Kebijakan Manajemen Risiko PT Bank Mandiri (Persero) Tbk.	Risk Management Policy PT Bank Mandiri (Persero) Tbk.
Dalam rangka meningkatkan nilai tambah di mata para pemangku kepentingan, Bank Mandiri secara konsisten mengelola sistem manajemen risiko dengan berpedoman pada regulasi dan perundangan yang berlaku di Indonesia. Dalam pelaksanaannya, Bank Mandiri senantiasa mengedepankan prinsip kehati-hatian dalam mengelola segala jenis risiko sebagai wujud komitmen Bank Mandiri dalam menjalankan praktik tata kelola perusahaan yang baik. Kerangka kerja dan tata kelola manajemen risiko Bank Mandiri menggunakan Pendekatan Pertahanan Tiga Lapis (*three layers of defence*), yaitu:	In order to increase the added value before of the stakeholders, Bank Mandiri is consistently managing the risk management system based on the regulations and laws applicable in Indonesia. In its implementation, Bank Mandiri always prioritized caution principles in managing all types of risks as a form of Bank Mandiri's commitment in conducting good corporate governance practices. Bank Mandiri's risk management framework and governance used the Three Layers of Defense Approach, namely:
1. Dewan Komisaris menjalankan fungsi pengawasan risiko (*risk oversight*) melalui Komite Pemantau Risiko, Komite Tata Kelola Terintegrasi dan Komite Audit.	1. The Board of Commissioners performed the risk oversight function through Risk Oversight Committee, Integrated Governance Committee and Audit Committee.
2. Dewan Direksi menjalankan fungsi kebijakan risiko (*risk policy*) melalui *Executive Committee* terkait manajemen risiko yaitu *Risk Management Committee, Asset & Liability Committee, Capital Subsidiaries Committee* dan *Integrated Risk Committee*.	2. The Board of Directors performed risk policy through Executive Committee related to risk management, i.e., Risk Management Committee, Asset & Liability Committee, Capital Subsidiaries Committee and Integrated Risk Committee.
3. Di tingkat operasional, Satuan Kerja Manajemen Risiko bersama unit bisnis dan unit kerja kepatuhan melakukan fungsi identifikasi risiko, pengukuran risiko, mitigasi risiko dan pengendalian risiko.	3. At the operational level, the Risk Management Work Unit together with the business unit and compliance work unit performed risk identification, risk measurement, risk mitigation and risk control functions.

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Empat Pilar Penerapan Manajemen Risiko Implementasi Manajemen Risiko Bank Mandiri dilaksanakan sesuai dengan ketentuan dari regulator yaitu dengan menerapkan empat pilar penerapan Manajemen Risiko sebagai berikut:	**Four Pillar of Risk Management Implementation** Implementation of Bank Mandiri Risk Management was implemented in accordance with the provision of the regulator by applying the four pillars of Risk Management implementation as follows:
1. Pengawasan Aktif Dewan Komisaris dan Direksi Kerangka kerja dan tata kelola manajemen risiko di Bank Mandiri terdiri dari Dewan Komisaris yang menjalankan fungsi pengawasan risiko (*risk oversight*) melalui Komite Audit, Komite Pemantau Risiko (KPR) dan Komite Tata Kelola Terintegrasi (TKT), serta Dewan Direksi yang menjalankan fungsi kebijakan risiko (*risk policy*) melalui *Executive Committee* terkait manajemen risiko yaitu *Risk Management Committee, Asset and Liability Committee, Capital and Subsidiaries Committee,* dan *Integrated Risk Committee*. Di tingkat operasional, Satuan Kerja Manajemen Risiko bersama Unit Bisnis dan Unit Kerja Kepatuhan melakukan fungsi identifikasi risiko, pengukuran risiko, mitigasi risiko dan pengendalian risiko. Tugas, tanggung jawab, dan wewenang Dewan Komisaris terkait dengan pengawasan aktif dalam kegiatan Manajemen Risiko antara lain meliputi: 1) Memahami risiko yang melekat pada aktivitas fungsional Bank, terutama yang dapat mempengaruhi kondisi keuangan Bank; 2) Mengevaluasi dan menyetujui kebijakan Manajemen Risiko yang dilakukan	**1. Active Monitoring of The Board of Commissioners and The Board of Directors** The risk management and governance frameworks of Bank Mandiri consisted of the Board of Commissioners performing the risk oversight function through the Audit Committee, Risk Monitoring Committee (KPR) and Integrated Governance Committee (TKT), as well as the Board of Directors performing the risk policy function through the Executive Committee related