

<b>KEBIJAKAN MANAJEMEN RISIKO PT Bank Mandiri (Persero) Tbk.</b>	<b>RISK MANAGEMENT POLICY PT Bank Mandiri (Persero) Tbk.</b>
<p>Risiko merupakan potensi kerugian yang mungkin dialami oleh Bank akibat terjadinya suatu peristiwa tertentu. Manajemen Risiko adalah serangkaian metodologi dan prosedur yang digunakan oleh Bank untuk mengidentifikasi, mengukur, memantau, dan mengendalikan Risiko yang timbul dari seluruh kegiatan usaha Bank.</p> <p>Bank menggunakan pendekatan Manajemen Risiko dan Prinsip Kehati-hatian dalam mengelola segala jenis risiko yang melekat pada aktivitas Bank dan Perusahaan Anak. Adapun risiko yang dikelola adalah Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Strategik, Risiko Kepatuhan. Dalam rangka Manajemen Risiko secara Terintegrasi, Bank juga melakukan pengelolaan terhadap Risiko Asuransi dan Risiko Transaksi Intra-Group.</p> <p>Bank memiliki Kebijakan Manajemen Risiko yang didalamnya mengatur hal-hal yang menjadi pedoman bagi Pegawai dan Pejabat Bank dalam menjalankan Manajemen Risiko baik secara individual Bank maupun secara Terintegrasi dengan Perusahaan Anak. Kebijakan Manajemen Risiko Bank Mandiri disusun mengacu kepada peraturan Pemerintah dan peraturan Regulator yang terkait, serta Anggaran Dasar Bank.</p> <p><b>PRINSIP MANAJEMEN RISIKO</b></p> <p>Dalam menjalankan fungsi Manajemen Risiko, Bank merapkan 8 (delapan) prinsip sebagai berikut:</p> <ol style="list-style-type: none"> <li>1. Permodalan Bank menyediakan permodalan sesuai risiko yang ditanggung Bank dan memelihara tingkat permodalan sesuai dengan ketentuan yang berlaku.</li> </ol>	<p>Risks are potential loss that may be gone through by Bank caused by which may be caused by a certain event. Risk Management is a series of methodology and procedure which are used by Bank for applying identification, measurement, monitoring and controlling the Risks that may arise out of Bank's business activities.</p> <p>Bank applies Risk Management approach and Prudent Principles in managing all various of risks which are attributed to Bank and its subsidiaries' business activities.</p> <p>Bank has arranged Risk Management Policy which regulates issues which become a guideline for its Employees and Officials in the implementation of Risk Management either individually or Integrated with the subsidiary companies. Risk Management Policy of Bank Mandiri is arranged by referring to Governmental Regulations and the elated Regulatory Provisions, as well as based on Articles of Association of Bank.</p> <p><b>RISK MANAGEMENT PRINCIPLES</b></p> <p>Bank applies 8 (eight) principles in implementing Risk Management functions, as follows:</p> <ol style="list-style-type: none"> <li>1. Capital Bank provides capital by taking into account the risks which are dealt with Bank and maintaining its capital adequacy complying with the applicable laws and regulations.</li> </ol>



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<p>2. <b>Transparansi</b> Bank secara terbuka menyampaikan informasi yang relevan dalam proses pengambilan risiko.</p> <p>3. <b>Independensi</b> Manajemen Bank bertindak secara profesional dan terbebas dari tekanan dan pengaruh pihak lain.</p> <p>4. <b>Terintegrasi</b> Bank menerapkan Manajemen Risiko Terintegrasi pada Lembaga Jasa Keuangan yang tergabung dalam Konglomerasi Keuangan Bank sesuai dengan ketentuan Regulator.</p> <p>5. <b>Berkesinambungan</b> Pengendalian risiko dilakukan secara terus-menerus dikembangkan agar lebih baik sesuai dengan kondisi bisnis dan <i>best practice</i> yang ada.</p> <p>6. <b>Akuntabilitas</b> Bank menerapkan kebijakan dan prosedur untuk menjamin akuntabilitas manajemen terhadap <i>stakeholder</i>.</p> <p>7. <b>Responsibilitas</b> Bank bertindak berdasarkan prinsip kehati-hatian dan kepatuhan terhadap peraturan perundangan yang berlaku.</p> <p>8. <b>Kewajaran (<i>fairness</i>)</b> Bank memperhatikan kepentingan <i>stakeholders</i> berdasarkan asas kesetaraan dan kewajaran (<i>equal treatment</i>)</p>	<p>2. <b>Transparency</b> Bank transparently disclose the relevant information in risk taking process.</p> <p>3. <b>Independency</b> Bank's management team acts professionally and independently free from intervention and influence of other parties.