

KEBIJAKAN MANAJEMEN RISIKO PT Bank Mandiri (Persero) Tbk.	RISK MANAGEMENT POLICY PT Bank Mandiri (Persero) Tbk.
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, <i>treasury</i>, dan operasional. Dalam kebijakan dan prosedur tersebut, antara lain diatur mengenai penetapan limit untuk masing-masing aktivitas, baik pada level portofolio maupun transaksional. Seluruh kebijakan dan prosedur di Bank Mandiri merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasional Bank Mandiri yang dievaluasi dan di-<i>update</i> minimal sekali dalam setahun. Terdapat 4 (empat) komponen utama yang berfungsi sebagai pilar pendukung dalam penerapan pendekatan <i>two-prong</i>, antara lain: 1. Organisasi & Sumber Daya Manusia (SDM) Satuan Kerja Manajemen Risiko Bank Mandiri bertanggung jawab dalam mengelola seluruh risiko yang dihadapi Bank Mandiri, termasuk dalam hal pengembangan <i>tools</i> pendukung yang dibutuhkan dalam proses bisnis dan pengelolaan risiko. Selain itu, terdapat unit kerja yang bertindak sebagai <i>risk counterpart</i> dari setiap unit bisnis dalam proses <i>four-eye</i> pemberian kredit. Menyadari bahwa pengelolaan risiko menjadi tanggung jawab seluruh unit kerja di Bank Mandiri, maka keberhasilan pengelolaan risiko ditentukan oleh adanya <i>risk awareness</i> di seluruh unit kerja Bank Mandiri yang disertai dengan kemampuan teknis yang memadai. Oleh karena itu, Bank Mandiri senantiasa	Bank Mandiri is having Bank Mandiri Risk Management Policy (KMRBM) which is used as main guideline in implementing risk management. For specific business area, Bank Mandiri has policies and procedures which more specific, for example in the fields of credit, treasury, and operational. The policy and procedures set the limits for each activity, both in portfolio level and transactional. All policies and procedures implemented by Bank Mandiri is a form of risk management which inherent in every operational activity of Bank Mandiri and will be evaluated and updated at least once a year There are four main components that function as supporting pillars in the implementation of a two-prong approach, among others: 1. The Organization and Human Resources (“HR”) Risk Management Unit of Bank Mandiri is responsible for managing all risks faced by Bank Mandiri, including the development of supporting tools needed in business processes and risk management. In addition, there is a working unit which acts as the counterparty risk of every business unit in the process of credit four-eye. Realizing that risk management is the responsibility of entire unit in Bank Mandiri, so the successful of risk management is determined by risk awareness in all units of the Bank Mandiri which is accompanied by necessary technical competence. Therefore, Bank Mandiri continues to increase the capabilities and knowledge of all employees, especially in terms of risk management, by



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meningkatkan kapabilitas dan pengetahuan seluruh pegawai terutama dalam hal pengelolaan risiko, dengan menyelenggarakan pelatihan internal secara rutin melalui <i>Risk Management Academy</i>. Selain itu, Bank Mandiri juga secara rutin minimal sekali dalam 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.	organizing internal training regularly through the Risk Management Academy. Moreover, Bank Mandiri regularly at least once a year conduct socialization, discussion forums, internships, as well as risk management program in line with the internalization of the corporate culture. Risk Management Unit at Bank Mandiri consists of Retail Risk Directorate which chaired by SEVP Retail Risk, Risk Directorate chaired by SEVP Wholesale Wholesale Risk and Risk Management Directorate Chaired by the Director of Risk Management & Compliance.
2. Kebijakan & Prosedur Kebijakan Manajemen Risiko Bank Mandiri (KMRBM) dijadikan sebagai pedoman utama dalam melaksanakan pengelolaan risiko secara operasional dan pengelolaan modal di Bank Mandiri mencakup: - Prinsip kehati-hatian, antara lain Penyediaan Kecukupan Modal, <i>Early Warning System</i>, Penetapan Limit, dan Diversifikasi Risiko. - Manajemen Risiko, antara lain <i>Risk Profile</i>, <i>Risk Appetite</i>, <i>Stress Testing</i> dan Manajemen Risiko Terintegrasi. - Manajemen Risiko untuk masing-masing jenis risiko, yang meliputi proses identifikasi, pengukuran, pemantauan dan pengendalian risiko. - Pengawasan Risiko, yang meliputi pemantauan penerapan aktivitas/	2. Policy & Procedure Bank Mandiri Risk Management Policy (KMRBM) used as main guideline in implementing operational risk management and capital management at Bank Mandiri include: - The Principle of Prudence, among others, Provision of Capital Adequacy, Early Warning System, Determination of Limit, and Risk Diversification. - The Risk Management, among others Risk Profile, Risk Appetite, Stress Testing and Integrated Risk Management. - The Risk Management for each type of risk, which includes the identification process, measurement, monitoring and risks control. - Risk supervision, including monitoring the implementation of activities/methodology of risk management at Bank Mandiri, as well