to risk management i.e., Risk Management Committee, Asset and Liability Committee, Capital and Subsidiaries Committee, and Integrated Risk Committee. At the operational level, the Risk Management Work Unit with the Business Unit and Compliance Unit performed the risk identification, risk measurement, risk mitigation and risk control functions. The duties, responsibilities and authorities of the Board of Commissioners in relation to the active monitoring of Risk Management activities included the following: 1) Understanding the risks attached to the Bank's functional activities, particularly those that may affect the Bank's financial condition; 2) Evaluating and approving Risk Management policies conducted at least

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sekurang-kurangnya satu kali dalam satu tahun atau dalam frekuensi yang lebih tinggi dalam hal terdapat perubahan faktor-faktor yang mempengaruhi kegiatan usaha Bank secara signifikan;	once a year or in higher frequency in the event of significant changes in factors affecting the Bank's business activities;
3) Melakukan evaluasi kepada Direksi mengenai penerapan Manajemen Risiko agar sesuai dengan kebijakan, strategi dan prosedur Bank yang telah ditetapkan;	3) Evaluating to the Board of Directors regarding the implementation of Risk Management to comply with Bank policies, strategies and procedures;
4) Memberikan konsultasi kepada Direksi terhadap transaksi atau kegiatan usaha dengan jumlah dana yang besar;	4) Providing consultations to the Board of Directors on transactions or business activities with large amounts of funds;
5) Menyetujui penyediaan dana kepada pihak terkait atas kredit yang diusulkan oleh komite kredit sesuai kewenangannya;	5) Approving the provision of funds to related parties on proposed credits by the credit committee in accordance with its respective authority;
6) Melakukan pengawasan secara aktif terhadap kecukupan modal Bank sesuai dengan profil risiko Bank secara menyeluruh, termasuk me*review Risk Appetite* Bank yang ditetapkan Direksi;	6) conducting active monitoring on the Bank's capital adequacy in accordance with the Bank's risk profile as a whole, including reviewing the Risk Appetite Bank determined by the Board of Directors;
7) Meningkatkan kepedulian dan budaya anti *fraud* pada seluruh jajaran organisasi Bank;	7) Increasing anti-fraud culture and concerns on all personnel of the Company.
8) Mengawasi penerapan Manajemen Risiko Terintegrasi sesuai dengan karakteristik dan kompleksitas usaha Bank.	8) Monitoring the implementation of Integrated Risk Management in accordance with the characteristics and complexity of the Bank's business.
Dalam rangka penerapan Manajemen Risiko Terintegrasi, Dewan Komisaris bertanggung jawab sebagai berikut:	In order to implement Integrated Risk Management, the Board of Commissioners was responsible for the following:
1) Mengarahkan, menyetujui, dan mengevaluasi kebijakan yang mengatur	1) Directing, approving, and evaluating policies regulating the Integrated Risk

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mengenai Manajemen Risiko Terintegrasi secara berkala;	Management on a regular basis;
2) Mengevaluasi pelaksanaan kebijakan Manajemen Risiko Terintegrasi oleh Direksi Entitas Utama.	2) Evaluating the implementation of the Integrated Risk Management policies by the Directors of the Main Entity.
2. Kecukupan Kebijakan, Prosedur, dan Penetapan Limit	**2. Sufficieny of Policies, Procedures, And Determination Of Limit**
Bank Mandiri memiliki Kebijakan Manajemen Risiko Bank Mandiri (KMRBM) yang dijadikan sebagai pedoman utama dalam melaksanakan manajemen risiko. Untuk area bisnis yang lebih spesifik, Bank Mandiri memiliki kebijakan dan prosedur yang lebih khusus, misalnya di bidang perkreditan, *treasury*, dan operasional. Dalam kebijakan dan prosedur tersebut, antara lain diatur mengenai penetapan limit untuk masing-masing aktivitas, baik pada level portfolio maupun transaksional.	Bank Mandiri had a Bank Mandiri Risk Management Policy (KMRBM) serving as the main guideline in implementing the risk management. For a more specific business area, Bank Mandiri had more specific policies and procedures, such as in credit, treasury, and operations. In such policies and procedures, among others were regulated on the limit determination for each activity, both at the portfolio and transactional levels.