</p> <p>4. <b>Integrated</b> Bank applies the Integrated Risk Management on the Financial Services Institution within Bank's Financial Conglomeration in compliance with the applicable provisions of Regulator.</p> <p>5. <b>Continuity</b> Control of the risks is implemented continually to be developed to achieve a better one in line with business conditions and the existing best practices.</p> <p>6. <b>Accountability</b> Bank applies a certain policies and procedures to give an assurance of accountability of management in dealing with the stakeholders.</p> <p>7. <b>Responsibility</b> Bank will always act based on prudence and compliance principles with the applicable laws and regulations.</p> <p>8. <b>Fairness</b> Bank pays attention on the stakeholders' interests based on equality and fairness principles.</p>
<p><b>TATA KELOLA MANAJEMEN RISIKO</b></p> <p>Kerangka kerja dan tata kelola manajemen risiko di Bank Mandiri menganut prinsip Empat Pilar sebagai berikut:</p> <p>1. Pengawasan aktif Dewan Komisaris dan Direksi</p>	<p><b>RISK MANAGEMENT GOVERNANCE</b></p> <p>Framework and governance of the risk management in Bank Mandiri adheres to Four Pillars Principles as follows:</p> <p>1. Active Control of Board of Directors and Board</p>



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<p>Dewan Komisaris dan Direksi Bank Mandiri memahami risiko-risiko yang dihadapi Bank dan memberikan arahan yang jelas, melakukan pengawasan dan mitigasi secara aktif serta mengembangkan budaya manajemen risiko.</p> <p>Dewan Komisaris menjalankan fungsi pengawasan risiko (<i>risk oversight</i>) melalui Komite Pemantau Risiko, Komite Tata Kelola Terintegrasi, dan Komite Audit. Dewan Direksi menjalankan fungsi kebijakan risiko (<i>risk policy</i>) melalui <i>Executive Committee</i> terkait Manajemen Risiko yaitu Risk Management Committee, Asset &amp; Liability Committee, dan Integrated Risk Committee.</p>	<p>of Commissioner</p> <p>Board of Commissioners and Board of Directors of Bank Mandiri are fully aware of risks which are encountered by Bank and they provide a clear direction, performing monitoring and mitigation proactively as well as developing the risk management culture.</p> <p>Board of Commissioners runs its risk oversight function through the Risk Monitoring Committee, Integrated Governance Committee, and Audit Committee. Board of Commissioners runs its risk policy function through Executive Committee related to Risk Management, i.e. Risk Management Committee, Asset and Liability Committee, and Integrated Risk Committee.</p>
<p>2. Kecukupan Kebijakan, Prosedur dan Penetapan Limit</p> <p>Penerapan Manajemen Risiko di Bank Mandiri didukung dengan kerangka yang mencakup kebijakan dan prosedur Manajemen Risiko serta limit risiko yang ditetapkan secara jelas dan sejalan dengan visi, misi, dan strategi Bisnis Bank serta peraturan perundang-undangan yang berlaku.</p> <p>Penetapan limit risiko telah memadai, yang meliputi limit per produk/transaksi, perjenis risiko, dan per aktivitas fungsional dan melakukan limit monitoring secara periodik.</p>	<p>2. Policy Adequacy, Procedure and Determination of Limitation</p> <p>Implementation of Risk Management in Bank Mandiri is espoused with a framework which covers Risk Management policy and procedure as well as the risk limit which is clearly determined and in line with the vision, mission and Bank's Business strategies as well as compliance with the applicable laws and regulations.</p> <p>An adequate limitation of risk has been set up which encompasses the limitation applied on each product/transaction, each type of risk, and each functional activity and performing a periodic limit monitoring.</p>
<p>3. Kecukupan proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko serta Sistem Informasi Manajemen Risiko</p> <p>Bank melakukan proses identifikasi dan pengukuran risiko secara tepat terhadap</p>	<p>3. Adequacy of Identification, Measurement, Monitoring and Controlling of Risk as well as Risk Management Information System</p> <p>Bank carries out the risk identification and measurement accurately on each risky</p>



