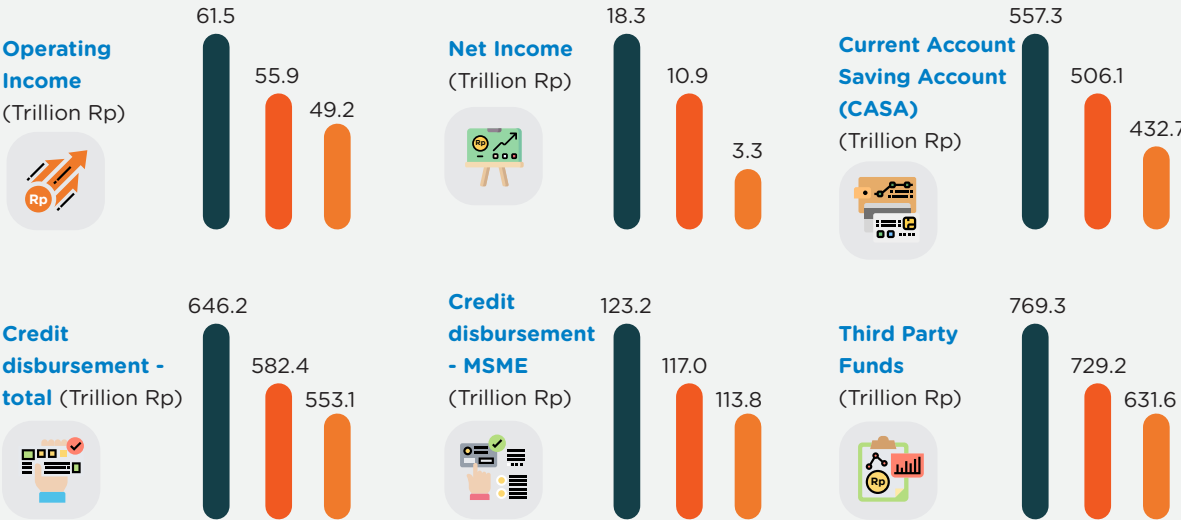
102	BNI's Approach for Steering Positive Impacts
104	Sustainability Governance Structure
105	Responsibilities Delegation for ESG Implementation
106	Monitoring and Evaluation of ESG Implementation
109	Achievements, Opportunities, and Challenges in Implementing Sustainable Finance
110	Corporate Governance
112	Anti-Corruption, Anti-Bribery, and Anti-Fraud Practices
114	Stakeholder Engagement
116	Statement of Responsibility for the Sustainability Report
118	Verification by Independent Parties
122	POJK, SUSBA, SASB, MSCI and GRI Standards References
137	Feedback Sheet

SUSTAINABILITY PERFORMANCE OVERVIEW

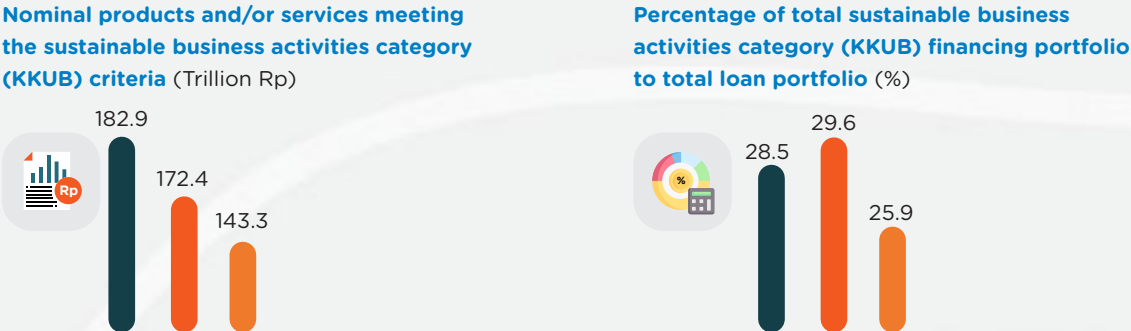
ECONOMIC

● 2022 ● 2021 ● 2020

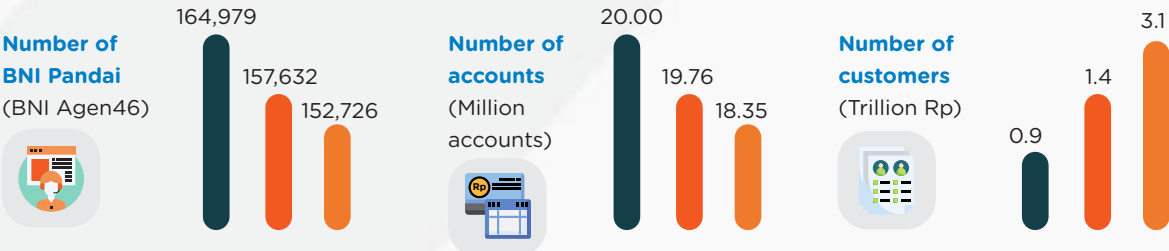
Internal Performance



Economic Aspect Performance Relevant to Sustainability



Financial Inclusion Performance

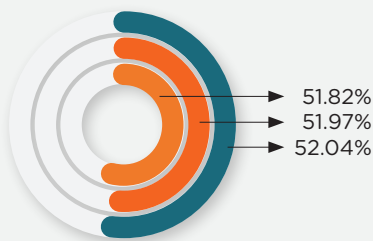


SOCIAL

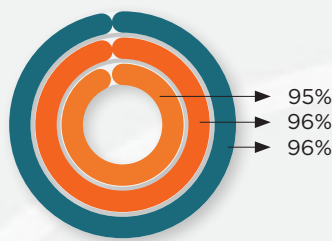
● 2022 ● 2021 ● 2020

Internal Performance

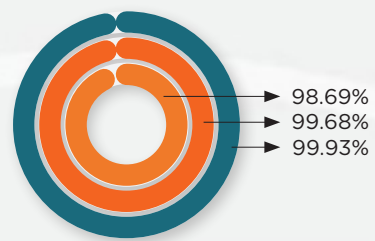
Female employees to total employees



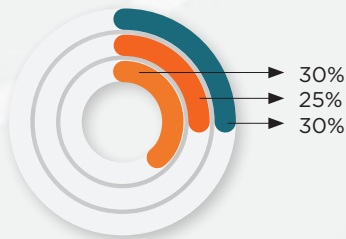
Employee engagement level



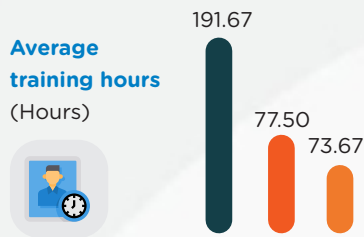
Customer complaint resolution rate



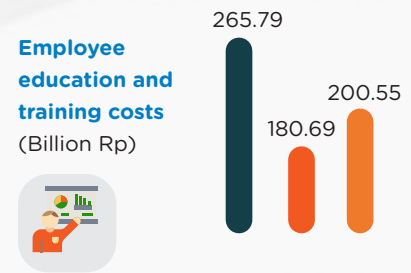
Women occupying manager upwards position



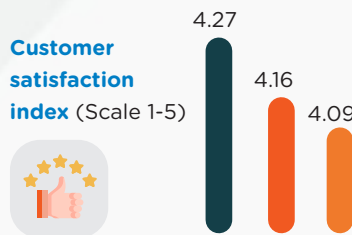
Average training hours (Hours)



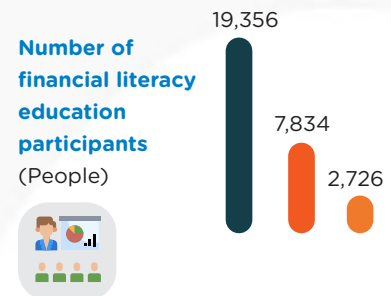
Employee education and training costs (Billion Rp)



Customer satisfaction index (Scale 1-5)



Number of financial literacy education participants (People)

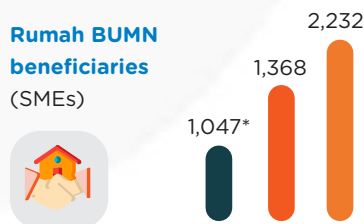


Social Responsibility Activities

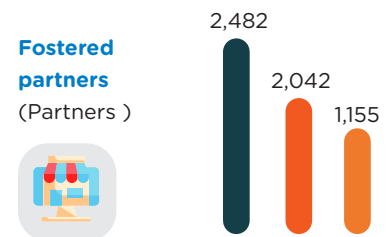
Realized funds for social responsibility activities (Billion Rp)



Rumah BUMN beneficiaries (SMEs)



Fostered partners (Partners)



*In 2022, the number of MSMEs players in Rumah BUMN showed a decline compared to the previous year. This was due to the closure of 6 non-productive Rumah BUMN, triggering the decrease in the number of UMKM Go Online.

ENVIRONMENTAL

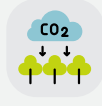
● 2022 ● 2021 ● 2020

Internal Performance

Energy Intensity
17.62
(Joule/Rp)

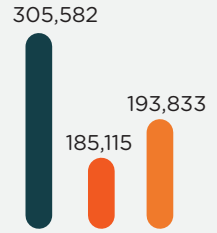
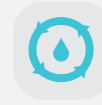


GHG emission intensity to income
0.000000000757
(Ton CO₂eq/Rp)



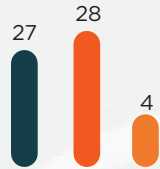
Note:
*) There was a calculation methodology adjustment in 2022

Water usage (m³)

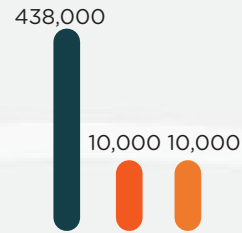
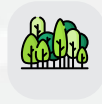


Environmental Responsibility Activities

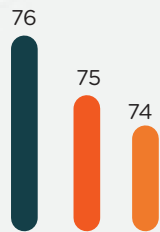
Realized environmental costs
(Billion Rp)



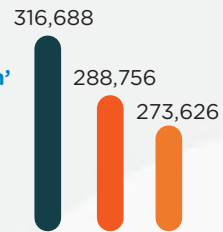
Tree planting
(Seedlings)



Rhinoceros conservation program
(Animals)



'Ayo Menabung dengan Sampah' program
(Accounts)



SUSTAINABILITY COMMITMENT AND STRATEGY [2-22, 2-23, 2-24]

BNI has implemented a strategy integrated with all environmental, social, and governance (ESG) aspects, which brings positive impacts to stakeholders and the environment in fulfilling the commitment to sustainability.

As a form of the company’s commitment to sustainability, BNI has formulated five sustainability pillars. The basis of the sustainability pillars is the bank’s mission to provide superior services and digital solutions for all customers as the primary business partner of choice, strengthening international services to support the needs of global business partners, increase excellent investment value for investors, create the best conditions for employees as a place of pride to work and make accomplishments, improve concern about and responsibility toward the environment and society, as well as become the reference for compliance and good corporate governance in the industry.



MESSAGE FROM THE BOARD OF DIRECTORS [2-11][2-12][2-14][2-22]



To our respected stakeholders,

In 2022, BNI has successfully proven its commitment to supporting the digitization of business transactions amid economic recovery. This year, we focus on the transformation and innovation of digitization for the bank to be able to compete on the aspects of products, business process, and controlled operating cost. Furthermore, BNI also implements transformation and innovation to optimize green banking practices.

Additionally, BNI supports the Government's target of net-zero emissions in 2060. This requires the commitment, especially of banking industry professionals, to make the transition toward the use of new and renewable energy (NRE) as well as encourage the financing of environmentally friendly sectors to increase green portfolio. Gradually, BNI has also studied efforts to give incentives for green portfolio loans to maintain the currently recovering economic growth trend.

Strategy and Policy in Responding to Sustainability Challenges

BNI's commitment to sustainability is actualized through the implementation of sustainable finance as an inherent part of work values and culture as well as the integrated Company strategy to achieve business goals while taking the achievements in environmental, social, and governance (ESG) performance into consideration. In implementing sustainable finance, the Bank is aware of the challenges that it faces. Hence, BNI carry out the strategy and strategic policy to address challenges in sustainable finance implementation.

One of the challenges faced by BNI is the demand for strong ESG framework and infrastructure. To support the achievement of net-zero emissions set by the Government, BNI strengthens the infrastructure by fortifying database management and formulating the ESG policy. BNI is currently in the process of establishing the short-, mid-, and long-term net-zero emissions roadmap as the commitment of BNI on the path toward net-zero emissions.

Another challenge that we face is relevant to the lack of ESG principles implementation among debtors in operating their businesses. However, we have financed a number of environmentally conscious projects developed by several large-scale debtors, compared to debtors from medium and small-scale companies. Our strategy to encourage ESG-based business activities includes disbursing the Sustainability Linked Loan (SLL), which is financing that offers incentives for BNI debtors that successfully achieve sustainability related targets (Sustainability Performance Targets/ SPTs) in accordance with the joint agreement.

Moreover, in an effort to ensure the smooth implementation of the sustainability strategy, the Board of Directors formed the special coordinator team for ESG implementation in BNI, namely the Environmental, Social, & Governance (ESG) Sub-Committee. The key functions of the ESG Sub-Committee are managing ESG implementation strategy and policy, monitoring ESG management integration in the bank's operating activities, managing ESG communication and publication activities, acting as liaison for regulators and other external parties, as well as managing ESG related reporting.

The Board of Directors has KPIs for ESG performance which are applied to the work units. One of the KPI indicators is the periodically reviewed achievement in ESG performance based on the MSCI Rating. To improve performance and good ESG rating, the management continues to encourage ESG implementation in the company by adjusting policy, strengthening data security and privacy system, managing ESG risks in financing, developing human capital, expanding access to products and services, as well as managing green portfolio and impacts on the environment.

From the results of ESG performance monitoring, the Board of Directors considers the ESG performance in 2022 to be positive, despite the uncertainties and various challenges. The positive achievement was inseparable from the cooperation with and support from all parties, particularly the commitment of BNI Hi-Movers.

Sustainable Finance Implementation

In 2022, the achievements in sustainability performance for the economic aspect showed an operating income of Rp61,472 billion or reaching 100.8% of the target, with the net income of Rp18,312 billion, which reached 114.9% of the target. The operating income increased by 10.0% and the net income increased by 68.0% from the previous year. The achievements were supported by the growth in net interest income and fee-based income. Furthermore, the Bank distributed Rp45,603 billion through remuneration and benefits for employees, dividend payment to shareholders, tax payment to the government, expenditure to local and non-local suppliers, and to the public through various empowerment and donation activities.

BNI also contributes to Indonesian economy through the disbursement of corporate, medium, and small productive loans in various sectors. Moreover, SLL scheme financing will be one of the suitable financing products to help the transformation of industry entities in implementing sustainable economy principles. BNI strengthens the green banking commitment by offering environmentally conscious corporate bonds (green bonds) worth Rp5 trillion. The accumulated fund will be used for the financing and refinancing of projects in the Environmentally Conscious Business Activities (KUBL) category.

Another sustainability performance implementation in the environmental aspect in BNI is the BNI Go Green, which comprises a number of internal and external initiatives. As an initiative, the Bank has also built an office with the green building concept. In 2022, the green building that has obtained the building design certification from the Green Building Council Indonesia (GBCI) was Plaza BNI with the platinum category. BNI also received the Cyclist Friendly Building recognition from the DKI Jakarta Governor for the Menara BNI Building.

The Bank continues to add portfolio with the green financing and green activity classifications. In 2022, BNI became a pioneer in the banking industry as the financial institution operating two Public Electric Vehicle Charging Stations (SPKLU) in its work environment, namely in the Grha BNI and Menara BNI buildings. Construction of SPKLU is in line with BNI's support for the acceleration of the use of Battery Based Electric Motor Vehicles (KBLBB) in Indonesia, which brings positive impacts on the environment.

In the social aspect performance, particularly relevant to Human Capital (HC) development, BNI puts the utmost effort into developing an inclusive and fair workplace where all employees are able to have a good and long-term career by establishing the HC policy which promotes diversity as well as capacity training and development. In 2022, one of the focus of employee competency improvement was relevant to the understanding of sustainable finance implementation. This is in line with the BNI RAKB, which has been formulated for a 5-year period by targeting 2022 as the year when 70% of the total employees have participated in training relevant to Sustainable Finance. Until the end of the reporting period, 26,074 employees or 95.94% of total employees have participated in training relevant to Sustainable Finance.

Whereas for the social aspect performance in relation to the community, BNI has conducted various community empowerment and partnership programs in 2022 with the goal of improving the community's quality of life. Until the end of the reporting period, BNI has allocated a TJSJ fund of Rp100 billion with the realization of Rp99.7 billion. Furthermore, for the partnership program, BNI empowered micro, small, and medium enterprises (MSMEs). In 2022, BNI has disbursed Rp123.16 trillion in financing to MSMEs, and 42.8% of the value was for the People's Business Credit (KUR). The total financing increased by 5.26% compared to Rp117.01 trillion in 2021. The increasing growth of MSME groups is one of the factors boosting economic recovery in Indonesia.

In 2022, the Bank made several achievements in sustainable finance implementation, including maintaining the MSCI Rating of A in 2022. Based on the MSCI report, BNI has completed a number of improvements in ESG commitment implementation, such as in the consumer financial protection, human capital development, and access to finance factors. The three key issues had a score above industry average, especially the consumer financial protection factor, which had the best customer complaint mechanism effectiveness among peers. Additionally, BNI also obtained several awards, such as the Medium ESG risk rating from Sustainalytics, SRI KEHATI INDEX, Constituent of IDX ESG LEADERS Index, the best stated-owned enterprise at the 13th IICD Corporate Governance Award.

Moreover, BNI also obtained the award as The Most Trusted Company at the CGPI Awards. This was the Bank's achievement in the commitment to protecting information security and sustainably developing cybersecurity to safeguard innovations in banking services and well-maintain the customer trust and comfort aspect. BNI also regularly gives education to employees and customers to increase awareness against cybercrime.

Strategy to Achieve Established Targets

To achieve sustainability targets, the Bank realizes the importance of risk management, whether financial and economic risks, environmental risks, or social risks. Therefore, the Bank develops an integrated strategy to achieve business goals while continuing to bear ESG performance achievements in mind.

Our strategy to achieve sustainability performance targets is by managing arising opportunities in line with sustainable finance implementation. A potential for us to maximize is BNI's chance to support sustainable business programs, preserve the environment, and support community welfare. Furthermore, BNI continues to maximize existing potentials through increasing financing in environmentally conscious projects, improving competency relevant to sustainable finance, and implementing the risk management of ESG aware financing.

The increasing prospect of businesses relevant to green financing is a positive opportunity for the Bank. Presently, BNI has been actively granting financing to green sectors and projects, giving offers for electric vehicle (EV) financing with a special interest rate to strengthen the electric vehicle ecosystem, supporting the financing of energy transition from PLTU (Steam Power Plant) to PLTG/GU (Gas Power Plant/Combined Cycle Gas Turbine Plant), supporting financing for PLTGas, including pipe gas transmission and infrastructure reinforcing clean energy projects. Furthermore, BNI supports the development of new and renewable energy (NRE) production, optimization of BBN (biodiesel or biohydrocarbon) production, including PLTSa (Garbage Power Plant) as a byproduct of waste management, and supports the financing of PLTS (Solar Power Plant), PLTA (Hydropower Plant), PLTGeothermal (Geothermal Power Plant), and other NREs as sources of the energy transition program. BNI has also cultivated

cooperation with several corporations for the SLL program used for sustainability business investment and to encourage debtors to implement the sustainability business process.

Closing

For the Bank's performance and achievements in 2022, we appreciate and extend our gratitude to the shareholders, regulators, BNI Hi-Movers, customers, business partners, and other stakeholders who have supported all the activities and programs BNI has conducted. We hope to continue giving contributions to the economic growth in Indonesia, support financial inclusion, maintain environmental equilibrium, as well as actualize sustainability in the future. We expect that all the challenges faced in this year are able to improve the Bank's future sustainability performance.

With the spirit of transformation and efforts to keep up with the times, we are optimistic in growing more agile and modern to serve the Nation and Go Global.

Jakarta, February 2023

Royke Tumilaar
President Director

ABOUT BNI

Vision, Mission, and Culture



BNI Vision

Becoming the primest financial institution that excel in services and sustainable performance.

BNI Mission

- Providing excellent services and digital solutions to all customers, and as the primary partner of choice.
- Strengthen international services to support the needs from our global business partner.
- Increasing the prime investment value for investors.
- Creating the best conditions for employees as a place of pride for work and accomplishment.
- Increasing awareness and responsibility to the environment and society.
- Becoming a reference for the implementation of compliance and good corporate governance for industry.



CULTURE

To synchronize its values, BNI Culture is supported and accelerated with the work culture transformation. The Core Values AKHLAK (Amanah, Competent, Harmonious, Loyal, Adaptive, and Collaborative) stipulated by the Ministry of SOEs are enforced simultaneously with the PRINCIPLE 46 as BNI Belief. Having been internalized for two years, these core values will always be embodied in various activities and methods, which will be evaluated for maximum implementation.





Company Profile ^[2-1]



Company Name

PT Bank Negara Indonesia
(Persero) Tbk

Head Office Address

Grha BNI
Jl. Jenderal Sudirman
Kav. 1 Jakarta 10220
Phone : (62-21) 251 1946
I-Telex : 765185 BNI DLN IA
Fax : (62-21) 251 1214
Email : bni@bni.co.id
Website : www.bni.co.id
PO Box 1946 Jakarta Mampang 12700

Shares Ownership Percentage



Indonesia Government **60%**
General Public **40%**



Operational Locations

Operating in 8 countries, which are: Indonesia, Singapore, Hong Kong, Japan, England, United States, South Korea, and Netherlands.

Data Office Network:

- **1** head office
- **17** regional offices
- **195** branch offices
- **6** subsidiary entities
- **1,613** sub-branch offices
- **16,125** ATM/CRM
- **226** DigiCS
- **10** overseas offices network



Business Activities, Products, and Services

Engaged in the banking business in accordance with Articles of Association No. 23 of 20 April 2021.

- Corporate, Medium, and Small Business Banking
- Consumer Banking
- International Banking and Treasury Services



Markets Served

Geographic markets served: Indonesia, New York, London, Hong Kong, Singapore, Tokyo, Seoul, and Amsterdam.

Sectors and types of customers served:

- Cooperative, Medium, and Small Business Banking
- Consumer Banking
- International Banking and Treasury services



Significant Changes in BNI

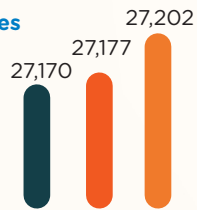
In 2022, the Bank endured some significant changes where:

1. Bank Mayora was acquired to complement the MSMEs segment that is currently expanding to the global market.
2. PT BNI Modal Venture or BNI Ventures was established.
3. Equity participation of Rp500 billion was added to PT Bank Syariah Indonesia Tbk, making BNI's ownership to 23.24%.
4. PT Bank Negara Indonesia (Persero) issued Green Bond I with the principal value of Rp5 trillion.

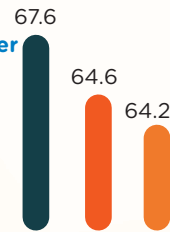
Company Scale

● 2022 ● 2021 ● 2020

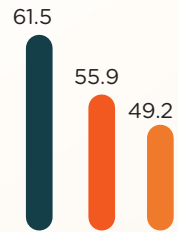
Total employees (People)



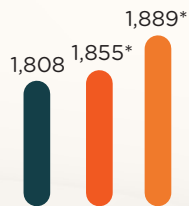
Total customer accounts (Million accounts)



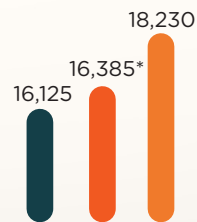
Operating income (Trillion Rp)



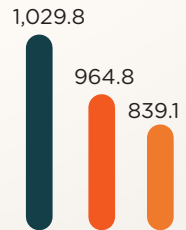
Total office network (Outlet)



Total ATM/CRM (Unit)



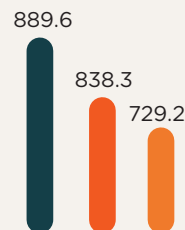
Total assets (Trillion Rp)



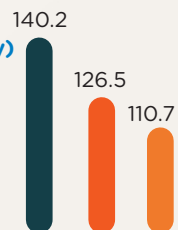
Notes: *) Restatement

Total capitalization

Debt (Liabilities) (Trillion Rp)



Capital (Equity) (Trillion Rp)



Products and Services

Current Account (Trillion Rp)

2022	314.6
2021	281.4
2020	221.1

Savings Account (Trillion Rp)

2022	242.7
2021	224.7
2020	211.3

Deposit (Trillion Rp)

2022	208.8
2021	223.1
2020	199.2

Gross Loans (Trillion Rp)

2022	646.2
2021	582.4
2020	553.1



SUPPORT FOR SUSTAINABLE DEVELOPMENT GOALS (SDGs)

SDGs	Achievement
------	-------------



NO POVERTY

- Simpanan Pelajar (Student Savings) Savings Fund of Rp1,556.66 billion with a number of 10,131,096 accounts.
- Disbursement of Rp97.78 billion through PUMK program to 2,482 fostered partners.
- Disbursement of Rp2,018.6 billion in financing to the small segment marine ecosystem and fisheries sector.
- Assistance for Uninhabitable House (RLTH) of 42 houses in Frontier, Outermost, Least-developed) areas.
- Disaster Relief Assistance Program at 30 disaster location points.
- Employee remuneration over the Provincial Minimum Wage or City/Regency Minimum Wage (UMP/UMK).
- 164,979 BNI Agen46 spread across Indonesia, from which 7,629 BNI Agen46 are in 3T areas.
- Opening job vacancies for employee or the BINA BNI internship positions.



ZERO HUNGER

- Social Forestry People’s Business Credit for 187,186 farmers with the total of Rp9,696 billion.
- Food Package assistance to communities of 238,069 packages.
- Distribution of assistance to farmers and animal farmers.



GOOD HEALTH AND WELL-BEING

- Assistance of 63 ambulances across Indonesia, among which the East Oku and Way Kanan Regencies (South Sumatra), Ngada Regency (East Nusa Tenggara), Banggai Laut Regency (Central Sulawesi), and Manokwari City (West Papua).
- Construction of a Community Health Subcentre In Lebak Regency (Banten).
- Distribution of operating room equipment and medical check-up equipment.
- Expressing appreciations to 423 nurses and midwives in managing the COVID-19 pandemic in 3T areas.
- Distribution of 1,000 pairs of glasses and 46 hearing aids for the elderly.
- Zero fatal accidents in the workplace. [403-9]



QUALITY EDUCATION

- Financial literacy for approximately 800 migrant workers.
- Conducting waste management education to 316,688 students and members of the community through the Let’s Save with Garbage (*Ayo Menabung dengan Sampah*) initiative.
- 875 accomplished university students received scholarships.
- Assistance of educational facilities in 131 schools.
- Appreciation & certification program, for 3,038 teachers in 3T areas.
- 27,676 workers received training.
- 115 children of BNI employees received scholarships for higher education.
- 26,074 employees participated in training relevant to Sustainable Finance.



GENDER EQUALITY

- The percentage of female employees as per 31 December 2022 was 52% of the total employees.
- Equality of the salary ratio between men and women.
- There were 30% of female employees occupying manager upwards position.



CLEAN WATER AND SANITATION

- The wastewater management system at Menara BNI was 189 m³ per day and at Plaza BNI 122 m³ per day.
- Assistance of clean water and sanitation at 12 points of clean water crisis areas.
- Rp314 billion in loan financing to “Sustainable Water and Wastewater Management” Environmentally Conscious Business Activities (KUBL).



AFFORDABLE AND CLEAN ENERGY

- Using solar cell with the capacity of 2,200 watts for lighting emergency stairs at Plaza BNI.
- Financing of sustainable business activities category (KKUB) relevant to Energy:
 - a. Rp10,872 billion for Renewable Energy; and
 - b. Rp14,033 billion for Energy Efficiency.
- Distribution of public facility in the form of 32 solar powered street lights.



DECENT WORK AND ECONOMIC GROWTH

- Total BNI employees as per 31 December 2022 were 27,170 people.
- Assistance of training, exhibition, and support to 8,196 MSMEs.
- Initiation of the National Children’s Tourism Areas (*Kawasan Wisata Anak Negeri/ KAWAN*) at 3 super priority destination locations.



INDUSTRY, INNOVATION AND INFRASTRUCTURE

- Construction of 3 bridges to increase the accessibility of communities.
- Assistance of 2 prototype units of the trash reverse vending machine.
- In the supply chain, BNI engages local parties to support the improvement of Indonesian economy.



REDUCED INEQUALITY

- Distribution of laptops to university students with disabilities and teaching aids to Special Schools.
- BNI hired 33 employees with disabilities.
- There were no complaints relevant to discriminatory practices in the BNI work areas.
- 2,141 participants from MSMEs in the BUMN House (*Rumah BUMN*) have taken part in an exhibition.
- BNI hired 34 people as managers of 29 *Rumah BUMN*.



SUSTAINABLE CITIES AND COMMUNITIES

- Menara BNI has also obtained the Gold Certification and Cyclist Friendly Building recognition from the DKI Jakarta Governor, while Plaza BNI obtained the Platinum Certification for building design from the Green Building Council Indonesia (GBCI) in 2022.
- The provision of 3,222 ATMs to be used by people with disabilities across Indonesia.
- BNI gave assistance in the form of the Integrated Waste Processing Sites (TPST) and the supporting equipment in Bogor, Yogyakarta, Pangkal Pinang, and Bali.
- BNI has owned 3 electric cars and 4 electric motorcycles currently used by the Head Office as well as 3 Public Electric Vehicle Charging Stations in Jakarta and Bali.



RESPONSIBLE CONSUMPTION AND PRODUCTION

- Initiative to turn off the lights in work areas during lunch hour.
- The BNI Greenhouse Gas Emissions Calculation: Scope 1, 2, and 3.
- Customer complaints handling rate of 99.93%.
- BNI has implemented the mandatory prerequisite of having ISPO/RSPO certification and other ESG related documents as the selection and evaluation of all debtors in the oil palm plantation sector.



CLIMATE ACTION

- Granting financing for 52 companies with Blue PROPER, 6 companies with Green PROPER, and 7 companies with Gold PROPER.
- Granting financing for 69 companies with the ISPO/RSPO certificate, with 33 companies having the ISPO/RSPO certificate and 36 others in the process of obtaining the certificate.
- Rehabilitation of watershed (DAS) areas by planting 200,000 trees.
- Rehabilitation of the Green Belt area on the Anyer Beach Coastline by planting 100,000 trees.



LIFE BELOW WATER

- BNI, FishOn, and Aruna brought fishermen closer to the Bank through financial inclusion and literacy.
- BNI disbursed the financing of Rp2,018.6 billion to coastline communities included in the small segment marine and fisheries sub sector.
- Assistance for Reef Conservation in Raja Ampat, West Papua Province.
- Planting 70,000 mangrove trees in Madura, Brebes, and the Thousand Islands.



LIFE ON LAND

- Conservation of 76 rhinoceroses in Ujung Kulon, Banten.
- Assistance for the Tree Nursery of ±438,000 trees, among which were the gold teak, trembesi, and durian trees in Batam, Banyumas, and Bali.
- Engaging communities for the nursery of approximately 300,000 trees in the Anyer Area, Banten.



PEACE AND JUSTICE STRONG INSTITUTIONS

- Having an Anti-Corruption Policy to reduce corruption and bribery in any form.
- BNI invested in IT infrastructure as well as continued to develop Personal Data Privacy and Cyber Security Management to improve data security and ease of payment for customers.



PARTNERSHIPS TO ACHIEVE THE GOAL

- Developing a credit card with environmental benefits with WWF totaling 38,234 BNI-WWF Affinity Credit Cards with Rp1,530 million in total sharing fee.
- Involved in sustainability associations.
- Owning overseas branch offices and representatives.