Seluruh kebijakan dan prosedur di Bank Mandiri merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasi Bank yang dievaluasi dan di-*update* minimal sekali dalam setahun.	All policies and procedures in Bank Mandiri were a form of risk management inherent in every Bank operating activity evaluated and updated at least once a year.
3. Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko, Serta Sistem Informasi Manajemen Risiko	**3. Adequacy of Risk Identification, Measurement, Monitoring, and Control Process and Risk Management Information System**
Bank Mandiri menjalankan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko, dan Sistem Informasi Manajemen Risiko melalui kerangka kerja *Enterprise Risk Management* (ERM). Implementasi ERM di Bank Mandiri menggunakan pendekatan *two-prong*,	Bank Mandiri had implemented Identification, Measurement, Monitoring, Risk Control, and Risk Management Information System through an Enterprise Risk Management (ERM) platform. Implementation of ERM at Bank Mandiri used a two-prong approach, to ensure that risks

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untuk memastikan bahwa risiko tidak hanya dimitigasi dengan baik memalui proses bisnis sehari-hari, namun juga pada kondisi yang tidak terduga (*downturn*) melalui pencadangan modal. Terdapat 4 (empat) komponen utama yang berfungsi sebagai pilar pendukung dalam penerapan pendekatan *two-prong*, antara lain: 1) Organisasi dan Sumber Daya Manusia (SDM) Satuan Kerja Manajemen Risiko Bank Mandiri bertanggung jawab dalam mengelola seluruh risiko yang dihadapi Bank Mandiri, termasuk dalam hal pengembangan *tools* pendukung yang dibutuhkan dalam proses bisnis dan pengelolaan risiko. Selain itu, terdapat unit kerja yang bertindak sebagai *risk counterpart* dari setiap unit bisnis dalam proses *four-eye* pemberian kredit. Menyadari bahwa pengelolaan risiko menjadi tanggung jawab seluruh unit kerja di Bank Mandiri, maka keberhasilan pengelolaan risiko ditentukan oleh adanya *risk awareness* di seluruh unit kerja Bank Mandiri yang disertai dengan kemampuan teknis yang memadai. Oleh karena itu, Bank Mandiri senantiasa meningkatkan kapabilitas dan pengetahuan seluruh pegawai terutama dalam hal pengelolaan risiko, dengan menyelenggarakan pelatihan internal secara rutin melalui *Risk Management Academy*. Selain itu, Bank Mandiri juga secara rutin minimal sekali dalam	were not only properly mitigated through day-to-day business processes, but also under unexpected conditions/downturn through capital reserves. There are four main components that function as supporting pillars in the implementation of a two-prong approach, among others: 1) Organization and Human Capital (HC) Bank Mandiri Risk Management Unit was responsible for managing all risks faced by Bank Mandiri, including in the development of the necessary supporting tools in business processes and risk management. In addition, there was a work unit acting as a risk counterpart of each business unit in the crediting four-eye process. Recognizing that risk management was the responsibility of all working units at Bank Mandiri, the success of risk management was determined by the existence of risk awareness across all work units of Bank Mandiri accompanied by adequate technical capabilities. Bank Mandiri had always improved the capability and knowledge of all its employees, particularly in terms of risk management, by organizing regular internal trainings through the Risk Management Academy. In addition, Bank Mandiri also regularly, minimum once a year, holds socialization, discussion forums, internship, or other programs related to risk management, which are in line with corporate culture internalization. Risk Management Unit at Bank Mandiri

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setahun mengadakan sosialisasi, forum diskusi, magang, maupun program mengenai manajemen risiko yang sejalan dengan internalisasi budaya perusahaan. Unit *Risk Management* di Bank Mandiri terdiri dari Direktorat *Retail Risk* dipimpin oleh SEVP *Retail Risk*, Direktorat *Wholesale Risk* dipimpin oleh SEVP *Wholesale Risk* dan Direktorat *Risk Management* dipimpin oleh Direktur *Risk Management & Compliance*.	consisted of Retail Risk Directorate led by SEVP Retail Risk, Wholesale Risk Directorate led by SEVP Wholesale Risk and Risk Management Directorate led by Risk Management & Compliance Director.