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<p>setiap produk/transaksi yang mengandung risiko. Identifikasi risiko bersifat proaktif, mencakup seluruh aktivitas bisnis Bank dan dilakukan dalam rangka menganalisa sumber dan kemungkinan timbulnya risiko beserta dampaknya terhadap Bank.</p> <p>Bank telah memiliki sistem pemantauan eksposur risiko yang memadai, meliputi adanya fungsi independen yang melakukan pemantauan terhadap eksposur risiko secara rutin, adanya sistem informasi yang akurat dan tepat waktu, dan adanya feedback beserta tindak lanjut perbaikan/penyempurnaan.</p> <p>4. Sistem Pengendalian Intern Yang Menyeluruh Bank melaksanakan sistem pengendalian intern dalam penerapan Manajemen Risiko Bank dengan mengacu kepada kebijakan dan prosedur yang telah ditetapkan. Bank memiliki penetapan wewenang dan tanggungjawab pemantauan kepatuhan, kebijakan, prosedur, dan limit.</p> <p>Satuan kerja audit intern Bank melakukan audit secara berkala dengan cakupan yang memadai, mendokumentasikan temuan audit, dan tanggapan manajemen atas hasil audit, serta melakukan review terhadap tindak lanjut temuan audit.</p> <p><b>PENERAPAN MANAJEMEN RISIKO</b></p> <p>Dalam melakukan penerapan Manajemen Risiko, Bank melakukan pengelolaan risiko terhadap sepuluh jenis risiko sesuai dengan ketentuan Regulator.</p> <p>1. Risiko Kredit</p> <p>Bank menerapkan prinsip kehati-hatian dalam pemberian kredit dengan menerapkan <i>four eye principal</i>. Dalam menilai dan memantau</p>	<p>product/transaction. Risk identification is carried out proactively, encompassing all Bank's business activities and carried out for the purposes of analyzing sources and possibility of risk emergence along with impacts on Bank.</p> <p>Bank has maintained a proper risk exposure monitoring system covering the availability of the independent functions which carry out monitoring the risk exposure regularly, providing an accurate and punctual information system, and further maintenance/improvement.</p> <p>4. Bank implements an internal control system in the application of Bank Risk Management by referring to the specified policy and procedures. Bank has also arranged authorities and responsibilities for monitoring compliance, policy, procedure, and limit.</p> <p>Internal units of Bank Mandiri carries out the appropriate periodic audits, preparing documentation of audit findings and management responses on audits results as well as arranging interviews on further action over audits findings.</p> <p><b>IMPLEMENTATION OF RISK MANAGEMENT</b></p> <p>There are ten risks that must be managed by Bank as specified by the Regulatory Body.</p> <p>1. Credit Risk</p> <p>Bank applies the prudence principles in providing credit facilities by implementing four eyes principles. In taking measurement and</p>



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<p>kualitas kredit, Bank mengacu kepada regulasi yang berlaku.</p> <p>Proses pemberian kredit dan pengelolaan kredit dilakukan oleh Business Unit, Credit Risk Management dan Credit Operation Unit secara terintegrasi. Proses pemberian kredit dan pengelolaan risiko kredit didukung oleh sistem yang terintegrasi dan dilakukan secara <i>end-to-end</i> dari kriteria penerimaan kredit, persetujuan dan penetapan limit kredit, penetapan suku bunga kredit, pemantauan kualitas kredit, manajemen agunan dan penanganan kredit bermasalah.</p> <p>2. Risiko Pasar</p> <p>Manajemen Risiko Pasar, termasuk Risiko Suku Bunga, Risiko Nilai Tukar, dan Risiko Ekuitas dilakukan pada <i>banking book</i> maupun <i>trading book</i> baik pada aktivitas fungsional tertentu maupun pada aktivitas Bank secara keseluruhan. Pemantauan Risiko Pasar dilakukan secara berkala terhadap limit Risiko Pasar, adapun limit tersebut dikaji secara berkala oleh Unit Manajemen Risiko dan ditetapkan oleh Direksi.</p> <p>3. Risiko Likuiditas</p> <p>Dalam melakukan manajemen Risiko Likuiditas, Bank memastikan kecukupan dana dan menetapkan limit-limit sesuai ketentuan Regulator maupun ketentuan internal Bank. Bank memiliki batasan cadangan likuiditas dalam bentuk limit <i>safety level</i>, yaitu proyeksi cadangan likuiditas Bank untuk tiga bulan kedepan yang dipantau secara berkala.