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metodologi pengelolaan risiko di Bank Mandiri, serta Sistem Pengendalian Internal. Kebijakan Manajemen Risiko ini menjadi dasar atas penyusunan prosedur dan petunjuk teknis terkait dengan pengelolaan risiko di Bank Mandiri. 3. Sistem & Data Sistem manajemen risiko dikembangkan untuk mendukung proses bisnis yang lebih efisien agar pengambilan keputusan dapat lebih cepat namun tetap mengacu pada prinsip kehati-hatian. Dalam rangka menjaga integritas dan kualitas data, Bank Mandiri telah menerapkan <i>Integrated Processing System</i> dan <i>Loan Origination System</i> untuk meningkatkan efisiensi proses kredit serta menjaga kualitas data di segmen korporasi, komersial maupun retail. Untuk meningkatkan produktivitas aktivitas <i>collection</i> khususnya di segmen konsumen dan ritel, Bank Mandiri mengimplementasikan <i>Integrated Collection System</i>. Bank Mandiri menggunakan <i>Summit System</i> dan <i>ALM System</i> untuk mengelola risiko <i>trading book</i> dan <i>banking book</i> dalam kegiatan <i>treasury</i> dan <i>asset & liability management</i>. Untuk mendapatkan gambaran profil risiko Bank Mandiri baik selaku perusahaan induk maupun profil risiko Bank Mandiri yang terkonsolidasi dan terintegrasi dengan perusahaan anak, Bank Mandiri telah mengimplementasikan <i>Risk Profile Mandiri System</i> (RPX) secara <i>web-based</i> sehingga mempercepat akses dan mempermudah kontrol. Dalam hal integrasi pengelolaan risiko secara <i>bankwide</i>, Bank Mandiri telah	as the Internal Control Systems. This Risk Management Policy became the basis for the preparation of procedures and technical guidance related to risk management at Bank Mandiri. 3. System & Data Risk management system was developed to create more efficient business processes in order to make decision faster within prudent principles. In order to maintain the integrity and quality of the data, Bank Mandiri has implemented an Integrated Processing System and Loan Origination System to improve the efficiency of the credit process and maintain data quality on corporate, commercial and retail segment. To increase the productivity of collection activity, especially in Consumer and Retail segment, Bank Mandiri implements the Integrated Collection System. Bank Mandiri is using Summit System and ALM System to manage the risk of trading book and banking book in the activities of treasury and asset & liability management. In order to get an overview of Bank Mandiri's risk profile, both as a holding company as well as Bank Mandiri's risk profile which has consolidated and integrated with the subsidiaries, Bank Mandiri has implemented a Risk Profile Mandiri System (RPX) which is a web-based system to accelerate and facilitate access control. In integrating bankwide risk management, Bank Mandiri has implemented ERM system as a tool to monitor the overall risk management, particularly in calculating the capital to cover all types of risk. ERM system has the capability to perform the



