



Implementation of Integrated Governance

As a form of transparency in the implementation of Integrated Governance in the BNI Financial Conglomerate, as well as a follow-up to the provisions stipulated in Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on the Implementation of Integrated Governance for the Financial Conglomerate jo. Circular Letter of the Financial Services Authority No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance for Financial Conglomerates, while the implementation of Integrated Management of BNI Financial Conglomerates in 2018 consisted of:

1. Self-Assessment Report on the Implementation of Integrated Governance during 2017.
2. Structure of BNI Financial Conglomerate.
3. Structure of share ownership in BNI Financial Conglomerates as of December 2017.
4. Management Structure of BNI Financial Conglomerate.
5. Basic Principles of Integrated Governance of BNI Financial Conglomerate.
6. Intra-Group Transaction Policy at BNI Financial Conglomerate.
7. Report on the Implementation of BNI Good Corporate Governance as the Main Entity at the BNI Financial Conglomerate.

Following is the Implementation of BNI Good Corporate Governance as the Main Entity in the BNI Financial Conglomerate.

REPORT ON SELF ASSESSMENT OF INTEGRATED GOVERNANCE IMPLEMENTATION IN 2019

Financial Services Authority Regulation No. 18/ POJK.03/2014 dated 18 November 2014 concerning the Implementation of Integrated Governance for Financial Conglomerates jo. Financial Services Authority Circular No. 15/SEOJK.03/2015 dated May 25, 2015 concerning the Implementation of Integrated Governance For Financial Conglomerates, among others, has required the Financial Conglomerate to compile a Self-Assessment Report periodically (June and December) to the Financial Services Authority and submitted no later than the 15th of the second month after the end of the relevant reporting month (August 15 and February 15).

Self Assessment of the implementation of Integrated Governance principles in the BNI Financial Conglomerate, must at least be realized and focused on 7 (seven) evaluation factors for the implementation of Integrated Governance consisting of:

Parameter

No	Parameter
1	Board of Directors of Main Entity
2	Board of Commissioners of Main Entity
3	Integrated Corporate Governance Committee
4	Integrated Compliance Work Unit
5	Integrated Internal Audit Work Unit
6	Implementation of Integrated Risk Management
7	Integrated Governance Guidelines

The self-assessment is categorized into 5 (five) ranks with an explanation of each rating as follows:

Rank	Explanation
1	The Financial Conglomerate is considered to have implemented an excellent Integrated Governance in general. This is reflected in the very adequate fulfillment of the application of Integrated Governance principles. If there are weaknesses in the implementation of Integrated Governance, in general those weaknesses are not significant and can be immediately corrected by the Main Entity and / or LJK.
2	The Financial Conglomerate is considered to have implemented Integrated Governance which is generally proper. This is reflected in adequate fulfillment of the application of Integrated Governance principles. If there are weaknesses in the implementation of Integrated Governance, in general these weaknesses are less significant and can be resolved by normal actions by the Main Entity and / or LJK.
3	The Financial Conglomerate is considered to have implemented Integrated Governance that is generally quite good. This is reflected in the adequate fulfillment of the application of Integrated Governance principles. If there are weaknesses in the application of Integrated Governance principles, in general those weaknesses are quite significant and require sufficient attention from the Main Entity and / or LJK.
4	The Financial Conglomerate is considered to have implemented Integrated Governance that is generally less proper. This is reflected in the inadequate fulfillment of the application of Integrated Governance principles. There are weaknesses in the implementation of Integrated Governance, in general these weaknesses are significant and require a comprehensive overhaul by the Main Entity and / or LJK.
5	The Financial Conglomerate is considered to have implemented Integrated Governance that is generally less proper. This is reflected in the inadequate fulfillment of the application of Integrated Governance principles. There are weaknesses in the implementation of Integrated Governance, in general these weaknesses are very significant and difficult to be corrected by the Main Entity and / or LJK.

In 2019, BNI has prepared its own appraisal related to the implementation of the BNI Financial Conglomerate Integrated Corporate Governance as follows:

Results of Self-Assessment of the Implementation of Integrated Governance

Ranks		Explanation of the Ranks
June 2019	December 2019	
2	2	The Financial Conglomerate is considered to have implemented an Integrated Governance in proper manner in general. It is reflected in adequate fulfillment of the application of Integrated Governance principles. Should there be weaknesses in the implementation of Integrated Governance, in general these weaknesses are less significant and can be resolved by normal actions by the Main Entity and / or LJK as a member of the BNI Financial Conglomerate.

Based on the results of the Self Assessment on 7 (seven) factors of Assessment of the Implementation of Integrated Governance for the period December 2019, we can conclude as follows:

1. Board of Directors of Main Entity

- In the Integrated Governance structure, all BNI Directors have fulfilled the qualifications stipulated by applicable laws.
- In the Integrated Governance process, the duties and responsibilities of the BNI Directors related to the Integrated Governance process have been carried out and followed up in accordance with the direction of the BNI Board of Commissioners.
- BNI's Board of Directors has followed up BNI Board of Commissioners' input on the evaluation on the Integrated Governance Guidelines, and ensured that audit findings from both internal and external have been followed up properly.



Implementation of Integrated Governance

2. Board of Commissioners of Main Entity

- In the Integrated Governance structure, all BNI Board of Commissioners have fulfilled the qualifications set by current regulation.
- In the Integrated Governance process, the duties and responsibilities of the BNI Board of Commissioners related to the Governance process Integrated Management, has provided input to the Directors of BNI in order to improve the Integrated Governance Guidelines.
- BNI's Board of Commissioners has provided input and direction as well as evaluation of audit findings from both internal and external to be followed up properly by the Directors of BNI.

3. Integrated Governance Committee

- The Integrated Governance Committee has been formed in accordance with applicable regulations.
- During the period of July - December 2019 the Integrated Governance Committee held 3 (three) meetings to provide input related to the implementation of Governance in the BNI Financial Conglomeration.

4. Integrated Compliance Work Unit

- The Compliance Division as an Integrated Compliance Unit is independent in accordance with applicable regulations.
- In the context of perfecting the integrated compliance function, the Compliance Division has coordinated with all units in each LJK.
- Compliance Division has been monitoring, evaluating and constantly updating the Company's Guidelines in accordance with applicable regulations to ensure the implementation of the compliance function in each LJK runs well.

5. Integrated Internal Audit Work Unit

- The Internal Audit Unit as an independent Internal Audit Work Unit in accordance with applicable regulations.
- Periodically the Internal Audit Unit has submitted the audit results and follow-up to the President Director and the Board of Commissioners of BNI with a copy to the Compliance Director.
- The Internal Audit Unit has evaluated the implementation of the integrated internal audit function at each LJK.

6. Implementation of Integrated Risk Management

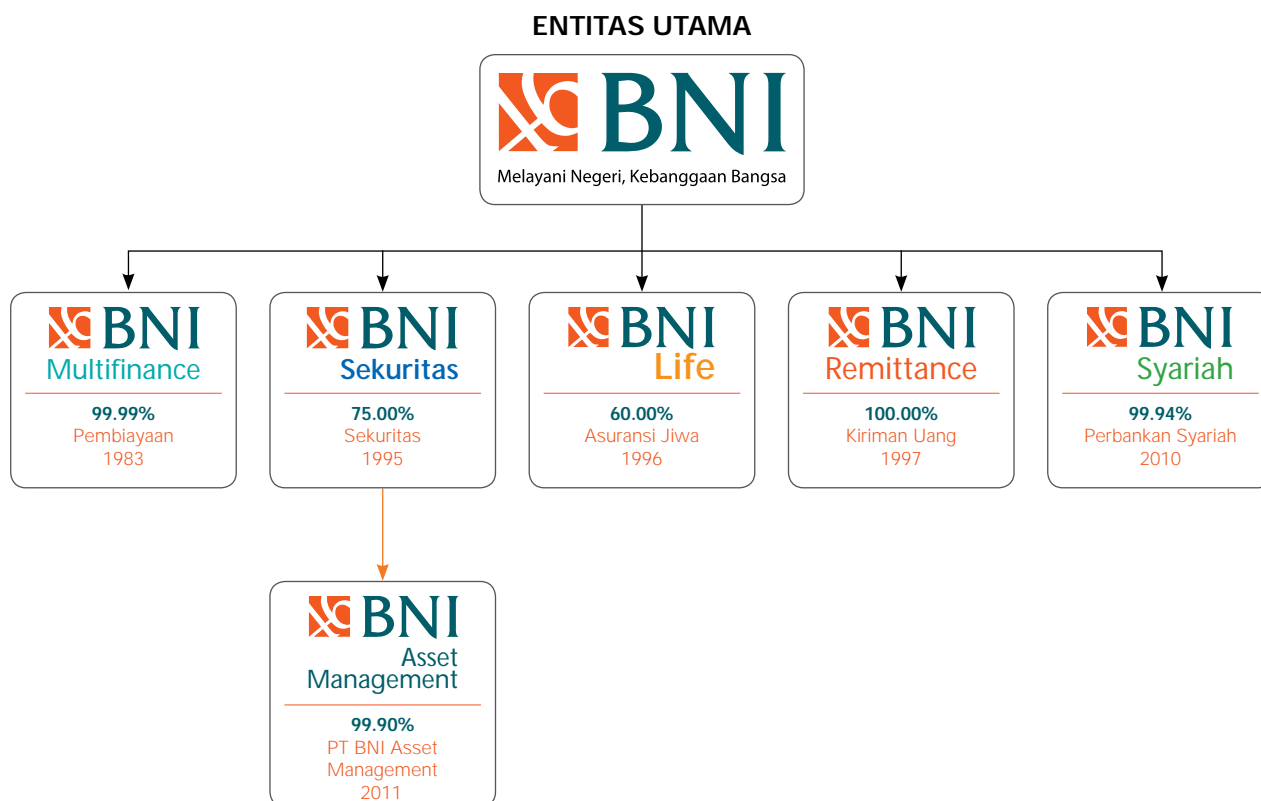
- The Bank's Risk Management Division as an independent Integrated Risk Management Work Unit in accordance with applicable regulations.
- The Bank's Risk Management Division has established and updated the Policies and determination of risk limits that apply to all LJKs.
- The Implementation of Integrated Risk Management has accommodated 4 (four) pillars of the application of Risk Management in accordance with the Financial Services Authority regulations.