2) Kebijakan dan Prosedur	2) Policies and Procedures
Kebijakan Manajemen Risiko Bank Mandiri (KMRBM) dijadikan sebagai pedoman utama dalam melaksanakan pengelolaan risiko secara operasional dan pengelolaan modal di Bank Mandiri mencakup:	Bank Mandiri Risk Management Policy (KMRBM) served as the main guidance in implementing operational risk management and capital management at Bank Mandiri including:
a. Prinsip kehati-hatian, antara lain Penyediaan Kecukupan Modal, *Early Warning System*, Penetapan *Limit* dan Diversifikasi Risiko.	a. Prudential principles were, among others, Provision of Capital Adequacy, Early Warning System, Limit Determination and Risk Diversification.
b. Manajemen Risiko, antara lain *Risk Profile, Risk Appetite, Stress Testing* dan Manajemen Risiko Terintegrasi.	b. Risk Management were, among others, Risk Profile, Risk Appetite, Stress Testing and Integrated Risk Management.
c. Manajemen Risiko untuk masing-masing jenis risiko, yang meliputi proses identifikasi, pengukuran, pemantauan dan pengendalian risiko.	c. Risk Management for each risk type, including the process of identification, measurement, monitoring and risk control.
d. Pengawasan Risiko, yang meliputi pemantauan penerapan aktifitas/ metodologi pengelolaan risiko di Bank Mandiri, serta Sistem	d. Risk Monitoring, including monitoring the implementation of risk management activities/ methodologies at Bank Mandiri, and

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Pengendalian Internal.	the Internal Control System.
Kebijakan Manajemen Risiko ini menjadi dasar atas penyusunan prosedur dan pertunjuk teknis terkait dengan pengelolaan risiko di Bank Mandiri.	This Risk Management Policy became the basis for the preparation of procedures and technical guidance related to the risk management at Bank Mandiri.
3) Sistem dan Data	3) System and Data
Sistem manajemen risiko dikembangkan untuk mendukung proses bisnis yang lebih efisien agar pengambilan keputusan dapat lebih cepat namun tetap mengacu pada prinsip kehatihatian. Dalam rangka menjaga integritas dan kualitas data, Bank Mandiri telah menerapkan *Integrated Processing System* dan *Loan Origination System* untuk meningkatkan efisiensi proses kredit serta menjaga kualitas data di segmen korporasi, komersial maupun retail. Untuk meningkatkan produktivitas aktivitas *collection* khususnya di segmen konsumer dan ritel, Bank mengimplementasikan *Integrated Collection System*. Bank Mandiri menggunakan *Summit System* dan ALM *System* untuk mengelola risiko *trading book* dan *banking book* dalam kegiatan *treasury* dan *asset & liability management*. Untuk mendapatkan gambaran profil risiko Bank Mandiri baik selaku perusahaan induk maupun profil risiko Bank yang terkonsolidasi dan terintegrasi	The risk management system was developed to support more efficient business processes in order to make decision making faster but still referred to the principles of prudence. In order to maintain data integrity and quality, Bank Mandiri had implemented Integrated Processing System and Loan Origination System to improve credit process efficiency and maintain data quality in corporate, commercial and retail segments. To improve the productivity of collection activities especially in consumer and retail segments, Bank implemented Integrated Collection System. Bank Mandiri used Summit System and ALM System to manage trading book and banking book risk in treasury and asset & liability management activities. To obtain Bank Mandiri's risk profile as a holding company as well as the Bank's risk profile that was consolidated and integrated with subsidiaries, the Bank had implemented Risk Assessment Consolidation Generator System (RACER System) on a web-based basis so as to accelerate access and simplify

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dengan perusahaan anak, Bank telah mengimplementasikan *Risk Assessment Consolidation Generator System* (RACER *System)* secara *web-based* sehingga mempercepat akses dan mempermudah kontrol. Dalam hal integrasi pengelolaan risiko secara *bankwide*, Bank Mandiri telah mengimplementasikan ERM *system* sebagai sarana untuk memantau pengelolaan risiko secara keseluruhan, terutama dalam menghitung modal untuk meng*cover* semua jenis risiko. ERM *system* memiliki kapabilitas untuk melakukan perhitungan *capital charge* (*Standardized Approach* dan *Advanced Approach*), implementasi *operational risk management tools*, *active portfolio management*, *stress testing* dan *value-based management*.	control. In terms of integration of risk management through bank-wide, Bank Mandiri had implemented ERM system as a means to monitor overall risk management, especially in calculating capital to cover all risk types. ERM system had the capability to perform capital charge calculation (Standardized Approach and Advanced Approach), implementation of operational risk management tools, active portfolio management, stress testing and value-based management.