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mengimplementasikan ERM <i>system</i> sebagai sarana untuk memantau pengelolaan risiko secara keseluruhan, terutama dalam menghitung modal untuk mencegah semua jenis risiko. ERM <i>system</i> memiliki kapabilitas untuk melakukan perhitungan <i>capital charge</i> (<i>Standardized Approach</i> dan <i>Advanced Approach</i>), implementasi <i>operational risk management tools</i>, <i>active portfolio management</i>, <i>stress testing</i> dan <i>value-based management</i>. 4. Metodologi/Model & Analytics Bank Mandiri secara berkelanjutan menerapkan pengukuran risiko yang mengacu kepada <i>international best practices</i> dengan menggunakan pendekatan permodelan kuantitatif maupun kualitatif melalui pengembangan model risiko seperti <i>rating</i>, <i>scoring</i>, <i>Value at Risk</i> (VaR), <i>portfolio management</i>, <i>stress testing</i> dan model lainnya sebagai pendukung <i>judgemental decision making</i>. Secara periodik, model-model risiko tersebut dikalibrasi dan divalidasi oleh unit <i>Model Risk Validator</i> 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 <i>best practice</i>, Bank Mandiri bekerja sama dengan salah satu konsultan terkemuka di bidang manajemen risiko untuk membantu proses adopsi serta implementasi <i>framework</i> 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 <i>Banking Book Position</i>, Risiko Operasional, Pengelolaan Modal dan <i>Internal</i>	computation of capital charge (<i>Standardized Approach</i> and the <i>Advanced Approach</i>), the implementation of operational risk management tools, active portfolio management, stress testing and value-based management. 4. Methodology/Model & Analytics Bank Mandiri continuously implements risk measurement which refers to the international best practices by using both quantitative and qualitative approach through the development of risk models such as rating, scoring, Value at Risk (VaR), portfolio management, stress testing and other models to support judgmental decision making. Periodically, these risk models are calibrated and validated by the Risk Model Validator unit which is independent to maintain the reliability and validity of the model as well as to meet the regulatory requirements. In order to harmonize the implementation of Basel II and ERM with Basel II regulations and the application of best practices, Bank Mandiri in cooperation with one of the leading consultants in risk management, assist in the adoption and implementation of the Basel II framework and ERM. The implementation of Basel II and ERM on Bank Mandiri covers the area of Credit Risk, Market Risk, Liquidity Risk, Interest Rate Risk in the Banking Book Position, Operational Risk, Capital Management and Internal Capital Adequacy Assessment Process (ICAAP).



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<i>Capital Adequacy Assessment Process (ICAAP).</i> Penerapan Manajemen Risiko Tata kelola manajemen risiko dan pengendalian intern di Bank Mandiri dilaksanakan menyeluruh di segala lini dan di seluruh tingkatan, sebagai berikut: 1. Pengawasan Aktif Dewan Komisaris dan Direksi a. 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. b. Direksi menetapkan struktur organisasi yang mencerminkan secara jelas mengenai batas wewenang, tanggung jawab dan fungsi, serta independensi antar unit bisnis dengan unit kerja manajemen risiko. c. Dewan Komisaris bertanggung jawab dalam melakukan persetujuan dan peninjauan berkala mengenai strategi dan kebijakan risiko yang mencakup tingkat toleransi Bank terhadap risiko, siklus perekonomian domestik dan internasional serta dirancang untuk keperluan jangka panjang. d. Direksi bertanggung jawab untuk mengimplementasikan strategi dan kebijakan risiko tersebut dengan cara menjabarkan dan mengkomunikasikan kebijakan dan strategi risiko, memantau dan mengendalikan risiko dan mengevaluasi penerapan kebijakan dan	Risk Management Application The risk management and internal control of Bank Mandiri are implemented in all lines (three layers of defense) and at all levels as explained below: 1. Active Supervision of the BOC and BOD a. The BOC and BOD understand the risks faced by the Bank and have provided clear direction, carried out active supervision and mitigation as well as developed Risk Management culture in the Bank b. The BOD establishes an organization structure that clearly reflects the limits of authority, responsibility and functions, as well as independency between the Bank's business units and line units of risk management c. The BOC assumes the responsibility for the approval and periodical observation of the risk strategy and policy that covers the Bank tolerance levels toward risk, the cyclic trends of domestic and international economy, as well as the design for long-term requirements. d. The BOD is responsible for implementing risk strategy and policy by clearly outlining and communicating risk strategy policy, monitoring and controlling risks and evaluating the implementation of the related policy and strategy.