7. Integrated Governance Guidelines

- Guidelines for Integrated Governance of the BNI Financial Conglomerate have been prepared and implemented in accordance with Financial Services Authority Regulation No. 18/POJK/POJK.03/2014.
- The applicable Integrated Governance Guidelines are in accordance to the Board of Directors' Agreement No. DIR/796 dated 12 December 2018 and Board of Commissioners' Approval Letter No. DK /140 dated 13 December 2018 and was reviewed by the Integrated Governance Committee on 31 October 2019.
- Guidelines for Integrated Governance of the BNI Financial Conglomerate have been communicated to all LJKs at the BNI Financial Conglomerate.

BNI FINANCIAL CONLOMERATION STRUCTURE

Based on the Board of Directors' Letter No. DIR/102 dated 13 March 2015 BNI Financial Conglomerate has reported the structure of BNI Financial Conglomerate as follows:



BNI Financial Conglomeration has fulfilled administrative requirements and has been recorded in the supervision administration of the Financial Services Authority in conform with Financial Services Authority Letter No. S-48/PB.313/2015 dated 15 April 2015, besides that the BNI Financial Conglomeration also has the Integrated Governance Committee (TKT) as follows:

Position	Name
Chairman	Bapak Revrisond Baswir (BNI)
Member	Bapak Joni Swastanto (BNI)
	Bapak Max Niode (BNI Syariah)
	Bapak Hasanudin (DPS BNI Syariah)
	Bapak Utang Ranuwijaya (BNI Life)
	Bapak Parikesit Suprpto (BNI Life)
	Bapak Eddy Siswanto (BNI Asset)
	Ibu Rosa Lima Dwi Mutiari (BNI)



Implementation of **Integrated Governance**

As a guideline BNI also has Integrated Governance Guidelines, which are compiled and reviewed in accordance with applicable laws and regulations, while the guidelines can be accessed through www.bni.co.id

The Integrated Governance Guidelines have been last updated through the Decree of the Board of Directors No. DIR / 796 December 12, 2018 and Board of Commissioners Decree No. DK / 140 December 13, 2018.

SHARE OWNERSHIP STRUCTURE IN BNI FINANCIAL CONGLOMERATION

PT Bank Negara Indonesia (Persero) Tbk as the Main Entity of the BNI Financial Conglomerate.



Structure of Share Ownership of Financial Service Institutions which are in the BNI Financial Conglomeration, namely: PT BNI Syariah

BNI FINANCIAL CONGLOMERATION STRUCTURE OF MANAGEMENT

PT Bank Negara Indonesia (Persero) Tbk

Structure of the Board of Commissioners

Name	Position
Ari Kuncoro	President / Independent Commissioner
Wahyu Kuncoro	Vice President Commissioner
Pataniari Siahaan	Independent Commissioner
Revrison Baswir	Independent Commissioner
Bistok Simbolon	Commissioner
Joni Swastanto	Commissioner
Ahmad Fikri Asegaf	Independent Commissioner
Marwanto Harjowiryo	Commissioner
Sigit Widyawan	Independent Commissioner

Structure of the Board of Directors

Name	Position
Achmad Baiquni	President Director
Herry Sidharta	Vice President Director
Putrama Wahyu Setyawan	Managing Director Corporate Business
Rico Rizal Budidarmo	Managing Director Treasury and International Banking
Anggoro Eko Cahyo	Managing Director Finance
Adi Sulistyowati	Managing Director Institutional Relations
Bob Tyasika Ananta	Managing Director Risk Management
Catur Budi Harto	Managing Director Small Business and Networks
Endang Hidayatullah	Managing Director Compliance
Dadang Setiabudi	Managing Director Information Technology and operation
Tambok P. Setyawati	Managing Director Retail Banking

PT BNI Syariah

Structure of the Board of Commissioners

Name	Position
Fero Poerbonegoro	President Commissioner
Komarudin Hidayat	Independent Commissioner
Max Niode	Independent Commissioner
Imam Budi Sarjito	Commissioner

Structure of the Board of Directors

Name	Position
Abdullah Firman Wibowo	President Director
Dhias Widhiyati	Business Director
Wahyu Avianto	Director of Finance & Operations
Tribuana Tunggadewi	Director of Compliance & Risk

Structure of Sharia Supervisory Board

Name	Position
Dr.Hasanudin,M.Ag.	Chairman
Ah.Azharuddin Lathif,Mag. *)	Member

*) Proses Fit & Proper di OJK

PT BNI Life Insurance

Structure of the Board of Commissioners

Name	Position
Parikesit Suprpto	President Commissioner / Independent Commissioner
Darwis Suzandi	Commissioner
Kazuhiko Arai	Commissioner
Husain Abdullah	Independent Commissioner
Henry Cratein Suryanaga	Independent Commissioner

Structure of the Board of Directors

Name	Position
Shadiq Akasya	President Director
Eben Eser Nainggolan	Director of Finance
Hiroschi Ono	Director
Naoto Oda	Director
Neny Asriany	Director

Structure of Sharia Supervisory Board

Name	Position
Ir. Agus Haryadi, AAAIJ, FIIS, ASAI	Chairman
Prof. Dr. H. Utang Ranuwijaya, MA	Member



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PT BNI Sekuritas

Structure of the Board of Commissioners

Name	Position
Boyke W Mukiyat *)	President Commissioner
Suhendry Hafni	Independent Commissioner
Suhendry Hafni	Commissioner

Structure of the Board of Directors

Name	Position
Antonius Chandra Satya *)	President Director
Reza Benito Zahar	Business Director
Geger N. Maulana	Director of Operations

PT BNI Multifinance

Structure of the Board of Commissioners

Name	Position
Rosa Lima Dwi Mutiari	President Commissioner / Independent Commissioner
Retno Murwani	Commissioner

Structure of the Board of Directors

Name	Position
Hasan Gazali Pulungan	President Director
Antonius Anung Fajar Nugroho	Director of Finance & Operations
Linda Saragih	Business Director

PT Aset Manajemen

Structure of the Board of Commissioners

Name	Position
Eddy Siswanto	President Commissioner, concurrently Independent Commissioner
Teddy Erdius Eka Saputra	Commissioner

Structure of the Board of Directors

Name	Position
Reita Fianti	President Director
Putut Endro Andanawarih	Director of Investment Research & Technology
Donny Susantio Adjie	Business Director

BASIC PRINCIPLES OF INTEGRATED GOVERNANCE IN BNI FINANCIAL CONGLOMERATION

To support the business and operations of the BNI Financial Conglomerate, BNI uses the GCG Roadmap issued by the Financial Services Authority and the ASEAN Corporate Governance Scorecard as the basic principles of implementing Integrated Governance.

In accordance with this, the basic principles of Integrated Governance of BNI Financial Conglomerate are as follows:

1. Implementation of Integrated Corporate Governance of BNI Financial Conglomerate aims to create superior performance and add economic value to shareholders and other stakeholders, and ensure that the operation of the BNI Financial Conglomerate in accordance with applicable laws, business ethics, and principles of good corporate governance.
2. Referring to the applicable laws and regulations, subsidiaries are separate legal entities from BNI, so that they have their own duties and responsibilities in managing the company.
3. Subsidiaries are independent legal entities in accordance with applicable laws and regulations, in which BNI is the Controlling Shareholder in BNI's financial conglomerate.
4. The Principles of Good Corporate Governance in this guideline apply to Subsidiary Companies as long as they are not regulated differently, according to the applicable laws and regulations. Articles of Association of Subsidiaries that are not in accordance with this Code, must be adjusted.

INTRA-GRUP TRANSACTION POLICY IN BNI FINANCIAL CONGLOMERATION - UNDERSTANDING THE INTRA-GRUP TRANSACTION RISK

The relationship between ownership and / or control in various financial services sectors will affect the business continuity of Financial Services Institutions (LJK) caused by risk exposures arising either directly or indirectly from the business activities of entities incorporated in a Financial Conglomerate. Therefore, the Financial Services Authority (OJK) has issued a number of regulations regarding the implementation of integrated Risk Management in conglomerates in the financial services industry, one of which is the obligation of the Financial Conglomerate to manage intra-group transaction risk.

Intra-group transaction risk is the risk arising from the dependency of an entity, directly or indirectly, on other entities within a Financial Conglomerate in the context of fulfilling the obligations of a written or unwritten agreement that is followed by a fund transfer and / or is not followed by a fund transfer.

The purpose of Intra-Group Transaction Risk Management

The application of Intra-group transaction Risk Management in the BNI Financial Conglomeration aims to:

- Manage and oversee the risk of intra-group financial conglomerate transactions based on the principle of prudence.
- Ensuring that the integrated risk management process can minimize the possibility of negative impacts caused by the dependency of an LJK either directly or indirectly on other LJK in one Financial Conglomerate, as well as the negative impact on the overall business condition of the BNI Financial Conglomerate.

Principles of Intra-Group Transaction Risk Management

Things that need to be done by BNI as the main entity in implementing Intra-group transaction Risk Management in the BNI Financial Conglomerate include:

- Having sufficient intra-group transaction risk management process for the Financial Conglomerate as a whole.
- Monitor intra-group transactions in the Financial Conglomerate and prepare periodic reports.