4) Metodologi/Model dan *Analytics*	4) Methodology/Model and Analytics
Bank Mandiri secara berkelanjutan menerapkan pengukuran risiko yang mengacu kepada *international best practices* dengan menggunakan pendekatan permodelan kuantitatif maupun kualitatif melalui pengembangan model risiko seperti *rating, scoring, Value at Risk* (VaR), *portfolio management, stress testing* dan model lainnya sebagai pendukung *judgemental decision making*. Secara periodik, model-model	Bank Mandiri continuously applied risk measurements referring to international best practices using quantitative and qualitative modeling approaches through the development of risk models such as ratings, scoring, Value at Risk (VaR), portfolio management, stress testing and other models as judgmental decision making support. Periodically, these risk models were calibrated and validated by the independent Model Risk Validator unit to maintain the reliability and validity of the model and meet regulatory

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risiko tersebut dikalibrasi dan divalidasi oleh unit *Model Risk Validator* yang bersifat independen untuk menjaga keandalan dan validitas model serta memenuhi persyaratan regulasi. Dalam rangka penyelarasan antara penerapan Basel II dan ERM dengan regulasi Basel II dan penerapan *best practice*, Bank Mandiri bekerja sama dengan salah satu konsultan terkemuka di bidang manajemen risiko untuk membantu proses adopsi serta implementasi *framework* Basel II dan ERM. Implementasi Basel II dan ERM di Bank Mandiri meliputi area di Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Suku Bunga pada *Banking Book Position*, Risiko Operasional, Pengelolaan Modal dan *Internal Capital Adequacy Assessment Process* (ICAAP).	requirements. In order to align the implementation of Basel II and ERM with Basel II regulations and best practice implementation, Bank Mandiri cooperated with one of the leading risk management consultants to assist in the adoption and implementation of the Basel II and ERM frameworks. Basel II and ERM Implementation at Bank Mandiri covers areas in Credit Risk, Market Risk, Liquidity Risk, Interest Rate Risk in Banking Book Position, Operational Risk, Capital Management and Internal Capital Adequacy Assessment Process (ICAAP).
Prinsip Manajemen Risiko Bank Mandiri	**Risk Management Principle of Bank Mandiri**
Prinsip Manajemen Risiko Bank Mandiri adalah sebagai berikut:	The Bank Mandiri Risk Management Principles were as follows:
1. **Permodalan.** Bank Mandiri menyediakan permodalan sesuai risiko yang ditanggung dan memelihara tingkat permodalan sesuai ketentuan yang berlaku.	1. **Capital.** Bank Mandiri provided capital according to the borne risks and maintained the level of capital in accordance with the applicable regulations.
2. **Transparansi.** Bank Mandiri secara terbuka menyampaikan informasi yang relevan dalam proses pengambilan risiko dan proses pengambilan risiko itu sendiri.	2. **Transparency.** Bank Mandiri openly disclosed relevant information in the risk-taking process and the risk-taking process itself.
3. **Independensi.** Manajemen Bank Manditi	3. **Independence.** The management of Bank

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bertindak secara profesional dan terbebas dari tekanan dan pengaruh pihak lain.	Mandiri acted professionally and was free from the pressure and influence of others.
4. **Terintegrasi.** Bank Mandiri menerapkan Manajemen Risiko Terintegrasi pada Lembaga Jasa Keuangan yang tergabung dalam konglomerasi keuangan Bank Mandiri sesuai dengan ketentuan regulator.	4. **Integrated.** Bank Mandiri implemented the Integrated Risk Management at Financial Services Institutions incorporated in the financial conglomeration of Bank Mandiri in accordance with the regulator's requirements.
5. **Berkesinambungan.** Pengendalian risiko dilakukan secara terusmenerus dikembangkan agar lebih baik sesuai dengan kondisi bisnis dan *best practice* yang ada.	5. **Continuous.** Risk control was continuously developed to better suit the available business conditions and best practices.