EXTERNAL INITIATIVES AND ASSOCIATION MEMBERSHIPS ^[2-28]

As an actualization of the Bank's support for the implementation of Sustainable Finance and sustainability principles in its operations, BNI adopted the principles and/or standards relevant to the economic, social, and environmental aspects, which included the following:



Description of owned ISO certifications:

No.	Certificate	Validity Period
1	ISO 9001:2015 The provision of trade processing services	23 December 2020 – 10 January 2024
2	ISO 9001/2015: Quality Management System on IT Operating Services	8 January 2020 – 26 September 2022
3	ISO 9001:2015 Information Technology (IT) Security Management	8 January 2020 – 26 September 2022
4	ISO 9001:2015 Provision of in-House Learning and in Learning/ Digital Learning for BNI Employees	8 January 2020 – 9 March 2023
5	ISO 9001/2015: Banking Operations for Guarantee Letter, RTGS, Remittance Services, Credit and Debit Clearing, Credit Administration, Card Production & Distribution, State Financial Transaction, Custodian Services, Jabodetabek Central Cash Services, Treasury Transaction Services, Trustee Services and Central Foreign Banknotes Services	18 November 2021 - 5 November 2024
6	ISO 9001:2015 BNI Contact Center Services in BSD, Surabaya & Semarang Site	6 August 2020 – 13 March 2023
7	ISO 9001/2015: Quality Management to Unit HPS	12 November 2020 - 11 November 2023
8	ISO 9001/2015: Quality Management to Unit Manajemen Vendor	27 November 2020 - 26 November 2023
9	ISO 9001:2015 Provision of BNI Credit Cards Business	30 June 2021 – 26 June 2024
10	ISO 37001:2016 Anti-bribery Management System	11 August 2020 – 10 August 2021
11	ISO 30301/2019: Management systems for records for the Archives Unit	26 October 2020 – 21 October 2023
12	New Building V.1.2 Greenship certificate	11 December 2020 – 11 December 2023
13	BNI Work Training Institution Accreditation – from the Training Provider Accreditation Agency -Sector: Securities Administration -Sector: Cash Management	11 November 2021 – 11 November 2026

Membership in Associations Relevant to Sustainability



Association	Role	Scope
United Nations Environment Programme Finance Initiatives (UNEP FI)	Member	International
Indonesia Sustainable Finance Initiative (IKBI)	Member/ Founder	National
Indonesia Business Council for Sustainable Development (IBCSD)	Member/ Founder	National
Green Building Council Indonesia (GBCI)	Member	National
Forum Human Capital Indonesia (FHCI)	Member	National
Indonesia Banking Human Capital Forum (FHCPI)	Member	National



ABOUT THE SUSTAINABILITY REPORT [2-2] [2-3] [2-4] [2-5]

Annually, BNI composes the Sustainability Report, which discloses the environmental, social, and governance (ESG) performance as well as presents information relevant to sustainable finance implementation to stakeholders. The report delivers information and data for the 1 January-31 December 2022. There are several implemented standards and regulations in the composition of the Sustainability Report, which are:

1. The Financial Services Authority Regulation (POJK) No. 51/POJK.03/2017 and the Financial Services Authority Circular Letter (SE OJK) No.16/SEOJK.04/2021;
2. Global Reporting Initiative (GRI) Standards, with the conformity: with reference to the GRI Standards;
3. The GRI-G4 Financial Services Sector supplementary indicator;
4. Sustainability Accounting Standard Board (SASB) of the Financial Services sector;
5. Sustainable Banking Assessment (SUSBA) World Wide Fund for Nature (WWF) and Sustainable Development Goals (SDGs).

Aside from referring to said standards and regulations, the report also adjusts disclosure of information based on the criteria of ESG related rating institutions, such as Sustainalytics and Morgan Stanley Capital International (MSCI). All presented information

and data originate from the BNI head office, and all branch offices spread across Indonesia. The disclosure of financial information also includes the consolidated financial data, which comprises BNI and its subsidiary entities, which are PT BNI Life Insurance, PT BNI Multifinance, PT BNI Sekuritas and its Subsidiary Entities, and BNI Remittance Ltd. The reported data and information have been validated by the relevant work units as data contributors.

The report contains significant changes regarding the information presented in the previous year's report, which are the material topics priority and several data restatements. In 2022, there were several data restatement in this report due to changes in data scope calculations.

The composition process of the sustainability report has taken the principles of fairness, comparability, accuracy, timeliness, clarity, and excellence into consideration. The formulation process of the sustainability report was coordinated by the Corporate Secretary as well as acknowledged and supervised by the Steering Committee consisting of the Board of Directors and SEVP. Contents of the sustainability report have been verified by SR Asia as an independent party.

Other information on BNI can be found on our website. For further information, inputs and suggestions for the improvement and progress of this report, please contact:

Okki Rushartomo

Corporate Secretary

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E-mail : corporate.secretary@bni.co.id



Material Topics Manages by BNI

Material topics were compiled based on significant issues and information in the reporting year. There are changes in material topics from the previous year. The changes were adjusted based on the activities and significant issues occurring in 2022. In determining topic priority, we engaged the management, independent observers, as well as academicians. Determining the material topics priority refers to the principles of stakeholder engagement, sustainability context, materiality, and completeness. The mapped material topics have been identified by the impacts and influences of decision making for the Bank and stakeholders.

Determination Process of Material Topics

The identification and assessment of business impacts are conducted through a review of Sustainable Finance principles

01

Understanding the BNI business process

Engaging internal stakeholders through discussions with academicians as experts and independent observers.

02

Conducting an identification of positive and negative impacts as well as actual and potential impacts of the Bank's business process by taking the financial sector standards of reference from GRI, SASB, and SUSBA into consideration.

03

Performing an importance level assessment of all the impacts of the Bank's activities, particularly from the financing and services aspects.



Determination of Material Topics:

Setting a priority from the most significant impacts to be presented in the sustainability report through discussions with the Corporate Secretary Function and experts.

Boundaries of Material Topics



DIGITAL BANKING



GREEN PORTFOLIO



DATA SECURITY & CUSTOMER PRIVACY

ISSUE

- Economic Performance
- Digitization
- Innovation

- Green Bonds
- ESG Risks
- Credit Portfolio

Data protection

IMPACT ON STAKEHOLDERS

- Employees
- Customers
- Communities
- Business partners/Suppliers/Vendors
- Regulators
- Investors/Shareholder

- Employees
- Customers
- Investors/Shareholders

- Employees
- Customers
- Regulators

MANAGED IMPACTS

In the digitization era, the Bank provides ease of service for customers through the use of technology and innovations in products and services. The development of digitization and innovation needs to be monitored to continue bringing positive impacts and minimize potentially occurring negative impacts. The quality of services with technological innovations will impact customer trust and the Bank's reputation, including the importance of providing equal service to all customers.

Credit portfolio, particularly in the Sustainable Business Activities Category (KKUB), is part of Sustainable Finance implementation with the goal of supporting a more environmentally friendly business transition. The impacts managed in this topic are social and environmental risks from debtors with loans from BNI. The higher KKUB financing percentage, the larger the role of BNI in supporting environmentally friendly financing, which will draw investors.

As a Bank, trust is a basic principle that must be managed. BNI has the commitment to manage data security and the privacy of all customers and the impacts. The positive impact of this topic management is customer trust to use BNI products and services, hence we need to improve the data safeguarding system. On the other hand, the negative impacts requiring management are cyber threats and data theft by external parties. Data security and customer privacy are the basis for the Bank's business to ensure data protection and trust as well as a form of respect for human rights.



ACCESS AND AFFORDABILITY

Information on products and services

- Customers
- Communities
- Regulators

The access to and affordability of financial products and services for customers impact the ease and comfort of their transaction. Therefore, BNI needs to manage digital and non-digital access to banking. The impacts that we manage include a broad access to financial products and services, particularly in the context of less served markets and/or population groups. The access to and affordability of financial products and services for customers will improve the benefits of the bank's existence in providing convenience in making transactions.



OCCUPATIONAL HEALTH AND SAFETY

A decent and safe work environment

- Employees
- Business partners/Suppliers/Vendors

The continuous cultivation of awareness of occupational health and safety and a decent, healthy, and safe work environment is very important to be managed and attempted due to the impact on the Bank's operational continuity.



CLIMATE CHANGE

- Energy consumption reduction
- Emissions reduction

- Employees
- Regulators
- Investors/Shareholders

Impacts of climate change can be internally managed by performing initiatives to reduce energy consumption and emissions. The management of external impacts can be conducted through environmentally conscious financing and analysis of environmental related credit risks.



DIVERSITY AND EQUALITY

Equal opportunity

- Employees
- Customers
- Investors/Shareholders

Diversity and equality in the Bank are significant to prevent discrepancy and create harmony and mutual respect.

Management Response to Feedback to the Report of the Previous Year

We extend our gratitude for the responses and inputs from stakeholders and ESG rating institutions for the 2021 Sustainability Report. Several matters requiring attention are green financing and initiatives to support climate change mitigation. BNI management will continue to improve commitment and information to gradually address the feedback in this year's and the following year's report.



Pillar 01

**BNI FOR
INDONESIA**

DIGITAL BANKING

Material Topic: Digital Banking

Our Approach ^[3-3]

Amid the acceleration of technology and digitization, BNI develops technology as the potential for BNI to give added value to its customers. Presently, digital technology is an enabler for the Bank to give inclusive and sustainable financial services, especially through innovations in products and services. Digital transformation has also brought substantial contribution from the aspects of operating efficiency and bank profitability increase by improving capacity and sustainable service capabilities.

Digital banking information disclosure also encompasses the Bank's economic performance and innovations relevant to digital transformation. The development of digitization and innovations needs to be monitored to continue bringing positive impacts and minimize potentially occurring negative impacts. Internal policy regarding digital banking includes the Digital Banking Service Policy for Retail and Corporate Segments. Digital banking management is conducted by the Retail Solution Division for retail customers and the Wholesale Solution Division for corporate customers. In the execution of their duties, both divisions are under the supervision of the Enterprise Risk Management, Compliance, Internal Audit, and Anti-Fraud Divisions to minimize the risks arising from digital banking; whereas the financial performance and economic achievements of digital banking are under the supervision of the Director of Finance supported by the Corporate Planning and Accounting Divisions.

Digital Transformation to Encourage the Banking Economic Performance

As one of the digital banking pioneers, BNI continues to carry out transformation and develop digital product innovations, hence digital transformation has contributed to the Bank's operating performance growth. One of the forms of innovation is BNI's continuous effort to strengthen flagship features and new features in the BNI Mobile Banking app. BNI integrates BNI Mobile Banking with various services that give added value, such as payment of tuition, electricity, e-wallet, to streaming vouchers and games. The goal is to bring ease for all customer transactions and increase BNI Mobile Banking users and transactions through strengthening the app features.

Aside from making product innovations, BNI also actively participates in activities promoting the Bank's flagship products. In 2022, BNI participated in the G20 Summit event that incorporated the 2022 Indonesia B20 Summit with the theme of "Advancing Innovative, Inclusive and Collaborative Growth". In the activity, BNI had the opportunity to introduce Go Global digital banking through the metaverse. Through the relatively new metaverse, BNI was capable of running several education, promotion, and marketing programs to introduce BNI's flagship programs to customers. In the future, BNI metaverse has the purpose of conveying messages to all of

the Indonesian public on the digital banking era that goes beyond borders, not affected by distance, time, or access to obtain banking services. The metaverse is expected to be one of the touchpoints of banking services for the public, capable of improving efficiency and reducing consumption of limited resources.

In addition to BNI Mobile Banking, BNI also introduced products such as the BNI Xpora and BNIDirect. The three products were attractively and informatively packaged in the metaverse.

Economic Performance

In 2022, the economic performance recorded an operating year on year (YoY) growth of 10.0% with the year on year (YoY) net income growth of 68.0%. The achievement was supported by Net Interest Income and Fee Based Income growth.



Economic Value Generated and Distributed (Billion Rp) [201-1]

Description	2022	2021	2020
a. Economic value generated			
Interest income - nett	41,321	38,247	34,041
Premium income - nett	1,551	1,398	1,471
Other operating income	18,600	16,220	13,640
Total	61,472	55,865	49,152
b. Economic value distributed			
Operating costs (excluding employee salary)	26,117	31,903	35,605
Expenditure for employee salaries and benefits	12,456	11,195	8,521
Dividends	2,725	820	3,846
Taxes	4,205	1,574	1,610
Expenditure for community activities	100	93	175
Total	45,603	45,585	49,757
c. Economic Value Retained (A-B)	15,869	10,280	(605)

The BNI economic performance in 2022 showed an operating income of Rp61,472 billion or reaching 100.8% of the target, with the net income of Rp18,312 billion, which reached 114.9% of the target. The operating income increased by 10.0% and the net income increased by 68.0% from the previous year. The Bank distributed Rp45,603 billion to stakeholders through remuneration and benefits for employees, dividend payment to shareholders, tax payment to the government, expenditure to local and non-local suppliers, and to the public through various empowerment and donation activities. In 2022, BNI did not receive financial assistance from the government. [201-1][201-4]

SUSTAINABLE FINANCE IMPLEMENTATION

Material Topic: Green Portfolio

Our Approach ^[3-3]

Green portfolio is an important topic to disclose because it is part of Sustainable Finance implementation, with the goal of supporting a more environmentally friendly business transition. Green portfolio management comprises credit management and KKUB becomes one of the benchmarks of the Bank’s Sustainable Finance implementation achievements. Green portfolio measurement is conducted on debtors and prospective debtors by considering the environmental, social, and governance (ESG) aspects and relevant to the management of their risks. BNI has implemented the policy relevant to the control of ESG risks potentially arising from the financing given as well as consistently perfected the existing policy. The policy is formulated in the 2022 Sustainable Finance Action Plan (RAKB) that has been ratified by the Board of Commissioners.

BNI has performed early screening of ESG risks in accordance with the existing policy prior to conducting the loan granting process to debtors and prospective debtors. The process is consistently carried out by Corporate Banking 1, 2, and 3, the International Division, Enterprise Banking Division, Commercial Banking Division, Institutional Banking Division 1 & 2, Syndication and Corporate Solution Division, SME Banking Division, Small Business & Program Division as the loan granting units in BNI as well as the Corporate & Enterprise Credit Risk Division and Commercial & SME Credit Risk Division as the risk units. Portfolio management and its policy are periodically evaluated and fall under the responsibility of the Enterprise Risk Management Division, Corporate Planning & Accounting Division, and Policy Governance Division.

Green Portfolio Financing

BNI’s strategy that focuses on green banking is assessed to be capable of bringing positive impacts on the company’s business. The Bank has disbursed financing to green portfolio to debtors in various business categories, economic sectors, and national strategic projects. In 2022, BNI’s financing to green portfolio has reached Rp59.77 trillion or 9% of the total loans. All the financing were directed toward industries generating products or services with positive impacts on the environment.

Credit Portfolio Based on Category (Billion Rp) ^[FS6]

Business Category	2022		2021		2020	
	Total	%	Total	%	Total	%
Corporate	256,845	39.7	229,028	39.3	226,473	40.9
Medium	106,314	16.5	99,132	17.0	99,463	18.0
Small	101,639	15.7	95,752	16.4	84,800	15.3
Consumer	110,115	17.0	98,991	17.0	89,877	16.2
International	67,405	10.4	58,466	10.0	50,972	9.2
Subsidiary	3,870	0.6	1,087	0.2	1,521	0.3
Total	646,188	100.0	582,436	100.0	553,106	100.0

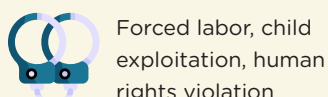
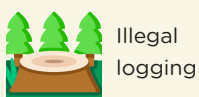
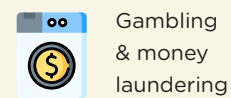
Credit Portfolio Based on the Productive Credit Business Sector (Billion Rp) [FS6]

Business Sector	2022		2021		2020	
	Total	%	Total	%	Total	%
Industry	133,896	20.7	121,977	20.9	110,963	18.9
Commerce, restaurants, and hotels	109,753	17.0	101,676	17.5	97,779	16.7
Agriculture	57,131	8.8	59,430	10.2	62,396	10.6
Business service	47,153	7.3	42,595	7.4	50,126	8.6
Transportation, warehousing, and communications	44,962	7.0	43,010	7.4	40,528	6.9
Construction	55,865	8.6	55,210	9.5	51,923	8.9
Electricity, gas, and water	22,073	3.4	20,301	3.5	23,344	4.0
Mining	39,063	6.0	15,685	2.7	15,230	2.6
Social services	23,240	3.6	20,925	3.6	23,585	4.0
Others	113,054	17.5	101,243	17.4	110,332	18.8
Total	646,188	100.0	582,436	100.0	553,106	100.0

In disbursing financing, BNI prioritizes the prudence principle and periodic portfolio monitoring as well as implements debtors' loan monitoring policy, handling of non-performing loans, and loan restructuring. The conducted monitoring includes factors of debtor conditions, payment timeliness, business prospects, and the financial condition of debtors. Each credit segment has a credit policy, which is formulated in the Company Guidelines (PP) for Business Banking Credit for the Corporate, Commercial, and Small Segments as well as the Company Guidelines for Organic Consumer Credit. The complete ESG testing can also be implemented on debtors, whether comprehensive or partial. This is necessary to determine the compliance level with ESG principles of the business to be given financing.

BNI Credit Policy

NO EXPOSURE IN



Abiding by OJK regulations, BNI's Sustainable Finance practices are shown in disbursements made for KKUB financing that consist of Environmentally Conscious Business Activities (KUBL) and MSMEs activities. BNI constantly endeavors to expand its KKUB portfolio gradually and sustainably by identifying and analyzing debtors and prospective debtors.

The financing growth in KUBL in 2022 was recorded at 6.12%, lesser than the previous growth of 20.33%. Of the total KKUB portfolio of Rp182,934 billion, 67% of which is absorbed by MSMEs financing. Moreover, the KKUB portion was 28.5% of the total financing in 2022, slighter than the 29.6% in 2021. These occurrences were influenced by the more accounts made by the existing debtors in the 2021 KUBL than in the 2022 KUBL, and the new registered debtors were under the classification of KUBL because several KUBL credit applications have not been realize.

Sustainable Business Activities Category (Billion Rp) [FS8] [FS10] [FS11]

Description	2022		2021		2020	
	Total	%	Total	%	Total	%
Total Portfolio of Sustainable Business Activities Category (KKUB) Financing	182,934	100.0	172,386	100.0	143,266	100.0
a. Renewable energy	10,872	5.9	9,528	5.5	4,920	3.4
b. Energy efficiency	14,033	7.7	17,746	10.3	156	0.1
c. Pollution prevention and control	4,003	2.2	5,098	3.0	214	0.1
d. Natural resources management and sustainable land use	19,695	10.8	14,004	8.1	21,261	14.8
e. Land and water biodiversity preservation	26	0.0	34	0.0	-	0.0
f. Environmentally friendly transportation	2,020	1.1	-	0.0	-	0.0
g. Sustainable water and wastewater management	314	0.2	2,856	1.7	21	0.0
h. Climate change adaptation	-	0.0	-	0.0	-	0.0
i. Products capable of reducing the use of natural resources and generating less pollution (eco-efficient)	1,011	0.6	251	0.1	1,158	0.8
j. Environmentally conscious buildings that meet nationally, regionally, or internationally acknowledged standards or certifications	7,394	4.0	5,278	3.1	528	0.4
k. Other environmentally conscious business activities and/or other activities	398	0.2	579	0.3	1,219	0.9
l. MSME activities	123,165	67.3	117,011	67.9	113,789	79.4

BNI has implemented more stringent inspection of sectors with high environmental risks, including oil palm. Prior to granting financing, the Bank conducts a screening of debtors from the oil palm sector to ensure that their business has met the sustainability principles, such as by having the Roundtable Sustainable Palm Oil (RSPO) and Indonesia Sustainable Palm Oil (ISPO) certificates and obtaining the blue, green, and gold PROPER rating. The number of debtors having the RSPO/ISPO certificate were 33 companies, whereas 36 other companies were in the process of obtaining the RSPO/ISPO certificates. Debtors receiving Blue PROPER rating were 52 companies, 6 companies Green PROPER rating, and 7 companies Gold PROPER rating.

Financing to the Energy Sector [FS10]

In line with Company policy to conduct energy transition from power plants powered by fossil fuel to renewable energy, BNI supports the energy transition process. The support is given in the form of financing, whether for steam power plants transitioning to gas powered or financing in the renewable energy sector. BNI has financed the following energy transition projects:



- 01** Supporting the financing of energy transition in the form of projects to replace PLTU with PLTG/GU.
- 02** Supporting the financing of PLTGas, including pipe gas transmission and infrastructure or storage for energy buffer reserves and reduction of fuel oil use by increasing the use of gas as a cleaner energy source.
- 03** Supporting the development of NRE production and optimizing BBN (biodiesel or biohydrocarbon) production, including PLTSa as the byproduct of garbage management.
- 04** Supporting the financing of PLTS, PLTA, PLTGeothermal, and other NREs as one of the sources of the energy transition program.

BNI also participates in preparing for the electric vehicles ecosystem infrastructure by becoming the first bank in Indonesia to use the Public Electric Vehicles Charging Station (SPKLU) Own Investor Operate (IO2) Investor Partnership cooperation scheme from PLN. SPKLU construction was a real step for BNI in encouraging the acceleration of Battery Based Electric Vehicles (KBLBB) use in Indonesia, which will bring positive impacts on the environment.

Green Bonds

In June 2022, the Bank has issued green bonds with the denomination of Rp5 trillion as the capital for green portfolio strengthening. The funds obtained from the public offering of green bonds will be used for new financing and refinancing of environmentally conscious projects. The financed projects are projects meeting the prerequisites based on the BNI Green Bonds framework and receiving Second Party Opinion (SPO) from Sustainalytics assessing the validity of the framework, appraising, and confirming that the projects indeed bring real contributions to the environment. The second party also presents an annual independent assessment to investors regarding the developments of said projects.

Sustainability Linked Loan (SLL)

BNI continues to improve the commitment to encouraging change toward future sustainable business activities in Indonesia and supporting Sustainable Finance in ESG along with the increasing trend of sustainable business investment. To that end, BNI has conducted the following cooperations with a number of corporations for the SLL program:

- Companies in the animal husbandry and food processing industries establish environmental key performance indicators relevant to the achievement of sustainability targets intended to minimize the impacts of water pollution.
- Companies in the steel processing industry implement the sustainability framework with the ESG risk rating improvement as an indicator.
- Companies in the cement processing industry sector implement the sustainability framework to minimize the impacts of carbon emissions through the syndicated credit facility.



FINANCING TO SUPPORT INFRASTRUCTURE DEVELOPMENT IN INDONESIA

The financed business sectors are sectors that support the acceleration of infrastructure development in Indonesia, which include the infrastructure, transportation, oil and gas, telecommunications, and electricity. Several environmentally friendly strategic projects financed by BNI are the Light Rail Transit

(LRT), the Merah Putih Catalyst Factory, toll road construction project receiving the Green Toll Road Indonesia certificate, as well as the green tower base transceiver station (BTS). BNI is committed to supporting sustainability financing to mitigate the impacts of climate change and align with SDGs.

Infrastructure Financing Portfolio [FS6]

Toll road and construction

2022	53,192
2021	56,296
2020	50,539

Transportation

2022	22,981
2021	25,685
2020	26,920

Electricity

2022	23,397
2021	21,242
2020	22,141

Oil and gas

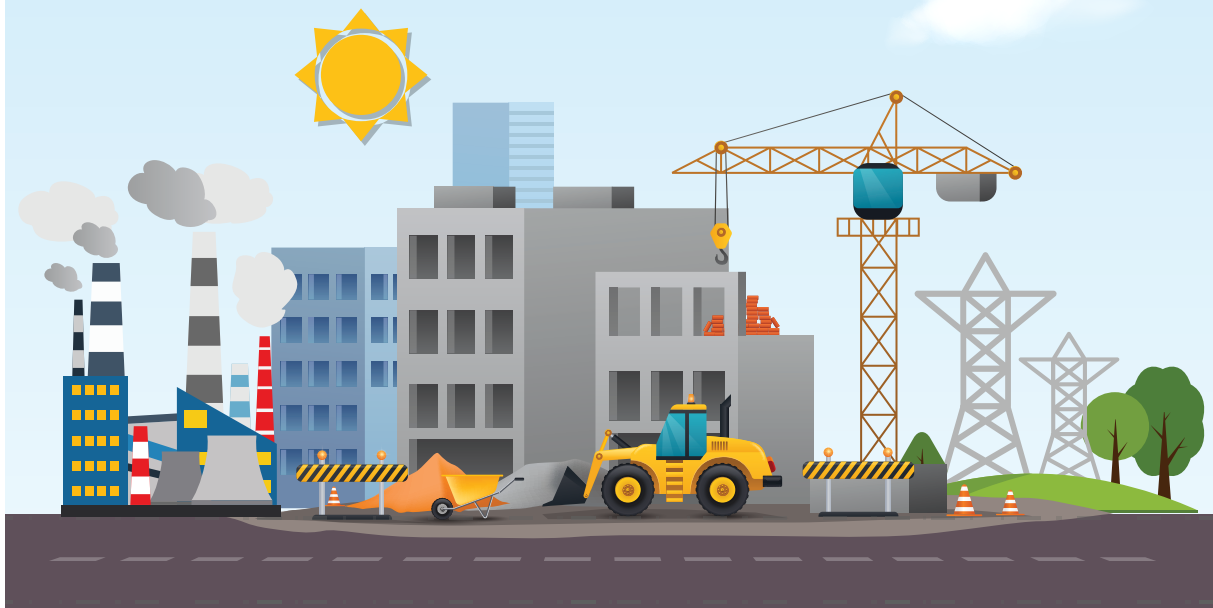
2022	8,359
2021	6,251
2020	5,963

Telecommunications

2022	16,466
2021	17,101
2020	14,423

Total

2022	124,396
2021	126,576
2020	119,987



ANALYSIS OF CLIMATE RELATED FINANCIAL RISKS

Climate change is one of the largest concerns in many countries, including Indonesia. The climate change caused by increasing carbon emissions and the earth's temperature, aside from impacting the environment, also potentially disrupts monetary stability and financial system. BNI, as a financial services institution and an SOE, also takes climate change and environmental risks into consideration. The Bank also supports the United Nations Environment Programme Finance Initiative (UNEP FI).

BNI's operating activities do not directly impact climate change; however, other sectors with business activities potentially causing climate change are debtors receiving financing from the Bank. BNI has the industry risk appetite and risk acceptance that have taken ESG issues into account, such as deforestation, the loss of biodiversity, forest logging, flood, drought, and pollution. Therefore, BNI attempts to lessen financing in sectors potentially damaging the environment.

BNI continues to supervise the management of ESG risks in financing activities, enforce ESG conscious credit policy, as well as starts to mitigate and adapt to climate change. [201-2]

Task Force on Climate-Related Financial Disclosures (TCFD)

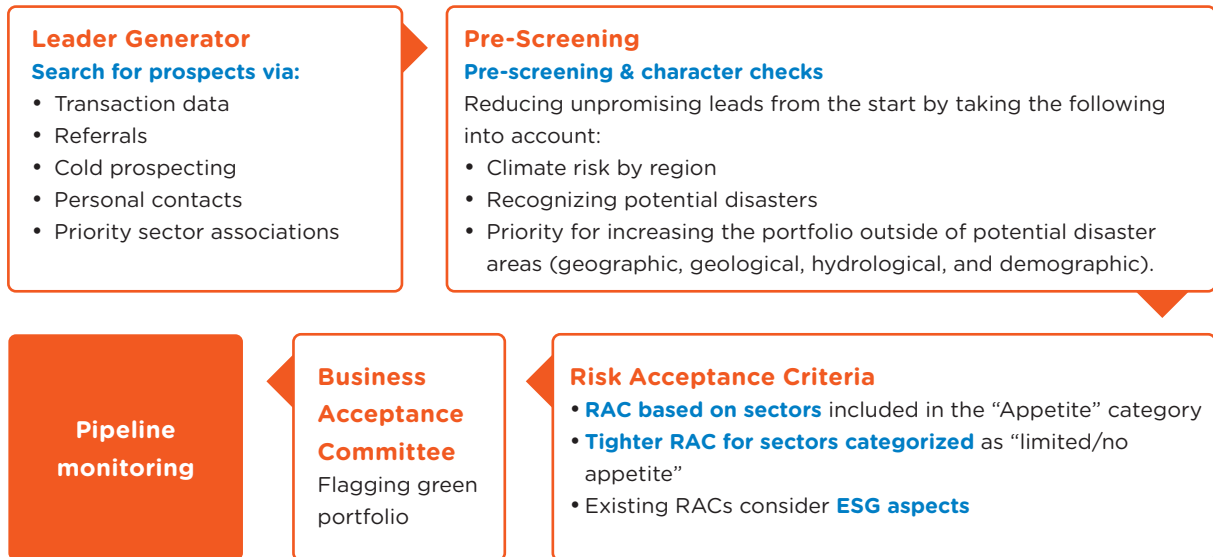
In line with BNI's commitment to strengthening ESG practices, BNI will adopt the TCFD framework to compose recommendations for climate related voluntary financial disclosure. Implementation of the framework has the goal of assisting the financial market in understanding the risks and opportunities faced by the company, as well as the company's method of supervision and management. In TCFD, there are recommendations requiring development by BNI, which include the company's governance, strategy, risk management, as well as the matrix and targets in facing climate change as the key element.



ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) RISK MANAGEMENT

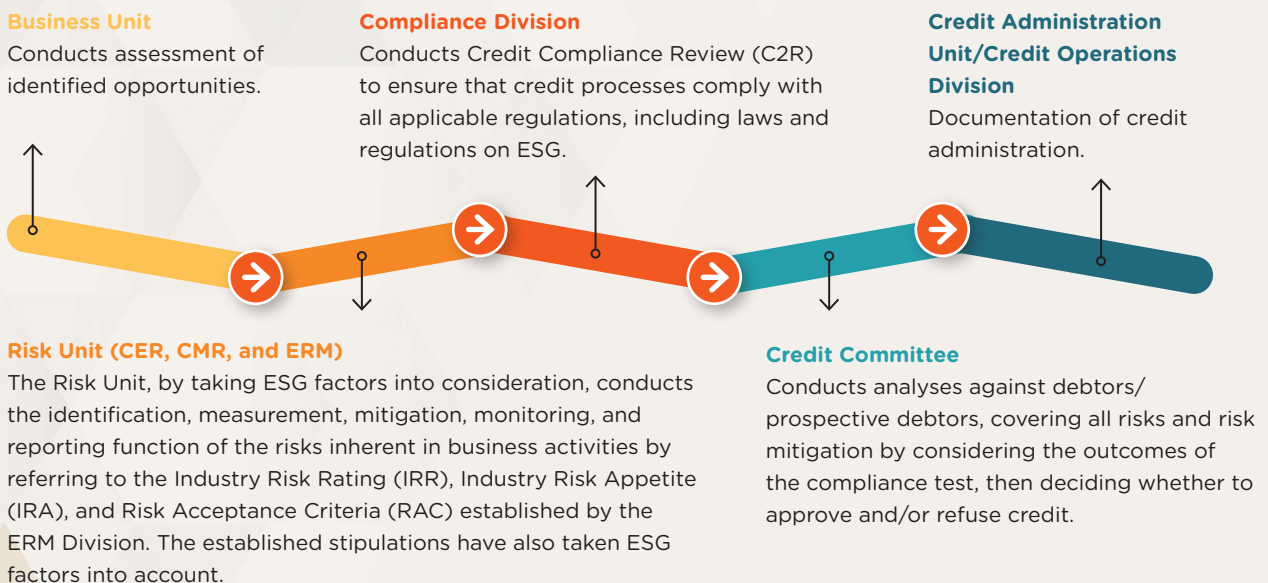
The management of ESG risks from banking activities is prudently conducted. The effort to improve ESG risk management is summarized in the following flow:

Process Flow of Pipeline Management by Considering ESG



Mechanism for the Credit Process and Preliminary Screening

BNI continues to adjust loan requirements for businesses with considerably high ESG risks. The Bank has an Internal Audit Division (IAD) performing control and internal audit in every branch relevant to compliance with the customers' loan process. ESG risk identification is conducted in every loan proposal review and specifically implemented in the ESG risk monitoring and management process.