- Encourage public disclosure related to intra-group transactions.
- Consider the impact of intra-group transactions on the performance of LJK members of the Financial Conglomerate directly or on the BNI Financial Conglomerate as a whole.

Types of Transactions that might Pose to Intra-Group Transaction Risks

The types of transactions that may pose risks to intra-group transactions at the BNI Financial Conglomerate include the following, but not limited to:

- Cross ownership between LJK in the Financial Conglomerate;
- Centralized short-term liquidity management in the Financial Conglomerate;
- Guarantees, loans, and commitments given or obtained by a LJK from other LJK in the Financial Conglomerate;
- Exposures to controlling shareholders, including loan exposures and off-balance sheets such as guarantees and commitments;
- Purchase or sale of assets from one LJK to another LJK in the Financial Conglomerate;
- Risk transfer through reinsurance; and
- Transactions to divert third party risk exposure between LJK in financial conglomerates.

Adequacy of the Risk Identification, Measurement, Monitoring and Control Process and the Intra-Group Transaction Risk Management Information System

In the implementation of intra-group transaction risk management, BNI as the Main Entity carries out the process of identifying, measuring, monitoring and controlling risks to all material risk factors in an integrated manner, and is supported by an intra-group transaction risk management information system that adequate.

a. Identification of Intra-group Transaction Risks

Identification of intra-group transaction risk is carried out by analyzing types of products and / or transactions between LJK in the BNI Financial Conglomerate that may pose an intra-group transaction risk in the BNI Financial Conglomerate.



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b. Measurement of Intra-Group Transaction Risk

Measurement of intra-group transaction risk aims to rank the risk level of intra-group transaction of the Financial Conglomerate. The things that need to be done by BNI as the main entity in measuring intra-group transaction risk is to compile an intra-group transaction risk measurement methodology and to evaluate the suitability of the assumptions, data sources, and procedures used to measure intra-group transaction risk.

c. Intra-group Transaction Risk Monitoring

Monitoring of intra-group transaction risk is carried out by evaluating the exposure of Intra-group Transaction Risk that is material or that has an impact on the capital condition of the Financial Conglomerate; and to improve the process and scope of reporting, among others, if there are changes in business activities, products, transactions, and risk factors that are material.

The material financial relationships in an intra-group relationship between LJK in the BNI Financial Conglomerate is measured based on the value of BNI's financial transactions with LJK members of the BNI Financial Conglomerate, and between fellow LJKs in the BNI Financial Conglomerate.

d. Intra-group Transaction Risk Control

In order to carry out risk control, BNI as the Main Entity ensures that the BNI Financial Conglomerate has a method of controlling intra-group transaction risks that could endanger the business continuity of the Financial Conglomerate.

The control of intra-group transaction risk at the BNI Financial Conglomerate is carried out by taking into account:

- 1) The composition of inherent risk parameters for intra-group transactions in the assessment of integrated risk profiles;
- 2) Compliance with the principle of arm's length

(fairness of transactions) related to intra-group transactions;

- 3) Availability and completeness of intra-group transaction documentation; and
- 4) Compliance with legal / regulatory provisions that apply to each intra-group transaction.

e. Intra-group Transaction Risk Management Information System

The intra-group transaction risk management information system includes:

- 1) Intra-group transaction risk profile report which is part of the integrated risk profile report;
- 2) Intra-group transaction report, which contains:
 - a) Recapitulation of transactions with related parties
 - b) Important agreements with related parties

BNI as the Main Entity prepares and submits the intra-group transaction risk profile report as part of the integrated risk profile report and the intra-group transaction report to the Financial Services Authority on a semi-annual basis for reporting positions in June and December.

REPORT ON THE IMPLEMENTATION OF BNI GOOD CORPORATE GOVERNANCE AS A MAIN ENTITY IN BNI FINANCIAL CONGLOMERATION.

Based on Financial Services Authority Regulation No. 55/POJK.03/2016 concerning the Implementation of Governance for Commercial Banks jo. Financial Services Authority Regulation No. 4/POJK.03/2016 concerning Rating of Soundness of Commercial Banks, among others, has been required for each Bank to conduct a self-assessment of the implementation of Good Corporate Governance (GCG) principles at least every semester for the position at the end of June and December.

Implementation of Corporate Governance Aspects and Principles in Accordance with Financial Services Authority Regulations

Implementation of Corporate Governance Aspects and Principles in Accordance with Financial Services Authority Regulations Based on POJK No. 21/POJK.04 / 2015 concerning the Implementation of Open Corporate Governance Guidelines and SEOJK No. 32/SEOJK.04 / 2015 on Guidelines for Public Corporate Governance, there are 5 (five) aspects, 8 (eight) principles and 25 (twenty-five) recommendations for the implementation of aspects and principles of good corporate governance.

Recommendations on the application of aspects and principles of good corporate governance in the Governance Guidelines are standards that must be applied by the Bank in implementing governance principles. BNI applies these aspects, principles and recommendations based on the "comply or explain" approach as follows:

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
I	Aspect 1: Relationship between Public Company and Shareholders in Guaranteeing the Rights of Shareholders;			
	Principle 1 Increase the Value of Organizing GMS	The Public Company has technical methods or procedures for voting, both publicly and privately, which promote independence and the interests of shareholders.	Each share with voting rights has one vote (the principle of one share one vote). Shareholders can exercise their voting rights when making decisions, especially in voting. However, the voting mechanism, both open and closed, has not yet been regulated in detail. Public Company is recommended to have a voting procedure in making decisions on an agenda of the GMS. The voting procedure must maintain the independence or freedom of the Shareholders. For example, open voting is done by raising hands according to the choices offered by the leaders of the GMS. Meanwhile, private voting is conducted on decisions that require confidentiality or at the request of the Shareholders, by using a voting card or by using electronic voting.	In BNI, the voting procedure in making decisions on an AGM agenda is carried out in private, using ballots or electronic voting. Procedures for calculating quorums, questions and answers and decision-making mechanisms for meetings have been set forth in the GMS Rules which refer to Financial Services Authority Regulation No. 32/POJK.04/2014 as amended last by Financial Services Authority Regulation No. 10/POJK.04/2017. Note: Comply
		All members of the Board of Directors and members of the Board of Commissioners of the Public Company are present at the Annual GMS.	The presence of all members of the Board of Directors and Board of Commissioners of the Public Company is intended so that each member of the Board of Directors and members of the Board of Commissioners can pay attention, explain and answer directly the problems that occur or questions raised by Shareholders related to the agenda at the GMS.	During the 2019 Annual General Meeting of Shareholders, BNI was attended by 10 (ten) members of the Board of Directors and 8 (eight) members of the Board of Commissioners. Note: Comply
		A summary of the GMS minutes is available on the Public Company Website for at least 1 (one) year.	The Public Company is required to make a summary of the minutes of the GMS in Indonesian and foreign languages (at least in English), and be announced 2 (two) working days after the GMS is held to the public, one of which is through the Public Company Website. The availability of a summary of the minutes of a GMS on the Public Company Website will help Shareholders who are not present to obtain important information in holding a GMS easily and quickly. Therefore, the provisions regarding the minimum time period for the availability of summary minutes of the GMS on the Website are intended to provide sufficient time for Shareholders to obtain such information.	The summary of the minutes of the Annual GMS has been announced within a maximum of 2 (two) working days after the GMS is held both on the Company's website and in the print media as well as through the electronic reporting system IDXnet and the e-reporting Financial Services Authority, namely on March 22, 2018. Note: Comply



Implementation of Corporate Governance Aspects and Principles in Accordance with Financial Services Authority Regulations

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
	Principle 2 Improve the Quality of Public Company Communications with Shareholders or Investors.	Public Company has a communication policy with shareholders or investors.	The communication between the Public Company and Shareholders or investors is intended so that the Shareholders or investors get a clearer understanding of information that has been published to the public, such as periodic reports, information disclosure, business conditions or prospects and performance, as well as the Implementation of Good Corporate Governance. In addition, Shareholders or investors can also submit their input and opinions to the management of the Public Company. The communication policy with the Shareholders or investors shows the commitment of the Public Company in carrying out communication with the Shareholders or investors. The policy can include strategies, programs, and timing of communication, as well as guidelines that support Shareholders or investors to participate in the communication.	The communication policy with the Shareholders or investors is contained in the company's guidelines Investor Relations No.IN/41/KMP/001 dated January 26, 2015 which includes policies on investor relations activities such as analyst meetings, annual report preparation, investor meetings, public expose, and roadshows. The policy includes strategies, programs and timing of communication, as well as guidelines that support Shareholders or investors to participate in communication. The existence of a communication policy with the Shareholders or investors shows BNI as a Public Company is committed to carrying out communication with the Shareholders or investors. Note: Comply
		The Public Company discloses the Public Company's communication policy with shareholders or investors on the Website.	Disclosure of communication policy is a form of transparency of the commitment of the public company in providing equality to all shareholders or investors for the implementation of communication. Disclosure of this information also aims to increase participation and the role of Shareholders or investors in the implementation of the public company communication program.	Disclosure of communication policies as well as the communication agenda with Shareholders or investors has been uploaded to the Website of the Investor Relations section. Note: Comply
II Aspect 2: Function and Role of the Board of Commissioners;				
	Principle 3 Strengthening the Membership and Composition of the Board of Commissioners	Determination of the number of members of the Board of Commissioners by considering the condition of the Public Company.	The number of members of the Board of Commissioners can affect the effectiveness of the duties of the Board of Commissioners. Determination of the number of members of the Board of Commissioners of a Public Company must refer to the provisions of the applicable laws and regulations, which consist of at least 2 (two) people based on the provisions of the Financial Services Authority regulations on the Board of Directors and the Board of Commissioners of an Issuer or Public Company. In addition, it also considers the condition of the Public Company which includes, among others, the characteristics, capacity, and size, as well as the achievement of objectives and meeting the different business needs of the Public Company. However, an excessively large number of members of the Board of Commissioners has the potential to interfere with the effectiveness of the Board of Commissioners' functions.	The number of members of the Board of Commissioners in BNI up to December 31, 2018 is 9 (nine) people, taking into account the diversity of compositions, this number is considered sufficient and in accordance with the conditions of BNI and adjusted to the provisions of the Financial Services Authority Regulation No. 33/POJK.04/2014. Note: Comply
		The composition of the members of the Board of Commissioners must be determined by taking into account the diversity of expertise, knowledge and experience required.	The composition of the Board of Commissioners is a combination of characteristics, both in terms of organs of the Board of Commissioners and individual members of the Board of Commissioners, in accordance with the needs of the Public Company. These characteristics can be reflected in the determination of expertise, knowledge, and experience needed in carrying out supervisory duties and providing advice by the Board of Commissioners of the Public Company. The composition that has taken into account the needs of the public company is a positive thing, especially related to decision making in the context of implementing the supervisory function carried out by considering a broader range of aspects.	The current composition of the Board of Commissioners meets the diversity element, which is a combination of independence, expertise / education, work experience, age and gender by considering BNI's needs and complexity. This has been explained in the Diversity Composition of the Board of Commissioners Section in this Governance Report. Note: Comply