6. **Akuntabilitas.** Bank Mandiri menerapkan kebijakan dan prosedur untuk menjamin akuntabilitas manajemen terhadap *stakeholde*	6. **Accountability.** Bank Mandiri implemented policies and procedures to ensure management accountability to stakeholders.
7. **Responsibilitas.** Bank Mandiri bertindak berdasarkan prinsip kehati-hatian dan kepatuhan terhadap peraturan perundangan yang berlaku.	7. **Responsibility.** Bank Mandiri acted upon the principles of prudence and compliance with the applicable laws and regulations.
8. **Kewajaran** (*fairness*). Bank Mandiri memperhatikan kepentingan *stakeholders* berdasarkan asas kesetaraan dan kewajaran *(equal treatment).*	8. **Fairness.** The Company took into account the interest of all stakeholders based on the principles of fairness and equality (equal treatment).
Evaluasi Pelaksanaan Manajemen Risiko	**Evaluation of Risk Management Implementation**
Bank senantiasa melakukan evaluasi atas efektivitas sistem manajemen risiko. Evaluasi meliputi penyesuaian strategi dan kerangka risiko sebagai bagian dari kebijakan manajemen risiko, kecukupan sistem informasi manajemen risiko serta kecukupan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko.	The Bank constantly evaluates the effectiveness of the system risk management. Evaluations include strategy adjustments and risk framework as part of risk management policy, adequacy of risk management information systems and adequacy process of identification, measurement, monitoring and control risk.

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Salah satu bentuk evaluasi pada kebijakan manajemen risiko adalah *annual evaluation* terhadap Kebijakan Manajemen Risiko Bank Mandiri (KMRBM) dan standar prosedur. Hasil *annual evaluation* menunjukkan bahwa manajemen risiko di Bank Mandiri selama 2017 telah memadai.	One form of evaluation on risk management policy is annual evaluation of the Bank's Risk Management Policy Mandiri (KMRBM) and standard procedures. The annual evaluation results shows that risk management at Bank Mandiri during 2017 is sufficient
Penerapan Manajemen Risiko Terintegrasi	**Implementation of Integrated Risk Management**
Konsolidasi/Integrasi manajemen risiko Bank Mandiri telah dimulai secara bertahap sejak tahun 2008 selaras dengan diterbitkan ketentuan BI nomor 8/6/PBI/2006 tentang Penerapan Manajemen Risiko Secara Konsolidasi Bagi Bank Yang Melakukan Pengendalian Terhadap Perusahaan Anak serta POJK No.17/POJK.03/2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan. Tahapan tersebut hingga saat ini menjadi salah satu bentuk inisiatif strategis unit kerja manajemen risiko di Bank Mandiri yang secara berkala dikomunikasikan dengan Otoritas Jasa Keuangan dalam sebuah forum yang khusus mendiskusikan topik profil risiko maupun Tingkat Kesehatan Bank (*Risk Based Bank Rating)*.	Consolidation/ntegration of Bank Mandiri risk management has begun gradually since 2008 in harmony with the published Bank Indonesia regulation number 8/6/PBI/2006 concerning Application of Management Consolidated Risk for the Controlling Bank Against Subsidiaries and POJK No.17/POJK.03/2014 on Application of Integrated Risk Management for Conglomeration Finance. These stages have until now become one form of strategic initiative of risk management working unit in Bank Mandiri which is periodically communicated with the Authority Financial Services in a special forum to discuss topics of risk profile and Bank Rating (Risk Based Bank Rating).