ESG Risk Management in Financing [FS1][FS2][FS3]

In financing debtors, BNI considers several criteria by taking the ESG aspects of each sector into account. In 2022, BNI strengthened the criteria in 4 key sectors, which are palm oil plantation, mining, and construction and energy. The criteria are:

Sector	ESG Aspect Criteria
Oil Palm Plantation	<ul style="list-style-type: none"> At a minimum, having ISPO or RSPO certification. Maintaining nature preservation in opening land without disrupting the environment and preserving land conditions following oil palm plantation. No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Mining	<p>Mine Operator:</p> <ul style="list-style-type: none"> At a minimum, having a Blue PROPER rating. Having a dedicated team for reporting to BoD to manage corporate social responsibility issues. No bad press about violations of local and international environmental regulations. No record of social/environmental disturbances in the last 5 years that impacted business continuity. <p>Smelter:</p> <ul style="list-style-type: none"> Have obtained the environmental impact analysis approval. No bad press about violations of local and international environmental regulations. Complying with regulations on air & noise pollution, including dust dispersal. Complying with regulations on water, sediment, and wastewater treatment. Complying with regulations on hazardous waste substance treatment. Managing social and cultural impacts on local communities. Conservation of wildlife/local habitat ecology management. No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Construction	<ul style="list-style-type: none"> Mandatory to have an OHS (Occupational Health, Safety, and Security). Meeting and complying with regulations of the construction sub-sector, which are: land use rights, employee occupational health and safety, minimizing pollution, minimizing impacts of hazardous substances, using/maintaining natural water sources. No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Power/Energy	<ul style="list-style-type: none"> Mandatory to have the Environmental Impact Assessment (AMDAL) and Occupational Health, Safety, and Environment (OHSE). No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Real Estate	<ul style="list-style-type: none"> Conformity with the regional spatial plan (RT & RW). Appropriate land use (land suitability with its function based on the regional/regional master plan, Basic Building Coefficient (KDB), Building Area Coefficient (KLB). No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Telecommunications	No record of social/environmental disturbances in the last 3 years that impacted business continuity.
Chemicals	No record of social/environmental disturbances in the last 3 years that impacted business continuity.
Cement Industry	<ul style="list-style-type: none"> At a minimum, having a Blue PROPER rating. No record of social/environmental disturbances in the last 5 years that impacted business continuity.

Sector	ESG Aspect Criteria
Fast Moving Consumer Goods (FMCG)	<ul style="list-style-type: none"> • Having AMDAL and K3L. • No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Hospitals	<ul style="list-style-type: none"> • At a minimum, having ISO 14001 certification. • No malpractice news that impacted business continuity. • Having a hospital waste treatment unit in accordance with government regulations. • No record of social/environmental disturbances in the last 5 years that impacted business continuity.
Pharmaceuticals	<ul style="list-style-type: none"> • No news of fatal side effects of the produced medications. • No record of social/environmental disturbances in the last 5 years that impacted business continuity.

BNI ensures that financing is disbursed to sectors not damaging the environment, responsible, and productive. Therefore, the Banking Business Unit periodically performs monitoring through the watchlist system and creates a rating. Every three months, the monitoring results are reported to Divisi Corporate & Enterprise Credit Risk (CER) and Divisi Commercial & SME Credit Risk (CMR). Moreover, each responsible unit is obligated to perform internal audit of a sample of debtors as part of monitoring. In the event of an ESG aspect violation, BNI will verify to the relevant parties and perform adjustments (downgrading) if the debtor is proven to be noncompliant with ESG regulations.

Risk Management Management in the Credit Portfolio

Aside from KKUB, the Government issued the Indonesia Green Taxonomy (THI), which is a classification system that determines the list of environmentally friendly economic activities. THI is used as the Bank’s guide in identifying risks from debtors, particularly relevant to the ESG aspects. THI uses color indicators of Green (low risk), Yellow (medium risk), and Red (high risk) to show the debtors’ risk regarding ESG, from which debtors deserving of financing are in the Green and Yellow categories. With THI, the Bank can ascertain debtors with business activities that support efforts of environmental protection as well as climate change mitigation and adaptation. BNI has classified the top 400 debtors based on the baki debt of December 2022, with the composition of 11.50% of red classification debtors, 43.25% of yellow classification debtors, 28.25% of green classification debtors, and 17.00% yet to have a category.

Compliance Audit ^[FS9]

The Internal Audit (IAD) has conducted an audit of debtors whose businesses are relevant to compliance with the loan requirement document. In the reporting period, the audit was performed on 39 commercial segment debtors and 46 corporate segment debtors, several of whom were in the construction, real estate, synthetic fiber manufacturing, finished textiles and rugs, coal mining, oil and gas, telecommunications, electricity, Fast Moving Consumer Goods (FMCG), oil palm plantation, chemicals, as well as plastic and synthetic rubber sectors.

RESPONSIBILITY FOR FINANCIAL PRODUCTS AND/OR SERVICES

Products/Services Evaluated as Safe for Customers

All (100%) of the financial products/services and features launched by BNI has been evaluated for safety for customers. BNI is responsible for ensuring product safety prior to launching. The evaluation of financial products/services involves several divisions, namely the Compliance Division to ensure compliance with regulations in Indonesia; the Legal Division to identify the legal basis as the foundation of the products, such as regulations or laws on information and transaction, system establishment, product regulation; the Enterprise Risk Management Division to analyze the mitigation of risks arising from financial products/services; as well as the IT Unit that inspects the financial products/services, whether from the operating procedure or technological aspect, and conducts Post Implementation Review (PIR).

PIR results will determine the following process. If PIR results still comprises deficiencies, the PIR will be repeated. The products and services meeting the requirements of the operational, technological, and risk aspects based on the PIR results will be submitted to Bank Indonesia and the Financial Services Authority to receive further approval before they are launched for the public.

[FS15]

In 2022, there were no launched financial products/services that received complaints and were withdrawn.



Positive and Negative Impacts of Sustainable Finance Products

The Bank always considers the impacts and risks of financial products/services prior to their launch. The creation of financial products/services hopes to cause minimum ESG risks and negative impacts but bring maximum positive impacts.

Digital banking products/services have potential negative impacts and risks, such as data security, customer privacy, and cybercrime. Whereas loan products, ESG risks, and climate related risks in the portfolio also require monitoring and improvement. Furthermore, loans in the KKUB portfolio also carry the risk of becoming non-performing loans (NPL) if infeasible, similar with non-KKUB loans. Hence, BNI implements the loan procedure by applying the risk management process to all financing products, including KKUB.

Additionally, the Bank continues to improve the positive impacts of financial products/services by paying attention on the potential to increase ESG conscious loan portfolio with the positive impacts of supporting environmental preservation and improve public welfare. The Bank also strengthens data security through sufficient IT infrastructure.

FAIR OPERATING PRACTICES

The Bank is committed to implementing fair operating principles in accordance with laws, regulations, social norms, and Code of Conduct. Fair operating practices are conducted by effectively managing intellectual assets, cultivating fair relations with stakeholders, eliminating conflict of interest with suppliers, competitors, and other relevant parties and applicable both internally and externally. Furthermore, BNI also participates in healthy competition by complying with antimonopoly laws.

Several forms of fair operating practices conducted by BNI are:

- Upholding anticorruption, antibribery, and anti-fraud in the work environment.
- Respecting and supporting intellectual property protection.
- Implementing fair trade practices and avoiding monopoly, maintaining mutual trust and fair relations with business partners/suppliers/vendors in accordance with the code of conduct and integrity pact.
- Complying with regulations and paying taxes to the Government in accordance with accurate calculations.
- Maintaining supply chain sustainability in various sectors, such as HC management, development of products and services, and information technology development, by continuing to take regulations and policies to manage human rights issues, customer privacy, and environmental preservation into consideration.
- Not contributing to politics and not engaged in politics or government policies.
- In cultivating and improving the risk culture, BNI management and employees must be sensitive to the environment and responsive to the needs of stakeholders.



Pillar 02

**BNI FOR
CUSTOMERS**

DATA SECURITY AND CUSTOMER PRIVACY PROTECTION

Material Topic: Data Security and Customer Privacy

Our Approach ^[3-3]

Amid the increasingly advanced digitization era, technology is easier to access. Hence, data security protection becomes a highly significant issue to disclose to safeguard customer privacy. Furthermore, privacy protection is one of the human rights elements that must be respected.

The ease of access in digital banking is also accompanied by the increasing risk in the misuse of data and cybercrime. BNI is committed to giving excellent service and customer interest protection in accordance with OJK Regulation No. 1/OJK.07/2013 on Customer Protection for the Financial Services Sector and Law No. 27 of 2022 on the Protection of Personal Data.

The challenges that we face relevant to this topic are data theft, cybercrime, and fraud, which require the Bank to continuously evaluate the security system by implementing an advanced information technology system and data security tools. Data security and customer privacy are part of the data security management, which is the responsibility of the Information Security Division (ISU) under the supervision of the Director of Information Technology and Operations.

The Bank's commitment regarding customer security and protection is actualized through the company's Code of Conduct, where all employees are prohibited from trading customer data and data change must only be performed with customer permission. Moreover, the Bank has a policy relevant to customer rights to access, correct, and file a request for data deletion or update. Every violation found will be followed-up by the Internal Audit Division (IAD) and monitored by the Employee Violation Processing Unit. The Bank has a special division to safeguard information security and improve cyber security, namely the Information Security Unit.

To protect customer data security, the Bank performs the following efforts:

- Implementing the Data Loss Prevention (DLP) mechanism from upstream to downstream to improve the safeguarding of important electronic information from information theft or access by unauthorized parties.
- Threat Hunting through the detection mechanism and taking down fake websites impersonating BNI.
- Customer protection mechanism from fraudulent transactions caused by banking malware or social engineering.

- Continuously conducting education to customers/banking partners including the bank’s employees to grow awareness in conducting banking activities and protect personal data security by not sharing credentials, such as password, PIN, or name of the birth mother.
- Improving education to customers via the bni.co.id website, which includes the link to Tips & Education regarding Transaction Security Tips (Internet Banking, ATM, SMS Banking, Mobile Banking, etc.)

The Bank sustainably develops cybersecurity to defend banking service innovations and well maintain the aspects of customer trust and comfort. The Bank’s puts the utmost effort to increase the digital banking security system by adopting the cybersecurity framework and internationally prevailing security standards, such as the ISO 27001 (Plan, Do, Check, Act) and NIST (Identify, Protect, Detect, Respond, Recover) to ensure system reliability. In 2022, there were no complaints based on customer privacy violation and loss of customer data.

[418-1]

To avoid data leak and cybercrime, literacy improvement to customers continues to be performed. BNI continuously attempts to comply with directions from OJK as the banking supervisor to educate customers regarding customer data protection through various channels. BNI implores customers to always safeguard the confidentiality of personal information, including PIN and transaction OTP as well as immediately contact the bank’s call center in the event of the card being lost, stolen, or there are irregularities in the banking transaction.



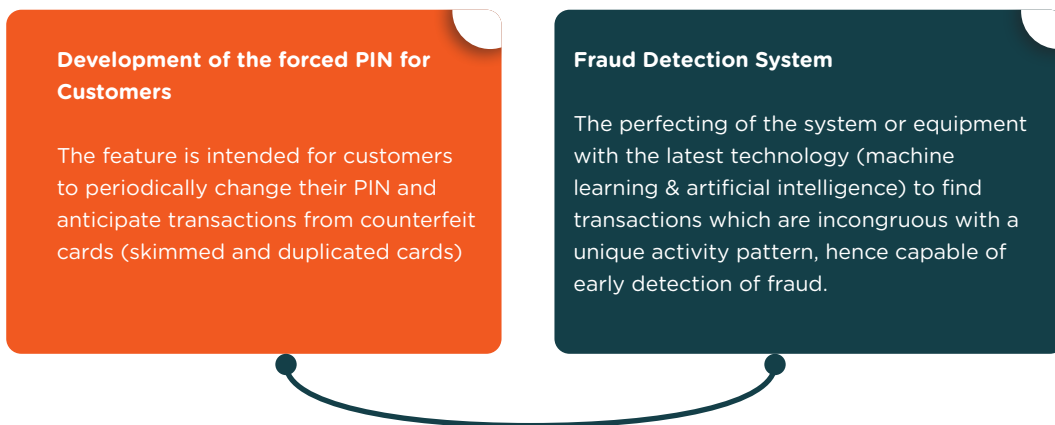
PREVENTING CYBERCRIME

BNI strives to improve its data security system and continuously performs monitoring to overcome cybercrime. Another effort is adopting the proactive NIST Cybersecurity framework to defend business continuity from the threat of cybercrime. BNI also improves the Information Security Management System to meet the ISO 27001 standards and ensure the IT software development practices have met international standards.

Furthermore, to mitigate data leak, the Bank unceasingly increases the pace of service digitization (customer to system, employee to system) to eliminate the need for physical documents (human to human). At all endpoints, a hardening process is conducted by joining domain, installing antivirus, and installing the desktop monitoring application (SystemSkan) in order to enhance the security of customer information assets.

To ensure good implementation of the data security system, BNI assesses third parties cooperating with BNI regarding information security, such as BSSN, Bank Indonesia, OJK, Himbara, Perbanas, and international consultants for cybersecurity. Additionally, cybersecurity is supervised by the Director of Information Technology & Operations and the monitoring of cyber security is managed and reviewed by the Information Security Unit. The Bank has also performed an internal Information Security Audit by the BNI Internal Audit Division, and the Cybersecurity Maturity Level assessment by the Information Security Unit produced the outcome that BNI has matured.

BNI invests in the development and utilization of technology to protect the Bank's and customers' internal information in the forms of:



Aside from improving the security system, the Bank also gives training to employees, particularly the IT work unit, relevant to technological development and data security. In 2022, 396 IT work unit employees have participated in soft skill training with the topics of digital leadership, technology presentation skill, as well as communication & negotiation skill. BNI also conducted hard skill training with the topics of project management, IT architecture, programming, CI/CD, secure coding, cloud security, DevSecOps, ISO 27001, and others. The Bank also granted certification for IT HC for competency improvement as well as gain national and international recognition.

DIGITIZATION AND INNOVATION FOR CUSTOMER CONVENIENCE



Digital Transformation in All Lines of Business

Digital transformation is believed to lead to a faster and more concise operating service; however, BNI continues to take the security factor into consideration. Opportunities in the digital era are optimally utilized to encourage digital transformation in all lines of business and ultimately stimulate the growth of operating and banking performance. This effort is a part of sustainable finance practices where BNI performs innovations and product/service development.

Evidence of BNI's digital transformation is the development of customer-facing digital banking platform with multiple touchpoints, whether for retail or corporate customers. To provide the service with a competitive advantage, the existing digital banking platform is continually developed to ease customer transactions and draw the interest of new customers. Several excellent features have been added to BNI Mobile Banking, including eWallet top-up and Lifestyle. Consequently, the digital transactions of BNI Mobile Banking have been capable of growing by 300% in the last 6 years.

Meanwhile, for Business Banking customers, BNI has developed the Xpora platform with the capability of the BNI International banking services one stop shopping solution for various business owners. Furthermore, BNI also conducts digitization on the BNI Agen46 as mini outlets or low-cost extensions of BNI outlets on the frontline. BNI also embraces fintech or peer-to-peer lending (P2P) companies to digitally expand the access to financing for MSMEs. Currently, approximately 75 peer-to-peer companies have joined hands with BNI.

As a member of the HIMBARA Bank, BNI has also supported efforts to improve the financial inclusion and digitization of MSMEs through introducing the Quick Response Indonesian Standard (QRIS) service into the digital ecosystem. Through QRIS, BNI intends to assist the government to inspire the improvement of economic activities with the digital ecosystem. Despite the efforts to digitize all business service processes, BNI continues to maintain that all provided services are safe and with minimal risk.

Digital Integration

BNI continues to develop cooperation with fintech or technology companies through the open banking service or open Application Programming Interfaces (API). BNI combines two services, conventional and fintech players, together. This collaboration benefits customers because the services on offer are more complete and more integrated. In 2022, the BNI Open API had 443 types of service as the highest number among peer banks. Moreover, the BNI Open API has also had more than 4,000 partners.

BNI Digital Hub

BNI formed the BNI Digital Hub with the goal of building a digital sourcing and talent community to meet the sourcing needs in developing BNI digital services and constructing a digital business ecosystem, whether from local startups/fintech companies or innovations made by the BNI Hi-Movers. In 2022, BNI established the BNI Digital Hub in Malang City, East Java.

BNI Direct

Apart from using the Open API, BNI has integrated digital transaction solutions for business and institutional customers, including MSMEs, namely BNIDirect. BNIDirect services support customers in creating efficient business financial processes and increasing customer business productivity by offering effective, safe and reliable cash management services to non-individual customers. In addition, this year BNIDirect innovates to become a one-stop-solution platform with access to all business services such as e-Bank Guarantee for bank guarantee transactions, FSCM for Supply Chain Financing transactions, API, Smart Commerce Pay, and FX on one platform. Complementing this development, BNIDirect carried out several

innovations such as integrated reporting. BNIDirect's total digital clients have reached 100,170, an increase of 16.7% from the previous year. Meanwhile, BNIDirect's total transactions throughout 2022 have reached 764 million transactions with a growth of 18.6% yoy.

BNI Digital Assistant (BDA)

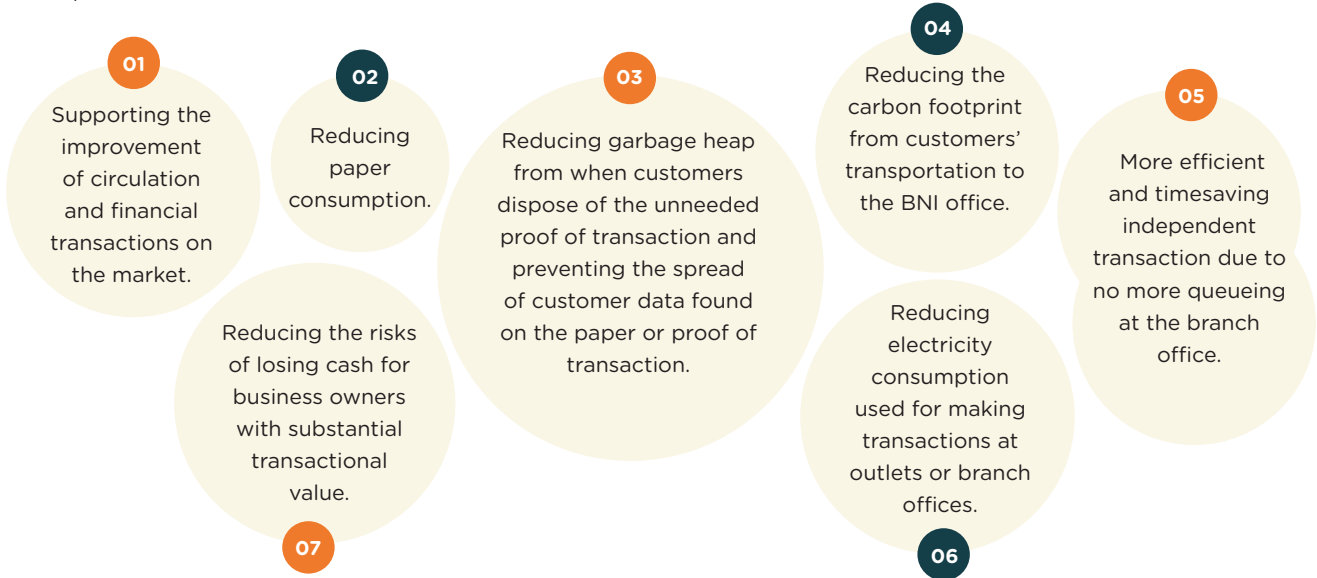
The development and digitization process of services continue to be conducted. BNI has implemented several automation and digital services, namely DigiCS, SPRINT, Cash Recycling Machine (CRM), E-banking application, Tapcash, and chip-based Debit Card & Credit Card. To ensure that BNI customers have understood the use of the digital channel for a faster shifting of transactions to digital, BNI places BNI Digital Assistant (BDA) officers in all outlets to assist with customer education and advisory in using digital services.

In 2022, BNI has implemented BDA in all BNI branch offices/outlets, and the presence of BDA officers is the main layer in shifting to digital and focused on positive customer experience and the advantage of fast, safe, and solution-oriented services in meeting the expectations of various financial transaction needs of customers.

BDA implementation continues to show positive development in serving and educating customers for the shift of transactions to digital, which can be viewed from the increase in intercept ratio from 18.3% in December 2021 to 36.3% in December 2022.

Positive Impacts of Digital Banking

The development of digital banking products brings positive impact on the Bank’s operations. The increase in efficiency and productivity of digital services provides convenience for users. Other positive impacts include:



IMPLEMENTATION OF HUMAN RIGHTS PRINCIPLES AND RESPONSE TO CUSTOMERS

Superior Services

BNI puts the utmost effort into providing superior services for all customers. The Bank has established the superior services strategy, which includes:

- Providing complete, integrated, quality, trusted, and reliable financial products/services.
- Providing a “one stop solution” service for business and individual customers.
- Providing best in class product and service quality.
- Improving customer experience in processes considered critical by customers.
- Proactively performing adjustments and improvements in line with the growth of customer needs and demands for the quality of products and services offered by BNI.
- Providing convenience for customers in making transactions.
- Increasing Human Capital competencies and capabilities, especially frontliners.
- Implementing equal service to all customers and the “beyond services” culture.
- Improving the security system in all networks and digital features.

- Safeguarding data security and customer privacy, whether physical or digital, as one of the basic rights of customers.

Moreover, BNI also implements “beyond services” and human rights principles in reaching out to customers in the frontier, outermost, and least developed (3T) regions in Indonesia. [FS 15]

Banking Services for People with Disabilities [FS 14]

In providing banking service, BNI also pays attention to customers with disabilities. In line with human rights principles, the Bank gives special access to provide convenience in making transactions in the form of a special ATM equipped with a voice service to assist people with blindness or physical disabilities. ATMs with voice service feature and braille buttons are spread across 393 cities/regencies in Indonesia with the total of 3,222 units.

ACCESS AND ACCESSIBILITY

Material Topic: Access and Accessibility

Our Approach [3-3]

Access to and accessibility of financial products and services for customers influence the ease and convenience in making transactions. Therefore, BNI needs to manage and increase access to banking, whether digital or non-digital, and the reachable areas. Policies related to access and affordability of banking services are contained in Network Management Company Policy No. IN/374/JAL/001 and Overseas Branch Offices.

The units responsible for access and affordability consist of the Channel Management Division and the International Division. In the reporting period, BNI has reached all regions in Indonesia, including frontier, outermost, and least developed (3T) areas as well as 7 other countries.

Access to Product and Service Information [FS13] [FS14] [FS15]

The improvement of access to product and service information is continuously conducted. The Bank has a policy of transparency regarding the information on products and services given for customers to be able to use the products and services appropriately. The transparency policy falls under the responsibility of the BNI Corporate University and has been disseminated to all employees.

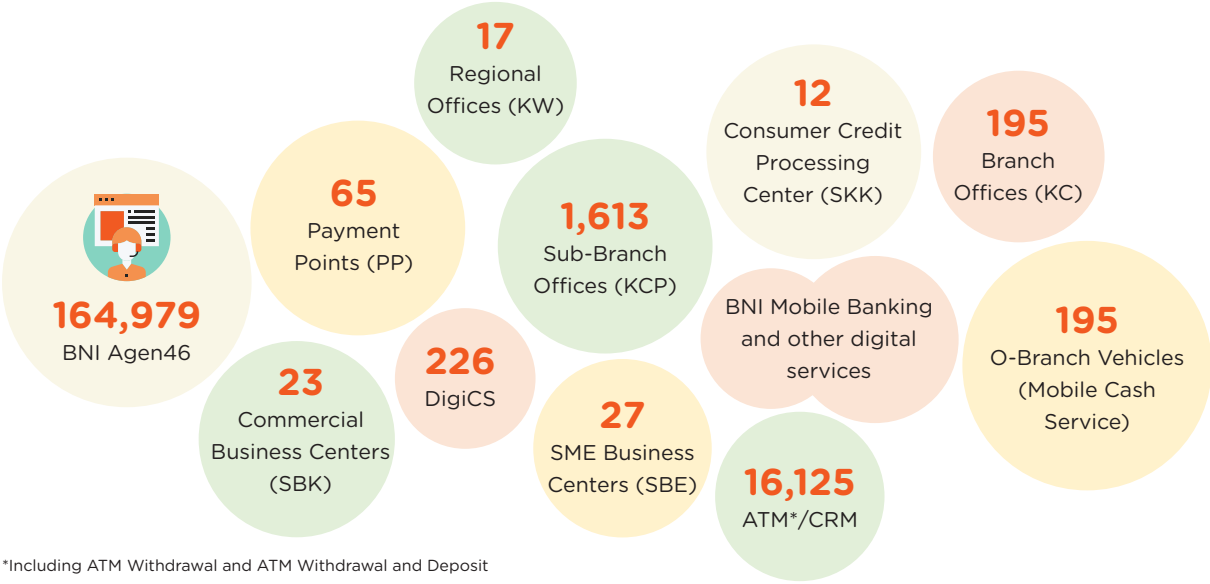
Customers are able to access product and service information on the BNI website, www.bni.co.id, annual report publication, BNI offices, as well as BNI Agen46. On the platform or publication, information is completely and clearly given, such as product names, types, benefits, requirements, inherent costs, interest or dividend calculations, as well as the validity period of the products/services. BNI also informs the risk profile of products to customers in order to give a complete view of the products. BNI Hi-Movers, especially frontliners and BNI Call, are always ready to provide consultation and further information on product and service information required by customers.



Access to Branch Offices and Bank Service Facilities

The BNI products and services can be accessed beyond large cities and have reached village and even 3T areas. In 2022, the BNI office network has been spread across 37 provinces and reached 449 cities/regencies (87%) in Indonesia, whereas BNI Agen46 managed to reach 514 cities/regencies (100%) across Indonesia. BNI also has 6 overseas branch offices (Singapore, Hong Kong, Tokyo, New York, London, Seoul); 1 overseas sub-branch office (Osaka); 2 overseas remittance branch offices (Singapore); and 1 overseas Representative Office (Amsterdam).

Based on the Financial Services Authority Regulation No. 12/03.POJK/2021 on Public Banks, the Cash Office (KK) status has been changed to sub-branch office. The rationalization or reduction of the number of branch offices is performed with a measured and sustainable parameter as a strategy to optimize and strengthen the business performance of outlets. The reduction of number of ATMs is conducted to meet the stipulations of regulators (reduction of obsolete ATMs) to decrease risks and improve the efficiency of ATMs.



*Including ATM Withdrawal and ATM Withdrawal and Deposit

Through digital technology advancement, the accessibility of bank services is not limited to physical channels but also through various digital channels accessible wherever and whenever. Accessibility is also a strength in BNI's various digital channels, where customers can access services from Android/iOS smartphones, through sms, or on a PC/laptop on the Web Browser.



Access and Marketing Communication Policy

The BNI product and service information is dispersed verbally by frontliners in the branch offices or through the means of marketing, such as print and electronic media, and others. BNI continues to consider and protect the interest of customers and communities to prevent the potential of future dispute due to inaccurate introduction relevant to the financial products and services. Access and marketing communications refer to several policies and guidelines, including:

1. SEOJK No. 12/SEOJK.07/2014 of 2014 concerning Submission of Information in the framework of Product Marketing and/or Financial Services.
2. Guidelines for Advertising Financial Services issued by OJK.
3. Internal policies: Company Guidelines (PP) Work Procedures of Marketing Management & Retail Consumer Portfolio Division; Integrated Marketing Communication PP; and PP Advertising.

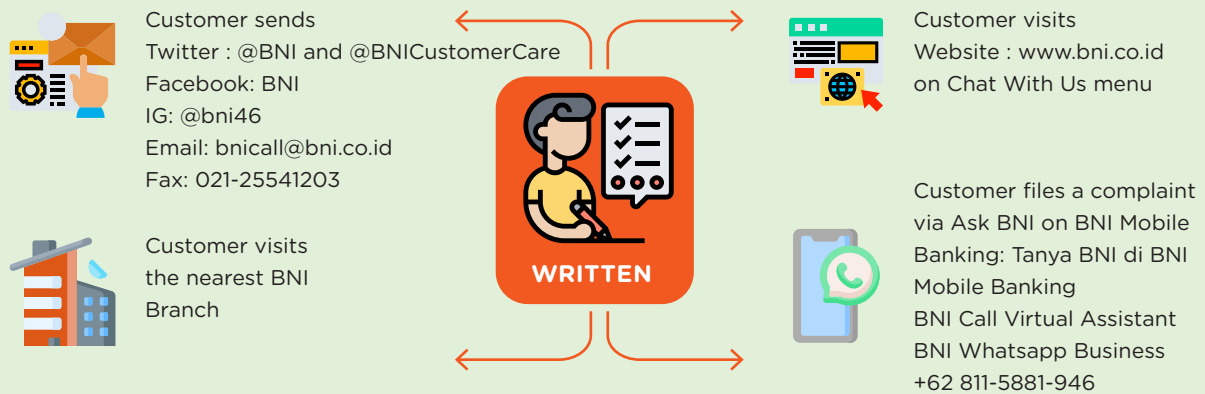
BNI always ensures that prior to the publication of products and services, all the presented information is accurate, honest, clear, not misleading, and does not contain elements of prejudice against ethnicity, religion, race, and inter-group relations or non-compliance with the marketing communication code of conduct. Aside from internal monitoring by management, the BNI marketing communication is also supervised by the Financial Services Authority (OJK) every month. All inputs given by OJK is one of the foundations for BNI to improve marketing communication in the future.

BNI also strives to keep abreast of modern marketing trends which are always dynamic by presenting digital marketing content such as LED, Videotron and Visual Marketing Communications. This is also a form of BNI's participation in preserving the environment or eco-friendly. In optimizing the use of social media, BNI collaborates with various parties. This resulted in achievements in terms of social media followers in 2022, namely, an increase in the number of BNI Instagram and Facebook followers reaching 1.1 million followers and 344,000 followers. Meanwhile, BNI's YouTube channel and Twitter account have more than 31,000 followers and 1.2 million followers. In addition, BNI provides increased capability (communication and marketing) for employees, especially the Marketing Communication (MCM) Division to continue to develop competencies related to marketing communications, employees are involved in various trainings, both internal and external and marketing certifications, such as Brand Operations Certification and Certified Professional Marketer (Asia).

HANDLING CUSTOMER COMPLAINTS

To maintain transparency and improve service, BNI openly welcomes all complaints, critiques, and suggestions from customers. The follow-up on customer complaints is conducted in accordance with the service level agreement (SLA), with the verbal complaint resolution standard of a maximum of 5 working days, while written complaints have a maximum resolution time of 20 working days. The Bank also evaluates the follow-up on various complaints, whether financial or non-financial, by the BNI Contact Center Division and monitored by Network & Services Director.

Media for BNI Customer Complaint



The BNI complaint service, namely the BNI Call 1500046, has received the ISO 9001:2015 certification for the quality management system relevant to service quality. The BNI Contact Center always prioritizes fast and easy service for customers by shifting from the call service to a digital service. Aside from the call service, customers can also access BNI's official social media service on Facebook, Instagram, and Twitter, the Live Chat service on the BNI website, the Ask BNI service on BNI Mobile Banking, WhatsApp Business service and the

BNI Call Virtual Assistant service that can be downloaded from PlayStore and AppStore. Moreover, customers can file complaints to BNI by email to bnicall@bni.co.id and fax to 021-25541203.

To improve service to customers and customer experience, BNI Contact Center also uses the Customer Journey Platform application, which is integrated with all touch points to simplify monitoring and maintain the complaint resolution SLA.

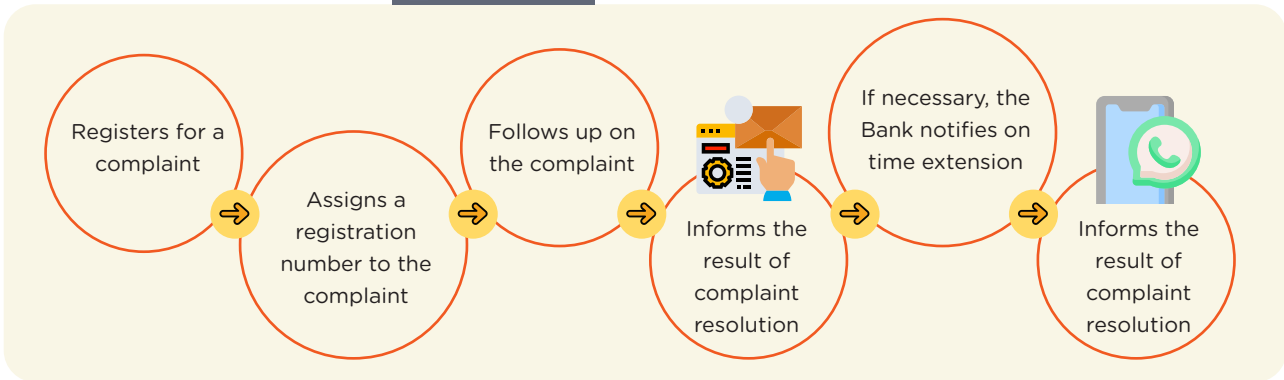
Customer Complaint Mechanism and Resolution



CUSTOMERS
files a complaint



BNI OFFICER



01

The resolution of verbally conveyed customer complaint is conducted in a maximum of 5 working days, while the resolution of written complaint takes a maximum of 20 working days.