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
	Principle 4 Improving the Quality of Duties and Responsibilities of the Board of Commissioners.	The Board of Commissioners has Self Assessment policy to assess the performance of the Board of Commissioners.	The Board of Commissioners Self Assessment Policy is a form of accountability for collegially evaluating the performance of the Board of Commissioners. Self Assessment is carried out by each member to assess the implementation of the performance of the Board of Commissioners collegially, and not to assess the individual performance of each member of the Board of Commissioners. With this Self Assessment, each member of the Board of Commissioners is expected to contribute to improving the performance of the Board of Commissioners on an ongoing basis. The policy can include assessment activities carried out along with their aims and objectives, periodic implementation time, and benchmarks or assessment criteria used in accordance with recommendations given by the public company nomination and remuneration function, where the existence of these functions has been required in the Regulation Financial Services Authority concerning the Nomination and Remuneration Committee of Issuers or Public Companies.	<p>This Self Assessment Policy assesses the performance of the Board of Commissioners based on the achievement of the work program realization of the Board of Commissioners in accordance with the Work Plan and Budget (RKA) of the Board of Commissioners and through GCG Self Assessment, in which there are indicators of the duties and responsibilities of the Board of Commissioners. The Self Assessment Policy to assess the performance of the Board of Commissioners based on the achievement of the work program realization of the Board of Commissioners in accordance with the Work Plan and Budget (RKA) of the Board of Commissioners is illustrated through advisory indicators on performance, strengthening executive functions, and compliance monitoring. While the assessment contained in the GCG Self Assessment is divided into 3 (three) benchmarks, namely the Governance Process and Governance Outcome. Governance structure consists of 14 (fourteen) indicators, governance process consists of 17 (seventeen) indicators while governance outcome consists of 6 (six) indicators.</p> <p>Note: Comply</p>
		The self assessment policy to assess the performance of the Board of Commissioners is disclosed through the Annual Report of Public Company.	The disclosure of self assessment policy on Board of Commissioners performance is conducted not only to fulfill the transparency aspect as a form of responsibility for the duty performance, but also to provide confidence, especially to the Shareholders or investors on efforts that are necessary to improve the Board of Commissioners performance. With such disclosure, the Shareholders or investors understand the mechanism of check and balance on Board of Commissioners performance.	<p>Disclosure of Self Assessment policy on Board of Commissioners performance is contained in the RKA submitted through the Annual Report of Public Company, while the GCG Self Assessment results on the duties and responsibilities of the Board of Commissioners are submitted to the regulator.</p> <p>Note: Comply</p>
		The Board of Commissioners has policy related to resignation of members of Board of Commissioners if involved in financial crime.	<p>The resignation policy of members of Board of Commissioners involved in financial crime is a policy that can improve stakeholders' trust on the public company to maintain the company's integrity. This policy is required to assist in smooth legal process and to ensure that the legal process does not interfere with the business activities. In addition, in terms of morality, this policy establishes an ethical culture within the public company's environment. Such policies may be covered by guidelines or code of conduct applicable to the Board of Commissioners.</p> <p>Furthermore, what is meant by engaging in financial crime is the status of the convicted against the member of the Board of Commissioners from the authorized party. The financial crimes referred are such as manipulation and various forms of embezzlement in financial services activities and the money laundering criminal act as referred to in Law No. 8 of 2010 on Prevention and Eradication of the Criminal Act of Money Laundering.</p>	<p>The Board of Commissioners' resignation policy is contained in the Articles of Association, Article 14 paragraph 16 c, which states that dismissal of members of Board of Commissioners, among others, if involved in actions that harm the Company and/or the State, Article 14 paragraph 18, which states that the decision to terminate is taken after the person concerned is given the opportunity to defend him/herself in the GMS, and Article 14 paragraph 26 f, which states that the position of a member of Board of Commissioners by itself ends if he/she no longer meets the requirements as a member of Board of Commissioners based on the Articles of Association and laws and regulations.</p> <p>Note: Comply</p>
		The Board of Commissioners or Committees performing the Nomination and Remuneration functions prepares a succession policy in the nomination process of members of Directors.	Based on the provisions of FSA Regulations on the Nomination and Remuneration Committee of Issuers or Public Companies, the committee in charge of nomination function has the duty to formulate policies and criteria required in the nomination process of candidate members of Board of Directors. One of the policies that can support the nomination process as referred to is the succession policy of members of Board of Directors. The policy on succession is aimed to maintain the continuity of regeneration process or leadership cadre in the company in order to maintain business sustainability and long-term goals of the company.	<p>One of the organs of Board of Commissioners is the Nomination and Remuneration Committee (currently all members are Commissioners) that carries out the nomination functions, including assisting the Board of Commissioners in evaluating performance of members of Board of Directors and/or members of Board of Commissioners based on benchmark prepared as evaluation criteria, by referring to SOE Regulation No. Per-02/ MBU/02/2015.</p> <p>Note: Comply</p>



Implementation of Corporate Governance Aspects and Principles in Accordance with Financial Services Authority Regulations

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
Aspect 3: Functions and Roles of The Board of Directors				
	Principle 5 Strengthening Membership and Composition of the Board of Directors	The determination of the number of members of the Directors considers the condition of Public Company, and the effectiveness of decision making.	As the organ of the company authorized in company's management, the determination of the number of Directors greatly affects the performance of Public Company. Thus, the determination of number of members of Board of Directors must be made through careful consideration and must be subject to the provisions of applicable laws and regulations, which according to the FSA Regulation on Board of Directors and Board of Commissioners of Issuers or Public Companies, at least there must be 2 (two) persons. In addition, determining the number of Board of Directors shall be based on the need to achieve public company's goals and objectives and adjusted to the public company's conditions, including the characteristics, capacity, and size of the public company and how to make effective Board of Directors' decision.	<p>The number and capacity of members of Board of Directors are based on POJK Regulation No. 33/POJK.04/2014. The number of Board of Directors as of December 31, 2018, was 11 (eleven) members.</p> <p>In order to make decision effectively, decision making in Board of Directors' Meetings is taken by deliberation to reach consensus.</p> <p>Information: Comply</p>
		The determination of composition of Board of Directors considers range of expertise, knowledge, and experience required.	<p>Similar to the Board of Commissioners, the diversity of composition of Board of Directors is a combination of characteristics required in terms of the Board of Directors as organ and as members of Board of Directors individually, according to the needs of the Public Company.</p> <p>Such combination was determined by considering the expertise, knowledge, and experience in accordance with the duties and functions of the Directors in achieving the Company's objectives. Therefore, the consideration of the combination of such characteristics will have an impact in the accuracy of the nomination process and the individual appointment of members of the Directors or the Directors in a collegial manner.</p>	<p>The current BNI's Board of Commissioners composition has satisfied the diversity element, which is a combination of independence, expertise/education, work experience, age and gender, by considering BNI's needs and complexity. This has been disclosed in the Sub Chapter of Diversity in the Composition of the Board of Directors in this Governance Report.</p> <p>Information: Comply</p>
		Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.	<p>The Financial Statement is management accountability report on the management of resources owned by Public Company, which must be prepared and presented in accordance with the Generally Accepted Financial Accounting Standards in Indonesia as well as the related FSA Regulations, such as the laws and regulations in Capital Market sector governing the presentation and disclosure of Public Company's Financial Statements. Based on the laws and regulations in Capital Market sector governing the Board of Directors' responsibilities to the Financial Statements, the Board of Directors are jointly and severally liable for the Financial Statements, signed by the President Director and members of Board of Directors in charge of accounting or finance sector.</p> <p>Thus, the disclosure and preparation of financial information presented in the financial statement will largely depend on Directors' expertise and/or knowledge, especially the members of the Directors who are in charge of accounting or finance sector. The qualification of expertise and/or knowledge in accounting sector which at least shall be possessed by such member of Board of Directors can provide confidence in the preparation of Financial Statements, so that the Financial Statements can be relied upon by the stakeholders as the basis of economic decision making related to the said Public Company. Such expertise and/or knowledge may be proven by educational background, training certification, and/or related work experience.</p>	<p>BNI's Financial Statements consist of a consolidated statement of financial position and a statement of profit and loss and other comprehensive income, a statement of changes in equity and a consolidated statement of cash flows and an overview of significant accounting policies and other explanatory information. Management is responsible for the preparation and fair presentation of the Consolidated Financial Statements in accordance with Indonesian GAAP as stated in the Board of Directors' Statement of Responsibility for Consolidated Financial Statements and Subsidiaries.</p> <p>Whereas in the presentation of BNI's Financial Statements there is a Board of Directors' Statement on the Responsibility for Consolidated Financial Statements and Subsidiaries which contains that the Board of Directors is responsible for the preparation and presentation of BNI's Consolidated Financial Statements and Subsidiaries, that has been prepared in accordance with SAK and all information in the Financial Statements has been published completely and correctly, by not removing material information or facts. In addition, the appointed Public Accountant Firm (KAP) is a Firm that has competence and professionals in the field. All of these shows the full commitment from the Board of Directors so that the Financial Statements can be relied on by stakeholders.</p> <p>The current BNI's Managing Director Finance has expertise, knowledge, and capabilities in the field of accounting/finance, this can be proven through the formal and informal education taken either inside or outside the country. Previous experience as Managing Director Risk and Compliance at other banks also supports the Managing Director's expertise, this is certainly an added value for the said Director and BNI.</p> <p>Information: Comply</p>