Hal tersebut dipandang penting karena Bank Mandiri menyadari bahwa kelangsungan usahanya juga dipengaruhi oleh eksposur risiko yang timbul secara langsung maupun tidak langsung dari kegiatan usaha Perusahaan Anak. Terkait hal tersebut, Bank Mandiri telah mengimplementasikan sistem konsolidasi/integrasi manajemen risiko	This is important because Bank Mandiri realized that its viability is also affected by risk exposure which arise directly or indirectly from activities business of the Subsidiary Company. Related to this, Bank Mandiri has implement a consolidation / integration management system risks to subsidiaries operating in Indonesia and outside the territory of Indonesia while remaining in line with

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terhadap perusahaan anak baik yang beroperasi di Indonesia dan di luar wilayah Indonesia dengan tetap memenuhi prinsipprinsip manajemen risiko dan disesuaikan dengan yurisdiksi otoritas/pengawas setempat, serta mempertimbangkan karakteristik bisnis dari masing-masing perusahaan anak. Konsep konsolidasi/integrasi manajemen risiko yang dijalankan oleh Bank Mandiri dan perusahaan anak secara umum dibagi menjadi 2 (dua) bagian besar, yaitu:	principles risk management and adapted to the jurisdiction of authority / local supervisors, as well as taking into account business characteristics of each subsidiary company. Concept of consolidation/ integration risk management undertaken by Bank Mandiri and the company children are generally divided into 2 (two) major parts, namely:
1. *First Line*, yaitu yang berkaitan dengan pemenuhan ketentuan POJK nomor 38/POJK.03/2017 tentang Penerapan Manajemen Risiko Secara Konsolidasi Bagi Bank Yang Melakukan Pengendalian Terhadap Perusahaan Anak, POJK Nomor 17/POJK.03/2014 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan, serta POJK Nomor 04/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.	1. First Line, which is related to the fulfillment of the provisions POJK number 38/POJK.03/2017 on Implementation of Management Consolidated Risk For a Doing Bank Control of Subsidiaries, POJK No. 17/POJK.03/2014 on the Implementation of Integrated Risk Management For the Financial Conglomeration, as well as POJK Number 04/POJK.03/2016 on the Rating of Commercial Bank Health.
2. *Second Line*, yaitu yang lebih merupakan pendekatan kebutuhan internal Bank Mandiri secara keseluruhan yang mencakup perangkat (*tools*), kesadaran risiko (*awareness*), tata kelola perusahaan (*governance*), dan sistem informasi manajemen risiko (*system*).	2. Second Line, which is more a needs approach internal Bank Mandiri as a whole that covers tools, awareness, governance corporate (governance), and management information systems risk (system). Gradually, Bank Mandiri has implemented consolidation/integration of risk management with subsidiary companies included in financial services institutions (Bank Syariah Mandiri, Bank Mandiri

Kebijakan Manajemen Risiko PT Bank Mandiri (Persero) Tbk.	Risk Management Policy PT Bank Mandiri (Persero) Tbk.
Secara bertahap, Bank Mandiri telah melaksanakan konsolidasi/integrasi pengelolaan risiko dengan perusahaan anak yang termasuk dalam lembaga jasa keuangan (Bank Syariah Mandiri, Bank Mandiri Europe Ltd, Bank Mandiri Taspen, Mandiri Sekuritas, Mandiri Manajemen Investasi, AXA Mandiri Financial Services, Mandiri AXA General Insurance, Mandiri InHealth Mandiri Tunas Finance, Mandiri Utama Finance, Mandiri International Remittance, dan Mandiri Capital Indonesia). Dalam rangka penerapan manajemen risiko terintegrasi yang komprehensif, Bank membentuk Komite Manajemen Risiko yang beranggotakan Direktur/Pejabat Eksekutif yang membawahkan fungsi *Risk Management* dari Bank serta Perusahaan Anak yang berperan dalam memberikan rekomendasi atas penyusunan, perbaikan serta penyempurnaan kebijakan manajemen risiko terintegrasi. Selain itu Bank juga membentuk Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) yang bertanggung jawab langsung kepada Direktur yang membawahkan fungsi *Risk Management*. Berikut tugas dan tanggung jawab SKMRT.	Gradually, Bank Mandiri has implemented consolidation/integration of risk management with subsidiary companies included in financial services institutions (Bank Syariah Mandiri, Bank Mandiri Europe Ltd, Bank Mandiri Taspen, Mandiri Sekuritas, Mandiri Investment Management, AXA Mandiri Financial Services, Mandiri AXA General Insurance, Mandiri InHealth Mandiri Tunas Finance, Mandiri Utama Finance, Mandiri International Remittance, and Mandiri Capital Indonesia). In order to implement integrated risk management comprehensive, the Bank established a Risk Management Committee consists of the Director/ Executive Officer in charge the Risk Management function of the Bank and the Subsidiary Company play a role in providing recommendations on the preparation, improvement and improvement of risk management policies integrated. In addition, the Bank also established a Work Unit Integrated Risk Management (SKMRT) is responsible answer directly to the Director who in charge of Risk function Management. Here are the duties and responsibilities of SKMRT.