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strategi dimaksud. e. Direksi memantau kondisi internal dan perkembangan kondisi eksternal, memastikan penetapan strategi Bank telah memperhitungkan dampak risiko dan memastikan Bank memiliki satuan kerja yang memiliki kewenangan dan tanggung jawab yang mendukung perumusan dan pemantauan pelaksanaan strategi termasuk <i>corporate plan</i> dan <i>business plan</i>. f. Direksi menetapkan prosedur kaji ulang yang memadai terhadap akurasi metodologi penilaian risiko, kecukupan implementasi sistem informasi manajemen risiko, dan kebijakan prosedur dan limit risiko. 2. Kecukupan Kebijakan, Prosedur dan Penetapan Limit a. Penerapan Manajemen Risiko di Bank Mandiri didukung dengan kerangka yang mencakup kebijakan dan prosedur Manajemen Risiko serta limit Risiko yang ditetapkan secara jelas sejalan dengan visi, misi, dan strategi bisnis Bank. b. Bank memiliki kebijakan dan prosedur tertulis yang memenuhi prinsip transparansi, peningkatan kualitas pelayanan nasabah & <i>stakeholders</i> dan kebijakan tersebut juga harus sejalan dengan peraturan perundang-undangan yang berlaku. c. Kebijakan manajemen risiko bank disusun sesuai dengan misi, strategi bisnis, kecukupan permodalan, kemampuan SDM dan <i>risk appetite</i> Bank.	e. The BOD monitors the internal and external conditions to ensure the execution of the Bank strategy has taken into account the risk impacts and ensure that the line units have the authority and responsibility that support the formulation and monitoring of strategy implementation, including the corporate plan and business plan. f. The BOD establishes the procedure for adequate review on the accuracy of risk assessment methodology, risk management information system implementation adequacy, as well as risk limit and procedure policy 2. The Adequacy of Policy, Limit Establishment and Procedure a. Risk Management application at Bank Mandiri is supported by a framework that covers policies and procedures for Risk Management and risk limits which are clearly defined in line with the vision, mission and business strategy of the Bank b. Bank Mandiri has written policies and procedures that fulfill the principles of transparency, improving service quality towards customers and stakeholders, and the policy must comply with the prevailing legislation. c. Bank Mandiri risk management policies are prepared according to the Bank's mission, business strategy, capital adequacy, human resource capacity and risk appetite.