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
	Principle 6 Increasing the Quality of Implementation of Duties and Responsibilities of the Board of Directors.	The Board of Directors has a self assessment policy to assess the performance of Board of Directors.	<p>Similar to the Board of Commissioners, the Board of Directors' self-assessment policy is a guideline used as a form of accountability for Board of Directors' performance collectively. Self assessment is performed by each member of the Board of Directors to assess the Board of Directors' performance collectively rather than assessing the individual performance of each member of the Board of Directors. With this self assessment, it is expected that each member of Board of Directors can contribute to improve the Board of Directors' performance on an ongoing basis.</p> <p>Such policy may include the assessment activities taken along with their purposes and objectives, the periodic execution time, and benchmarks or assessment criteria used in accordance with the recommendations given by the nomination and remuneration function of the Public Company, in which the formation of such functions is required in the FSA Regulation on Nomination and Remuneration Committee of Issuers or Public Companies.</p>	<p>The Board of Directors' performance assessment policy is contained in the Guiding Principle of Key Performance Indicator (KPI) of BOD.</p> <p>The Board of Directors' performance assessment consists of several KPIs which are measured collegially on all Directors and are both quantitative and qualitative.</p> <p>The policy includes assessment activities carried out on several factors, which are market capitalization, profits, market share, and leadership. The Remuneration and Nomination Committee has evaluated and prepared and provided recommendations to the Board of Commissioners on the nomination and remuneration system/policy for Commissioners, Directors, executive officers, and employees as a whole.</p> <p>Information: Comply</p>
		The self assessment policy to assess the performance of the Directors is disclosed through the annual report of Public Company.	The disclosure of self assessment policy on Board of Directors' performance is conducted not only to meet the transparency aspect as a form of accountability for the performance of their duties, but also to provide important information on the improvement efforts of Public Company's management. Such information is very useful to give confidence to the Shareholders or investors that there is a certainty that the company is continuously managed to a better direction. With such disclosure, the Shareholders or investors may know the check and balance mechanism on the Board of Directors' performance.	<p>Each year, the Board of Directors Performance Assessment has been disclosed in the Annual Report which can be accessed by shareholders/investors and other stakeholders through BNI website so that the information is very useful to provide confidence to shareholders or investors that there is certainty that the company is continuously managed to a better direction.</p> <p>Information: Comply</p>
		The Board of Directors has policy related to resignation of members of Board of Directors if involved in financial crime.	<p>The resignation policy of members of Board of Directors involved in financial crime is a policy that can improve stakeholders' trust on Public Company to maintain the Company's integrity. This policy is required to assist in smooth legal process and to ensure that the legal process does not interfere with the business activities. In addition, in terms of morality, this policy will build an ethical culture within the Public Company's environment. Such policy may be covered in the Guidelines or Code of Conduct applicable to the Board of Directors.</p> <p>Furthermore, what is meant by engaged in financial crime constitutes the convicted status of the member of the Directors from the competent authority. The financial crimes referred include manipulation and various forms of embezzlement in financial services' activities and the money laundering criminal act as referred to in Law No. 8 of 2010 on the Prevention and Eradication of the Criminal Act of Money Laundering.</p>	<p>The Bank will react actively in the event of a financial crime as stipulated in the Articles of Association, Article 11 paragraph 13 in conjunction with Article 11 paragraph 14 d, which states that member of Board of Directors can be dismissed at any time due to reasons, among others, if involved in actions that harm the Company and/or the State, Article 11 paragraph 15, which states that the decision to dismiss is taken after the said person is given the opportunity to defend him/herself in the GMS, and Article 11 paragraph 24 f, which states that the position of a member of Board of Directors by itself ends if he/she no longer meets the requirements as a member of Board of Directors based on the Articles of Association and laws and regulations.</p> <p>In addition, the Articles of Association also state that members of Board of Directors may be temporarily dismissed by the Board of Commissioners by stating the reason if the relevant person acts in violation of the Articles of Association or there are indications of damaging the Company or neglecting obligations or urgent reasons for the Company.</p> <p>The Bank already has BNI's Anti-Money Laundering and Countering Financing of Terrorism (AML & CFT) Policy Statement in order to enforce Law No. 8 of 2010 on Prevention and Eradication of the Criminal Act of Money Laundering.</p> <p>Information: Comply</p>



Implementation of Corporate Governance Aspects and Principles in Accordance with Financial Services Authority Regulations

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
IV. ASPEK 4: Partisipasi Pemangku Kepentingan				
	Principle 7 Increasing the Corporate Governance Aspect through Stakeholders Participation	The Public Company has a policy to prevent the occurrence of insider trading.	A person having inside information is prohibited from engaging in a Securities transaction by using insider information as referred to in Capital Market Law. Public Company can minimize this insider trading through prevention policies, for example by strictly separating the confidential data and/or information from public ones, and dividing the duties and responsibilities for the management of such information in a proportionate and efficient manner.	BNI already has a Policy related to insider information to prevent insider trading. This policy is contained in Online Company Guidelines (e-PP). Information: Comply
		Public Company has anti- corruption and anti-fraud policies.	Anti-corruption policy is useful for ensuring that the Public Company's business activities are conducted legally, prudently, and in accordance with the principles of good governance. This policy may be part of the code of ethics, or on a separated form. This policy may include programs and procedures taken in handling corrupt practices, kickbacks, fraud, bribery, and/or gratification in Public Company. The policy scope must illustrate the prevention of Public Company against all corrupt practices, either giving to or receiving from other parties.	In order to comply with SE BI No. 13/28/DPNP dated December 9, 2011, on the Implementation of Anti-Fraud Strategies to grow the Anti-Fraud Committee to foster Anti-Fraud culture and concern at all organizational levels. The policies and principles of "no Fraud for our bank" are implemented through Anti-Fraud Strategy Implementation. To measure the achievement of a compliance culture, the Compliance Division has developed a tool called Compliance index (CIX). While the anti-corruption policy has been regulated in the code of ethics, Guidelines for Gratification, and Whistleblowing System of BNI that can be accessed by all employees and stakeholders through BNI website. Information: Comply
		Public Company has a policy on selection and improvement of supplier or vendor capabilities.	Policies on selection of suppliers or vendors are useful to ensure that the Public Company acquire the necessary goods or services at competitive prices with good quality. While the policy on increasing the ability of suppliers or vendors is useful to ensure that the supply chain runs efficiently and effectively. The ability of suppliers or vendors to supply/meet the goods or services required by the Bank will affect the quality of Bank's output. The implementation of these policies can ensure continuity of supplies, both in terms of quantity and quality required by Public Company. The scope of this policy includes criteria in the selection of suppliers or vendors, transparent procurement mechanisms, efforts to improve the ability of suppliers or vendors, and the fulfillment of rights related to suppliers or vendors.	The Company has a supplier or vendor selection and capacity building policy as outlined in the form of Procurement Online Company Guidelines (e-PP). The policy also regulates Procurement Procedures including the method and process flow. The policy is always applied in the procurement process of goods and/or services and becomes a guideline by all employees. Providers of goods and/or services needed by BNI must be registered in the manual system or in the e-Procurement application system. Notification of winners of procurement of goods and/or services is carried out transparently. Information: Comply
		Public Company has a policy on the fulfillment of creditors' rights.	Policies on fulfillment of creditor rights are used as a guideline to provide lending to creditors. The purpose of the policy is to maintain the fulfillment of rights and maintain the creditor trust in the Public Company. The policy includes consideration in making agreements, as well as follow- ups in fulfilling the Public Company's obligations to creditors.	Policies related to creditors' rights have been stated in the agreement in the event that BNI enters into an Agreement with Creditors. In the agreement, the rights and obligations of the parties have been stated, related to the creditor's rights, for example in providing information in a transparent, accurate, and timely manner both at the time of request and use of loans, keeping the financial ratio (Current Ratio, DeR, Debt to Service Ratio) with a ratio agreed with the creditor, submitting an annual audited financial statements for the period agreed upon with the Creditors, and so on. Information: Comply
		Public Company has whistleblowing system policies.	A well-structured whistleblowing system policy will provide assurance of protection to the witnesses or reporters for an indication of breach by an employee or public company's management. The implementation of such system policy will impact the establishment of good corporate governance culture. The whistleblowing system policy includes among others types of violations that can be reported through whistleblowing system, methods to file a complaint, safeguards and confidentiality of the complainant, complaint handling, party managing complaints, and the results of the handling and complaints follow-up.	Whistleblowing System (WBS) Management in BNI under the name of "WBS to CEO. WBS is a commitment to create a clean work environment, with integrity, in the form of active participation by BNI personnel to report violations occurring within BNI's environment. Violation report through WBS can be submitted by telephone, e-mail, letter, or website. Information: Comply