</p>	<p>monitoring credit facility quality, Bank is in compliance with the applicable regulations.</p> <p>Process of the credit facilities provision and credit facilities maintenance is under integrated authorities of Business Unit, Credit Risk Management and Credit Operation Unit. Process of Credit Facilities provision and credit risk management are supported with an integrated system and carried out under end-to-end basis based on criteria of credits facilities acceptance, approval and determination of the credit limit, interest rate specification, credit facility quality monitoring, security management and handling of problem loans.</p> <p>2. Market Risk</p> <p>Market Risk management, including Rate Interest Risk, Exchange Risk, and Equity Risk are applied using banking book or trading book, either for a specific bank's functional activities or for general bank's functional activities in a whole. Monitoring the Market Risk is carried out periodically against the Market Risk limit. As for the Market Limit is subject to a periodic review prepared by Risk Management Unit and under Board of Directors' determination.</p> <p>3. Liquidity Risk</p> <p>In applying Liquidity Risk, Bank ensures the sufficiency of funds and defines the limits in compliance with the regulator's provisions or bank's internal provisions. Bank has a liquidity reserve comprising safety level limit, i.e. Bank's liquidity reserve projection for the upcoming three months which is periodically monitored.</p>



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<p>4. Risiko Operasional</p> <p>Bank mengelola Risiko Operasional untuk meminimalisasi potensi kerugian Bank dari segi financial maupun segi reputasi Bank. Kerangka kerja pengelolaan Risiko Operasional dikembangkan dengan mengacu kepada ketentuan eksternal dan internal Bank. Cakupan kerangka kerja tersebut meliputi kebijakan dan prosedur, pengembangan tools dan sistem informasi manajemen risiko operasional, monitoring dan pelaporan, serta model perhitungan beban modal risiko operasional.</p> <p>Bank juga menerapkan manajemen risiko pada Produk dan Aktivitas Baru, menerapkan <i>Whistleblowing System</i> melalui <i>Letter to CEO</i>, dan menerapkan <i>Business Continuity Plan</i>.</p> <p>5. Risiko Hukum</p> <p>Bank senantiasa meningkatkan pengendalian Risiko Hukum diantaranya dengan menempatkan <i>Legal Officer</i> di unit-unit kerja Kantor Pusat dan Regional <i>Officers</i> untuk menyediakan advis maupun bantuan hukum untuk mendukung kegiatan operasional Bank. Manajemen Risiko Hukum dilakukan pada semua produk dan aktivitas Bank.</p> <p>6. Risiko Reputasi</p> <p>Setiap unit kerja di Bank wajib menjaga reputasi Bank sesuai dengan bidangnya masing-masing. Pengelolaan Risiko Reputasi memenuhi prinsip-prinsip transparansi dan peningkatan kualitas pelayanan nasabah dan <i>stakeholders</i> lainnya, sejalan dengan ketentuan yang berlaku.</p> <p>Bank telah memiliki standar layanan nasabah yang dimonitor secara berkala, dan <i>contact</i></p>	<p>4. Operational Risk</p> <p>Bank manages Operational Risk for minimizing potential financial or reputation losses that may be suffered by Bank. The underlying framework for implementation of the Operational Risk management is developed by referring to Bank’s internal or external provisions. the said framework covers the policy and procedure, tools development and operational risk management information system, monitoring and reporting, as well as operating risk capital costs calculation model.</p> <p>Bank also applies the risk management on the New Product and New Activities, implementing Whistleblowing System through Letter to CEO and applying Business Continuity Plan.</p> <p>5. Legal Risk</p> <p>Bank also always, from time to time, makes its great efforts to intensify the Legal Risk control, among other is by placing its Legal Officer in the Headquarter and Regional Offices units to provide legal advices or legal aid as support for Bank operational activities. Legal Risk management is implemented over all products and activities of Bank.</p> <p>6. Reputation Risk</p> <p>Each unit in Bank must keep the reputation of Bank in compliance with its respective scope of duties. Reputation Risk management abides by transparency principles and enhancement of services provision to customers and other stakeholders by complying with the applicable laws and regulations.</p>