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d. Bank melakukan evaluasi dan pengkinian kebijakan manajemen risiko dengan mempertimbangkan perkembangan kondisi internal dan eksternal. e. Penetapan limit risiko telah memadai, yang meliputi limit per produk/transaksi, per jenis risiko dan per aktivitas fungsional dan melakukan <i>limit monitoring</i> secara periodik. 3. Kecukupan Proses Identifikasi, Pengukuran, Pemantauan dan Pengendalian Risiko serta Sistem Informasi Manajemen Risiko a. Bank melakukan proses identifikasi dan pengukuran risiko secara tepat terhadap setiap produk/transaksi yang mengandung risiko. b. Identifikasi Risiko bersifat proaktif, mencakup seluruh aktivitas bisnis Bank dan dilakukan dalam rangka menganalisis sumber dan kemungkinan timbulnya Risiko serta dampaknya. c. Bank telah memiliki sistem pemantauan eksposur risiko yang memadai, meliputi adanya fungsi yang independen yang melakukan pemantauan terhadap eksposur risiko secara rutin, adanya sistem informasi yang akurat dan tepat waktu dan adanya <i>feed back</i> dan tindak lanjut perbaikan/penyempurnaan. d. Bank mengembangkan sistem informasi manajemen yang disesuaikan dengan karakteristik, kegiatan dan kompleksitas kegiatan usaha Bank. 4. Sistem Pengendalian Intern Yang Menyeluruh a. Bank melaksanakan sistem pengendalian	d. Bank Mandiri conducts evaluation and updates the risk management policies by taking into consideration development in internal and external conditions. e. The establishment of risk limits, which include limits per product/transaction, per type of risk and per functional activity, has been sufficient and monitoring limit is carried out periodically. 3. The Adequacy of Identification Process, Measurement, Monitoring and Risk Control as well as the Risk Management Information System a. The Bank undertakes accurate risk identification and measurement processes on every product or transaction deemed to be having risks. b. Risk identification is proactive, covers all business activities of the Bank and is conducted to analyze the sources and the possibility of risk incidence and its impact. c. The Bank already has adequate risk exposure monitoring systems, including the existence of independent functions to routinely monitor risk exposure, provide accurate and timely information, feedback and follow-up on corrective actions and improvements. d. The Bank develops a management information system tailored to the characteristics, activities and complexities of the Bank business activities. 4. A Comprehensive Internal Control System a. The Bank implements internal control



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intern dalam penerapan Manajemen Risiko Bank dengan mengacu pada kebijakan dan prosedur yang telah ditetapkan. b. Terdapat penetapan wewenang dan tanggung jawab pemantauan kepatuhan kebijakan, prosedur dan limit. c. Bank menetapkan jalur pelaporan dan pemisahan fungsi yang jelas dari satuan kerja operasional kepada satuan kerja yang melaksanakan fungsi pengendalian. d. Bank memiliki prosedur yang cukup untuk memastikan kepatuhan bank terhadap ketentuan. e. Bank melakukan kaji ulang yang efektif, independen, dan obyektif terhadap kebijakan, kerangka dan prosedur operasional Bank yang dapat ditingkatkan frekuensi/intensitasnya, berdasarkan perkembangan eksposur Risiko Bank, perubahan pasar, metode pengukuran, dan pengelolaan Risiko. f. Satuan kerja audit intern Bank melakukan audit secara berkala dengan cakupan yang memadai, mendokumentasikan temuan audit dan tanggapan manajemen atas hasil audit, serta melakukan <i>review</i> terhadap tindak lanjut temuan audit. g. Penjelasan yang menyeluruh mengenai faktor-faktor risiko serta upaya untuk mengelola masing-masing risiko dapat dilihat pada bagian Tinjauan dan Kondisi Usaha mengenai <i>Risk Management</i>.	systems into Bank Risk Management application in reference to the established policies and procedures. b. There are delegation of authority and responsibility for monitoring the compliance with the policies, procedures and limits. c. There are clear reporting line and separation of functions between operational line units and line units assuming control functions. d. Bank Mandiri has established sufficient procedures for ensuring compliance with the prevailing laws. e. The Bank conducts an effective, independent and objective review of the policies, framework and procedures for Bank operations of which the frequency/intensity of these procedures can be improved based on the risk exposure, market movements, measurement methods and risk management. f. Internal Audit line unit conducts the audit on a regular basis with adequate coverage, documenting the findings and the management's feedbacks on audit results and reviewing the follow-up on such findings. g. A comprehensive description of the risk factors and efforts to manage each risk may also be consulted in the Overview of Business Support Functions, in Risk Management section.
Tata Kelola Manajemen Risiko Kerangka kerja dan tata kelola manajemen risiko di Bank Mandiri menganut prinsip Empat	Risk Management Governance Framework and governance of the risk management in Bank Mandiri adheres to Four