No.	Principles	Recommendations	Remarks on Recommendations From Financial Services Authority	Explaining the Implementation in BNI
		The Public Company has a long term incentive policy to the Directors and employees.	<p>Long-term incentives are incentives based on the achievement of long-term performance. Long-term incentive plans have a rationale that the long-term performance of the company is reflected by the growth in the share value or other long-term targets of the bank. Long-term incentives are useful in order to maintain loyalty and motivate the Board of Directors and employees to boost performance or productivity that will impact on improving the company's performance over the long term.</p> <p>This long-term incentive policy is a commitment of the Public Company to encourage the implementation of long-term incentives to the Board of Directors and Employees on terms, procedures, and forms tailored to the long-term objectives of Public Company. Such policies may include, among others: the intent and objectives of providing long-term incentives, terms and procedures in giving incentives, and the conditions and risks that the Public Company shall pay attention to in providing incentives. Such policies may also be included in the existing remuneration policy of the Public Company.</p>	<p>The policy of providing long-term incentives to the Board of Directors and employees has been stated in a separate Long Term Incentive Guidelines, for tahun 2016, 2017 dan 2018, and for Employees it is contained in the Stock Bonus Guidelines.</p> <p>The total provision of Long Term Incentive (LTI) for the Board of Directors and Board of Commissioners amounting to Rp192,912,000,000, - has been approved at the Board of Commissioners' Meeting on September 26, 2018. This incentive policy is BNI's commitment that is tailored to the Bank's Long-term goals and provisions of laws and regulations.</p> <p>Information: Comply</p>
V. ASPECT 5: INFORMATION DISCLOSURE				
	Principle 8 Increasing Implementation of Information Disclosure.	The Public Company has utilized the use of information technology more broadly than the website as a media for information disclosure.	<p>The use of information technology can be useful as a medium to disclose information. The information disclosure is conducted not only to the information disclosure as regulated in the laws and regulations, but also to other information related to the Public Company that is deemed necessary for the Shareholder or investors. By utilizing information technology widely, it is expected that in addition to the Website, the Bank can improve the effectiveness of disseminating corporate information.</p> <p>Nevertheless, the utilization of information technology taken still pay attention to company's benefits and costs.</p>	<p>In addition to the Website, BNI also utilizes other information technology platforms, such as email, twitter, and instagram as means of communication and information disclosure. The information disclosure is conducted not only to the information disclosure as regulated in the laws and regulations, but also to other information related to the Public Company that is deemed necessary for the Shareholder or investors.</p> <p>Information: Comply</p>
		The Annual Report of the Public Company discloses the ultimate beneficial owner of Company's ownership of at least 5% (five percent) of shares, in addition to the disclosure of ultimate beneficial owner in the ownership of Public Company shares through Major Shareholders and Controllers.	<p>The laws and regulations in Capital Market sector governing the submission of Public Company's Annual Report has specified the obligation of information disclosure on Shareholders having 5% (five percent) of shares or more of the Public Company, as well as the obligation to disclose information about the main and controlling Shareholders of the Public Company, whether directly or indirectly, to the ultimate beneficial owner in the ownership of such shares. The Corporate Guidelines disclose the ultimate beneficial owner of the Public Company's ownership of at least 5% (five percent) of shares, in addition to the disclosure of ultimate beneficial owner in the ownership of shares through Major Shareholders and Controllers.</p>	<p>The ultimate beneficial owner in the Public Company's share ownership of at least 5% (five percent) has been disclosed in the Annual Report, Sub Chapter of List of Shareholders and Sub Chapter of Share Ownership of Board of Directors and Board of Commissioners.</p> <p>Information: Comply</p>



Implementation of ASEAN Corporate Governance Scorecard

As explained in the Corporate Governance Assessment section through an independent party assessment based on the Asean Corporate Governance Scorecard parameter, BNI received a Very Good predicate with a value of 95.61 which is an increase compared to the previous year with a score of 91.58. The assessment is carried out based on BNI's information disclosure which can be accessed by all stakeholders on the Asean Corporate Governance Scorecard parameters. The availability of information based on the Asean Corporate Governance Scorecard parameters can be described as follows:

No.	Parameter	Availability	Notes on Presentation
PRINSIP A: HAK-HAK PEMEGANG SAHAM			
A.1.1	Does the company pay (interim and final/annual) dividends in an equitable and timely manner; that is, all shareholders are treated equally and paid within 30 days after being (i) declared for interim dividends and (ii) approved by shareholders at annual general meeting (AGM) for final dividends?	Yes	It has been presented in the Summary of Annual GMS Minutes which was published on the Company's website, Investor Daily, The Jakarta Post, OJK / IDX website on 15 May 2019, as described in the following website: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
	Do shareholders have the right to participate in:		
A.2.1	Amendments to the company's constitution?	Yes	As stated in Article 28 of the Company's Articles of Association http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf
A.2.2	The authorization of additional shares?	Yes	Yes, as stated in Article 4 paragraph 6 of the Company's Articles of Association Yes, as it has been published http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf
A.2.3	The transfer of all or substantially all assets, which in effect results in the sale of the company?	Yes	Yes, as uploaded Yes, as stated in Article 12 paragraph 7 of the Company's Articles of Association http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf
A.3.1	Do shareholders have the opportunity, evidenced by an agenda items, to approve remuneration (fees, allowances, benefit-in-kind and other emoluments) or any increases in remuneration for the non-executive directors/commissioners?	Yes	In accordance with the implementation in the Annual GMS held on May 13, 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.2	Does the company provide non-controlling shareholders a right to nominate candidates for board of directors/commissioners?	Yes	In accordance with the implementation in the Annual GMS held on May 13, 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.3	Does the company allow shareholders to elect directors/commissioners individually?	Yes	In accordance with the implementation in the Annual GMS held on May 13, 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.4	Does the company disclose the voting procedures used before the start of meeting?	Yes	Yes, in accordance with the rules of the GMS published on the Company's website 21 days before the GMS: https://bni.co.id/portals/1/bni/perusahaan/docs/upload-web-bbni-pemanggilan-material.pdf

No.	Parameter	Availability	Notes on Presentation
A.3.5	Do the minutes of the most recent AGM record that the shareholders were given the opportunity to ask questions and the questions raised by shareholders and answers given recorded?	Yes	In accordance with the implementation in the Annual GMS held on May 13, 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.6	Does the company disclose the voting results including approving, dissenting, and abstaining votes for all resolutions/each agenda item for the most recent AGM?	Yes	As a summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019 follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.7	Does the company disclose the list of board members who attended the most recent AGM?	Yes	As a summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019 follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.8	Does the company disclose that all board members and the CEO (if he is not a board member) attended the most recent AGM?	Yes	As a summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019 follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.9	Does the company allow for voting in absentia?	Yes	As a summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019 follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.10	Did the company vote by poll (as opposed to by show of hands) for all resolutions at the most recent AGM?	Yes	As in the summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019, below: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.11	Does the company disclose that it has appointed an independent party (scrutineers/inspectors) to count and/or validate the votes at the AGM?	Yes	As in the summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019, below: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
A.3.12	Does the company make publicly available by the next working day the result of the votes taken during the most recent AGM/EGM for all resolutions?	No.	-
A.3.13	Do companies provide at least 21 days notice for all AGMs and EGMS?	Yes	As in the Summons of the Annual GMS and Extraordinary GMS 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/bbni-publikasi-pemanggilan-investor-daily.pdf https://bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan%20RUPSLB%20BBNI.pdf



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No.	Parameter	Availability	Notes on Presentation
A.3.14	Does the company provide the rationale and explanation for each agenda which require shareholders' approval in the notice of AGM/ circulars and/or the accompanying statement?	Yes	As stated in the GMS Agenda Explanation as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/upload-web-bbni-pemanggilan-material.pdf
A.3.15	Does the company give the opportunity for shareholder to place item/s on the agenda of AGM	Yes	As stated in the Announcement of the Annual GMS and Extraordinary GMS as follows: https://bni.co.id/Portals/1/BNI/Perusahaan/Docs/Pengumuman%20RUPSLB%20BBNI.pdf
A.4.1	In cases of mergers, acquisitions and/or takeovers, does the board of directors/commissioners of the offeree company appoint an independent party to evaluate the fairness of the transaction price?	N/A	-
A.5.1	Does the company publicly disclose policy/practice to encourage shareholders including institutional shareholders to attend the general meetings or engagement with the company?	Yes	As in the Summons of the Annual GMS and Extraordinary GMS 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/bbni-publikasi-pemanggilan-investor-daily.pdf https://bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan%20RUPSLB%20BBNI.pdf
PRINCIPLE B: EQUAL TREATMENT OF SHAREHOLDERS			
B.1.1	Do the company's ordinary or common shares have one vote for one share?	Yes	As in the Summons of the Annual GMS and Extraordinary GMS 2019 as follows: https://bni.co.id/portals/1/bni/perusahaan/docs/bbni-publikasi-pemanggilan-investor-daily.pdf https://bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan%20RUPSLB%20BBNI.pdf https://bni.co.id/portals/1/bni/perusahaan/docs/Pemanggilan%20RUPSLB%20BBNI.pdf
B.1.2	Where the company has more than one class of shares, does the company publicise the voting rights attached to each class of shares (e.g. through the company website / reports/ the stock exchange/ the regulator's website)?	Yes	As stated in the Company's Articles of Association: http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf
B.2.1	Does each resolution in the most recent AGM deal with only one item, i.e., there is no bundling of several items into the same resolution?	No	-
B.2.2	Are the company's notice of the most recent AGM/ circulars fully translated into English and published on the same date as the local-language version?	Yes	As published on the Company's website and IDX website: https://bni.co.id/id-id/perusahaan/tatakelola/rups
	Does the notice of AGM/circulars have the following details:		
B.2.3	Are the profiles of directors/commissioners (at least age, qualification, date of first appointment, experience, and directorships in other listed companies) in seeking election/re-election included?	No	Company Explanation: SOE Minister Regulation No. PER-02 / MBU / 02/2015 and No. PER-03 / MBU / 02/2015 concerning Requirements, Procedures for Appointment and Dismissal of Members of the Board of Commissioners / Directors of State-Owned Enterprises regulates that for open SOEs, curriculum vitae of prospective members of the Board of Commissioners / Directors to be proposed to be appointed at the GMS, must be available and announced at the time of the General Meeting of Shareholders before making a decision regarding the appointment of the concerned member of the Board of Commissioners / Directors. Since the Company is a publicly listed SOE, the Company is subject to these conditions.
B.2.4	Are the auditors seeking appointment/re-appointment clearly identified?	No	-