02

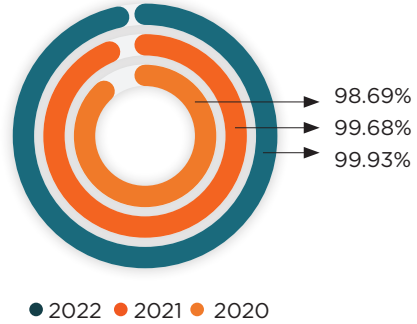
If supporting documents are required for a verbally conveyed customer complaint, BNI will ask the customer to file the complaint in a written. Customers can complete documents for complaints submitted within 20 working days and can be extended within 20 working days.

03

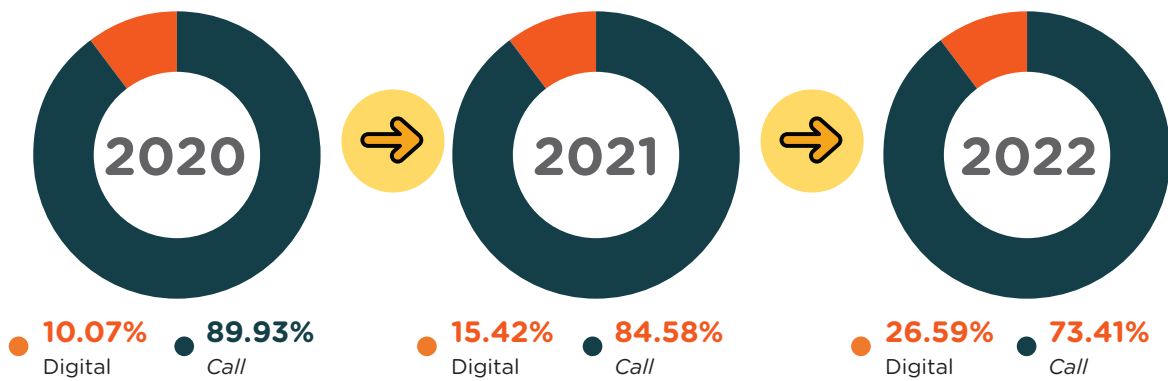
In certain conditions, the resolution of a written complaint can be extended to the next 20 working days, in accordance with POJK Number 1/POJK.07/2013 which has been updated through POJK No. 06/POJK.07/2022 concerning Consumer and Community Protection in the Financial Services Sector and POJK Number 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Services Sector. The information of complaint resolution time extension is notified in a written manner to the customer by phone, email, letter, or short message.

Number of Complaints and Percentage of Resolution

Year	Total Complaints	Resolved Complaints
2022	542,637	542,298
2021	612,713	610,752
2020	687,375	678,370

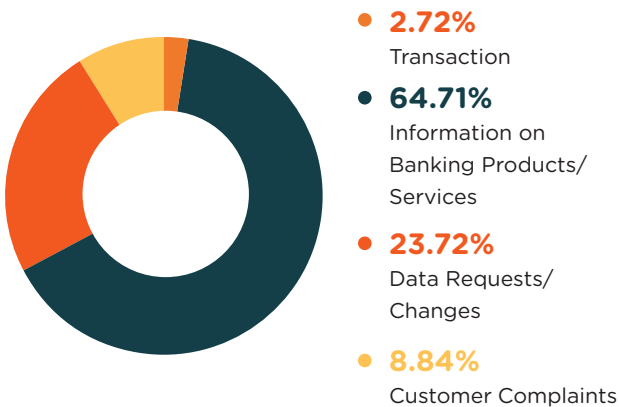


Transformation from the Call Service to Digital Service 2020 - 2022



In 2022, BNI Contact Center served 73.41% of customers through the call service and 26.59% of customers through the digital service. From 2020 to now, incoming through the digital service has been increasing, which signifies that there is a shift in customer behavior in interacting with the bank from call service to digital service.

Demography of BNI Contact Center Incoming in 2022



Throughout 2022, incoming customers in all BNI Contact Center channels are dominated by customer needs as follows:

1. Information on banking products/ services
2. Data requests/changes
3. Customer complaints
4. Banking transactions

Customer complaints were dominated by **58.67%** of transaction issues at ATMs, **24.58%** of BNI Mobile Banking problems, and **13.57%** of BNI TapCash top up.

CUSTOMER SATISFACTION SURVEY

To make the BNI Vision of becoming the primest financial institution that excels in services and with sustainable performance, as well as to improve and monitor the service performance at all touch points, BNI has conducted the Customer Satisfaction Survey (CSS) since 2011 to BNI's external and internal customers.

CSS consists of two evaluation aspects, which are the Business Satisfaction Survey (BSS) and User Satisfaction Survey (USS):

**Business
Satisfaction
Survey (BSS)**

The survey is conducted on BNI's external customers, which comprise the Business Banking (Corporate, Medium, and Small) segment and Consumer (Emerald and Non-Emerald) segment. The survey is the voice of customers evaluating customer satisfaction through the 7P aspects of product, price, place, promotion, people, process, and physical environment. Results of the BSS survey reflects the customer satisfaction level and become a reference in performing sustainable improvements.

**User
Satisfaction
Survey (USS)**

The survey is conducted on BNI's internal customers (BNI employees) with the purpose of measuring the satisfaction level over the internal service performance at BNI in order to obtain the basis to improve the service quality of divisions/units. The assessment aspects of this survey include the Coordination, Communication, and Cooperation; Output; Work Process; Commitment/SLA; Employees; and Data & Information.

CSS is performed periodically once a year. As a result of the 2022 survey, BNI attained a score of 4.27 from a scale of 1-5. The score increased compared to 4.16 in 2021. To ensure that excellent service is capable of reaching every touch point, BNI always implements intense and systematic management monitoring, controlling, and evaluating that engage all elements from the leader level to the technical level in accordance with the type of services and products generated.



CSS Score





Pillar 03

**BNI FOR
THE ENVIRONMENT**

REALIZING AN ECO-FRIENDLY BANK

Policies and Initiatives

BNI materializes concern for the environment through green banking activities known as BNI Go Green. BNI Go Green is the implementation of BNI's support for Sustainable Development Goals (SDGs). BNI Go Green implementation comprises various initiatives, whether from the internal or external aspect.

The following are internally implemented environmental preservation initiatives:

- Conducting energy, water, and paper saving, processing waste, and reducing emissions.
- Increasing employee concern about eco-friendly lifestyle.
- Conducting an internalization of eco-friendliness regulated in the Eco-Friendly Lifestyle.
- Conducting training on environmental and social risks in the loan feasibility analysis.
- Launched the BNI WWF credit card product with the aim of encouraging green living behavior with the main missions of preserving, restoring and managing Indonesia's ecosystems and biodiversity. In addition, BNI Credit Card also provides BNI American Express Vibe credit card products, where the physical credit card is made using recycled plastic material.

For the external aspect, the Bank attempts to grant loan financing to activities/businesses that are environmentally conscious and preserve the environment, such as eco-friendly, renewable energy, and biodiversity conservation projects.

During 2022, the Bank will spend Rp27.35 billion in environmental costs aimed at activities that support environmental preservation.

Identification of BNI's Operations on the Environment

The Bank's operating activities do not bring direct negative impacts on the environment. However, there are potential direct negative impacts on the environment occurring from the business activities of the Bank's debtors. Therefore, the Bank ensures the granting of financing to debtors who comply with regulatory laws in the environmental and social sectors to prevent the negative impacts from the debtors' operations. In 2022, there were no spill incidents nor were there any complaints concerning environment as banking sector is BNI's only scope of activity.

EFFORTS TO SAVE PAPER

Operating activities that have started shifting toward digital form can reduce the internal use of paper at the Bank. Nevertheless, paper use cannot be completely avoided, hence we strive to minimize its use by two methods: digital banking and conventional initiatives.



Digital Banking

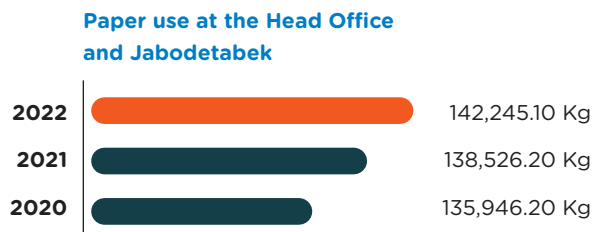
- Maximizing the BNI e-office function, which is the portal for document processing application with the paperless concept.
- Print document efficiency for the application for leave, absence, tardiness, and employee attendance report via e-attendance.
- Reducing print document and correspondence via BNI e-PP.
- Optimizing the use of digital banking in serving customers through the digital acquisition of credit cards and e-billing statement.
- Efficiency of paper use by simplifying marketing collateral through the optimization of information use on the BNI website.



Conventional Initiatives

- Conventional paper saving conducted through the utilization of used paper and improving digitization.
- Reducing hardcopy printing for the Annual Report and Sustainability Report.

” In processing the paper waste from the office, the Bank cooperates with a third party to collect and recycle waste to be reused and have use value (upcycle).



There was a 2.68% increase in paper use in 2022 compared to the previous year. This was due to the increase in employee activities engaged in Work from Office (WFO) but still within a manageable limit.

Impact of e-Office on Paper Reduction (unit of sheet of paper)

Description	2022	2021	2020
Electronic SOP/BNI e-PP	39,882,240	27,564,240	26,894,440
Electronic Billing Statement/BNI E-Billing	12,674,073	12,598,163	13,386,237
Billing Envelope Efficiency/BNI E-Billing	84,615	106,874	151,376

Number of Documents Circulating Through Application (DGL)

Description	2022	2021	2020
Memo	103,564	55,297	89,123
Internal Note	11,329	9,768	9,470
External Letter	46,656	41,896	54,096
Total Documents	161,549	106,961	152,689
Disposition Sheet	446,946	345,683	487,479



REDUCING THE IMPACTS OF CLIMATE CHANGE THROUGH ENERGY MANAGEMENT AND EMISSIONS REDUCTION

Material Topic: Climate Change

Our Approach ^[3-3]

Climate change is one of the most important current issues. Climate change is the impact of global warming, which can cause extreme weather phenomena, such as floods and storms, rising sea levels, and increase in temperature. This change can also affect human health, air quality, agriculture and food supply, forests, ecosystems, coastal areas, and water resources.

The impacts of climate change can be internally managed by making initiatives to reduce energy and emissions. The management of impacts from external aspect can be conducted through environmentally conscious financing and analysis of credit risks relevant to the environment. The Bank has policies regarding the management of the impacts of climate change, namely the Stipulation for the Implementation of Efficiency No. JAL/2.2/1799 and Efficiency of Lighting and Air Conditioning No. JAL/3/3564. The appeal for energy use and emissions management is conducted by the Procurement and Fixed Assets (PFA) Division and the Channel Management (CMA) Division. The Bank evaluates climate change by performing disaster risk mitigation.

Energy Management

In minimizing impacts of climate change, BNI makes various initiatives to save energy, which are regulated in the Stipulation for the Implementation of Efficiency No. JAL/2.2/1799 and Efficiency of Lighting and Air Conditioning No. JAL/3/3564.

Energy Consumption Inside and Outside of the Company ^{[302-1][302-2]}



975,767
Use of fuel for generators and use of electrical energy at BNI offices throughout Indonesia (GJ)

Inside the Company



13,710
Use of fuel for land service travel at the BNI office (GJ)

Outside the Company

Notes:
*) Calculation of electricity consumption is based on the total bill at per kWh price of Rp1,115 for the B-3 category and Rp1,645 for the special service customer category. The results are then converted to GJ, with the formula of 1 kWh = 0.0036 GJ and 1 m³ = 0.038 GJ.

Energy Intensity [302-3]

Description	Unit	2022
Total electrical energy and fuel converted into Giga Joules (GJ)	GJ	989,477
Income	Rp	56,141,000,000,000
Energy intensity	Joule/Rp	17.62

Note:

The results of energy calculations are based on data on the realization of electricity purchases covering all BNI offices and the use of fuel for official land trips sourced from BNI's largest vehicle vendors. Energy intensity is calculated from the ratio of total energy to income in 2022.

Energy and Emission Reduction Efforts [302-4][305-5]

In 2022, BNI will make adjustments to the calculation of energy use and expand its scope to include the use of electrical energy in all BNI offices, the use of fuel including land service travel in all BNI offices from BNI's largest vendors. During 2022 BNI continues to make efforts to save energy including:

- Turning off the lights in the workspace during break hour (12:00 - 13:00).
- Electricity efficiency through reducing the use of lamps at Grha BNI, Plaza BNI, Gedoeng BNI, and Menara BNI.
- Setting the AC temperature within the 23°C - 25°C range at Menara BNI, Grha BNI, Gedoeng BNI and Plaza BNI.
- Reducing the use of chillers on Saturday and Sunday.
- Implementation of magnetic bearing technology in the Plaza BNI coolers to enable frictionless operation of motor components.
- Solar panel installation with the capacity of 2,200 watts to lighting emergency stairs at Plaza BNI.

- Limiting business trips and replacing them with teleconference.
- Using energy saving lamps.

Another initiative BNI has conducted is constructing the green building with the eco-friendly and energy saving concept. The buildings that have received building design certification from the Green Building Council Indonesia (GBCI) are:

- Platinum for Plaza BNI in 2022.
- Gold for Menara BNI in 2020.

Furthermore, BNI received the Cyclist Friendly Building award from the Governor of DKI Jakarta for the BNI Menara Building. The green building is expected to contribute to climate change mitigation.

Implementation of Electrical Energy Efficiency

To commemorate Earth Day, BNI annually cuts electricity for 1 hour in March at the BNI head office and all branches. The power cut is not implemented at ATMs and ATM signs. This is in line with BNI's efforts to reduce emissions from office operations. Furthermore, BNI also cuts power in the entire Head Office building during the office break hour for 60 minutes daily.



Saved consumption during Earth Hour



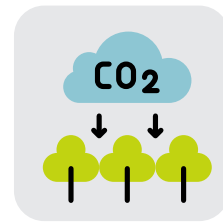
Construction of the Public Electric Vehicle Charging Station (SPKLU) in the BNI Work Environment

BNI is committed to continue being an agent of transformation in the implementation of ESG principles. One of the methods is by performing green activities. In 2022, BNI was a pioneer in the banking industry by operating three SPKLU at the Grha BNI, Menara BNI, and Sub-branch Offices Crea Nusa Dua buildings to encourage the acceleration of Battery Based Electric Vehicle (KBLBB) use in Indonesia, which will bring positive impacts on the environment.



Emissions Reduction

As part of the net zero emission roadmap, during this reporting period, BNI made several improvements in submitting emission data which included adjusting the calculation methodology in terms of the classification of emission sources to calculate emissions, especially for scope 3. Scope 2 emissions have included electricity use in all BNI offices. Coverage three emissions cover ground service travel, air service travel, and financing emissions by adopting the methodology from PCAF. BNI has also started calculating financing emissions for medium and corporate category debtors, namely the palm oil plantation sector, the palm derivative industry, coal mining and trading, the processing industry, the trading industry, pulp and paper, construction, and PLTU which covers 47% of the entire portfolio. BNI loans in both segments. In the net zero emission roadmap, BNI is currently preparing guidelines and formats for collecting data on emission sources so that in the future emission calculations can be carried out in more detail and precision. Furthermore, BNI will set net zero emission targets to obtain accurate milestones toward net zero emission.



Greenhouse Gas Emissions Generated [305-1][305-2][305-3][305-4]

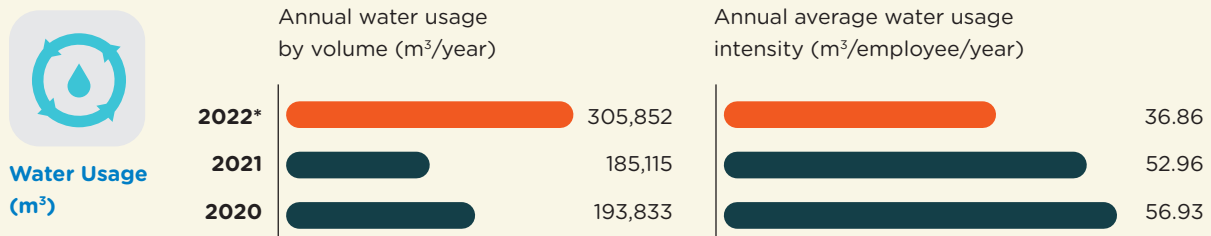
Source of Emissions	2022
Scope 1:	
Fuel consumption in buildings (ton CO ₂ eq)	121.64
Scope 2:	
Emissions from electricity use (ton CO ₂ eq)	295,208.86
Scope 3:	
Air Service Travel (ton CO ₂ eq)	2,013.87
Ground Service Travel (ton CO ₂ eq)	889.12
Financing Emissions (ton CO ₂ eq)	13,392,779.24
GHG emission scope 1 & 2	295,330.50
Total GHG emissions	13,691,012.79
Emission intensity of scope 1, 2 & 3 business trips to income (ton CO ₂ eq/Rp)	0.000000000757
Scope 3 emission intensity of financing to income (ton CO ₂ eq/Rp)	0.000000239

BNI FOR THE ENVIRONMENT

Additionally, BNI also pays close attention to ozone layer depleting emissions by reducing the use of equipment with the potential of generating ozone layer depleting emissions, such as equipment containing the Chlorofluorocarbon (CFC) substance and instead switching to equipment using eco-friendly substances. Until the end of 2022, BNI did not report emissions other than greenhouse gas emissions, such as Nitrogen Oxide (NO_x), Sulphur Oxide (SO_x), and other conventional emissions because they are not directly generated in the operating activities. [305-6] [305-7]

Water Management

The Bank's water supply is allocated for domestic activities. It is sourced from the Regional Drinking Water Company (PDAM) and ground water originating from the environment that surrounds the company. The water management manipulates wastewater that is adjusted to the building management system. Various water minimizing initiatives were practiced, such as water management technology installation at Plaza BNI, water saving campaign, reasonable use of water, reporting on faucet leaks, and treated wastewater use for watering plants and flushing toilets.



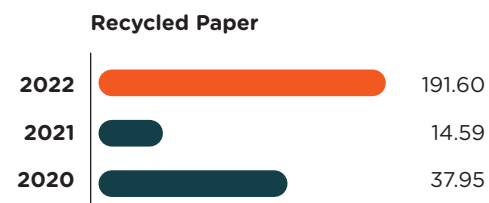
Note:
Water consumption was calculated in m³ using the PDAM data
*)New Normal affected the increasing activities among the employees who have actively returned in the head office, which corresponded to the water use in said location.

Waste Management

The waste generated from the Bank's operations comes in the form of paper, organic waste from food scraps and plastic. BNI actively leads environmentally friendly measures, supported by all work units, to curb waste around the work environment. Such measures are as follows:

- Reducing plastic use.
- Using personal tumblers during meetings and providing refilled drinking water at the time of the meetings.

Waste Generated and its Management (Ton)



In 2022, the volume of recycled paper increased with the intensifying activities of employees working from the office.

BIODIVERSITY AND ENVIRONMENTAL CONSERVATION

Reforestation Program



In 2022, a number of reforestation activities were launched. The Indonesian Financial Transaction Reports and Analysis Center (INTRAC) and BNI planted 2,000 seedlings of trees in several domestic and international BNI offices with a symbolic ceremony held at Anyer Beach, Banten. This activity was carried out to commemorate the two-decade Anti-Money Laundering and Counter Terrorism Financing (APU-PPT) Movement.

In addition, BNI is a member of an environmentalist community, which actively and proactively organize various activities to help recover the function of nature and environment. In 2022, both the Bank and the communities effectively reforested over 27 hectares of barren land in Mega Mendung and assisted with the nurseries of approximately 300,000 trees for Anyer Banten Area and the upstream Citarum River Basin (DAS).

The nurseries, planting, and maintenance activities on the rehabilitated land were conducted through agroforestry and the communities were involved that non-wooden and wooden products were able to be outputted, increasing the quality of environment and economy of the local community. The environmental impacts were evident in improving soil and air quality and mitigations for disaster preventions, for instance landslide and floods. Meanwhile, the economic impacts were gained through vegetables, seasonal plants, and wooden products in the long term.

Environmental Recovery of Bunaken Tourism Island



BNI simultaneously synergizes social and environmental activities. Through BNI Berbagi, the Bank collaborated with North Sulawesi Local Government to rejuvenate Bunaken Tourism Island and recover the natural condition and the people's economy. The activities carried out focused on intensively recovering the marine ecosystem, which will strengthen the construction of sustainable economy as BNI had the communities joined to be further empowered.

Releasing sea turtles and preserving coral reefs were among the activities. By preserving coral reefs, the habitats of marine biota could be protected and sustained coastal ecosystems would benefit the coastal communities. Sea turtles has been regarded as an endangered animal, thus a conservation was a real initiative to protect and maintain their existence from extinction. BNI also provided environment-based business management training to create economic values without activities that might degrade the marine ecosystem.

Waste Management Program



The waste management program runs with the involvement of communities and calculated waste management through literacy program (BNI Agen46, waste bank). Education materials related to the program impacts are accessible, highlighting on the reduction of waste that will be delivered to the Final Disposal (TPA) and the economic impacts from recycled waste filtration. The activities conducted were Pos Pandai Program (Central, Treated Waste, Sort, Take, Save, Recycle, Tools, and Innovations), incinerators, waste motorbikes, and waste bins for waste management venues, BUMDes, and schools.



Pillar 04

**BNI FOR
THE COMMUNITY**

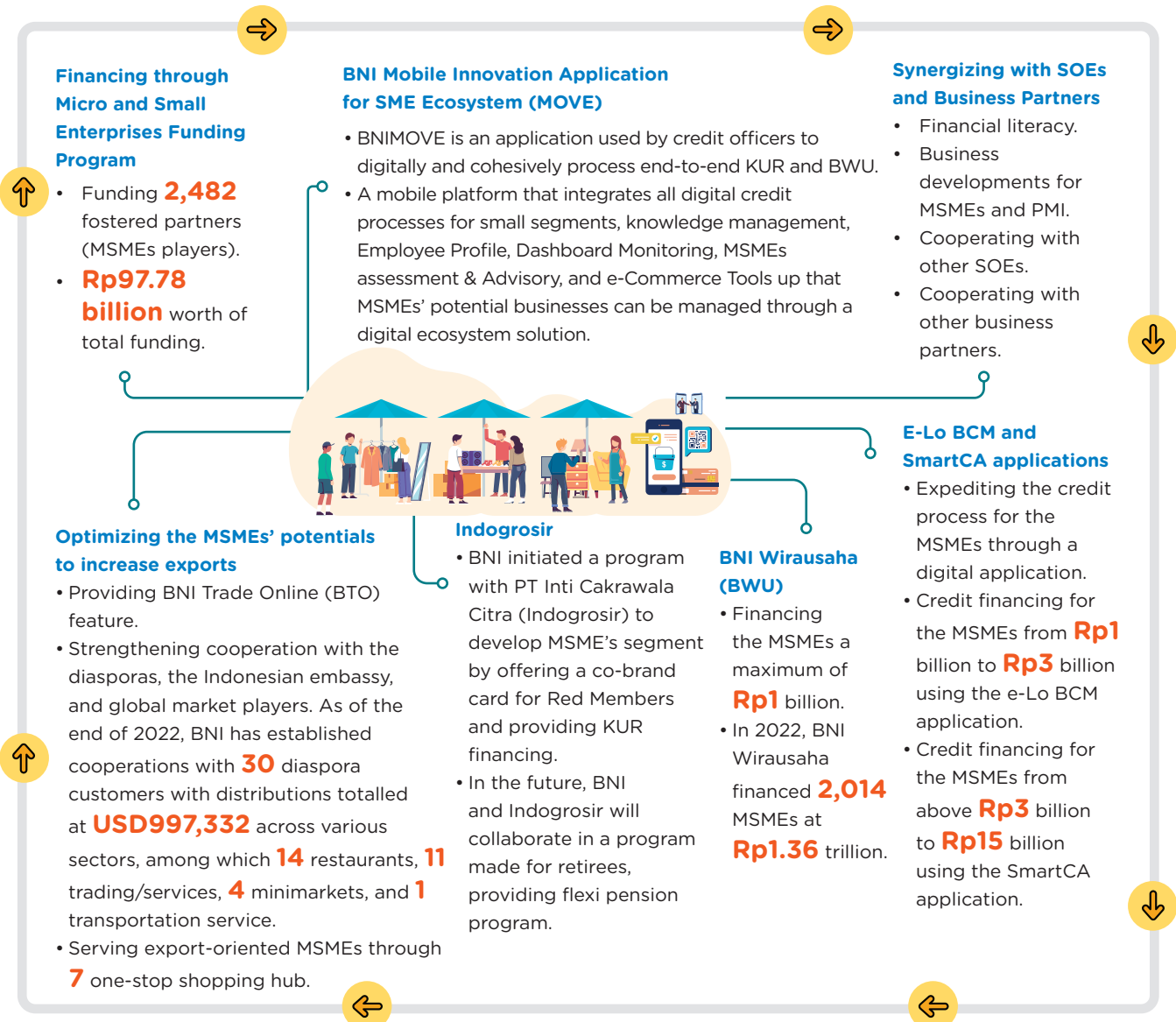


BNI endeavors to increase the quality of the community's life through collaborations in economic empowerment and partnership.

EMPOWERING THE MICRO, SMALL, AND MEDIUM ENTERPRISES (MSMEs) [203-2]

The Micro, Small, and Medium Enterprises (MSMEs) that are thriving has been one of Indonesia's driving force towards economic recovery. In 2022, BNI managed the MSMEs financing at Rp123.24 with 42.8% allocated for the People's Business Credit (KUR). This financing had 5.26% compared to Rp117.01 trillion in 2021.

Measures and Strategies for MSMEs



Financing through Micro and Small Enterprises Funding Program

- Funding **2,482** fostered partners (MSMEs players).
- **Rp97.78 billion** worth of total funding.

BNI Mobile Innovation Application for SME Ecosystem (MOVE)

- BNIMOVE is an application used by credit officers to digitally and cohesively process end-to-end KUR and BWU.
- A mobile platform that integrates all digital credit processes for small segments, knowledge management, Employee Profile, Dashboard Monitoring, MSMEs assessment & Advisory, and e-Commerce Tools up that MSMEs' potential businesses can be managed through a digital ecosystem solution.

Synergizing with SOEs and Business Partners

- Financial literacy.
- Business developments for MSMEs and PMI.
- Cooperating with other SOEs.
- Cooperating with other business partners.

Optimizing the MSMEs' potentials to increase exports

- Providing BNI Trade Online (BTO) feature.
- Strengthening cooperation with the diasporas, the Indonesian embassy, and global market players. As of the end of 2022, BNI has established cooperations with **30** diaspora customers with distributions totalled at **USD997,332** across various sectors, among which **14** restaurants, **11** trading/services, **4** minimarkets, and **1** transportation service.
- Serving export-oriented MSMEs through **7** one-stop shopping hub.

Indogrosir

- BNI initiated a program with PT Inti Cakrawala Citra (Indogrosir) to develop MSME's segment by offering a co-brand card for Red Members and providing KUR financing.
- In the future, BNI and Indogrosir will collaborate in a program made for retirees, providing flexi pension program.

BNI Wirusaha (BWU)

- Financing the MSMEs a maximum of **Rp1** billion.
- In 2022, BNI Wirusaha financed **2,014** MSMEs at **Rp1.36** trillion.

E-Lo BCM and SmartCA applications

- Expediting the credit process for the MSMEs through a digital application.
- Credit financing for the MSMEs from **Rp1** billion to **Rp3** billion using the e-Lo BCM application.
- Credit financing for the MSMEs from above **Rp3** billion to **Rp15** billion using the SmartCA application.



BNI is truly committed to supporting the MSMEs financing, which is one of the State’s economic pillars. By the end of 2022, BNI recorded 28.08% achievement for RPIM.

Green Financing through Digital Ecosystems for MSMEs Go Global Segment

As an agent of development, BNI perpetually supports the MSMEs, the backbone of national economy. Green financing is continuously promoted through digital ecosystems in MSMEs segment in the interest of going global. There are 3 (three) points that have become the focus in BNI MSMEs’ journey, namely go-global market orientation (Xpora), Environmental-Social-and-Governance (ESG), and digitalization.

The programs implemented in 2022 are as follows:

a. BNI’s *Jejak Kopi Khatulistiwa*

The ecosystem developments of green economy financing for coffee farmers around social forestry is through closed loop financial. This serves as a Development Program from the Social Forestry Program, which has been pioneered by BNI since 2017.

Its purpose is to amplify the use of social forest through Green Economic Ecosystem, digitalization in the “Third Wave Coffee” farming cultivation, financial inclusion, and ready-to-export for farmers and downstream ecosystem of Social Forestry Coffee. As of the end of December 2022, the total KUR for *Jejak Kopi Khatulistiwa* (JKK) program amounted to Rp1.97 billion for 100 Farmers. The KUR distribution for JKK was included as KUR’s Acquisition for BNI *Perhutanan Sosial* (Social Forestry). As of 31 December 2022, the total distribution reached Rp175.85 billion for 9,776 Social Forest Farmers.



b. BNI Millennial Smartfarming

The Millennial Smartfarming represents BNI’s development program underlining the digitalization for the agriculture sector with effects on green economy financing. This program helps establishing millennial agricultural ecosystem through an integrated farming ecosystem. Millennial farmers, as the key player, have roles and they are empowered through digital farming developments using IoT-based farming technology from upstream to downstream.

As of the end of December 2022, 1,072 farmers have joined the program with a total financing of Rp28.67 billion.



c. BNI Desa Digital Khatulistiwa (BNI Dedikasi)

BNI Dedikasi functions as a development, mentoring, and empowerment program for existing economic potentials in villages by optimizing BUMDes roles as an economic organizer to map, execute, and manage all economic potentials, orienting on village millennials through information technology (IoT). *Desa Digital* also maximizes the current renewable energy to form an integrated and modern digital ecosystem-based village entrepreneurship.



Financing the People’s Business Credit (KUR) ^[203-2]

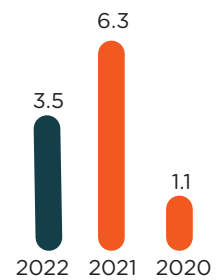
KUR aims to equip small-scale entrepreneurs with access to capital and business development assistance. As of the reporting period, BNI has distributed Rp35.2 trillion for KUR financing, succeeding in achieving the 96.5% contribution target, as determined by the Government of Indonesia.

KUR Disbursement Based on Business Segments in 2022 ^[FS7]

Business Segment	Number of Debtors	Maximum Credit (Billion Rp)	Target (Billion Rp)	Achievements Based on the Government Targets
Supermicro	3,783	28	30	93.6%
Micro	193,663	7,189	7,600	94.6%
Retail	96,633	27,958	28,795	97.1%
PMI	1,328	31	75	41.8%
Total	295,407	35,206	36,500	96.5%

BNI’s KUR financing is also disbursed for food security through KUR Tani. As of the end of December 2022, total disbursement for KUR Tani reached Rp10.17 trillion for 189,544 debtors, which increased by 12.8% from the total disbursement in 2021. For farmers with active Kartu Tani, they can use them as debit card and receive subsidy along with social assistance from the Government. ^[FS7]

Activated Kartu Tani (Million)



KUR Klaster Program

In December 2022, the Government through the Ministry of Cooperatives and SMEs launched the Business People’s Credit (KUR) through business group-/cluster-based scheme. BNI managed to support 26.8% of the total KUR disbursement in 2022 and, furthermore, this scheme was necessary for acquisitions, mainly in production sector where 92.9% was absorbed in the agricultural sector.



Official bestowal of KUR Klaster by the President of Republic of Indonesia at the Presidential Palace, Jakarta (19/12/2022)

Taksi Alsintan Financing Program

Together with the Ministry of Agriculture, BNI launched Taksi Alsintan Program in Gresik, East Java in August 2022 to accelerate agricultural modernization through agricultural mechanization and developments in agricultural machine and tools. A total of Rp70.6 billion KUR was disbursed to 210 debtors.



Taksi Alsintan Financing from KUR BNI Facilities

BNI Xpora [203-2]

BNI Xpora is a digital solution aimed to elevate the MSMEs’ business capacity. Through its overseas branches across 7 financial centers worldwide – Singapore, Seoul, Tokyo, Hong Kong, London, Amsterdam, and New York – BNI is able to help the MSMEs in exports and attaining potential buyers, for instance local and international exhibitions as well as business matching.

Since its establishment in 2021, BNI Xpora has accommodated the MSMEs players with financing programs, such as Export Transaction Facility (FAST TREX) and BWU FAST TREX. Through the 7 locations, BNI Xpora disbursed a total credit value of Rp27 trillion to 32,000 debtors, both direct and indirect exporters in 2022.



MSMEs Upgrade Class with NIB [203-2]

The MSMEs are provided with facilities to upgrade their business by having the Government encouraging them to register their business permits through online single submission (OSS). To this end, BNI cooperated with the Indonesian Investment Coordinating Board (BKPM) to hold webinars as a means for socialization and guidance in accelerating the business permits registration. With more players in the MSMEs obtaining their business registration number, BNI expects for more advanced micro entrepreneurs who can upgrade and export their business (go global). Acceleration in the NIB issuance has been performed on 2,015 small-scale debtors, or 0.64% of the total number, reaching 315,752 debtors.