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<p><i>center</i> untuk memudahkan nasabah dalam menyampaikan keluhan maupun <i>inquiry</i> mengenai produk dan layanan Bank.</p> <p>7. Risiko Strategik Dalam pengelolaan Risiko Strategik, Bank secara rutin melakukan <i>review</i> kinerja dan mengevaluasi kebijakan penyusunan target bisnis dan melakukan langkah-langkah perbaikan dalam rencana strategi dan target bisnis dengan mempertimbangkan kondisi eksternal dan internal, apabila diperlukan.</p> <p>8. Risiko Kepatuhan Dalam pengelolaan Risiko Kepatuhan, Bank memiliki <i>Code of Conduct</i> sebagai pedoman berperilaku dan merupakan bagian dari Budaya Perusahaan (<i>Corporate Culture</i>). Dalam upaya pengendalian Risiko Kepatuhan, Bank melakukan tiga pendekatan, yaitu pendekatan preventif (<i>ex-ante</i>), <i>Early Warning System</i>, dan pendekatan kuratif (<i>ex-post</i>).</p> <p>9. Risiko Asuransi Dalam rangka Manajemen Risiko secara Terintegrasi, Bank melakukan manajemen Risiko Asuransi pada Perusahaan Anak yang bergerak dalam bidang usaha Asuransi.</p> <p>10. Risiko Transaksi Intra-Grup Penerapan Manajemen Risiko Transaksi Intra-Group dilakukan dengan Perusahaan Anak sesuai dengan strategi usaha Bank. Bank melakukan identifikasi dan analisis terhadap aktivitas yang dapat meningkatkan Risiko Transaksi Intra-Group dan dipantau secara berkala.</p>	<p>7. Strategic Risk In running Strategic Risk management, Bank performs a routine review on the performance and evaluation of the business targets arrangement policy and taking improvement measures for strategic plan and business target by taking into account external and internal conditions, if necessary.</p> <p>8. Compliance Risk In term of Compliance Risk management, Bank has prepared Code of Conduct as a guideline for behavior within Bank’s environment and as a part of Corporate Culture of Bank. In the implementation of the Compliance Risk, bank adopts three approaches, i.e. preventive approach (<i>ex-ante</i>), Early Warning System, and curative approaches (<i>ex-post</i>)</p> <p>9. Insurance Risk In the realization of the Integrated Risk Management, Bank applies Insurance Risk management towards its Subsidiaries Companies which engages in Insurance Business.</p> <p>10. Intra-Group Risk Implementation of the Intra-Group Risk Management is performed with the Subsidiaries Companies in line with Bank’s business strategy. Bank, in term of this type of risk, performs identification and analysis on activities that potentially heighten the Intra-Group Transaction Risk and this risk is under a periodic monitoring performed by Bank.</p>



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<p><b>MANAJEMEN RISIKO TERINTEGRASI</b></p> <p>Bank melakukan Penerapan Manajemen Risiko dengan Perusahaan Anak yang dimulai secara bertahap sejak tahun 2008 sesuai dengan ketentuan Regulator. Penerapan Manajemen Risiko Terintegrasi dilakukan dengan Perusahaan Anak yang beroperasi baik di Indonesia maupun di Luar Wilayah Indonesia dengan tetap memenuhi prinsip-prinsip Manajemen Risiko dan disesuaikan dengan yurisdiksi otoritas/pengawas setempat, serta mempertimbangkan karakteristik bisnis masing-masing Perusahaan Anak. Penerapan tersebut merupakan salah satu inisiatif strategik unit kerja manajemen risiko di Bank dan secara berkala dikomunikasikan kepada Regulator.</p> <p>Secara umum inisiatif-inisiatif mengenai penerapan manajemen risiko di Bank dan Perusahaan Anak dibagi menjadi 2 (dua) bagian besar, yaitu sebagai berikut:</p> <ol style="list-style-type: none"> <li>1. <i>First Line</i>, inisiatif-inisiatif yang dilakukan berkaitan dengan proses konsolidasi yang mencakup antara lain mengenai laporan keuangan, perhitungan permodalan minimum, penilaian kualitas aktiva, monitoring Batas Minimum Pemberian Kredit (BMPK), pengelolaan Perusahaan Anak, laporan berkala yang memuat mengenai profil risiko, dan penilaian tingkat kesehatan secara menyeluruh.