No.	Parameter	Availability	Notes on Presentation
B.2.5	Were the proxy documents made easily available?	Yes	As stated in the summary of the minutes of the Annual General Meeting of Shareholders on May 13, 2019 follows: https://bni.co.id/portals/1/bni/perusahaan/docs/Pengumuman%20Ringkasan%20Risalah%20RUPST%202018%20BBNI.pdf https://bni.co.id/portals/1/BNI/Perusahaan/Docs/Announcement%20of%20Summary%20of%20Minutes%20of%20GMS%20BBNI.pdf
B.3.1	Does the company have policies and/or rules prohibiting directors/commissioners and employees to benefit from knowledge which is not generally available to the market?	Yes	As stated in the provisions of the Company's Prohibited and Non-Prohibited Transactions Guidelines reported in the 2019 Annual Report for concerning Governance Principles to Improve Corporate Governance Aspects through Stakeholder Participation.
B.3.2	Are the directors and commissioners required to report their dealings in company shares within 3 business days?	No	Company Explanation: The Company already has the provisions contained in the provisions of the Company Guidelines on Prohibited and Non-Prohibited Transactions that are reported in the 2018 Fiscal Year Annual Report regarding Governance Principles to Improve the Corporate Governance Aspects through Stakeholder Participation.
B.4.1	Are directors and commissioners required to disclose their interest in transactions and any other conflicts of interest?	Yes	As stated in the 2018 Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures: http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/Pedoman%20dan%20Tata%20Tertib%20Kerja%20Direksi%202018.pdf http://bni.co.id/Portals/1/BNI/Perusahaan/Docs/the%20board%20manual%20for%20the%20board%20of%20commissioners.pdf
B.4.2	Does the company have a policy requiring a committee of independent directors/commissioners to review material/significant RPTs to determine whether they are in the best interests of the company?	Yes	As stated in the 2018 Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/Pedoman%20dan%20Tata%20Tertib%20Kerja%20Direksi%202018.pdf http://bni.co.id/Portals/1/BNI/Perusahaan/Docs/the%20board%20manual%20for%20the%20board%20of%20commissioners.pdf
B.4.3	Does the company have a policy requiring board members (directors/commissioners) to abstain from participating in the board discussion on a particular agenda when they are conflicted?	Yes	As stated in the 2018 Board of Directors' Work Guidelines and Procedures and Commissioners Work Guidelines and Procedures http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/Pedoman%20dan%20Tata%20Tertib%20Kerja%20Direksi%202018.pdf http://bni.co.id/Portals/1/BNI/Perusahaan/Docs/the%20board%20manual%20for%20the%20board%20of%20commissioners.pdf
B.4.4	Does the company have policies on loans to directors and commissioners either forbidding this practice or ensuring that they are being conducted at arm's length basis and at market rates.	No	Company Explanation: The Company has disclosed the Provision of Funds to Related Parties and Provision of Large Funds in the 2019 Annual Report.
B.5.1	Does the company disclose that RPTs are conducted in such a way to ensure that they are fair and at arms' length?	No	Company Explanation: Provisions regarding loans to the Directors and Board of Commissioners are regulated in the Company's internal regulations.
B.5.2	In case of related party transactions requiring shareholders approval, is the decision made by disinterested shareholders?	Yes	As stipulated in the Company's Articles of Association: http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/BBNI%20-%20ARTICLES%20OF%20ASSOCIATION%202018.pdf



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No.	Parameter	Availability	Notes on Presentation
PRINSIP C: PERAN PEMANGKU KEPENTINGAN			
	Does the company disclose a policy that :		
C.1.1	The existence and scope of the company's efforts to address customers' welfare?	Yes	As stated in the 2019 Annual Report in the section Social Responsibility - Corporate Social Responsibility Related to Responsibilities to Consumers.
C.1.2	Supplier/contractor selection procedures?	Yes	Yes, as stated in the Procurement Auctions section on the Company's website http://bni.co.id/id-id/beranda/berita/lelangpengadaan
C.1.3	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	Yes	As stated in the 2019 Annual Report on the Social Responsibility section.
C.1.4	The company's efforts to interact with the communities in which they operate?	Yes	As stated in the 2019 Annual Report on the Social Responsibility section.
C.1.5	Describe the company's anti-corruption programmes and procedures?	Yes	As stated in the 2019 Annual Report on the Corporate Social Responsibility section Regarding Fair Operations.
C.1.6	Describes how creditors' rights are safeguarded?	Yes	As stated in several sections in the 2019 Annual Report, including the Implementation of Aspects of Corporate Governance Principles in accordance with the Financial Services Authority.
C.1.7	Does the company have a separate corporate responsibility (CR) report/section or sustainability report/section?	Yes	The Company publishes the 2018 Sustainability Report and can be accessed through the Company's website: https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
C.2.1	Does the company provide contact details via the company's website or Annual Report which stakeholders (e.g. customers, suppliers, general public etc.) can use to voice their concerns and/or complaints for possible violation of their rights?	Yes	The Company announces Perseroan contact details on the Company's Annual Report and the Company's website: https://bni.co.id/id-id/kontak/kontakbni/hubungikami
C.3.1	Does the company explicitly disclose the health, safety, and welfare policy for its employees?	Yes	As stated in the 2019 Annual Report on Corporate Social Responsibility Related to Employment, Health and Safety.
C.3.2	Does the company explicitly disclose the policies and practices on training and development programmes for its employees?	Yes	As stated in the 2019 Annual Report on the Profile and Employee Competency Development section.
C.3.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	Yes	As explained in the 2019 Annual Report on the Remuneration section.
C.4.1	Does the company have a whistle blowing policy which include procedures for complaints by employees concerning alleged illegal (including corruption) and unethical behavior and provide contact details via the company's website or annual report?	Yes	As stated in the 2019 Annual Report on the section Corporate Governance - Whistleblowing System.
C.4.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behavior from retaliation?	Yes	As stated in the 2019 Annual Report on the Legal Aid Facilities section.

No.	Parameter	Availability	Notes on Presentation
PRINCIPLE D: DISCLOSURE & TRANSPARENCY			
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	Yes	As stated in the 2019 Annual Report in the Main and Controlling Shareholder Information section.
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	Yes	As stated in the 2019 Annual Report in the Main and Controlling Shareholder Information section.
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	Yes	As stated in the 2019 Annual Report in the Directors' Share Ownership section.
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Yes	As stated in the 2019 Annual Report in the Directors' Share Ownership section.
D.1.5	Does the company disclose details of the parent/ holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	Yes	As stated in the 2019 Annual Report in the Names and Addresses of Subsidiaries, Associated Entities.
	Does the company's annual report disclose the following items:		
D.2.1	Corporate objectives	Yes	As stated in the 2019 Annual Report in the Vision, Mission and Corporate Culture section.
D.2.2	Financial performance indicators	Yes	As stated in several sections in the Annual Report including the Management Report section.
D.2.3	Non-financial performance indicators	Yes	As stated in several sections in the Annual Report including the Management Report section.
D.2.4	Dividend policy	No.	D.2.4, requests the disclosure of dividend policy for the 2018 fiscal year in the company's Annual Report 2018. The information contained in the company's Annual Report only mentions the dividend policy that has been carried out by the company for the previous period, i.e. for the 2017 financial year course (dividend history), but does not reveal the target / dividend policy for the 2018 fiscal year.
D.2.5	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/ commissioners	Yes	As stated in the 2019 Annual Report on the Board of Directors' Profile and Commissioner Profile.
D.2.6	Attendance details of each director/commissioner in respect of meetings held	Yes	As stated in the 2019 Annual Report in the Directors' Meeting section.
D.2.7	Total remuneration of each member of the board of directors/commissioners	No	D.2.7 requests the disclosure of the amount and structure of remuneration received by each member of the board of commissioners in the 2019 Annual Report of the company. PT Bank Negara Indonesia (Persero) Tbk did not disclose information about this matter. Existing information only reveals the aggregate amount of remuneration received by the Board of Commissioners without explicitly mentioning the name of the commissioner and the amount of remuneration received.
D.2.8	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Yes	As stated in the 2019 Annual Report on the Management Reports.