Achievements in BNI’s Fostered MSMEs Program

BNI’s Fostered MSMEs Go Export

In 2022, BNI Xpora boosted 32,000 MSMEs Go Export, or increased by 140% compared to the previous year. The MSMEs export value rose from Rp19 trillion to Rp27 trillion.

BNI’s Fostered MSMEs Go Global

Wirausaha Jabar Sejahtera (WJS) Cooperative is one of BNI’s Fostered MSMEs that successfully expanded to Hong Kong. In addition, WJS secured a trade relationship with Surya Trading Lts, a diaspora and a debtor of BNI Hong Kong with 80 affiliated stores in Hong Kong.

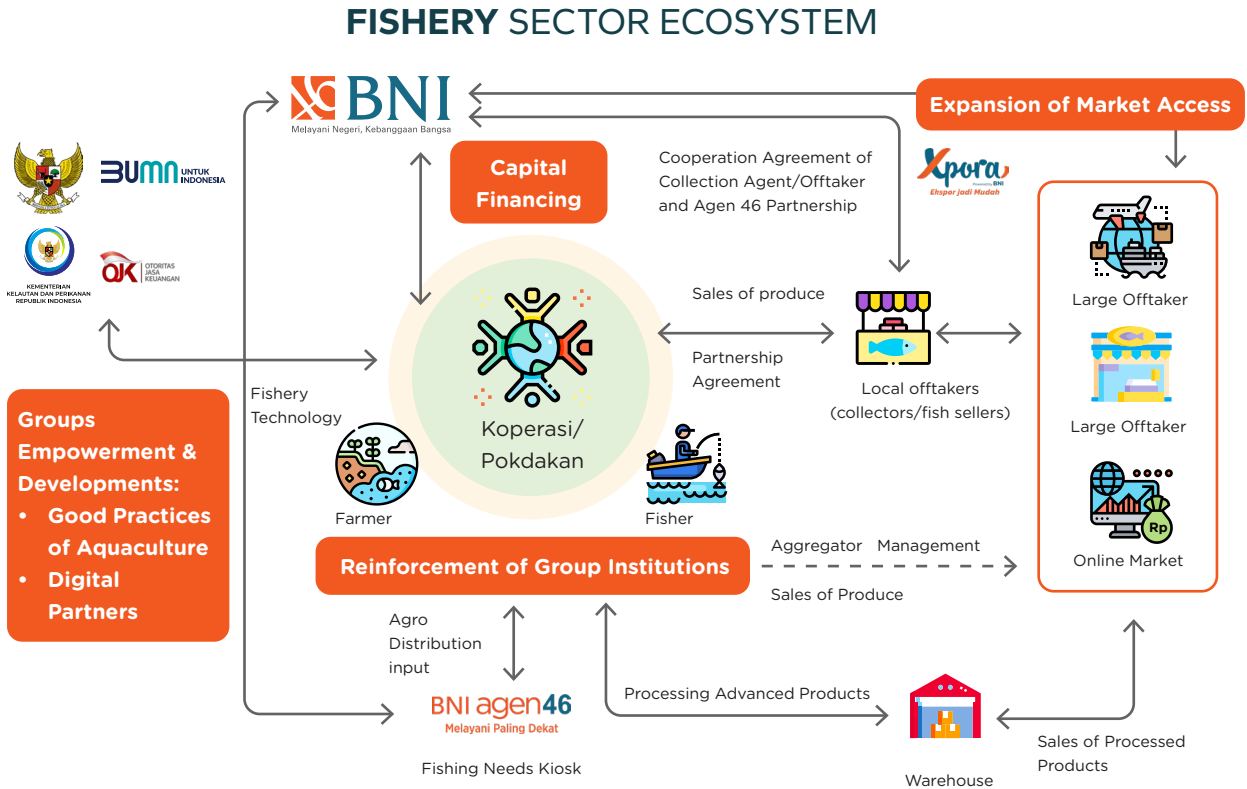
BNI’s Fostered MSMEs Tembus PaDi

Endorsing #BelaPengadaan and #BanggaBuatanIndonesia programs, BNI actively participates in the Ministry of SOEs’ platform, “PaDi UMKM”. As of 2022, there were 507 onboarding fostered MSMEs of BNI as sellers on the PaDi UMKM platform. The purchase-procurement transactions recorded on said platform were realized at Rp37.29 billion from 6,044 transactions.



Support for Marine and Fisheries Enterprises [FS5]

BNI works together with the Coordinating Ministry of Maritime Affairs and Investment and the Ministry of Marine and Fisheries (KKP) to support the MSMEs in the marine and fisheries sector. To safeguard the marine and fisheries ecosystem, clusters of MSMEs were formed in a closed-loop ecosystem through financial inclusion. Hence, fishery products can reach the community and *Gemarikan* and *Pasar Laut Indonesia* programs have the supports they need.



Empowering Coastal Communities

BNI provides credits for small-scale marine and fisheries sub-sector to establish partnerships and empower the communities through a synergy in coastal communities empowerment programs as well as financial inclusion and literacy.



Portfolio of Aquaculture and Fishing Sub-Sector

5,852 Debtors
Rp1,441.5 billion of Total Loans

Portfolio of Small-Scale Marine and Fisheries

7,061 Debtors
6,608 KUR Debtors
453 Non-KUR Debtors
Rp2,018.6 billion of Total Loans

Portfolio of Trading on Fishery Products Sub-Sector

963 Debtors
Rp427.5 billion of Total Loans

Kampung Perikanan Budidaya [FS5]

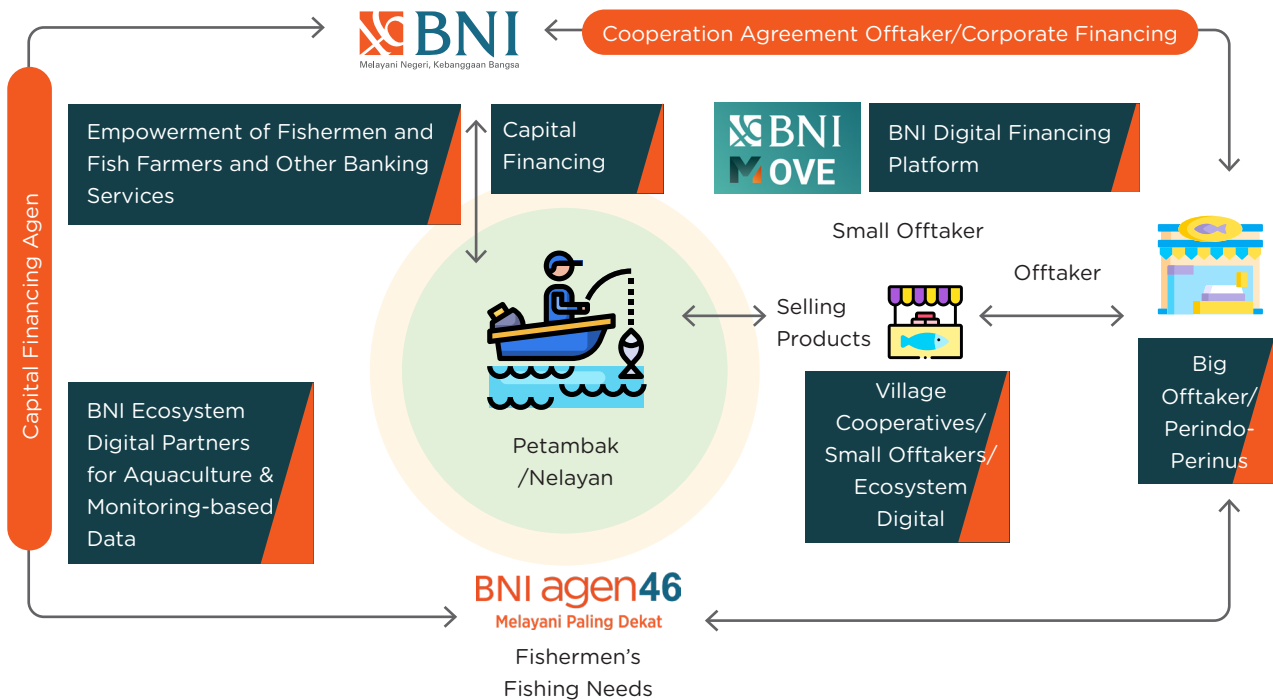
BNI implements ecosystem-based banking services in Kampung Perikanan Budidaya, a priority program under the Ministry of Marine and Fisheries. This village manages prime and/ or local commodities with the help of the communities to boost a more competitive and sustainable aquaculture business developments.



Iridescent Shark Fisheries Village in East Ogan Komering Ulu (OKU Timur), Baturaja

Value Chain in Fishermen Mentoring Program [FS5]

Cooperating with FishOn is one of BNI's initiative to increase the fishermen's businesses through business mentoring, working capital, financial literacy, and data digitalization which will help them to access various programs and assistance.



Risk Management in Financing the MSMEs [2-23]

BNI has measured and conducted risk management upon implementing the Sustainable Finance in the MSMEs sector. The most recognized risk in the MSMEs sector is completeness of documents, mainly environmental permits and HR management with potential social and human rights risks.

FINANCIAL LITERACY AND INCLUSION [FS16]



BNI is committed to supporting the Government programs on financial inclusion and financial literacy. Through these programs, it is hoped that BNI's supports can address inequality, improving the welfare of weaker society, and alleviate poverty.

Financial Inclusion in Remote Areas [FS13] [FS14]

In areas with low population or lacking economic resilience, BNI has BNI Agen46, Laku Pandai (officeless financial services for financial inclusion), and e-Payment made available even to the remotest areas in Indonesia. With the help of BNI Agen46, various transactions are accessible, such as savings, cash withdrawals, electricity payments, PDAM, and other banking services. Throughout 2022, 164,979 BNI Agen46 were placed across the country, growing by 4.7% compared to the year before. Its services have widely spread in over 5,958 districts and 33,957 sub-districts/villages.

Additionally, BNI Agen46 has the capacity to convert its agents to Referral Agent to accelerate KUR disbursements and open regular and quality accounts. Socialization and training are routinely held, online and offline, to all BNI Agen46, discussing cyber security. Currently, BNI is pursuing digital developments, one that can only be accessed by BNI Agen46 in the attempt to further strengthening customer data. A forum that allows sharing knowledge is open for all BNI Agen46 and local community.

Achievements of BNI Agen46

Description	Unit	2022		2021	2020
		% Increase	Achievement		
Number of BNI Agen46	Agent	4.7	164,979	157,632	152,762*
Transaction	Million	(43.3)	83.02	146.38	145.67
Nominal	Trillion Rp	(20.01)	73.80	92.31	82.54
Operating CASA	Trillion Rp	(23.6)	2.71	3.54	1.93
BNI Pandai Accounts	Million Accounts	1.2	20.00	19.76	18.35
BNI Pandai Savings	Billion Rp	(33.6)	920	1,387	3,105.75

Note:

The decrease in BNI Agen46 performance was due to transitions of social assistance transactions to PT POS

*) Restatement was because of adjustments in the recording of BNI Agen46 performance

Financial Inclusion Supporting Products

The Government introduced various aid cards to be distributed among underprivileged communities. With these cards, people living in poverty can be reduced and human development index can improve. To further help this government program, BNI circulates the cards along with the funds. The types of cards include Social Assistance Card (*Bansos*), Farmer Card (*Kartu Tani*), Smart Indonesia Card (*Kartu Indonesia Pintar*), and Kusuka Fisherman Card (*Kartu Nelayan Kusuka*).

Through “Ayo Menabung dengan Sampah” program, BNI cooperated with the local government and the Indonesian Waste Bank Association (ASOBSI) to integrate financial inclusion and literacy with environmental awareness. Students coming from different schools with diverse backgrounds are encouraged to sort and deposit the waste to the assigned waste bank, which then will be exchanged with savings. In 2022, the program was launched in 5 cities, Lombok, Surakarta, Padang, Denpasar, and Palu.

This program has become one of many that achieved awareness from the United Nations Environment Programme (UNEP), and it lended BNI an opportunity to be a speaker in an online event, Sea Circular Beat the Plastic Pollution, on 24 November 2022. In addition, the program was also stated in Best Practice Documentation Publication from Indonesia Business Council for Sustainable Development (IBCSD).



316,688 Accounts

Number of accounts related to the Waste Bank program

Rp1,821,993,321

Funds collected for “Ayo Menabung dengan Sampah” Program as of 31 December 2022

Positive/Negative Impacts of Financial Inclusion

BNI’s financial inclusion program opened more opportunities for the community to access banking products and services. Nevertheless, for those who are accustomed to financial services have the potential for social engineering, which can lead to financial loss if not balanced with financial literacy. This is where financial literacy and financial inclusion programs become useful in increasing the community awareness in financial management.

Financial Literacy

Financial literacy activities aim to amplify knowledge, skills, and confidence of the community for better financial management. Working with various parties, BNI provides education on financial literacy in the hope that the community can widen their knowledge and capability to manage their finances. The disadvantage that needs to be prevented is uncontrolled consumptive behavior due to lacking understanding of financial literacy.



A part of its financial literacy program, BNI Student Savings is savings designed for students that are issued nationally by Indonesian banks with easy and straightforward requirements. It offers appealing feature aimed at financial education and financial inclusion to encourage savings culture digitally early on in life.



2022	2021*	2020*
10,131,096 Accounts	10,401,867 Accounts	13,509,541 Accounts
Rp1,556.65 Billion Total Funds	Rp1,378.99 Billion Total Funds	Rp1,848.07 Billion Total Funds

Note:
*) Restatement due to adjustments made to the records

By the end of 2022, to further instill financial literacy among midwives and pregnant women, BNI had cooperated with Women’s World Banking to prepare a banking solution for financial planning aimed at childbirth and postnatal programs through banking services with Midwives as the BNI Agen46. A one-day workshop was held on 17 November 2022 with the Women’s World Banking team.

SUPPORTING THE COMMUNITY GROWTH

Kawasan Wisata Anak Negeri (KAWAN) Program [203-1]

BNI expends efforts in promoting developments in Indonesia’s tourism ecosystem and sustainable. Through *Kawasan Wisata Anak Negeri (KAWAN)*, the Bank has its focus on three locations, Cunca Wulang Village (Labuan Bajo), Kuta Village (Lombok), and Marinsow Village (Likupang).

Throughout 2022, BNI focused on building infrastructure and Human Resources (HR) developments. The latter was applied on Village-owned Enterprises (BUMDes), Tourism Awareness Group (Pokdarwis), and other parties involved directly in the tourism industry.

The HR developments are routinely held to achieve direct impacts over the governance and tourism management in the Villages that have become the main foundation in managing Tourism Villages.

It is hoped that the assistance provided though KAWAN BNI could further attract local and international tourists as it can bring direct impacts to the increasing number of tourists and the transpiring tourism ecosystem that upholds an interaction of nature, culture, and local communities with good corporate governance. It may start from community developments (people) to villages’ attractions (products) that could affect the community’s attractiveness and economic performance around KAWAN BNI’s site.

Rumah BUMN [203-1]

Rumah BUMN (RB) was built in 2016 as a forum for the Micro, Small, and Medium Enterprises (MSMEs) players to create the Digital Economy Ecosystem through capacity and capability building. RB is laden with data and information, and serves as a center for education, development, and digitalization to generate superior and more qualified Indonesia’s MSMEs. With this program, the National and Global Market could grow and the MSMEs role in building the nation could be maximized.



7,941
Total MSMEs Go Modern

5,816
Total MSMEs Go Digital

17,447
Total Products (including their derivatives)

1,047
Total MSMEs Go Online

Rp15,702,120,000*
Online Transaction Value

*Average online transaction of the MSMEs per year 13 million x 1,047

BNI assumes the role of executive and manager of 29 Rumah BUMN across Indonesia. Aside from the mentoring, the following are the contributions made by Rumah BUMN:

- Helped obtaining 2,767 legal permits in 2022.
- Provided MSMEs data to the Government concerning the Productive Presidential Assistance (Banpres) for Micro Enterprises, making Rumah BUMN as one of the information sources in each region.
- Cleared the path for the MSMEs upon entering the national retails outlets in their respective region, such as Alfamart and Indomaret.

In 2022, the number of MSMEs players in Rumah BUMN showed a decline compared to the previous year. This was due to the closure of 6 non-productive Rumah BUMN, triggering the decrease in the number of UMKM Go Online.

In addition, in 2022, the program helped contributing Rp2.74 billion to KUR by working with BNI’s local branch.

Mentoring the MSMEs at Rumah BUMN

Description	Activity	Total Participant
Workshop/training	585	18,556
Visits to the MSME’s Location	2,702	2,827
Exhibitions/Events	165	3,235

*Average online transaction of the MSMEs per year 13 million x 1,047

Rumah BUMN proved to be able to manage community and environmental empowerment in relation to maintaining the surrounding natural resources into a commodity with high economic value and sales value. Rumah BUMN Tabalong has a fostered partner, namely PURUNIK, which makes use of purun grass, growing wildly in South Kalimantan. The purun grass is processed and used in various crafts, such as shopping bags, mats, flower pots, and other craftwork, to substitute plastic-made goods. The processing of purun grass had approximately 25 people from the community contributed.

Apart from empowering MSMEs, Rumah BUMN also empowers people with disabilities. Rumah BUMN has a fostered partner, namely Batik Widi Nugraha, who employs people with disabilities as tailors and pattern makers to make ready-to-wear fashion.

Bolstering Tourism Economics

[203-1]

BNI supports local wisdom-based tourism economics, especially in potential-laden tourism destination villages. In 2022, a total of Rp16.1 billion was injected into the tourism industry and it was mostly allocated for *Kawasan Wisata Negeri* (KAWAN) Program and Wisata Ponggok Klaten.

Clean Water Supply and Sanitation

[203-1]

Sufficient supply of clean water and sanitation are people’s daily basic necessities. Hence, the Bank helped supply clean water and sanitation to West Java, East Java, Special Region of Yogyakarta, Riau Islands, and East Nusa Tenggara which amounted to Rp1.8 billion.

Philanthropic Activities

BNI supplied laptops to university students with disabilities in Tangerang, including assistive technology and adaptive tools, for instance speech trainer, hearing aids, nasalisator, recording device, breathing exercise equipment, spatula, and consonants and vocals chart for State Extraordinary School in North Sumatera.

BNI for Indonesian Migran Worker is a program under the collaboration with various parties to support the procurement of quality, inclusive, and equal education, starting from pre-departure to post-duty. There were 2 types of trainings, financial inclusion and entrepreneurship. Financial literacy training was presented for 800 migrant workers every year across BNI’s branch offices overseas.

BNI sponsored 260 orphans and underprivileged children in a mass circumcision event held in DKI Jakarta.

BNI provided direct assistance through Smart Indonesia program with 4,458,393 beneficiaries, credit disbursements for the MSMEs partnership program, community empowerment program, food packages for people with the COVID-19.

BNI also supported the education sector through:

- Rp250 million fund disbursements to facilitate the education developments in Cilacap Regency
- Direct assistance for SMP Angkasa renovation via BNI Padang Branch.

Complaints Handling Mechanism

BNI is open for any complaints reported by the public concerning operational impacts caused. However, in 2022, there were no significant complaints from the beneficiaries of the empowerment programs that have been implemented.

Social and Environmental Responsibility (TJSL) Funds Realization

All Social and Environmental Responsibility activities carried out by BNI refers to Minister of SOEs' Regulation Number PER-05/MBU/04/2021 of 8 April 2021. Since 2021, BNI has conducted the program basing on the 4 key pillars, namely Social Pillar, Environmental Pillar, Economic Pillar, and Legal and Governance Pillar. By the end of the reporting period, BNI had realized Rp99.7 billion in TJSL of the total allocated fund of Rp100 billion.

Fund Disbursements for Flagship Programs

1. Outsourced Youth Scholarship Program
The program offers full scholarships for those who are interested in pursuing higher education. The fund disbursed reached Rp5 billion for 115 youths from 2002 to 2026 (graduation). This scholarship fully covers all 6 semesters for D3 and 8 semesters for Bachelor's Degree.
2. Food Security Program
The Food Security Program is prioritized for the disadvantaged society and those who will receive food packages. A total of Rp27.2 billion was distributed for 238,069 food packages in the event of Religious Holiday as well as for the communities whose health and economy were inflicted during the COVID-19 pandemic.

3. Place of Worship Facilities Assistance Program
In 2022, BNI's disbursement of Rp16 billion helped funded the development of 367 places of worship from different religious backgrounds.
4. Appreciation Program for Honorary Teachers and Certified Teachers
BNI allocated a budget valued at Rp14.5 billion for two programs, Honorary Teachers Appreciation in 3T Regions and Training and Appreciation for Certified Teachers, which included 3,038 teachers.
5. Appreciation Program for Nurses and Midwives
In 2022, BNI disbursed Rp1.09 billion to appreciate healthcare workers in managing the COVID-19 across BNI's work areas, helping 423 nurses and midwives.
6. Support Program for the MSMEs
BNI's substantial contributions to the MSMEs were ranging from assisting the MSMEs certification, supplying business equipments to holding training on enhancing the MSMEs' competency and business quality. The total disbursement of Rp11.3 billion was realized for 8,358 MSMEs.

Operations Impacts on Local Communities

Prior to performing any activities in Social and Environmental Responsibility (TJSL), BNI conducts social mapping to identify the communities' state of condition. The program brings positive impacts, for instance improvements in the quality of life, change in behaviors, and increased income. On the other hand, the negative impacts that need to be mitigated are unequal assistance for beneficiaries, limited access to information, and social resentment which potentially lead to conflicts among the communities.

SUPPLY CHAIN AND SOUND PROCUREMENT PRACTICES

In supply chain, BNI involves local and international parties (mainly Business Partners of the existing Principals in Indonesia) to maintain Indonesia’s economy. Suppliers/partners working with BNI are construction services, construction planning services, construction supervisory services, non-construction consulting services, and other goods and services supplier services.

Goods and Services Procurement in 2022 [2-6]

Types of Suppliers/ Business Partners	2022		2021	
	Number of Suppliers/ Business Partners	Goods Procurement Value (Trillion Rp)	Number of Suppliers/ Business Partners	Goods Procurement Value (Trillion Rp)
Local	331	4.39	477	3.33
Overseas	44	-	-	-
Total	375	4.39	477	3.33

- Note:
- Local refers to companies whose its entire ownership originates domestically
 - Overseas refers to companies whose its entire or partial ownership originates internationally.

The General Policy of Vendor Management is as follows:

- Vendor Management is carried out to support Good Corporate Governance (GCG), Anti-Bribery Management System (SMAP), Discriminative Behavior Prohibition against Vendors, and Compliance with the Code of Conducts.
- Heightening transparency, sound and competitive business competition by managing the vendors.
- A corporate guideline on Vendor Management has been developed as a reference in BNI.
- All vendors and units in BNI involved in Vendor Management activities have the obligations to adhere to prevailing guidelines.
- Vendor management division functions as trustworthy vendor services providers in goods and/or services procurement process by recommending quality and excellent vendors in their field.

The supply chain management in BNI has been made systematic so that prospective vendors can file a registration through e-procurement. Further information on registration can be accessed via <https://e-proc.bni.co.id/portal/home>. For healthy supply chain and suitable business partners, BNI determines several assessment aspects and conducts performance evaluation.



MEASURING THE IMPACTS OF SOCIAL INVESTMENTS

To measure the impacts from the performed TJSJ program, the Bank measures the social return on investment (SROI) to distinguish the acquired social investment value of one program. In 2022, BNI performed SROI to three TJSJ programs, namely:

Balapunah Suspension Bridge, Sangiang Tanjung Village, Lebak

The Balapunah Suspension Bridge is vital in its existence as its main function is to support the people's activities, those who always access the bridge. From 2016 to 2017, BNI renovated the bridge, changing the non-permanent wooden bridge to more solid and safe materials.

The impacts experienced by the community after the renovation:

Economic	Improving community's economic rate with greater access to transportation
	Lower economic cost due to fuel efficiency with shorter distance
	New strategic regions, which can serve as the new source of income
Socio-cultural	Strengthened the regional resilience because of the more solid alliance among the regions
	Transpired the feeling of safe and convenience for the bridge passersby

To strengthen the value of the benefits of the Balapunah suspension bridge renovation program in Sangiang Tanjung Village, BNI conducted a program impact study using the Social Return on Investment (SROI) method. The SROI calculation for the 2018-2022 period obtained an SROI value of 3.89. With this value, it means that for every Rp1 investment to renovate the Balapunah suspension bridge, a benefit value of Rp3.89 is obtained, which means that the benefit value of the Balapunah suspension bridge renovation program is greater than the investment value.

Organic Forest, Bogor

Since 2018, BNI has been cooperating with Organic Forest Farmers Group, planting trees across 10 hectares land of the total 27 hectares of organic forest in Megamendung, Bogor, West Java. The initiative has generated several effects to date, such as adequate supply of clean water for the community, especially during the dry season, minimized landslide risk, and having the forest functioning as an environmental education school. In addition, the bigger the size of the trees, the more the carbon stock is produced.

The SROI calculation in the period of 2018-2022 for this program was at 2.34. This signifies that for each Rp1 investment into the Organic Forest program, the benefit value was Rp2.34. Hence, the profit value of this program was greater than its investment value.

Rumah BUMN Tegal

BNI has assessed the impacts on Rumah BUMN Tegal, encompassing 4 fostered regions, namely Tegal City, Tegal Regency, Brebes Regency, and Pemalang Regency. The program has brought significant impacts to the quality of the people's welfare, such as better cohesiveness in fostered MSMEs which further amplified their productiveness, turnover rate, and employment. Moreover, the fostered MSMEs under Rumah BUMN Tegal had wider reach of market access through social media and online marketplace.

The SROI calculation results for the Rumah BUMN Tegal program which have been accumulated for 6 years have an SROI value of 5.02. This means that every Rp1 invested can generate a benefit value of Rp5.02. This shows that the Rumah BUMN Tegal Program can produce significant positive impacts that are felt directly by stakeholders.



Pillar 05

**BNI FOR
EMPLOYEES**



BNI is committed to providing inclusive and fair work environment so that all employees can optimize their performance to reach excellence. Having Human Resources (HR) policies that accommodate employees' diversity and quality training and development, BNI guarantees that all demands made by the stakeholders can be fulfilled by the employees, today and tomorrow.

BNI EMPLOYEES [2-7] [2-8]

Employees are one of the integral aspects with significant impacts to the company's business continuity in the future. As of the end of the reporting period, BNI has recruited 27,170 employees, consisting of 13,031 male employees and 14,139 female employees. The Company endeavors to maintain their inclusivity by balancing different educational level, age group, work experience, gender, race, ethnicity, and religion. In 2022, BNI had zero part-time employees for all employees were recruited under full-time employment. There was not discrimination indicated nor was there abuse towards social aspects regarding relationships among employees.



Composition of Employees Based on Employment Work Contract and Gender [2-7]



Employment Contract	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
Permanent	12,203	13,131	12,211	12,960	12,241	12,860
Contract	606	761	581	942	693	1,021
Trainee	222	247	261	222	171	216
Total	13,031	14,139	13,053	14,124	13,105	14,097
Grand total	27,170		27,177		27,202	

Composition of Employees Based on Operating Areas and Gender [2-7]



Operating Areas	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
Head Office	3,058	2,447	2,754	2,252	2,573	2,139
Regional Office 01	546	587	573	597	733	737
Regional Office 02	721	731	749	744	768	756
Regional Office 03	726	805	714	780	676	729
Regional Office 04	816	798	851	812	836	812
Regional Office 05	519	570	516	571	504	561
Regional Office 06	744	1,051	786	1,082	805	1,076
Regional Office 07	644	689	663	701	640	639
Regional Office 08	677	707	707	704	718	732
Regional Office 09	777	811	799	843	818	837
Regional Office 10	388	624	411	634	434	664
Regional Office 11	372	503	376	505	409	525
Regional Office 12	501	598	537	621	530	635
Regional Office 14	471	818	496	829	505	835
Regional Office 15	559	752	588	791	594	776
Regional Office 16	228	234	239	240	253	244
Regional Office 03	617	726	618	741	604	713
Regional Office 03	646	681	652	671	676	684
Overseas Branch Office	21	7	24	6	29	3
Total	13,031	14,139	13,053	14,124	13,105	14,097
Grand total	27,170		27,177		27,202	

Composition of Employees Based on Age Group and Gender [2-7]



Age Group	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
>50 Years	1,601	1,032	1,531	877	1,711	946
>45-50 Years	1,285	1,037	1,277	1,084	1,322	1,118
>40-45 Years	1,965	1,838	2,203	1,955	2,306	2,025
>35-40 Years	1,603	1,550	1,186	1,090	1,198	1,098
>30-35 Years	3,210	4,075	3,334	4,270	3,458	4,529
>25-30 Years	2,724	3,597	2,734	3,671	2,615	3,570
≤ 25 Years	643	1,010	788	1,177	495	811
Total	27,170		27,177		27,202	

Composition of Employees Based on Position Level and Gender [2-7]



Position Level	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
≥ Senior Vice President*	68	25	65	25	58	16
≥ Vice President	181	50	168	47	165	43
Assistant Vice President	901	413	878	395	813	356
Manager	2,016	1,420	1,962	1,347	1,929	1,289
Assistant Manager	5,380	5,640	5,270	5,521	5,122	5,354
Assistant	4,467	6,591	4,681	6,789	4,971	7,039
Employee	18	0	29	-	47	-
Total	27,170		27,177		27,202	

Note:

*Consists of: Senior Vice President, Executive Vice President, and Senior Executive President

Composition of Employees Based on Educational Level and Gender [2-7]



Educational Level	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
Doctoral Degree	7	4	6	4	7	4
Master's Degree	1,627	1,151	1,598	1,104	1,581	1,076
Bachelor's Degree	10,355	11,511	10,384	11,674	10,297	11,549
Diploma	679	1,467	635	1,335	717	1,463
Primary to High School	363	6	430	7	503	5
Total	27,170		27,177		27,202	

BNI's Other Non-Employees [2-8]

To further facilitate the Bank's business operations, several functions are established through outsourcing cooperations with service providers (vendor). BNI is also committed to providing a workplace that is full of mutual respect, politeness, decency and courtesy, and upholds human rights for all employees, including those related to corporate, such as workers from a third party. The cooperations existed with the third parties adhere to applicable laws and regulation. However, this report has yet presented details on the number of BNI's other non-employees, considering the ever changing dynamic in their movement.

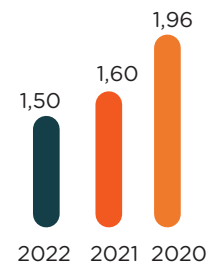
BNI's Employee Turnover [401-1]

Employees are significant for BNI to sustain its business operations and realize its vision. Hence, an end-to-end and integrated policy on human resources management was established, regulating the entire process from recruitment to handling their exit. The human capital management in BNI aims to attract, motivate, and maintain the employees.

Employee turnover rate is one of the indicators to measure employee retention. In 2022, BNI's turnover rate reached 1.5%, or lowered compared to 1.6% in 2021. The decrease indicates the HR management implemented in BNI created employee value proposition, namely jointly creating the best place to learn, grow, and contribute to Indonesia (Learn, Grow, and Contribute to Indonesia), so as to be able to retain employees to continue contribute with BNI.