</li> <li>2. <i>Second Line</i>, yang lebih merupakan pendekatan kebutuhan internal Bank secara keseluruhan yang mencakup perangkat (<i>tools</i>), kesadaran risiko (<i>awareness</i>), tata kelola perusahaan (<i>governance</i>), dan sistem</li> </ol>	<p><b>INTEGRATED RISK MANAGEMENT</b></p> <p>Implementation of Risk Management is performed by Bank with its Subsidiaries Companies gradually which was commenced since 2008 compliance with provisions of the Regulatory Body. The integrated Risk Management is realized with its Subsidiaries Companies operating their business either within Indonesia or overseas by keep complying with the Risk Management principles and in accordance to the local authoritative/supervisory jurisdiction as well as taking into account a specific business of the respective subsidiary company. That implementation constitutes one of the strategic initiatives of the risk management unit in Bank and it will periodically be communicated to the Regulatory Body.</p> <p>Generally, the initiatives in term of risk management application in Bank and its Subsidiary Companies consists of two (2) main parts as follows:</p> <ol style="list-style-type: none"> <li>1. First Line, in this part, the initiatives which are taken relating to the consolidation process which covers among others, concerning financial statements, minimum capital calculation, assets quality assessment, Legal Lending Limit monitoring, Subsidiary Companies management, periodic reports containing risk profiles and an overall liquidity assessment.</li> <li>2. Second Line, this part is a general internal needs approach covering tools, awareness, governance and management information system. This approach is realized by among others synchronization of the monitoring tools</li> </ol>





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<p>informasi manajemen (<i>system</i>). Pendekatan tersebut diwujudkan antara lain dengan penyelarasan perangkat monitoring secara berkala yang mencakup investasi dana perusahaan anak, perkembangan likuiditas gabungan, simulasi ketahanan beberapa risiko dalam menghadapi kondisi ekstrim, perkembangan portfolio kredit, dan pengembangan <i>Integrated Risk Register</i> (IRR) sebagai <i>single database</i> dalam pengelolaan risiko sehari-hari.</p> <p>Dalam rangka peningkatan pemahaman dalam penerapan Manajemen Risiko di Bank dan Perusahaan Anak, pada tahun 2015 telah diselenggarakan forum diskusi setiap triwulanan yang mencakup pembahasan yang bersifat teknis, Rapat <i>Integrated Risk Committee</i> (IRC) yang dihadiri oleh Direktur Manajemen Risiko Bank dan Perusahaan Anak, pelaksanaan <i>Risk Awareness Survey</i> (RAWS), untuk mengukur tingkat pemahaman risiko di Perusahaan Anak, dan pelatihan penggunaan <i>Risk Management Tools</i> sesuai dengan kebutuhan Perusahaan Anak.</p> <p>Untuk mengatur mengenai tata kelola pelaksanaan sehari-hari, Bank telah menyusun <i>Mandiri Subsidiaries Principal Guideline</i> (MSPG) yang salah satu itemnya mencakup penerapan manajemen risiko dengan Perusahaan Anak.</p>	<p>periodically which encompasses fund investment of subsidiary companies, consolidated liquidity growth, simulation of persistence against several risks in dealing with extreme conditions, credit portfolio growth, and development of the <i>Integrated Risk register</i> (IRR) as a single database in the daily risk management application.</p> <p>In making efforts to increase the awareness in implementation of Risk Management in Bank and Subsidiary Companies, in 2015 has been held a quarterly discussion forum to discuss technical aspects, the <i>Integrated Risk Committee Meeting</i> (IRC) which was attended by Risk Management Director of Bank and Subsidiary Companies, implementation of <i>Risk Awareness Survey</i> (RAWS) o measure the risk awareness level in Subsidiary Companies, and training for using <i>Risk Management Tools</i> in line with the Subsidiary Companies' needs.</p> <p>For the purposes of the daily governance Bank has arranged the <i>Mandiri Subsidiaries Principal Guideline</i> (MSPG) which one of its substances is to cover the implementation of the risk management with Subsidiary Company.</p>