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No.	Parameter	Availability	Notes on Presentation
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Yes	As stated in the 2019 Annual Report in the Prohibition section. Limits, and / or Significant Barriers to Transferring Funds between Banks and Other Entities in One Business Group.
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Yes	As stated in the 2019 Annual Report in the Prohibition section. Limits, and / or Significant Barriers to Transferring Funds between Banks and Other Entities in One Business Group.
D.4.1	Does the company disclose trading in the company's shares by insiders?	Yes	As stated in the 2019 Annual Report in the Board of Directors' Share Ownership section.
D.5.1	Are audit fees and non-audit fees disclosed?	Yes	As stated in the 2019 Annual Report in the Public Accounting Firm, Accountant Name, and Fee sections.
D.5.2	Does the non-audit fees exceed the audit fees?*)	No	ACGS explanation: For assessment item D.5.2, the answer "Yes" indicates that the company actually has not complied with the practice referred to, otherwise the answer "No" if the practice has complied or has been carried out by the company.
	Does the company use the following modes of communication?		
D.6.1	Quarterly reporting	Yes	The Quarterly Report has been published on the Company's website and the IDX website. https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.6.2	Company website	Yes	The Company's website is bni.co.id
D.6.3	Analyst's briefing	Yes	Report on the implementation of the Analyst Meeting every Quarter is published on the Company's website and the IDX website. https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.6.4	Media briefings /press conferences	Yes	Press releases are published on the Company's website: http://bni.co.id/id-id/beranda/berita/siaranpers
D.7.1	Are the audited annual financial report/statement released within 120 days from the financial year end?	Yes	The Annual Report that is accompanied by the 2018 Financial Report is published on the Company's website on April 18, 2019 or before 120 days have ended since 2018.
D.7.2	Is the annual report released within 120 days from the financial year end ?	Yes	The Annual Report that is accompanied by the 2018 Financial Report is published on the Company's website on April 18, 2019 or before 120 days have ended since 2018.
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	Yes	As stated in the 2019 Annual Report Ratification Sheet.
	Does the company have a website disclosing up-to-date information on the following:		
D.8.1	Financial statements/reports (latest quarterly)	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.2	Materials provided in briefings to analysts and media	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.3	Downloadable annual report	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/laporanpresentasi
D.8.4	Notice of AGM and/or EGM	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/rups
D.8.5	Minutes of AGM and/or EGM	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/rups
D.8.6	Company's constitution (company's by-laws, memorandum and articles of association)	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/anggarandasarbni
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer responsible for investor relations?	Yes	https://bni.co.id/id-id/perusahaan/hubunganinvestor/kontakinvestor/kontakinformasi

No.	Parameter	Availability	Notes on Presentation
PRINCIPLE E: RESPONSIBILITIES OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS			
	Tanggung Jawab Dewan Komisaris dan Kebijakan CG seharusnya dinyatakan secara jelas oleh perusahaan:		
E.1.1	Does the company disclose its corporate governance policy / board charter?	Yes	Yes, the Guidelines and Rules of Work of the Directors and Board of Commissioners are published on the Company's website http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatatertib
E.1.2	Are the types of decisions requiring board of directors/commissioners' approval disclosed ?	Yes	Yes, published in the Company's Articles of Association http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/072018_resize_AD%20BNI%202018%20(dan%20AHU).pdf
E.1.3	Are the roles and responsibilities of the board of directors/commissioners clearly stated ?	Yes	Yes, published in the Guidelines and Rules of Work of the Directors and Board of Commissioners and the Company's Articles of Association http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatatertib http://bni.co.id/Portals/1/BNI/Perusahaan/TataKelola/Docs/GCG/072018_resize_AD%20BNI%202018%20(dan%20AHU).pdf
	Visi dan Misi Perusahaan:		
E.1.4	Does the company have an updated vision and mission statement?	Yes	As stated in the 2019 Annual Report.
E.1.5	Does the board of directors play a leading role in the process of developing and reviewing the company's strategy at least annually?	Yes	As stated in the 2019 Annual Report Projection section 2019.
E.1.6	Does the board of directors have a process to review, monitor and oversee the implementation of the corporate strategy?	Yes	As stated in the 2019 Strategy Explanation in the 2019 Annual Report.
	Kode Etik atau Kode Perilaku:		
E.2.1	Are the details of the code of ethics or conduct disclosed?	Yes	Yes, it is regulated in the Guidelines and Rules of Work of the Directors and Board of Commissioners published on the Company's website http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatatertib
E.2.2	Does the company disclose that all directors/ commissioners, senior management and employees are required to comply with the code?	Yes	As stated in the 2019 Annual Report section on the Number of Violations of the Code of Ethics.
E.2.3	Does the company have a process to implements and monitors compliance with the code of ethics or conduct?	Yes	As stated in the 2019 Annual Report Supervision of Implementation of the BNI Ethics Code.
	Struktur dan Komposisi Dewan Komisaris:		
E.2.4	Do independent directors/commissioners make up at least 50% of the board of directors/ commissioners?	Yes	https://bni.co.id/id-id/perusahaan/tentangbni/komisaris
E.2.5	Does the company have a term limit of nine years or less or 2 terms of five years each for its independent directors/commissioners?	Yes	Yes, it has been regulated in the Guidelines and Rules of Work of the Directors / Board of Commissioners in the Term of Office of the Directors / Board of Commissioners http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatatertib
E.2.6	Has the company set a limit of five board seats that an individual independent/non-executive director/ commissioner may hold simultaneously?		Yes, it has been regulated in the Guidelines and Rules of Work of the Directors / Board of Commissioners in the Term of Office of the Directors / Board of Commissioners http://bni.co.id/id-id/perusahaan/tatakelola/pedomandantatatertib



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No.	Parameter	Availability	Notes on Presentation
E.2.7	Does the company have any executive directors/ commissioners who serve on more than two boards of listed companies outside of the group?*) Note: Untuk item penilaian E.2.7, jawaban "Yes" menunjukkan bahwa perusahaan justru belum comply terhadap praktik dimaksud, sebaliknya jawaban "No" apabila praktik tersebut sudah comply atau sudah dilakukan perusahaan.	No	-
	Komite Nominasi:		
E.2.8	Does the company have a Nominating Committee (NC)?	Yes	Yes, the Company has a Nomination and Remuneration Committee http://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.9	Is the Nominating Committee comprise of a majority of independent directors/commissioners?	No	E.2.9 requires a majority of the presence of commissioners or independent parties in the membership of the company nomination committee. Because the number of commissioners or independent parties is only 5 of the total nomination committee members of 10 people (50%), the company is considered to have not met the majority requirement (more than 50%) for nomination committee members who come from independent parties or commissioners. E.2.9 requires the Audit committee to provide recommendations on the appointment and replacement of external auditors. PT Bank Negara Indonesia (Persero) Tbk (BBNI) only mentions the obligation to recommend the appointment of an External Auditor, while there is no disclosure of the obligation to recommend the replacement of an External Auditor.
E.2.10	Is the chairman of the Nominating Committee an independent director/commissioner?	Yes	As with the 2019 Annual Report, the Chairperson of the Nomination and Remuneration Committee is held by Br. Ari Kuncoro, President Commissioner / Independent Commissioner.
E.2.11	Does the company disclose the terms of reference/ governance structure/charter of the Nominating Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.12	Is the meeting attendance of the Nominating Committee disclosed and if so, did the Nominating Committee meet at least twice during the year?	Yes	As stated in the 2019 Annual Report section Frequency and Attendance at Nomination and Remuneration Committee Meetings.
	Komite Remunerasi/Komite Kompensasi:		
E.2.13	Does the company have a Remuneration Committee?	Yes	Yes, the Company has a Nomination and Remuneration Committee http://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.14	Is the Remuneration Committee comprise of a majority of independent directors/commissioners?	No	E.2.14 requires a majority of the presence of commissioners or independent parties in the membership of the company's remuneration committee. The explanation of the company's non-compliance with this valuation item is the same as the explanation in item E.2.9 above.
E.2.15	Is the chairman of the Remuneration Committee an independent director/commissioner?	Yes	As stated in the 2019 Annual Report, the Chairperson of the Nomination and Remuneration Committee is held by Br. Ari Kuncoro, President Commissioner / Independent Commissioner.
E.2.16	Does the company disclose the terms of reference/ governance structure/ charter of the Remuneration Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.17	Is the meeting attendance of the Remuneration Committee disclosed, and if so, did the Remuneration Committee meet at least twice during the year?	Yes	As stated in the 2019 Annual Report section Frequency and Attendance at Nomination and Remuneration Committee Meetings.
	Komite Audit:		

No.	Parameter	Availability	Notes on Presentation
E.2.18	Does the company have an Audit Committee?	Yes	https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.19	Is the Audit Committee comprised entirely of non-executive directors/commissioners with a majority of independent directors/commissioners?	Yes	As published on the Company's website https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.20	Is the chairman of the Audit Committee an independent director/commissioner?	Yes	As published on the Company's website https://bni.co.id/id-id/perusahaan/tatakelola/komitedewankomisaris
E.2.21	Does the company disclose the terms of reference/governance structure/charter of the Audit Committee?	Yes	https://bni.co.id/Portals/1/BNI/Perusahaan/Docs/Plagam%20Komite%20Audit%20BNI.pdf
E.2.22	Does at least one of the independent directors/commissioners of the committee have accounting expertise (accounting qualification or experience)?	Yes	As stated in the 2019 Annual Report on the Audit Committee Structure, Membership and Expertise.
E.2.23	Is the meeting attendance of the Audit Committee disclosed, and if so, did the Audit Committee meet at least four times during the year?	Yes	As stated in the Frequency and Attendance of Audit Committee Meetings.
E.2.24	Does the Audit Committee have primary responsibility for recommendation on the appointment, and removal of the external auditor?	No	Company Explanation: Disclosure of the implementation of the duties and responsibilities of the Audit Committee in providing recommendations to the Board of Commissioners regarding the appointment of a Public Accountant and KAP for the 2018 audit year has been outlined in the 2019 Annual Report.
	Rapat dan Kehadiran Dewan Komisaris:		
E.3.1	Are the board of directors meetings scheduled before the start of financial year?	No	Company Explanation: The Board of Directors Meeting Plan has been presented in the 2019 Annual Report in the 2019 Board of Directors Meeting Scheduled in.
E.3.2	Does the board of directors/commissioners meet at least six times per year?	Yes	As stated in the 2019 Annual Report.
E.3.3	Has each of the directors/commissioners attended at least 75% of all the board meetings held during the year?	No	-
E.3.4	Does the company require a minimum quorum of at least 2/3 for board decisions?	No	As stipulated in the Company's Articles of Association https://bni.co.id/id-id/perusahaan/tatakelola/anggarandasarbni
E.3.5	Did the non-executive directors/commissioners of the company meet separately at least once during the year without any executives present?	Yes	As stated in the 2019 Annual Report.