**BNI's
Employee
Turnover (%)**



Composition of New Employees Based on Age Group and Gender



Age Group	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
< 30 Years	494	579	539	618	477	651
30-50 Years	45	18	18	17	27	16
> 50 Years	8	2	2	2	2	0
Total	1,146		1,196		1,173	

Composition of New Employees Based on Operating Areas and Gender



Operating Areas	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
Head Office	346	254	260	232	218	245
Regional Office 01	5	14	19	9	43	59
Regional Office 02	6	16	14	15	29	55
Regional Office 03	53	52	54	59	7	5
Regional Office 04	8	20	16	11	4	4
Regional Office 05	20	19	31	44	2	9
Regional Office 06	12	27	21	31	26	52
Regional Office 07	11	23	20	28	10	24
Regional Office 08	2	19	8	1	23	21
Regional Office 09	7	5	13	23	8	2
Regional Office 10	6	26	5	9	7	8
Regional Office 11	9	15	4	6	10	14
Regional Office 12	2	20	24	34	9	8
Regional Office 14	3	23	9	27	14	33
Regional Office 15	5	21	21	39	12	15
Regional Office 16	12	8	7	9	11	8
Regional Office 03	24	12	24	46	24	49
Regional Office 03	16	25	9	14	49	56
Overseas Branch Office	0	0	0	0	0	0
Total	1,146		1,196		1,173	

Composition of Exiting Employees Based on Age Group and Gender



Age Group	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
< 30 Years	51	102	53	106	51	138
30-50 Years	97	146	97	170	124	210
> 50 Years	12	11	6	4	8	11
Total	419		436		533	

Composition of Employees Based on Operating Areas and Gender



Operating Areas	2022		2021		2020	
	Male	Female	Male	Female	Male	Female
Head Office	34	44	37	31	42	46
Regional Office 01	5	11	4	13	4	17
Regional Office 02	10	10	9	16	11	17
Regional Office 03	7	14	9	19	13	29
Regional Office 04	16	13	8	21	13	29
Regional Office 05	5	13	9	12	6	9
Regional Office 06	16	31	10	31	13	31
Regional Office 07	10	7	6	14	8	21
Regional Office 08	2	7	0	11	7	9
Regional Office 09	10	25	15	24	16	27
Regional Office 10	10	10	8	8	6	19
Regional Office 11	4	6	8	9	4	10
Regional Office 12	2	12	1	17	10	18
Regional Office 14	4	13	8	14	9	16
Regional Office 15	1	14	6	11	4	22
Regional Office 16	3	5	5	4	3	6
Regional Office 03	8	11	3	15	7	11
Regional Office 03	13	13	10	10	7	13
Overseas Branch Office	0	0	0	0	0	0
Total	419		436		533	

IMPLEMENTING FAIR AND EQUAL EMPLOYMENT PRACTICES [2-30]

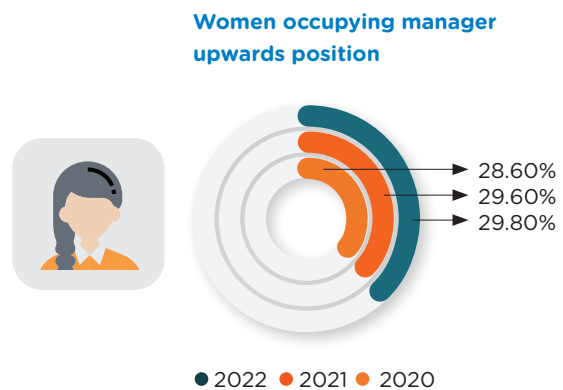
Compliant with prevailing regulations and ensuring zero child labor and forced labor, BNI's working hours and break hours are regulated in the 2022 Collective Labor Agreement (CLA) Article 20. Provisions on the working hour and the break hour prove that BNI does not practice forced labor. In essence, overtime is not considered as an obligation, but an agreement between workers/employees and the Company's executives to complete any urgent work.

BNI has implemented a Respectful Workplace Policy in line with KBUMN directives through SE No. SE-3.MBU.04/2022. Through this policy, BNI is committed to providing a safe work environment that respects each other, free from discrimination, exclusion or restrictions, harassment, bullying and other forms of violence and upholds dignity and self-esteem, to maintain productivity while working. In addition, BNI also pays attention to persons with disabilities, gender equality and prevents bias and discrimination against women within the BNI environment, BNI subsidiaries and consolidated affiliated companies.

Employees with different backgrounds are also given equal opportunities to be a part of BNI's team. Any diversities may bring potentials that can drive the company's developments faster and more creatively.

BNI unceasingly empowers fair and equal in a fair and equal manner, and more endeavors are attempted for an inclusive working environment through equitable policies, so that female employees are able to perform optimally. Several policies implemented are menstrual leave, day care, maternity leave, employee assistance program (EAP), nursery room in BNI's each facility, and flexible working arrangement.

To ensure any progress in the career of female employees and raise their representation in leadership level (Assistant Vice President above), a number of career policies are enacted to help launching with the female employees' career, for instance Accelerated Career Track. The results show that in the trend data for the last 3 years, the proportion of female talents in the leadership level constantly increased as illustrated in the following graphic:



People with disabilities also have equal opportunities to be a part of BNI's team, assuming positions and types of jobs based on the respective level of expertise and skills. In 2022, there were 33 employees with disabilities working with BNI.



Sri Utari

Payroll & Benefit Assistant, Human Capital Services Division

Assistant in Payroll & Compensation of Human Capital Services Division
A dream finally came true to be a part of BNI. Learning to be an administrative assistant has enriched my experiences to help with employee issues on BPJS Health, and I am glad I can gain new knowledge from working in BNI. As long as I have been working in BNI, there has been no discriminative behaviors made against me. BNI truly gives safety and convenience in working experience.



Regina Ambaryanti

Administrative Assistant in Assets & Procurement Management Division

I am proud and grateful to be a part of BNI's team, mainly the PFA Division, as finding a job has been difficult for me. Despite my physical limitations, I am more than capable to do my job and with integrity. I have always received motivational insights/general knowledge, guidance, and encouragements by my superiors to strive to be better, and I have supportive colleagues. Thank you BNI for the respect you have given to people with disabilities, for being ready with assistance if needed, and for the adequate facilities.



Abdul Majid

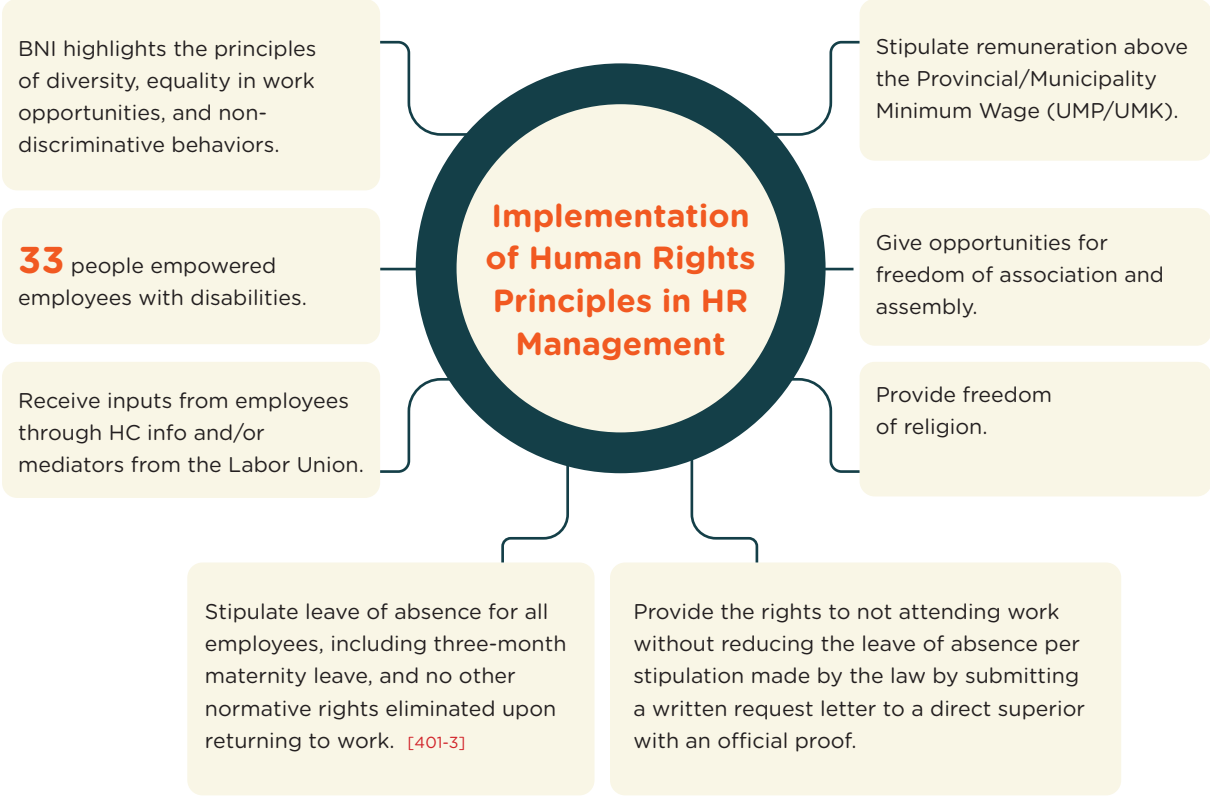
Administrative Assistant at Samarinda Main Branch Office

BNI Samarina Main Branch Office has given me the opportunity to always progress and grow. The appropriate facilities made me convenient in managing my work and the guidance provided by my colleagues helped me with managing the jobdesk well. For as long as I can remember, I have always received good treatment, no disrespectful behavior was ever made. I am delighted and moved for being trusted to be in BNI Kota Samarinda's creative team and to being involved in BNI Samarina's Union as a spiritual member. I would like to express my gratitude to BNI who has offered me this opportunity.

Labor Union and Collective Labor Agreement (CLA)

BNI's Labor Union was established to create a harmonious work environment, in which the rights and obligations of all parties are entirely met that it advances the Company and lifts the spirit in working for the welfare of the employees. A management is in order for interpersonal relationships and Labor Union with the management in the form of Partnership Forum, which also functions as a communication means between employees/units with the Labor Union.

Committed to upholding human rights, BNI has strong policies concerning employment management. The provisions applied by BNI refer to and adhere to Law No. 13 of 2003 on Manpower and Law No. 11 of 2020 on Job Creation. The CLA of 2020-2024 was drawn up based on an agreement between the management and the employees' representatives, who joined in the Labor Union. All employees (100%), both permanent and contract, are protected by the CLA. The CLA undergoes regular review and updating once every two years. [2-30]



EMPLOYEE COMPETENCY DEVELOPMENT PROGRAM [404-2]

Routinely-held training and competency development program are prepared for the employees to sharpen their insights and skills, preparing them to be able to respond to the banking developments and challenges presented in the new digital era. BNI Corporate University, as the trustee, manages employee competence development, develops strategy, and design various training programs, including programs which purpose is to manage Sustainable Finance and meet the employees' competence.

In exercising its mandate, BNI Corporate University oversees the fund for HR quality developments by adhering to applicable provisions stated in Decree of BI Director No. 31/310/KEP/DIR of 1999 on Funds Distribution for General Human Resources.

As stated in the Collective Labor Agreement, every employee is entitled to the opportunity to receive education and training. For this reason, so that the quality development funds can be enjoyed by all employees, a budget management allocation strategy is carried out based on conformity with the company's strategy, namely:

1. Centralized Fund managed by BNI Corporate University
2. Decentralization Fund managed by the unit
3. Personal Funds managed by employees

Through this capability development strategy, it is hoped that all employees will be able to maximize their competencies and capabilities so that they are able to carry out their duties and responsibilities optimally.



Types and Scope of Competency Development Program

BNI has wide-ranging types and scope of competency development program with different purposes and goals. The program will benefit the employees in performing their daily work and throughout the transition process to a higher level in their career path, or approaching retirement and leaving work.

1. A learning program to enhance employees' capacity in supporting BNI's businesses

No.	HR Capability that supports business process	Segmentation in Learning Process	Example of Learning Program
1	Understanding about market trends	Credit & Market Expansion	License in Credit, License in Sales, etc.
2	Risk Culture	Risk Culture	Anti-Fraud Awareness, Auditor, Anti-Bribery, etc.
3	Global Banking	Global Business	Trade Finance, Financial Institution, Cash Management, etc.
4	Digital Mindset	Digital	Digital Marketing, UI/UX Design, etc.
5	Advanced Analytic	Analytic	Data Analytic, Data Scientist, Data Governance, Cyber Security, etc.

2. A learning program to strengthen employees' leadership capabilities and career development, starting from entry to executive level, including modules on Work Culture, Code of Conduct, and Good Corporate Governance.
3. A learning program to prepare near-retiring employees, as stated in the Collective Labor Agreement, including modules on self-empowerment strategy and tips on post power syndrome, healthy lifestyle, financial planning after retirement, and business opportunities after retirement.

Executive Management Program (EMP)

To hone the executives' competency in leadership, BNI designed an executive development program for members of the Board of Directors, Board of Commissioners, managerial, starting from one to two levels under the Board of Directors.

The executive development program is divided into three themes, namely onboarding, upskilling, and progressing. The onboarding program is aimed at meeting the needs of competency development in risk, compliance, and strategy. The upskilling program is focused on leadership competency development through sharing session, coaching, and

webinar series methods; whereas the progressing program has members of the Board of Directors and Board of Commissioners participate in Executive Education Program held by several best Business School overseas, such as Harvard Business School, IMD Business School, Stanford Graduate School of Business, so that they are exposed to the latest insights on leadership strategy in the digital era.

As for the managerial staff 1 to 2 levels under the Board of Directors, a time-restricted learning program is constructed by adapting to a blended-learning method (in-class learning, social learning, and experiential learning), in which curriculum developments and their implementation are led by learning consultants with world-class competence.

Competency Development on Sustainable Finance ^{[404-2] [FS4]}

Employees' competency development concerning the sustainable finance was realized per RAKB that, by 2023, 100% of the total employees will have participated the sustainable finance training. As of the end of the reporting period, 26,074 employees or 95.94% of total employees have received the training. This training is organized annually as a refreshment program on the sustainable finance developments. In addition, details on sustainable finance programs followed by the Board of Commissioners and Directors can be viewed in the 2022 Annual Report.

In 2022, there were 3 members of the Board of Directors participated in sustainability training. The trainings are Road to G20 PLN, Energy Transition Day I PLN, Driving Sustainability from the Boardroom I of the SOEs' Ministry, and TIIWG Road to G20 SOE International Conference: Driving Sustainable & Inclusive Growth I of the SOEs' Ministry. Aside from this, 3 directors became a speaker on sustainability.

More supports for the sustainable finance implementation, BNI works with an external party to create training modules on environmental, social, and governance (ESG) issues and risks, sustainable finance, and/or sustainability principles. Through these trainings, it is hoped BNI's employees can have in-depth understanding towards sustainability and ESG concept, analyze the company's sustainability report as well as comprehend the management of environmental, social, and sustainable finance governance risks.

Sustainability Training in 2022

Name of Training	Total Participants
Industry Study & Analysis: Plam Oil Sector	82
Industry Study & Analysis: Export Trade Sector	142
Industry Study & Analysis: Shipping Industry	80

Webinars on Sustainability in 2022

Name of Training	Total Participants
Supplementary Insight on Fraud as Ethics Issues and Profession Integrity	9,809
Fraud Awareness Series - Professional Ethics against Fraud	13,460
Training on Industrial Relationship and Anti-Fraud Awareness	793
Anti-Fraud Awareness Series: Upholding Ethics against Violations towards Corruption	13,063
Anti-Fraud Series: Digital Forensic in Managing Internal and External Fraud	5,825
Supplementary Insight on Legal Knowledge and Legal Risk Awareness for Corporate Credit	238
Supplementary Insight on Cyber Security in Banking 4.0: The Future of Customers Data Protection and Regulation Risk	1,962

Name of Training	Total Participants
Risk Management Refreshment Series: Minimize Risk Losses through Data Analytics and Modelling	953
Risk Management Refreshment Series: How To Minimize Banking Losses Through Operational Risk Management Enhancement In Credit Process?	1,851
Risk Management Refreshment Series: Know Your Employee to Prevent Fraud	1,740
Refreshment Risk Management Series: Environmental, Social & Governance (ESG): Building Carbon-Free Future Risk Business Based On Esg	855
Risk Management Refreshment Series: Digital Risk (The Emerging Strategic Cyber Attacks On The Financial Service Industry)	731



26,074 Participated in the **mandatory sustainability finance e-learning**

Additionally, BNI maintains an ESG and sustainable finance e-learning mandatory system in the form of sustainability module that is compulsory for all employees for maximized attempts in implementing sustainable finance in BNI.

Employee Training and Developments

Employee developments and training are vital for long-term corporate sustainability and they are also used as means to maintain and prepare skilled employees for the company’s achievements. This is in congruent with the training and development policy regulated in the Collective Labor Agreement and Company’s Guidelines on Learning. Various training and development activities are under the responsibility of BNI Corporate University and all employees, male and female, are subjected to periodical evaluation on performance and career developments.

In 2022, BNI completed 127 in-class training programs, 8 mandatory e-learning programs, and 54 DEEP46 topics with total participation attaining 1,057,238 employees with total average training hours reaching 191.67 hours per employee.



Rp265.79 billion
Realization of Employee Competency Development Funds

Average Training Hours Based on Gender [404-1]

Gender	2022	2021	2020
Male	185.27	80.30	76.53
Female	171.46	74.92	71.45

Average Training Hours Based on Employee Categories and Gender [404-1]

Job Level	Employees Attending Training		Annual Training Hours		Average Training Hours	
	Male	Female	Male	Female	Male	Female
≥ Senior Vice President*	61	24	847	35	36.83	7.00
Vice President	186	55	3,955	4,235	26.02	94.11
Assistant Vice President	929	434	112,987	73,703	75.32	105.59
Manager	2,060	1,451	372,897	261,023	163.77	153.18
Assistant Manager	5,450	5,748	1,765,645	1,841,042	270.02	246.06
Assistant	4,535	6,726	298,914	473,662	90.66	85.45
Employee	17	0	28	0	7.00	0
Total	27,676**		5,208,973		177.97	

*) Consists of Senior Vice President, Executive Vice President, and Senior Executive Vice President.

***) Total employees included 731 terminated employees (resigned and retired employees).

Learning Participation by Academy

Academy	2022			2021			2020		
	Course	Class	Participant	Course	Class	Participant	Course	Class	Participant
Leadership Academy and Corporate Core Function									
Leadership	14	43	2,066	25	143	4,263	32	148	16,177
Governance, Risk, and Compliance	12	42	174,484	25	76	239,268	18	38	189,360
New Entry	2	29	654	4	29	665	3	27	748
Corporate Core Function	30	53	272,081	42	109	148,360	32	96	58,060
Strategic Initiative	3	8	15,961	7	21	561	31	48	164,241
Sub Total	61	175	465,246	102	378	393,117	116	357	428,586
Business Academics									
Banking Operation	9	24	24,063	26	83	59,208	24	104	76,068
Credit and Business	51	211	125,525	71	252	64,397	67	183	61,766
Marketing, Sales, and Service	39	212	257,631	54	231	160,170	44	125	69,184
Transactional Banking	8	28	44,422	6	15	1,595	9	23	108,170
Treasury and Global Banking	16	62	137,382	17	108	95,727	10	62	29,554
Professional Certification	5	95	2,969	18	111	3,707	19	97	3,131
Sub Total	128	632	591,992	192	800	384,804	173	594	347,873
Grand Total	189	807	1,057,238	294	1,178	777,921	289	951	776,459

Various digitalized competency developments have been prepared for BNI's employees, for instance in-class virtual/online learning, e-learning, and Daily Exercise Employee Program (DEEP46). The in-class learning is held online by complying with a strict health protocol. All BNI's employees must participate e-learning activities, in which their participation is monitored by BNI Corporate University and can be accessed via BNI Smarter application. Furthermore, DEEP46 offered a learning platform where employees received questions per daily work. These programs can be monitored by BNI Corporate University, and/or division/region where the organizing body was based as well as recorded by the Human Capital Management System (HCMS) platform.

25,725
Employees accessing DEEP46

828,986 participations
Membership of DEEP46

26,332
Employees accessing e-learning

198,983 participations
E-learning membership

STRENGTHENING EMPLOYEE WELFARE

Remuneration is presented as a reward for employees in preserving and heightening their performance. Aside from this, there are allowances, incentives, and other benefits. The competitive remuneration is in accordance with position level, including the entry level, following applicable regulations, above UMP/UMK stipulated in each work area

Benefits received based on employment status [401-2]

Type of Benefit	Permanent Employee
Basic Salary	v
Healthcare Facilities/Treatment Facilities	v
Retirement Health Fund	v
Leave (Leave Days and Travel Expenses)	v
Maternity Leave	v
Pre-Retirement	v
Pension Program	v

Note: BNI employees are full-time employees (BNI does not have part-time employees)

BNI also offers 3-month maternity leave for female employees and this also applies to those who endure accidental miscarriages or abortus provocatus with underlying medical explanation, as stated in the CLA 2022 Article 29. Female employees with long-period maternity leave are welcomed back to work after the leave period is over without diminishing their other rights. As for male employees, paternity leave on the birth of a child from a legal wife and two-day permission to accompany their miscarried wife are granted, as stipulated in the CLA of 2022 Article 33.

Retirement Program ^[201-3]

The applicable retirement program is stipulated in the CLA of 2022 Article 53. In 2022, there were 449 retired employees, consisting of 231 male employees and 218 female employees. With several retirement programs enacted, the Bank hopes they will bring positive impacts and employee welfare after retirement is maintained.

Furthermore, as an appreciation and effort to protect the welfare of the retirees, BNI has pre-retirement training organized for those retiring, preparing their mentality, insights, and skills that are basic after retirement.

- 01** Defined Benefit Pension Program (PPMP) is available for individuals appointed as permanent employees prior to 1 September 2005 with 7.5% fee paid by the employees of their basic pension salary per actuarial calculations.
- 02** Defined Contribution Pension Program (PPIP) is for individuals appointed as permanent employees from 1 September 2005 onwards with 3.5% fee paid by the employees of total cash and 11.5% paid by the Company of total cash.
- 03** Retirement Period Health Fund Program (DKMP) is a defined contribution program for pre-retirement employees and their spouses that provides health benefits, which have been prepared while the employees are still active.

Employee Performance Appraisal ^[404-3]

Opportunities in career development are open for all employees (100%) without discrimination in ethnicity, religion, race, class, social status, gender, and other attributes that may endanger human rights. Such opportunities are transpired through performance appraisal by considering the achievements towards Key Performance Indicator (KPI).

Performance Management Individual is regularly monitored for performance culture. BNI has its employees undergone quarterly and annual performance evaluation and assessment through a process of completing self-assessment and one-on-one meeting between employees and line managers. The final scores will then be used as feedback in various aspects, among which reward & remuneration, capacity building, and career development.

For sustainable and preminent performance, all employees are provided with equal opportunities to self develop and build career that correspond to the performance growth and their capacity in a position. BNI offers a promotion (and succession) program for those meeting the established criteria, which follows an objective assessment led by an employment committee. It is also related to career and development planning stated in the Individual Development Plan (IDP). Each start of the year after performance appraisal, employees and Line Managers undergo an One-on-One Discussion as feedback-session as well as evaluate the previous IDP and plan IDP for the current year.

Composition and Percentage of Permanent Employees with Review [404-3]

Status	Gender	2022	
		Total	%
Review	Male	12,203	48%
One on One Career Development *)	Female	13,131	52%
	Total	25,334	100%

*) excluding trainees and contract employees

In 2022, BNI conducted performance appraisal to all employees (100%) along with reviews on their self-growth and career development stated in IDP through One-on-One Discussion.

Employee Engagement and Satisfaction

Employee satisfaction survey is an interaction medium with one of the company’s stakeholders. The Company performs it periodically, inquiring all employees to complete a questionnaire through DigiHC. Through this survey, BNI is able to detect the employees’ satisfaction rate in working and whether they have positive engagement. In 2022, the employee engagement was ranked at 96% and the employment satisfaction level was scored at 90%.



HEALTHY, DECENT, AND SAFE WORKING ENVIRONMENT

Access to Safety and Healthcare Facilities

[403-1] [403-3] [403-4] [403-5] [403-6] [403-8]

BNI's commitment to providing a healthy, decent, and safe working environment is evident in various supporting facilities, such as dining rooms, nursing rooms, day care, etc. Health/medical clinics are also available for all employees at Grha BNI, Menara BNI, Plaza BNI, and Gedoeng BNI. As a reference, BNI collaborates with hospitals in DKI Jakarta and for operating areas outside DKI Jakarta, there are hospitals in the nearest cities. Moreover, health webinars and broadcasts are held to increase the employees' health awareness.

In 2022, BNI acclimated well by establishing a policy to regulate activities in the office, among which was hybrid system (both offline and online). The office was regularly sterilized by disinfectants, handwashing facilities were available, and health insurance covering the COVID-19 treatment. Not only that, the company offered health aids for those who were exposed to or positive with the COVID-19, including performing testing, tracing, and treatment (PCR/test swab) optimally in the office. [403-6] [403-7]

For fire prevention, fire extinguishers (APAR) and other safety tools, for instance cabinets and Personal Protective Equipment (PPE), are installed in buildings where BNI operates. Fire and earthquake drill is regularly simulated at Grha BNI, Menara BNI, Plaza BNI, and Gedoeng BNI at least two times in a year, collaborating with the building management and local Fire Department. Until now BNI has not had an OHS committee. However, we implement OHS in the banking environment. Our building office has Technical Instructions Building Operations (PTO) as a guide for emergencies.

Incident Reporting Mechanism

[403-2]

Any incidents relating to individuals' health and/or safety, employees are expected to request permission to their superiors to take a break/leave the office. If there are potential dangers, BNI has Business Continuity Management (BCM) and Crisis Management Team (CMT) or Emergency Task Force for all employees to report.

DigiHC has been set in motion so that employees can communicate their health condition and apply for permission to leave the office if feeling indisposed. To sustain employees' activities and convenience in the working areas, BNI implements a quick reporting mechanism for potential dangers or damages on the company's assets through QR code placed in every Head Office. There were 30 complaints filed through QR Code in 2022, which pointed at the building facilities and they were all resolved 100%.



Pillar 06

**SUSTAINABILITY
GOVERNANCE AND
STAKEHOLDER
ENGAGEMENT**

BNI'S APPROACH FOR STEERING POSITIVE IMPACTS

Creating Sustainability Culture ^[2-27]

The sustainability and sustainable finance principles are embedded in the Bank's governance, starting from staff to managerial level, to help build sustainability culture internally. Various initiatives have been carried out, several of which are the formation of Environmental, Social, & Governance (ESG) Sub-Committee under the Risk Management & Anti-Fraud Committee per Board of Directors' Decree No. KP/484/DIR/R of 26 October 2021; credit policy that was based on the ESG factors, sustainability principles inclusion in the Code of Conduct, policies, and Standard Operating Procedures (SOP); sustainability-related trainings to enhance employees' knowledge; and mapping credit portfolio with environmental high-impacts.

BNI's special work unit, ESG Management Group, is a part of the Enterprise Risk Management (ERM) Division, as stipulated in the Board of Directors' Decree No. KP/218/DIR/R of 17 June 2022. Both ESG Subcommittee and ESG Management Group of the ERM Division hold similar authorities to report any sustainability-related deliverables to the management.

BNI internally socializes all programs made to achieve continuity, such as Indonesian Green Taxonomy (THI) in business units, Go Green program, e-learning mandatory and ESG awareness programs to all employees through different communication channels, for instance YouTube, email blasts, Sinergi BNI Magazine, and others. The Bank also cooperates with ESG consultants to provide assistance in developing ESG framework, ESG roadmap, and policies/SOP on internal ESG practices, including sustainability governance.

Implementing Sustainable Finance and Developing RAKB

BNI is committed to implementing Sustainable Finance and endeavors to become the leading financial institution with services and performance based on ESG risk aspect. This commitment permeates the RAKB development so that it enables the Bank to have more systematic and specific plans on implementing sustainable finance in business practices. The Bank also complies with prevalent regulations as well as supports the Sustainable Finance Roadmap prepared by OJK and the Sustainable Development Goals in Indonesia.



RAKB 2023 states BNI will set the infrastructure towards Net Zero Emission by reinforcing the ESG database and framework, completing ESG-related policies, and stipulating short-, medium-, and long-term roadmap on Net Zero Emission in BNI.



The previous report shows that BNI has stipulated the implementation of Sustainable Finance and coordinated the functions through President Director’s Decree on the Implementation of Sustainable Finance No. KMP/4/2602. BNI established Environmental, Social, and Governance (ESG) Sub-Committee under the Risk Management & Anti-Fraud Committee through Board of Directors’ Decree No. KP/484/DIR/R of 26 October 2021.

BNI’s underlying cause for performing Sustainable Finance are as follows:

- ➔ Providing necessary fund sources for the sustainable development goals and sufficient funds for affairs related to the climate change;
- ➔ Minimizing the social gaps, reducing and preventing environmental damage, preserving biodiversity, and encouraging efficiency in energy and natural resources use; and
- ➔ Improving the resilience and competitiveness of FSIs, issuers, and public companies through better environmental and social risk management by presenting financial products and/or services that adhere to the Sustainable Finance principles, thereby able to positively contribute to financial system stability;
- ➔ Refining financial products and/or services that apply the Sustainable Finance principles.

SUSTAINABILITY GOVERNANCE STRUCTURE

The entire executive levels in BNI, including the Board of Commissioners and Board of Directors show their support in the Sustainable Finance through direct planning and oversight. Today, the Bank operates the ESG Sub-Committee under the Risk Management & Anti-Fraud Committee. The ESG Sub-Committee consists of cross-function personnel.

Chairman	: Vice President Director
Vice Chairman	: Risk Management Director
Secretary	: Head of Enterprise Risk Management Division
Permanent Member equivalent to the Board of Directors and SEVP (Voting Member)	: <ol style="list-style-type: none"> 1. Finance Director 2. Corporate & International Banking Director 3. Institutional Banking Director 4. Enterprise & Commercial Banking Director 5. Treasury Director 6. Consumer Banking Director 7. Network & Services Director 8. SEVP Treasury
Permanent Member equivalent to the Board of Directors (Non-Voting Member)	: Human Capital & Compliance Director
Permanent Member equivalent to Division/Unit (Non-Voting Member)	: <ol style="list-style-type: none"> 1. Head of Enterprise Risk Management Division 2. Head of Corporate Secretary Division 3. Head of Policy Governance Division 4. Head of Investor Relations Division 5. Head of Management Data & Analytics Division 6. Head of Corporate Planning & Accounting Division 7. Head of Corporate Development & Transformation Division 8. Head of International Division 9. Head of Subsidiaries Development Division 10. Head of Treasury Division 11. Head of Compliance Division 12. Head of Human Capital Strategy Division 13. Head of Corporate Banking 1 Division 14. Head of Corporate Banking 2 Division 15. Head of Corporate Banking 3 Division 16. Head of Enterprise Banking Division 17. Head of Commercial Banking Division 18. Head of Corporate & Enterprise Credit Risk Division 19. Head of Commercial & SME Credit Risk Division 20. Head of Consumer Product Division 21. Head of Channel Management Division 22. Head of SME Banking Division 23. Head of Small Business & Program Division

RESPONSIBILITIES DELEGATION FOR ESG IMPLEMENTATION

[2-9] [2-13] [2-14] [2-15] [2-16]

The Environmental, Social, and Governance (ESG) Sub-Committee, under the Risk Management & Anti-Fraud Committee, is in charge of the ESG implementation in BNI.

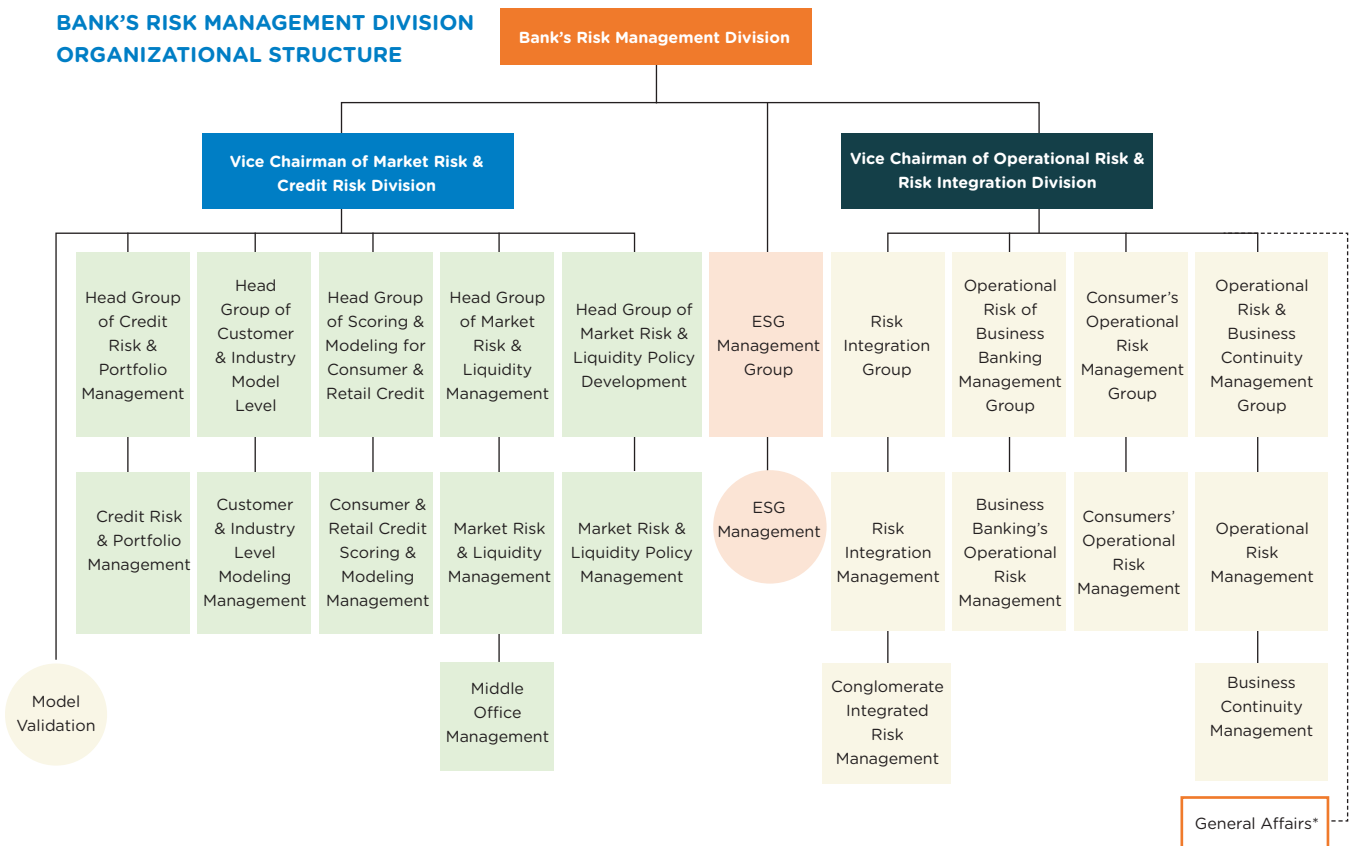
The principal roles assumed by the sub-committee are as follows:

1. Preparing policies and strategies on the Environmental, Social, and Governance (ESG) management along with their adjustments;
2. Identifying ESG potential risks that may impact BNI and its stakeholders;
3. Monitoring the implementation of Sustainable Finance strategy;
4. Monitoring, evaluating, and giving recommendations upon the results of BNI's ESG assessment;
5. Evaluating the implementation of ESG strategy across all BNI's business lines.