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Pilar sebagai berikut: 1. Pengawasan aktif Dewan Komisaris dan Direksi 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. Dewan Komisaris menjalankan fungsi pengawasan risiko (risk oversight) melalui Komite Pemantau Risiko, Komite Tata Kelola Terintegrasi, dan Komite Audit. Dewan Direksi menjalankan fungsi kebijakan risiko (risk policy) melalui Executive Committee terkait Manajemen Risiko yaitu Risk Management Committee, Asset & Liability Committee, dan Integrated Risk Committee. 2. Kecukupan Kebijakan, Prosedur dan Penetapan Limit 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. Penetapan limit risiko telah memadai, yang meliputi limit per produk/transaksi, perjenis risiko, dan per aktivitas fungsional dan melakukan limit monitoring secara periodik.	Pillars Principles as follows: 1. Active Control of Board of Directors and Board of Commissioner 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. Board of Commissioners runs it 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. 2. Policy Adequacy, Procedure and Determination of Limitation 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. 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.
3. Kecukupan proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko serta Sistem Informasi Manajemen Risiko Bank melakukan proses identifikasi dan pengukuran risiko secara tepat terhadap setiap produk/transaksi yang mengandung	3. Adequacy of Identification, Measurement, Monitoring and Controlling of Risk as well as Risk Management Information System Bank carries out the risk identification and measurement accurately on each risky product/transaction. Risk identification is



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risiko. Identifikasi risiko bersifat proaktif, mencakup seluruh aktivitas bisnis Bank dan dilakukan dalam rangka menganalisa sumber dan kemungkinan timbulnya risiko beserta dampaknya terhadap Bank. 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. 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. 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.	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. 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. 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. 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.
MANAJEMEN RISIKO TERINTEGRASI 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	INTEGRATED RISK MANAGEMENT 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/



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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. Secara umum inisiatif-inisiatif mengenai penerapan manajemen risiko di Bank dan Perusahaan Anak dibagi menjadi 2 (dua) bagian besar, yaitu sebagai berikut: 1. First Line, 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. 2. Second Line, yang lebih merupakan pendekatan kebutuhan internal Bank secara keseluruhan yang mencakup perangkat (tools), kesadaran risiko (awareness), tata kelola perusahaan (governance), dan sistem informasi manajemen (system). Pendekatan tersebut diwujudkan antara lain dengan penyesuaian 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 Integrated Risk Register (IRR) sebagai single database dalam pengelolaan risiko sehari-hari.	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. Generally, the initiatives in term of risk management application in Bank and its Subsidiary Companies consists of two (2) main parts as follows: 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. 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 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 Integrated Risk register (IRR) as a single database in the daily risk management application.



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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 Integrated Risk Committee (IRC) yang dihadiri oleh Direktur Manajemen Risiko Bank dan Perusahaan Anak, pelaksanaan Risk Awareness Survey (RAWS), untuk mengukur tingkat pemahaman risiko di Perusahaan Anak, dan pelatihan penggunaan Risk Management Tools sesuai dengan kebutuhan Perusahaan Anak. Untuk mengatur mengenai tata kelola pelaksanaan sehari-hari, Bank telah menyusun Mandiri Subsidiaries Principal Guideline (MSPG) yang salah satu itemnya mencakup penerapan manajemen risiko dengan Perusahaan Anak	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 Integrated Risk Committee Meeting (IRC) which was attended by Risk Management Director of Bank and Subsidiary Companies, implementation of Risk Awareness Survey (RAWS) o measure the risk awareness level in Subsidiary Companies, and training for using Risk Management Tools in line with the Subsidiary Companies' needs. For the purposes of the daily governance Bank has arranged the Mandiri Subsidiaries Principal Guideline (MSPG) which one of its substances is to cover the implementation of the risk management with Subsidiary Company.