Managing sustainability aspect is the responsibility of all work units under the Board of Commissioners and Board of Directors' supervision. For all these to work, BNI has a special work unit, Environmental Sustainability Governance (ESG) Management Group, which is a part of the Enterprise Risk Management (ERM) Division. The following are the main duties of the ESG management group:

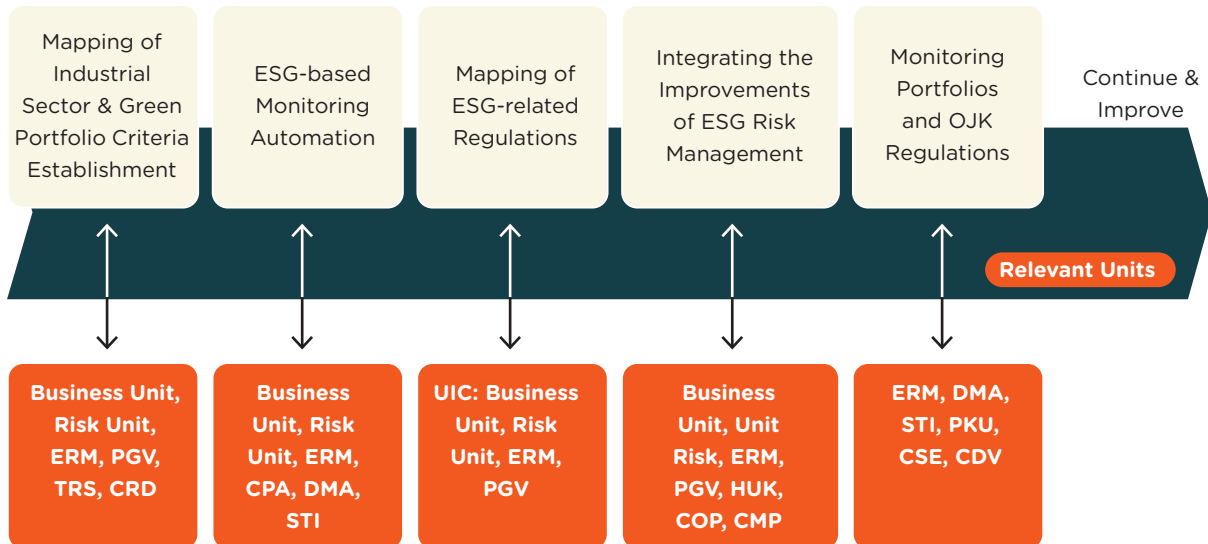
1. Managing the strategy and policy related to the ESG implementation;
2. Monitoring the integration of ESG management in daily operations;
3. Managing activities relating to ESG-related communication and publications;
4. Acting as a liaison for regulators and other external parties;
5. Managing the ESG-related reporting.

BANK'S RISK MANAGEMENT DIVISION ORGANIZATIONAL STRUCTURE



MONITORING AND EVALUATION IN ESG IMPLEMENTATION

Summary of ESG risk management in BNI



Policies on Managing Environmental, Social, and Governance (ESG) Risk ^[2-13]

The Bank’s top management – Board of Directors and Board of Commissioners – together with the entire work units supervise the good corporate governance principles implemented to ensure responsibility in business practice and promote the prudential principle in managing the risk. We put efforts to maintain the highest standards of ethical conduct for operations and accountable, accurate, and transparent reporting, and comply with prevalent laws and regulations.

The governance structure, policy, and operations employed are aimed to identify and manage the environmental, social, and governance (ESG) risk materialized in all BNI’s value chain.

Risk Identification Procedure on Sustainable Finance Implementation and its Management ^{[2-16] [2-25] [2-26]}

Identifying, measuring, monitoring, and controlling sustainable finance risk make up the four pillars of risk management.

The four pillars of BNI’s risk management:

- Active Supervision by the Board of Commissioners and Board of Directors;
- Adequacy in Policy, Procedure, and Limit Stipulation;
- Internal Control System;
- Adequacy in Identification, Measurement, Monitoring, and Controlling Risk Process as well as in Risk Management Information System.

The arising risks which were identified during the Sustainable Finance implementation are as follows:

No.	Risk	Risk Mitigation [2-25]
ESG risk in banking operations		
1	The launch of new innovations in products/services that did not necessarily reach all levels of society	<ol style="list-style-type: none"> 1. Targeting the Break Even Point on certain products and services. 2. Surveying the community's financial inclusion needs. 3. Analyzing cost and benefit on products and services changes or innovations. 4. Performing marketing intelligence related to the market needs. 5. Performing massive promotion prior to launching the innovations and changing the products and services.
2	Digital finance products/services heightened risks of cybercrime and endangered customer privacy	<ol style="list-style-type: none"> 1. Identifying and assessing the digital risk as well as risk mitigation adequacy over digital products. 2. Identifying risks and ensuring the mitigation adequacy against cyber threats. 3. Performing assessment security maturity on third parties. 4. Performing assessment data privacy and data security adequacy in an end-to-end process (data at rest, data in transit).
3	Energy consumption in banking operations and climate change risk	<ol style="list-style-type: none"> 1. BNI has implemented energy saving in the form of: <ol style="list-style-type: none"> a. Switching off workspace lights during break hours every day b. Using solar energy for lighting the emergency exits in BNI's main building c. Optimizing meetings through online platforms d. Organizing online trainings through Zoom or webinars 2. Performing baseline calculation and determining net zero emission roadmap with the assigned ESG consultants.



No.	Risk	Risk Mitigation [2-25]
ESG risk in credit disbursements		
4	Prospective debtors whose businesses were not socially friendly nor KKUB-classified	<p>The general credit policy applied by BNI consists of minimum requirements that are mandatory to prospective debtors, such as RSPO/ISPO certification for debtors whose businesses focus on palm oil, environmental document completeness, for instance AMDAL or UPL/UKL or PROPER according to their business sector. This also includes comprehensiveness in requirements, such as land tenure certificate (SKPT).</p> <p>The public credit requirements are substantiated by Risk Acceptance Criteria (RAC) in corporate, commercial, and retail segments as one of the pre-screening aid tools in the pipeline management. Two types of RAC, generic and specific subsector, were designed by BNI to accommodate said three segments. These are the 11 economic sector with several specific subsectors:</p> <ul style="list-style-type: none"> • Trade (Wholesale, Retail, and Export Import for Commercial & SME); • Processing Industry (FMCG & Pharmacy for corporate, food & beverages for Commercial and SME as well as Chemical Industry for all segments); • Palm Oil Plantation (all segments); • Construction (all segments); • Transportation & Communication (Telecommunication for Corporate & Public Transportation for Commercial & SME); • Real Estate & Service Providers (Real Estate for Corporate); • Rental Services (Commercial); • Mining (Corporate); • Electricity/Energy (Corporate); • Accommodation Providers (Commercial & SME); • Healthcare services (Corporate & Commercial).
5	Existing debtors whose businesses burdened with ESG risk	Business units will regularly monitor through the watchlist system and debtor level assessment. If there are any violations made against the ESG aspect, the relevant parties will undergo verification and the level of debtors will be adjusted should there be any evidence of not meeting the determined ESG aspect.
6	Green bonds were not in line with the designations	Evaluation and selection of projects distributed by green bonds are led by the ESG subcommittee, which is chaired by the Vice President Director. The disbursements are channeled to project financing projects so that the fund use can be monitored by BNI. The second party opinion (SPO) has formed its opinion over BNI's green bond disbursements report.
7	Debtors under Sustainability Linked Loan did not meet the agreed KPI SPT targets	A penalty system is imposed to debtors for every failure to achieve the agreed KPI SPT. An annual review by an independent third party is performed on the credits to evaluate the debtors' performance, including their achievement towards the KPI SPT targets.
Social risk in carrying out financial literacy and inclusion		
8	Uneven spread of financial literacy and inclusion beneficiaries	<ol style="list-style-type: none"> 1. Target market on financial literacy and inclusion attendees is prepared. 2. A regional mapping on the target market detailing the financial literacy and inclusion attendees is developed. 3. Financial literacy and inclusion is conducted gradually in accordance with the target market mapping of financial literacy and inclusion attendees.

ACHIEVEMENTS, OPPORTUNITIES, AND CHALLENGES IN IMPLEMENTING SUSTAINABLE FINANCE

Realizing the commitments in implementing the Sustainable Finance, appreciations were awarded to the Bank from various parties:

1. Participating in the establishment of the Indonesian Sustainable Finance Initiative (IKBI).
2. Playing an active role in the preparation of the OJK Sustainable Finance Task Force Team.
3. Participating in the preparation of the OJK Green Taxonomy.
4. Receiving appreciation in the Asia Sustainability Reporting Rating (ASRRAT) 2022 event.
5. Consistently being included in the SRI-KEHATI Index.
6. Receiving appreciation for being included as a constituent of the IDX KEHATI Senior Leaders ESG Index.
7. Being assessed as a Medium Risk ESG exposure company from Sustainalytics.
8. Receiving an 'A' ESG Rating from MSCI.

Along with the Sustainable Finance implementation, the opportunities we gained are continuously explored:

1. Looking for green financing opportunities in Indonesia by communicating with the government, contacting potential overseas investors, and utilizing partnerships with domestic and international institutions to promote sustainable finance.
2. Greater amount of businesses are starting to pay attention to environmental, social and governance aspects in conducting their business.
3. Increasingly intensified attention from the government, regulators, and investors regarding the implementation of a sustainable business which is expected to create products that are environmentally and socially sound.
4. Carrying out Environmental and Social Responsibility (CSR) activities to support an environmental and socially aware portfolio.

5. The sizable number of MSMEs that can be fostered and financed.
6. Development of digital-based financial product/service innovations to reduce the need for customers to commute to branch offices.
7. Collaboration with various parties who are familiar with sustainability issues to develop programs that support sustainability and SDGs.
8. Issuing Green Bond; and
9. Encouraging debtors to implement sustainable finance through Sustainability Linked Loan.

To achieve maximum results, there are challenges that need to be managed:

1. Another challenge is related to supporting activities for sustainable finance implementation where the understanding of ESG integration is still not evenly spread. Going forward, internal capacity building will be carried out through training or e-learning on sustainable finance, either by BNI or related (external) parties.
2. Fostering cross-agency synergies at the central and regional levels are another challenge. In this regard, formulating memorandum of understanding will be pursued to become the legal basis for national implementation.
3. Having the ESG database management that will assist the process of identifying and monitoring green portfolio and bankwide carbon emission.
4. The development of digital monitoring of the performance of waste banks and their customers in each area is expected to encourage a higher level of participation, as performance can be directly monitored and viewed easily, quickly, and transparently.

CORPORATE GOVERNANCE [2-9][2-10] [2-11] [2-12] [2-19][2-20][2-21]

Corporate governance has been applied based on the Good Corporate Governance principles (GCG). Adhering to the implementation of Sustainable Finance and sustainability principles, the Bank navigates the governance organs' responsibilities and actions to manage the principles and seize business opportunities amidst the intensifying sustainability issues.

Structurally, operations and management are controlled by the Board of Directors, whose performance is supervised by the Board of Commissioners. Each Directorate is led by a Director, who oversees the divisions managing ESG aspects. Collectively, the Board of Directors is responsible for internal ESG performance. The complete corporate governance structure can be accessed in the Annual Report 2021 on page 621.

The Board of Directors and the Board of Commissioners are nominated and appointed by Shareholders and the General Meeting of Shareholders (GMS) legalize its existence. The Bank ensures there is no conflict of interest among the Board of Directors, Board of Commissioners, and Shareholders as it may affect all decisions made. Information disclosure on these affairs are detailed in the Annual Report of 2022 on page 796, 764 up to 765. On the other hand, information on remuneration policy and processes for the Board of Directors and Board of Commissioners are explicitly explained in the Annual Report from pages 707 to 714.

Composition of the Board of Directors and Board of Commissioners [2-11]

Information on the highest governance organs and their committees is contained in the Annual Report 2021, which can be accessed in:

- Chapter on Board of Directors, pages 665-686;
- Chapter on Board of Commissioners, pages 642-661;
- Chapter on Board of Commissioners' Supporting Organs, pages 766-881.

Enhancing Knowledge on Economic, Social, and Environmental Topics [2-17]

In facing uncertain challenges, the Board of Directors needs to continue to develop its knowledge and competencies, including on sustainability issues. Information on competency development for BNI Board of Directors can be found on this report on page 201-224.

Board of Directors' Performance Assessment [2-18]

Evaluation and assessment of the Board of Directors performance is conducted through several procedures, including assessment by the GMS, fulfillment of the Company's performance targets and evaluation using the GCG assessment method. More detailed information on this matter can be found in the Annual Report, Corporate Governance Chapter on pages 683-686.

Code of Conduct

BNI has a code of conduct that provides basic principles that accord with the vision, mission, values, and regulations within the Bank. It is served as an ethical guideline that underpins the relationships of all BNI personnel from BNI Hi-Movers, Board of Commissioners, Board of Directors, and employees in conducting businesses.

The Bank disseminates its code of conduct through sharing sessions, internal media, seminars, coaching, and distribution of the BNI Code of Conduct pocketbook. Implementing the Code of Conduct is an essential part of good corporate governance as well as sustainability principles in BNI.

Violations Reporting System

In the endeavor to enhance the effectiveness of GCG implementation, management is committed to running the company in a professional manner where corporate behaviors are in line with the code of conduct and work culture. In this regard, the Company has created a Whistleblowing System (WBS), an independent and confidential channel designed to accommodate violations reporting and protect the whistleblowers.

The Whistleblowing System (WBS) with the name of “WBS to CEO” is one of the early detection mechanisms at BNI against violations that can cause financial losses, as well as do damage to BNI’s image.

WBS management is carried out in collaboration with an external party, i.e Deloitte. As a result, the WBS represents a commitment to create a clean work environment where BNI Hi-Movers actively play a role in reporting all potential violations.

The effectiveness of WBS implementation is complemented with various complaint channels, which includes a special e-mail address: bni-transparan@tipoffs.com.sg, via SMS/WA to 081-1970-1946, or letters to BNI Transparan PO Box 2646/JKP 10026, or even through the Anti-Fraud Unit as the special unit that handles such complaints.

ANTI-CORRUPTION, ANTI-BRIBERY AND ANTI-FRAUD PRACTICES [2-16][205-1]

Anti-Corruption, Anti-Bribery and Anti-Fraud Policy

Building company's reputation, BNI unceasingly attempts to earn the trust from all stakeholders. There are several policies that regulate corruption, bribery, and fraud which apply to all BNI employees, including members of the Board of Directors and the Board of Commissioners.

The Bank's Anti-Corruption and Anti-Bribery is established by considering the conventions stated in the prevailing laws and regulations and POJK No. 39/POJK.03/2019 on the Implementation of Anti-Fraud Strategy. The policy is then translated into several activities, such as follows:

1. Establishment of Organization
 - a. Gratification Control Unit (UPG) of the Compliance Division under the supervision of Human Capital & Compliance Director. UPG receives gratification report through Compliance Information Management System (CIMS) portal.
 - b. Anti-Fraud Unit to strengthen the anti-fraud strategy by referring to the 4 pillars, namely prevention, detection, investigation, reporting and punishing, monitoring and evaluation.
 - c. Anti-Fraud Committee to create culture and instill awareness towards anti-fraud across the organization as well as to evaluate the implementation of the anti-fraud strategy policy.
2. Policy and Procedure
 - a. Employees' signing the Integrity Pact as a form of controlling gratification at the beginning of year.
 - b. Creating 14 Code of Conducts that underpins the Bank's code of conduct.
 - c. The application of anti-bribery at BNI is in line with the anti-bribery management system and has obtained ISO 37001:2016 certification on the Anti-Bribery Management System (SMAP)/Anti Bribery Management System (ABMS).

- d. Work Guidelines for the Risk Management & Anti-Fraud Capital Committee have been approved by the Board of Directors through the Board of Directors' Decree No. KP/484/DIR/DIR/R dated October 26, 2021 concerning Structure of the Risk Management and Anti-Fraud Committee.
- e. Compliance Guidelines on Anti-Fraud Strategy has been stated in the Online Company Guidelines (e-PP) No. IN/283/KPN/003 dated 18 May 2020.
- f. Company Guidelines on Administrative Sanction which states employees committing fraud is subject to a single sanction, i.e. termination of employment.
- g. The signing of Integrity Pact by Prospective Debtors/Debtors for the credit agreement that has been included in the Credit Company Guidelines concerning the Credit Agreement.
- h. The signing of Integrity Pact by Procurement Committee, Pemutus, Chairman of User Unit and/or Implementing Unit, and Procurement Participants has been elaborated in the Company Guidelines of Procurement.

Socialization and Enforcement

[205-2]

The Bank puts the utmost effort into controlling gratification, anti-bribery, and anti-fraud through the following activities:

1. Updating the Integrity Pact by including the Anti-Fraud Commitment signed by the Board of Commissioners, Board of Directors, and all employees.
2. Sustainably providing frontliner officers with certification and brevet training for first level managers (outlet head/supervisor) as well as Branch Operation Management (BOM) training for Branch Office Heads including operating risks material.

3. Anti-fraud awareness and socialization both offline and online through zoom, which reaches more employees.
4. Periodically reminding employees relevant to the obligation to perform their work in accordance with stipulations through the Quality Month and Morning Briefing carried out at all Bank outlets.
5. Imposing an administrative sanction on relevant personnel (non fraud perpetrators) in accordance with the severity of the mistake.
6. Reporting fraud perpetrators to Law Enforcement.

- Risk literacy among customers by giving education to customers via the Bank’s official media.

Strategic initiatives in preventing corruption, bribery, and fraud are evaluated through the Active Monitoring by the Board of Directors and Board of Commissioners conducted through the Audit Committee. The Bank also consistently complies with the stipulations of regulators to periodically report the implementation of anti-fraud strategy in the form of the Anti-Fraud Strategy Report submitted to the Financial Services Authority (OJK).

Monitoring, Evaluation, and Follow-Up

Fraud prevention is monitored by the Anti-Fraud Unit in cooperation with the Risk Management & Anti-Fraud Committee. The Bank is committed to lowering the number of fraud incidents and preventing corruption through corrective action, which includes the strengthening of the following aspects:

- Human Capital by strengthening integrity and understanding of risks.
- Tools that can help leadership elements in conducting supervision.
- The mitigation and detection of external fraud cases in Card Payment Instruments (APMK) products.

Strict Saction

The Bank strictly sanctions employees, vendors, business partners, and other stakeholders proven to engage in corruption, bribery, or fraud. Employees violating the regulations will be sanctioned in accordance with the type of violation in the forms of a letter of warning, reform, demotion, to termination of employment and demand for recompense. Whereas employees committing fraud are imposed a single sanction in the form of termination of employment and sanction for actions that open the opportunity for the occurrence of fraud. [\[205-3\]](#)

Fraud Cases Found [\[205-3\]](#)

Internal Fraud in 1 Year	Number of Cases Committed by								
	Members of the Board of Directores and Board of Commissioners			Permanent Employees			Non-Permanent Employees and Outsourced Personnel		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
Total fraud cases	0	0	0	14	9	6	7	3	2
Resolved cases	0	0	0	10	9	6	2	3	2
In the resolution process within BNI	0	0	0	4	0	0	5	0	0
No attempts at resolution	0	0	0	0	0	0	0	0	0
Followed up through the legal process	0	0	0	2	4	3	1	1	1

Note: Cases of violation/fraud with a loss of over Rp100 million

STAKEHOLDER ENGAGEMENT [2-29][2-30]

BNI stakeholders are determined based on mapping by taking the principles of dependency, responsibility, tension, influence, diverse, perspectives, and proximity into account, followed by the identification of significant issues and the needs of stakeholders.

Engagement Method	Significant Topics/Issues and Needs	BNI's Response
Customer: Economic relations		
<ul style="list-style-type: none"> • Call center services, branch offices, telephone, website, social media (Facebook, Instagram, and Twitter) • Customer satisfaction survey • Information from website & frontliners • Gathering of BNI Agen46 agents 	<ul style="list-style-type: none"> • Security of banking transactions • SME loans • Banking facilities and ease of access • Clear and transparent information on banking products and services 	<ul style="list-style-type: none"> • Innovation of products and services according to needs and technological developments • Financial education related to banking products • Storage and protection of customer data as per regulations • Strengthening the data security system and strive for ISO 27001 certification • Reaching and nurturing SMEs, to helping provide financing
<p>Frequency</p> <ul style="list-style-type: none"> • At all times • Once in two years • At all times • At least once a year 		
Investors/Shareholders: Economic, Ownership & Legal relations		
<ul style="list-style-type: none"> • Quarterly Performance Report • Analyst Meeting • Reporting to the Indonesia Stock Exchange (IDX) • Holding Annual GMS (once a year) and Extraordinary GMS when needed 	<ul style="list-style-type: none"> • Financial and non-financial performance • Environmental, Social and Governance (ESG) Performance • Rise in Share Price • Investment in eco-friendly companie 	<ul style="list-style-type: none"> • Provision of periodic information on BNI's performance • Direct communications or through analysts, to ensure the delivery of material information • Executing strategies to achieve business targets • Disclosing more comprehensive information on ESG performance in the Sustainability Report • Enhancing competencies, skills and expertise of employees. • Following up on recommendations for ESG aspects from Rating Agencies • Conducting audits on financial statements • Preparation of Annual Report and Sustainability Report
Employees: Legal relations & stakeholders involved in the achievement of company goals		
<ul style="list-style-type: none"> • Internal Media (eSinergi digital magazine, HCMS, Sinergi magazine, BNI Forum) • Annual Employee Satisfaction Survey 	<ul style="list-style-type: none"> • Employee rights • Training and development • Equality of opportunity • Career development • Valuable and enjoyable work experience • Work life balance 	<ul style="list-style-type: none"> • In-class training and e-learning • Performance appraisal and promotions • Availability of communication facilities such as HCT info, internal communication (eSinergi, SMS Blast) • Existence of whistleblowing system • Existence of a labor union • Availability of Facilities and Infrastructure to carry out activities • Welfare provision for work and post-employment periods

Engagement Method	Significant Topics/Issues and Needs	BNI's Response
Labor Union: Legal relations		
<ul style="list-style-type: none"> Meetings and Discussions Discussion of Collective Labor Agreement (CLA) every two years 	<ul style="list-style-type: none"> Employee rights, remuneration, and benefits 	<ul style="list-style-type: none"> Accommodating and identifying proposals and inputs from the Labor Union Opening communications in case of industrial relations disputes Holding regular meetings in bipartite forum between BNI and labor union Ensuring the safety and rights of workers through the CLA
Government/OJK: Legal relations/Interest as a Financial Services Institution		
<ul style="list-style-type: none"> Submission of the Bank's Business Plan and its execution to Bank Indonesia and the Financial Services Authority (OJK) Submission of the Sustainable Finance Action Plan to OJK Other reports in accordance with applicable stipulations to regulators <p>Frequency</p> <ul style="list-style-type: none"> At least once a year 	<ul style="list-style-type: none"> Compliance with laws and regulations Environmental & social risk analysis in lending Anti Bribery and Corruption (ABC), Anti-Money Laundering (AML) and Anti-Terrorism Green banking Inclusive banking Sustainable finance 	<ul style="list-style-type: none"> Compliance with applicable regulations Paying taxes, retributions and Non-Tax State Revenue (PNBP) in accordance with prevailing regulations Developing a Sustainable Finance Action Plan (RAKB) Establishing an ESG Sub Committee to monitor RAKB implementation Adjusting internal policies and regulations with government policies Implementing GCG principles in all work units Submitting reports on performance and other activities: Sustainable Finance Action Plan Report, Annual Report, Sustainability Report, and other reports
Suppliers: Economic and Legal relations		
<ul style="list-style-type: none"> Seminars and socialization of policies as needed 	<ul style="list-style-type: none"> Mutually beneficial relationship with suppliers, fair and transparent procurement process for goods and services 	<ul style="list-style-type: none"> Building collaborations with partners in the provision of goods and services for the Bank Fair and compliant partner selection process Payment system based on work contract Socialization of procurement procedure policies
Community: Social relations, social license & social responsibility and proximity to the company		
<ul style="list-style-type: none"> Strategic cooperation in BNI's social care through the Social and Environmental Responsibility program 	<ul style="list-style-type: none"> Environmental impact and performance Planning and execution of the Social and Environmental Responsibility program Opportunity to collaborate in the Social and Environmental Responsibility programs Information on company activities Understanding of Sustainable Finance 	<ul style="list-style-type: none"> Implementing Financial Inclusion and Literacy initiatives Organizing CSR programs through the BNI Berbagi and BNI GoGreen programs Organizing internship or contract programs for fresh graduates through the BNI BINA Program Provision of job opportunities as needed
Media: Social relations, social license		
<ul style="list-style-type: none"> Press releases when needed and media gatherings every three months 	<ul style="list-style-type: none"> Financial and non-financial performance Environmental impacts and performance Implemented and planned CSR programs Opportunity to collaborate on the Social and Environmental Responsibility programs 	<ul style="list-style-type: none"> Updating information related to banking solutions or company performance submitted on the website www.bni.co.id Development of communication facilities such as press conferences Provide press release material on the website at www.bni.co.id

STATEMENT OF RESPONSIBILITY FOR THE SUSTAINABILITY REPORT [2-14]

We, the undersigned, state that all information contained in the 2022 Sustainability Report, PT Bank Negara Indonesia (Persero) Tbk is presented in its entirety, and we take full responsibility for the correctness of the content in this Sustainability Report.

This statement is hereby made in all truthfulness.

Jakarta, 21 February 2023

Board of Commissioners



Agus Dermawan Wintarto Martowardojo
President Commissioner/Independent Commissioner



Pradjoto
Vice President Commissioner/
Independent Commissioner



Sigit Widyawan
Independent Commissioner



Asmawi Syam
Independent Commissioner



Septian Hario Seto
Independent Commissioner



Iman Sugema
Independent Commissioner



Erwin Rijanto Slamet
Independent Commissioner



Askolani
Commissioner



Susyanto
Commissioner



Fadlansyah Lubis
Commissioner

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Jakarta, 21 February 2023

Board of Directors



Royke Tumilaar
President Director



Adi Sulistyowati
Vice President Director



Novita Widya Anggraini
Finance Director



Corina Leyla Karnalies
Consumer Banking Director



Sis Apik Wijayanto
Institutional Banking Director



David Pirzada
Risk Management Director



Silvano Winston Rumantir
Corporate & International Banking
Director



Ronny Venir
Network & Services Director



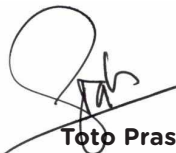
Muhammad Iqbal
Enterprise & Commercial
Banking Director



Putrama Wahyu Setyawan
Treasury Director



Mucharom
Human Capital & Compliance
Director



Toto Prasetyo
Direktur Technology & Operations

VERIFICATION BY INDEPENDENT PARTIES



Independent Assurance Statement The 2022 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk

Number : 02/000-174/II/2023/SR-Asia/Indonesia

Assurance Type : Type 1

Assurance Level : Moderate

Reporting Standards : GRI Universal Standard 2021 Consolidated, GRI G4 FS (FSSS), SASB Commercial Bank, and SUSBA

Reporting Regulation : Sustainable Finance Regulation POJK No.51/2017 (Indonesia)

Dear stakeholders,

PT Bank Negara Indonesia (Persero) Tbk (“the Bank” or the “Reporting Organization”) has engaged **Social Responsibility Asia** (“SR Asia”) to assess its **2022 Sustainability Report** (“the Report”) for the reporting period of **January 1st to December 31st, 2022**. The Reporting Organization is a state-owned company and one of the largest commercial banks in Indonesia and is listed on the Indonesia Stock Exchange. This is the Independent Assurance Statement (“the Statement”) that reflects the results of assurance work conducted following the specific methods and approaches as agreed by the “Management.”

Intended User and Purpose

The Statement discloses the results of the assessment covering our opinion, findings, and recommendations on the Report content to the stakeholders. The scope of analysis includes also the Bank’s sustainability commitment, practices, and performance as specified in the Report content. The assurance work was performed following a specific mechanism, procedures, and scope of work based on the best practices and global standards and principles. Due to some limitations applied, except for the areas covered in the scope of assurance work, the Statement shall NOT be used as the basis for interpreting the sustainability or the whole performance of the Bank.

Responsibilities

SR Asia is mainly responsible for evaluating the Report, NOT an audit, and generating recommendations as well as the Statement. We are also responsible for coming up with conclusions and recommendations based on the agreed standards, methods, and approaches hence SR Asia is only evaluate for the latest received editorial and data on the final draft as of February 13th, 2023. The Management is solely responsible for the presentation of claims, data, information, and figures in the Report Content. Unless the law requires it, we assume NOT to accept any responsibility to any other person or organization regarding the assurance work and the results. Therefore, any dependence that a third party has placed on the Statement or the Report is entirely at its own risk.

Independence, Impartiality, and Competency

We apply the assurance mechanisms and procedures based on a professional code of conduct that requires our experts to carry out the assurance work in an objective and truthful manner. SR Asia confirms that NO members of the Assurance Team have any relationships with the Bank that can prevent them to provide an independent and impartial statement. SR Asia also ensures that the

SR Asia Independent Assurance Statement, version 2022, page 1 of 4

appointed Assurance Team members have skills and expertise in sustainability reports from various industry sectors. They have knowledge of ISO 26000, the principles and standards of AA1000 AccountAbility, various reporting regulations, standards, and principles, such as POJK 51 regulation as well as GRI, TCFD, SASB, and SUSBA standards.

Type and Level of Assurance Service

1. **Type 1 assurance** on the Report content.
2. **A moderate level of assurance** procedure on the Report content and evidence, where the risks of information and conclusions of the Report being error is reduced, but not to very low, but not zero.

Scope and Limitation of Assurance Service

1. Data and information in the Report for the period of **January 1st to December 31st, 2022**.
2. Topics in the Report content that have been identified as “Material” by the Bank: **Digital Banking, Green Portfolio, Customer Data Privacy and Security, Access and Affordability, Occupational Health and Safety, Climate Change, and Diversity and Equality**.
3. Financial data, information, and figures in the Report content are NOT included in the scope of assurance. SR Asia assumes the Bank, independent parties, or other parties associated with the Bank, have verified and/or audited any data and information related to financial statements.
4. Evaluation of publicly disclosed information, system, and process of the Bank to ensure adherence of the Report content to the reporting principles.
5. Adherence to the following reporting principles, standards, and regulations:
 - a) The Regulation of Indonesia Financial Service Authority No.51/POJK.03/2017 regarding the Application of Sustainable Finance to Financial Service Institution, Issuer, and Publicly Listed Company (“POJK 51”) with reference to Financial Services Authority Circular Letter (SEOJK) 2022 No. 16/SEOJK.04/2021.
 - b) The Consolidated set of GRI Sustainability Reporting Standards 2021 (GRI Universal Standards) issued by the Global Reporting Initiative and GRI G4 Financial Services Sector Disclosure (GRI-G4 FS) issued by the Global Reporting Initiative.
 - c) Sustainability Accounting Standard for Commercial Bank (FN-CB) issued by the Sustainability Accounting Standard Board (SASB).
 - d) Sustainable Banking Assessment (SUSBA) issued by World Wildlife Funds (WWF).

Exclusion

1. Financial performance data and information as presented in the Bank’s financial statements and documents, other than those mentioned in the Report.
2. Topics, data, and information outside the reporting period, or in the public domain not covered in the reporting period.
3. Topics, data, and information other than those mentioned under the defining materiality section and discussion on the defining Report content.
4. Analysis or assessment against regulations, principles, standards, guidelines, and indicators other than those indicated in the Statement.
5. The expression of opinion, belief, expectation, advertisement, and also forward-looking statements, including future planning of the Bank as specified in the Report content.
6. Stakeholder engagement that might be taken by the Bank in developing the Report.

Methodology

1. Assign the experts and form an Assurance Team in Indonesia with conduct the pre-engagement phase to ensure the independence and impartiality of the Assurance Team.
2. Perform kick-off meeting and initial analysis of the Report draft against the standards, principles, and indicators of AA1000AS v3, AA1000APS (2018), and standards/ regulation used in the Report, Implement the SR Asia Protocol on Assurance Analysis.
3. Discuss online the results of the analysis with the Management and data contributors.
4. Verify evidence and trace data and information as covered in the Report.
5. The Bank incorporated our recommendations in the draft Report and release the final Report content.
6. Prepare the Statement and send it to SR Asia International Director for review to get approval before submitting it to the Bank.
7. Prepare a Management Letter detailing all aspects seen, recorded, and observed during the assurance work to the Management of the Bank for further improvement of sustainability processes.

Adherence to AA1000AP (2018) and GRI Universal Standards

Inclusivity – The inclusion of significant stakeholders has demonstrated the Report's respect for the inclusivity principle. The Bank has identified the stakeholders, as well as their engagement potential, viewpoints, and expectations. The Bank has used a variety of operations and units to illustrate stakeholder engagement strategies. In the next report, we recommend the Bank to create official engagement plans that have a more balanced portion for each stakeholder engagement program and intensify the impact of each CID program. We also suggest the Bank to keep improve their balanced portion of stakeholder engagement in each sector and activities.

Materiality – The materiality issues of the Report are sufficiently described the sustainability of the Bank ecosystem. The report acknowledges the existence of all sustainability context (economic, environmental, and social) and treats them all equally. We hope that the Bank will continue to pay attention to the discussion of each materiality topic to make sure it is corresponding and fair. However, in the next report the Bank should keep to enhance the human rights impact in each material topics as emphasized in GRI Universal Standard 2021.

Responsiveness – The Bank already has a Whistleblowing System (WBS) for receiving customer recommendations and grievances, and anti-bribery management system. In order to standardized the quality of BNI Contact Center services and the anti-bribery management system, the Bank has additionally achieved ISO 37001:2016. Furthermore, the Bank has a whistleblowing system for reporting code violations. Overall, the Report demonstrated the Bank's adherence to responsiveness principles and was produced utilizing suitable reporting principles, structures, and procedures that facilitate the comparability of information.

Impact – On the effects of the Bank's commercial operations on sustainability context, the Report provides both quantitative and qualitative data. With the use of the Social Return on Investment methodology, the Reporting Organization has already determined its social impact (SROI). The Bank's Community Involvement & Development (CID) initiative is adequate have significant impact. In general, the skills and resources needed to lessen the effects mentioned are sufficient.

Statement of Use: “with Reference to the GRI Standards” – Our experts evaluated the Report content against the GRI Universal Standards principles, disclosures, and requirements for reporting. The Bank has already fulfilled its requirements with publish a GRI Content Index, provide a statement of use, and notify GRI.

GRI Standards Principles – As the assurance work was taken, the report content indicates its adherence to sustainability reporting principles (accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, and verifiability). The Management provided adequate support during the assurance work by submitting evidence and documents as requested.

Recommendation

1. To conduct stakeholder engagement practices strategically with appropriate metrics in accordance with standards and best practices.
2. To build an integrated management system across functions that covers sustainability performance data and information from various units or functions, following the sustainability reporting standards, approaches, and methodologies.
3. To increase the positive impact of each CID program and develop formal engagement plans with more evenly distributed portions for each stakeholder engagement program.
4. To enhance and disclose the human rights impact of each material topics for the next reporting year.
5. To keep the effort in determining material topics to ensure that it is corresponding and fair align with the risk and opportunity.

The assurance provider,

Jakarta, February 20th 2023



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SR Asia Independent Assurance Statement, version 2022, page 4 of 4

POJK, SUSBA, SASB, MSCI, AND GRI STANDARDS REFERENCES

POJK 51/OJK.03/2017

No Index	Index Name	Page
Sustainability Strategy		
A.1	Elaboration on Sustainability Strategy	11
Summary of Sustainability Aspect Performance		
B.1	Economic Aspects	8
B.2	Environmental Aspects	10
B.3	Social Aspects	9
Company Profile		
C.1	Vision, Mission, and Values of Sustainability	16
C.2	Company's Address	17
C.3	Enterprise Scale	18
C.4	Products, Services, and Business Activities	17-18
C.5	Membership in Association	22-23
C.6	Significant Changes in Issuers and Public Companies	17
The Board of Directors' Explanation		
D.1	The Board of Directors' Explanation	12-15
Sustainability Governance		
E.1	Responsible for Implementing Sustainable Finance	104-105
E.2	Competency Development Related to Sustainable Finance	94-95
E.3	Risk Assessment of the Implementation of Sustainable Finance	106-108
E.4	Relations with Stakeholders	114-115
E.5	Problems with the Implementation of Sustainable Finance	109
Sustainability Performance		
F.1	Sustainable Culture Development Activities	102
Economic Performance		
F.2	Comparison of targets to performance of production, portfolio, financing targets, or investments, revenue as well as profit and loss	30, Annual Report page 25
F.3	Comparison of target to performance of portfolio, financing target, or investments in financial instruments or projects in line with the implementation of Sustainable Finance	31-33, Annual Report page 25

No Index	Index Name	Page
Environmental Performance		
General Aspect		
F.4	Environmental Costs That Incur	58
Material Aspect		
F.5	Use of Environmentally Friendly Materials	58
Energy Aspect		
F.6	Amount and Intensity of Energy Used	61-62
F.7	Efforts and Achievements of Energy Efficiency and Use of Renewable Energy	62-64
Water Aspect		
F.8	Water usage	64
Aspects of Biodiversity		
F.9	Impacts from Operational Areas that are Near or Located in Conservation Areas or Have Biodiversity	65
F.10	Biodiversity Conservation Efforts	65
Emission Aspect		
F.11	Total and Intensity of Emissions Generated by Type	63-64
F.12	Efforts and Achievements of Emission Reduction Made	62-63
Waste and Effluent Aspects		
F.13	Amount of Waste and Effluent Generated by Type	64
F.14	Waste and Effluent Management Mechanism	64
F.15	Occurring Spills (if any)	58
Complaint Aspects Related to the Environment		
F.16	Number and Material of Environmental Complaints Received and Resolved	58
Social Performance		
F.17	Commitment to Provide Services on Equal Products and/or Services to Consumers	50-52
Employment Aspect		
F.18	Equal Employment Opportunity	89
F.19	Child Labor and Forced Labor	89
F.20	Regional Minimum Wage	97
F.21	Decent and Safe Work Environment	100
F.22	Employee Capability Training and Development	94-97
Community Aspect		
F.23	Impact of Operations on Surrounding Communities	80
F.24	Community Complaints	80
F.25	Corporate Social Responsibility (CSR)	65, 77-80, 82

No Index	Index Name	Page
Responsibility for Sustainable Product/Service Development		
F.26	Innovation and Development of Sustainable Financial Products/Services	47-49
F.27	Products/Services That Have Been Evaluated for Safety for Customers	41
F.28	Product/Service Impact	42
F.29	Number of Product Recalls	41
F.30	Customer Satisfaction Survey on Sustainable Financial Products and/or Services	56
Others		
G.1	Written Verification from Independent Party (if any)	118
G.2	Feedback Sheet	137
G.3	Responses to Feedback on the Previous Year's Sustainability Report	27

GRI Standard

Index GRI	Disclosure	Page
Statement of Use	PT Bank Negara Indonesia (Persero) Tbk has reported the information quoted in the GRI content index from 1 January to 31 December 2022 with the references of GRI Standards 2021.	
General Disclosures		
GRI 2: General Disclosures 2021	2-1 Organization details	17
	2-2 Entities included in the organization's sustainability reporting	24
	2-3 Reporting period, frequency and contact point	24
	2-4 Restatements of information	24
	2-5 External assurance	24
	2-6 Activities, value chain and other business relationships	81
	2-7 Employees	84-86
	2-8 Workers who are not employees	86
	2-9 Governance structure and composition	105, 110
	2-10 Nomination and selection of the highest governance body	110
	2-11 Chair of the highest governance body	12-15, 110
	2-12 Role of the highest governance body in overseeing the management of impacts	12-15, 110
	2-13 Delegation of responsibility for managing impacts	105-106
	2-14 Role of the highest governance body in sustainability reporting	12-15, 105, 116-117
	2-15 Conflicts of interest	105
	2-16 Communication of critical concerns	105-108, 112-113
	2-17 Collective knowledge of the highest governance body	110
	2-18 Evaluation of the performance of the highest governance body	110

Index GRI	Disclosure	Page
	2-19 Remuneration policy	110
	2-20 Process to determine remuneration	110
	2-21 Annual total compensation ratio	110
	2-22 Statement on sustainable development strategy	11-15
	2-23 Policy commitments	11, 74
	2-24 Embedding policy commitments	11
	2-25 Processes to remediate negative impacts	106-108
	2-26 Mechanisms for seeking advice and raising concerns	106-108
	2-27 Compliance with laws and regulations	102
	2-28 Membership associations	22-23
	2-29 Approach to stakeholder engagement	114-115
	2-30 Collective bargaining agreements	89, 91, 114-115
Material Topic		
GRI 3: Material Topcs	3-1 Process to determine material topics	25
	3-2 List of material topics	26-27
	3-3 Management of material topics	29, 31, 44, 50, 61
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	30
	201-2 Financial implications and other risks and opportunities due to climate change	37
	201-3 Defined benefit plan obligations and other retirement plans	98-99
	201-4 Financial assistance received from government	30
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	77-79
	203-2 Significant indirect economic impacts	67, 70-72
GRI 302: Energy 2016	302-1 Energy consumption within the organization	61
	302-2 Energy consumption outside of the organization	61
	302-3 Energy intensity	62
	302-4 Reduction of energy consumption	62
GRI 305: Emission 2016	305-1 Direct (Scope 1) GHG emissions	63
	305-2 Direct (Scope 1) GHG emissions	63
	305-3 Other indirect (Scope 3) GHG emissions	63
	305-4 GHG emissions intensity	63
	305-5 Reduction of GHG emissions	62
	305-6 Emissions of ozone-depleting substances (ODS)	64
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	64

Index GRI	Disclosure	Page
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	86-88
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	94-97
	401-3 Parental leave	91
GRI 403: Occupational Health & Safety 2018	403-1 Occupational health and safety management system	100
	403-2 Hazard identification, risk assessment and incident investigation	100
	403-3 Occupational health services	100
	403-4 Worker participation, consultation, and communication on occupational health and safety	100
	403-5 Worker training on occupational health and safety	100
	403-6 Promotion on worker health	100
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	100
	403-8 Workers covered by an occupational health and safety management system	100
	403-9 Work-related injuries	19
GRI 414: Training and Education 2016	404-1 Average hours of training per year per employee	95-96
	404-2 Programs for upgrading employee skills and transition assistance programs	92-97
	404-3 Percentage of employees receiving regular performance and career development reviews	98-99
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	45

G4 Financial Services Sector Disclosure 2013

Code	Disclosure	Page
FS1	Policies with specific environmental and social components applied to business lines	39-40
FS2	Procedures for assessing and screening environmental and social risks in business lines	39-40
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions	39-40
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines	94-97
FS5	Interactions with clients/ investees/business partners regarding environmental and social risks and opportunities	73-74
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/ large) and by sector	31-32, 36

Code	Disclosure	Page
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	70
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	33
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	40
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues	33-34
FS11	Percentage of assets subject to positive and negative environmental or social screening	33
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting	-
FS13	Access points in low-populated or economically disadvantaged areas	50-51, 75
FS14	Access to financial services for disadvantaged people	49, 50-51, 75-76
FS15	Policies for the fair design and sale of financial products and services	41, 50
FS16	Initiatives to enhance financial literacy	75-77

Sustainability Accounting Standard Board (SASB)

Code	Disclosure	Page
Activity Metrics		
FN-CB-000.A	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	18
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	31-32
Data Security		
FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	44-46
FN-CB-230a.2	Description of approach to identifying and addressing data security risks	44-46
Financial Inclusion & Capacity Building		
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	67
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	70

Code	Disclosure	Page
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	75-77
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	76-77
Incorporation of Environmental, Social, and Governance Factors in Credit Analysis		
FN-CB-410a.1	Commercial and industrial credit exposure, by industry	31-32
FN-CB-410a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	38-40
Business Ethics		
FN-CB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	45
FN-CB-510a.2	Description of whistleblower policies and procedures	111
Sistem Manajemen Risiko		
FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	-
FN-CB-550a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis into capital adequacy planning, long-term corporate strategy, and other business activities	31

Sustainable Banking Assessment (SUSBA) Index

Indicator	Disclosure	Page
Purpose	Sustainability strategy and stakeholder engagement	11, 114-115
	Participation in sustainable finance initiatives	109
Policy	Public statements on specific ESG issues	104-108
	Public statements on specific sectors	33
Process	Assessing ESG risks in client and transaction approvals	38-40
	Client monitoring and engagement	38-40
People	Responsibility for ESG issues	106
	Staff E&S training and performance evaluation	94-97, 110
Products	ESG integration in products and services	47-49, 58
Portfolio	ESG risk assessment and mitigation at portfolio level	31-35
	Disclosure of ESG risk exposure and targets	31-33

Index ESG (Environment, Social & Governance) Based on Morgan Stanley Capital International (MSCI) Standards

ENVIRONMENTAL

Company Practice	Page
Environmental Impact Financing	
Scope of management system to assess ESG risk in financing activities	
<ul style="list-style-type: none"> BNI has implemented a management system to assess ESG risk for all loan and investment banking operations. BNI has extended the integration of ESG risk in the underwriting process to other industrial sectors as one of the strategies for managing loan risk in 2022. 	<ul style="list-style-type: none"> Sustainability Report pages 107-108 Sustainability Report pages 38
Environmental loan policy	
<ul style="list-style-type: none"> BNI has developed binding environmental loan/investment policies related to agriculture, including palm oil. BNI has participated in the development of sustainable agricultural ecosystems through the Millennial Smart Farming program. 	<ul style="list-style-type: none"> Annual Report pages 1.121-1.122 Sustainability Report pages 69
<p>BNI has developed an environmentally sound loan policy in the following sectors:</p> <ul style="list-style-type: none"> Palm oil plantations Mining (Mine Operator, Smelter Refiner, Fabricator, Trader) Construction (Toll Road Contractors and Contractors) Electricity/Energy Real Estate Telecommunications Chemicals Non-Metal Mineral Subsector (Cement Industry) Fast Moving Consumer Goods (FMCG) Hospitals Pharmaceuticals 	<ul style="list-style-type: none"> Annual Report pages 1.121-1.122 Sustainability Report pages 39-40
<p>BNI participates in the development of social forestry programs aimed at economic equity, improving the welfare of communities living around the forests and preventing illegal logging through sustainable forest empowerment.</p>	<p>Sustainability Report pages 68</p>
<p>BNI already has a loan policy to regulate the loan terms for industries related to agriculture; biodiversity; energy use; forestry; mining; oil and gas; transportation; and use of materials. The general loan policy is determined by the Credit Policy Committee and environmental and social risk analysis is carried out by the Risk Management & Anti-Fraud Committee, with evaluations carried out by the Audit Committee.</p>	<ul style="list-style-type: none"> Sustainability Report pages 34 Sustainability Report pages 38
ESG Risk Management Integration	
<p>To strengthen supervision in establishing the Environmental, Social & Governance (ESG) policies and management, BNI established an ESG sub-committee of the Risk Management & Anti-Fraud Committee, chaired by the Vice President Director with the Risk Management Director as vice chairperson. The Bank's Head of Enterprise Risk Management Division is the secretary of the committee.</p>	<p>Annual Report pages 1.125</p>
<p>All BNI staff are trained on ESG risks and procedures, evidenced by the valid ESG training program provided.</p>	<p>Sustainability Report pages 95</p>

Company Practice	Page
ESG Risk Management Supervision	
<ul style="list-style-type: none"> Active supervision of the Board of Commissioners and Board of Directors in the application of risk management, including establishing a risk appetite and risk tolerance framework, risk control tools, as well as an integrated risk management framework and implementation. To strengthen supervision of the Environmental, Social & Governance (ESG) policies and management, BNI established an ESG sub-committee of the Risk Management & Anti-Fraud Committee, chaired by the Vice President Director with the Risk Management Director as vice chairperson. 	<ul style="list-style-type: none"> Annual Report pages 479 Annual Report pages 1.125
<p>Through the ESG Sub Committee under the Risk Management and Anti-Fraud Committee, the Board of Directors is actively involved in managing ESG risks including:</p> <ul style="list-style-type: none"> Developing Environmental, Social, & Governance (ESG) management policies and strategies and their changes; Identifying potential ESG risks that impact both BNI and BNI stakeholders; Monitoring the application of Sustainability Finance strategies; Monitoring, evaluating and providing recommendations on the BNI ESG Assessment results; Evaluating the application of the ESG strategy in all BNI business lines. 	Annual Report pages 1.125
ESG Risk Management System	
<p>BNI has developed a strong management system to assess ESG risk in financing activities, which is outlined in the form of:</p> <ul style="list-style-type: none"> Industry Risk Rating Prospective Sector Industry Risk Appetite Risk Acceptance Criteria 	Annual Report pages 1.123
Environmental Financing Opportunities	
<p>BNI is one of the recognized sustainability leaders and has received a number of ESG awards, and is entered in the IDX ESG Senior Leader and SRI Kehati Index</p>	<ul style="list-style-type: none"> Sustainability Report pages 5 Annual Report pages 1.114
<ul style="list-style-type: none"> Gradually, BNI has taken an approach to identify and analyze climate-related risks, as well as take steps to reduce emissions. BNI has a significant investment in impact and target investments. 	Sustainability Report pages 62
<p>BNI's total financing portfolio in the Sustainable Business Activities (KKUB) category amounts to Rp182.93 trillion, mainly in the form of financing to the MSME segment, sustainable natural resource management, energy efficiency and renewable energy.</p>	Sustainability Report pages 32

SOCIAL

Company Practice	Page
Consumer Financial Protection	
Practice	
<p>BNI provides annual training for all employees dealing with customers, including frontliners who serve customers directly. In 2022, 99.17% of the employees received training.</p>	Annual Report pages 159

Company Practice	Page
<p>BNI strives to ensure fair operating practice policies are applied, and are in accordance with the Bank's policies and prevailing regulations. In its operational practices, BNI guarantees the following:</p> <ul style="list-style-type: none"> • Prevention of conflicts of interest • Prohibition of giving, accepting gifts or souvenirs • Provisions for prohibition of abuse of office and accepting gratification • To realize good corporate governance, BNI has a Whistleblowing System (WBS). • Customer protection policies and provision of Information/Data/ Documents to external parties • Policy on fulfillment of creditor rights • Anti-corruption and anti-fraud policies 	<ul style="list-style-type: none"> • Annual Report pages 996-999 (APU PPT) • Annual Report page 1,000 (Protection of Creditors' Rights) • Annual Report page 1,001 (Anti-Corruption Policy) • Annual Report pages 1,005-1,007 (Anti Gratification & Anti-Bribery Policy) • Annual Report pages 1,008-1,010 (WBS) • Annual Report page 1,039 (Conflict of Interest) • Annual Report page 895 (Policy for customer protection and provision of Information/Data)
<p>BNI has an independent debt collection policy with clear procedures, and regular training for related employees. Collection training was held for 742 employees in 2022.</p>	<p>Annual Report pages 159</p>
<p>The Board of Directors is highly involved in product supervision through the Business Committee sub Product Committee, whose duties and responsibilities including:</p> <ul style="list-style-type: none"> • Determining the size and business development strategy through BNI products/activities; • Conducting comprehensive testing and deciding on the "feasibility" of new products/activities, especially related to cross-sectoral/segmental alliances and strategic alliances with subsidiaries/other companies outside BNI by inviting the relevant Sector Directors; • Monitoring BNI products/activities and making decisions on the products/activities sustainability based on recommendations from the Supporting Staff Group/product owner; and • Acting as an arbitration institution in cross-sectoral issues related to the new products/activities. 	<p>Annual Report page 877</p>
<p>BNI carries out marketing communications transparently based on OJK regulations and in accordance with company internal policies.</p>	<p>Sustainability Report pages 52</p>
<p>BNI has an independent customer ombudsman & internal complaint review body with clear procedures and/or targets.</p>	<p>Sustainability Report pages 1.008</p>
<p>BNI has an independent settlement system to provide protection for reporting parties and special training on internal and external protection programs</p>	<p>Sustainability Report pages 1.008</p>
<p>In the Debt Collection Policy, BNI has well-defined loan modification options including income-based considerations and customer access to escalation options.</p>	<p>Annual Report pages 429-430</p>
<p>BNI runs BNI Corpu TV on its youtube channel to educate the public regarding financial literacy and the latest trends in society by presenting speakers from internal BNI and from professional institutions. Education is also carried out through social media and in collaboration with various government/ private institutions.</p>	<p>Annual Report pages 440</p>
<p>The BNI Board of Commissioners'-level committees supervise the complaints.</p>	<p>Annual Report pages 463</p>

Company Practice	Page
Human Resource Development	
Practice	
<ul style="list-style-type: none"> • BNI provides training and competency development on all aspects of the Company's operations in a planned and sustainable manner and provides equal opportunities, including gender, to all levels of the organization. In 2022, BNI provided training and development programs organized by the Bank internally, and external parties, to 27.676 employees or 99,17%, with an average for each employee receiving training of 38,90 times. • BNI has a program that covers all employees (including part time and suppliers/vendors) • Since 2018, BNI has had a mandatory learning program for all employees through Sustainable Finance e-learning to increase awareness and capability regarding the practice of integrating Environmental, Social and Governance (ESG) criteria into financial services to realize sustainable development outcomes, including mitigation and adaptation to the adverse effects of climate change. 	<ul style="list-style-type: none"> • Annual Report pages 159 • Annual Report pages 1.007 • Sustainability Report pages 93-95
Strategy	
<p>BNI has a Whistleblowing System (WBS) with the name "WBS to CEO", as an early detection mechanism for any violations at BNI that can cause financial losses, including matters that can damage BNI's image. WBS management is carried out in collaboration with an external party, namely Deloitte</p>	<ul style="list-style-type: none"> • Annual Report pages 1.008 • Annual Report pages 111
<p>BNI carries out employee engagement surveys every year through a digital .platform. In 2022, the employee engagement level was 96%</p>	<p>Annual Report pages 443</p>
Talent path development strategy	
<p>The workforce planning strategy is directed at ensuring employee availability in functions is in line with BNI's strategy. Recruitment is carried out through various programs including the Officer Development Program, Assistant Development Program and Experience Hire. In 2022, BNI strengthened its talent acquisition mechanism by improving the General ODP policy and opening new ODP channels, including ODP Information Technology, ODP .Data Scientist, ODP Digital and ODP Global Analyst Program</p>	<p>Annual Report pages 434-443</p>
<p>In addition to the Bina internship program, BNI also has an internship program for students. In 2022 internship were given to 779 people, through the BNI Digital Talent Internship program, Ministry of SOEs Certified Student Internship Program from FHCI, Digital Apprentice Program for 2020 Kominfo Graduate Digital Talent Scholarship (DTS), Ministry of Education, Culture, Research and Technology (Kemendikbudristek) Independent Campus Internship Program, BNI Digital Bootcamp Malang Internship Program, and .Individual Internship Programs</p>	
<p>BNI's Bina Apprenticeship Program is organized to provide training and work guidance to the inexperienced workforce by providing the knowledge, skills, .and abilities needed to compete in the world of work</p>	<p>Sustainability Report pages 115</p>
<p>To provide learning solutions for its employees, BNI Corporate University provides learning facilities and infrastructure in-house and in partnership with .other educational institutions</p>	<p>Annual Report pages 439-440</p>

Company Practice	Page
Programs & Initiatives	
BNI has a share ownership program for the Company's employees and management after receiving approval from the shareholders at the fiscal year 2020 annual GMS held on March 29, 2021. The Company management share ownership program commenced on July 29, 2022	Annual Report pages 725
The remuneration strategy covers all employees, and is determined based on the principles of supply and demand, BNI's remuneration position compared to the market, and considers employees' talent classification. The employee remuneration consists of fixed remuneration that is calculated based on a position and person value weighting. Variable remuneration is based on performance based on the Bank's performance, unit performance, and individual employee performance	Annual Report pages 724
BNI provides training and competency development at all Company levels, which are carried out in a planned and sustainable manner by upholding the provision of equal opportunities, adapted to the training and development needs at each level	Annual Report pages 159-162
The Education and Training Costs in 2022 amounted to Rp267,1 billion (2,3% of total personnel costs) with the total number of training participation increasing by 1,7% to 27.676 participants	
Access to Finance	
Products and Strategies	
BNI is a direct provider or is directly involved in providing services in Micro services/Micro Insurance	Sustainability Report pages 67-74
Distribution and Reach	
To support customer convenience when conducting banking transactions, BNI offers a variety of e-Banking facilities that are constantly being refined through developments and innovations. The number of E-banking users in 2022 reached 13,6 million.	Annual Report pages 325-326
To expand its reach, BNI has more than 157 thousand BNI Agen46 who are BNI partners in providing banking services to the public in the context of financial inclusion. Agen46 can facilitate many kinds of banking services to assist in the distribution of Government programs, such as distribution of social assistance and subsidies.	<ul style="list-style-type: none"> • Annual Report pages 327-328 • Sustainability Report pages 75
Advanced innovations in branchless alternative distribution channels targeting underserved demographics through Digital and Agen46 services.	Annual Report pages 327-328
Privacy & Data Security	
Practice - Operations	
<ul style="list-style-type: none"> • BNI guarantees that customers can update data, change, access and update data changes through BNICall and Customer Service. • BNI has a data protection and information security policy that regulates all related business lines/subsidiaries. • BNI's consumer data/information protection policies follow Bank Indonesia Regulation (PBI) No. 22/20/PBI/2020 dated December 22, 2020 concerning Consumer Protection, and the Bank Indonesia Board of Governors Members Regulation No. 23/17/PADG/2021 dated September 9, 2021 concerning Procedures for Implementing Bank Indonesia Consumer Protection. 	<ul style="list-style-type: none"> • Sustainability Report pages 44, 56 • Sustainability Report pages 46 • Annual Report pages 416

Company Practice	Page
BNI launched innovations for credit card and other consumer loan applications through e-forms, including opening digital accounts through mobile banking to reduce the potential misuse of customer data, as data is directly stored in the system without any physical forms.	<ul style="list-style-type: none"> • Annual Report pages 274-276 • Annual Report pages 284-285
BNI has established a special organization (Information Security Division) combining several units with functions related to information security to maintain independence and focus more on evaluating, running, monitoring and improving cyber security.	Annual Report pages 64
To ensure system reliability and information security, technology audits are conducted regularly by the Internal Audit. Assessments by external parties include the National Cyber and Crypto Agency (BSSN) through the Information Security Index (WE Index).	Annual Report pages 451
The Technology Management Committee is a permanent committee at BNI authorized to provide recommendations to the Board of Directors on the formulation, determination of policies and strategies for BNI's information technology development. This committee was established to assist the Board of Commissioners and the Board of Directors in supervising Information Technology (IT) activities, including those related to cyber security.	Annual Report pages 880
Practices - Employees	
BNI provides IT Work Unit employees with training to develop their soft skills and hard skills. The hard skills training includes project management, IT architecture, programming, CI/CD, secure coding, cloud security, and others, carried out in-house or through LinkedIn Learning, Google and AWS training, and other training media.	Annual Report pages 449
For all employees, data security and/or privacy risks and procedures awareness is also carried out by increasing awareness through training and digital mindset development.	

CORPORATE GOVERNANCE

Company Practice	Page
Corporate Governance	
SALARY FIGURES	Annual Report pages 717
<ul style="list-style-type: none"> • Executive Officer Payment Disclosure 	
OWNERSHIP STRUCTURE	Annual Report pages 635
<ul style="list-style-type: none"> • Controlling shareholders • Controlling Shareholders Requiring Attention 	
ONE SHARE ONE VOTE	Annual Report pages 640
<ul style="list-style-type: none"> • Multiple Equity Classes with Different Voting Rights • Government Intervention Requiring Attention 	
Board of Directors	
KEMANDIRIAN DIREKSI	Annual Report pages 774
<ul style="list-style-type: none"> • Executive Officers on the Board of Directors • Transactions with Related Parties 	
BOARD OF DIRECTORS EXPERTISE & DIVERSITY	Annual Report pages 698
<ul style="list-style-type: none"> • There are 25% female directors 	

Company Practice	Page
Salaries	
PAYMENT FIGURES	Annual Report pages 717
<ul style="list-style-type: none"> Executive Officer Payment Disclosure 	
PAYMENT PERFORMANCE ALIGNMENT	Annual Report pages 720-723
<ul style="list-style-type: none"> CEO's Equity Policy Clawback & Malus Payments Related to Sustainability 	
Share Ownership & Control	
DIRECTOR SELECTION	<ul style="list-style-type: none"> Annual Report pages 677-678 Annual Report pages 636
<ul style="list-style-type: none"> Annual Director Selection Proxy Access 	
ONE SHARE ONE VOTE	Annual Report pages 640
<ul style="list-style-type: none"> Multiple Equity Classes with Different Voting Rights 	
SHAREHOLDERS' RIGHTS	Annual Report pages 635
<ul style="list-style-type: none"> Right to Talk about Payment Policy 	
Accountancy	
ACCOUNTING RISK	Annual Report pages 375-376
<ul style="list-style-type: none"> Expenditure Recognition 	
Business Ethics	
Business Ethics Policies and Practices	
BNI has a Board of Directors or C-suite level committee or executive committee that oversees ethical issues.	Annual Report pages 873-874
BNI has a detailed formal policy on bribery and anti-corruption	<ul style="list-style-type: none"> Annual Report pages 1.005-1.007 Annual Report pages 1.001
BNI audits all operations at least once every three years.	Annual Report pages 926
BNI has a formal anonymous reporting system with legal protection for whistleblowers through the Whistle Blowing System (WBS) that is managed by an external party, Deloitte.	Annual Report pages 1.008
BNI has an ethical standard training program covering all employees (including part-time employees) and contractors.	Annual Report pages 1.002
BNI has an ethical standard training program covering all employees (including part-time employees) and contractors	Annual Report pages 1.018
BNI already has an Anti-Money Laundering Policy. The policy and implementation strategy is explained	Annual Report pages 996-999
Tax Transparency	
Implementation of tax transparency already refers to Government regulations or policies	Annual Report pages 1.136

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FEEDBACK SHEET

Thank you for reading the Sustainability Report 2022 of PT Bank Negara Indonesia (Persero) Tbk. We look forward to receiving inputs, criticisms and suggestions from you by answering some of the questions below.



Name (if you may) :
Institution/Company :
Email :
Telp/Hp :

STAKEHOLDER CATEGORY

- Government/OJK
- Shareholder/Investor
- Customer
- Employee
- Supplier
- Business Organization
- Media
- Trade Union
- General Public
- Other

Please select the following answer that best fits the questions below.

- | | Yes | No |
|---|-----|-----|
| 1. This report is easy to understand and useful for you. | () | () |
| 2. This report informs you on the practices and initiatives of sustainable finance implementation at BNI. | () | () |
| 3. Information related to environmental, social and governance (ESG) aspects is quite sufficient | () | () |

Please rate the material topics below as per their significance: (score of 1 = most significant to 7 = least significant).

- Digital Banking
- Green Portfolio
- Data Security & Customer Privacy
- Access and affordability
- Occupational Health and Safety (OHS)
- Climate Change
- Diversity and Equality

Kindly provide your advice/suggestions/comments on this report:

.....

We wish to thank you for sending your criticisms, suggestions, and inputs for improving this report in the coming year. The feedback sheet and other matters related to the Sustainability Report 2022 can be submitted to:

Corporate Secretary

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