

VALUE CREATION

for Greater Impacts

2025

Sustainability Report

PT Bank Negara Indonesia (Persero) Tbk



Value Creation for Greater Impacts

BNI creates sustainable value by ensuring business growth aligns with measurable economic, social, and environmental impacts that are managed responsibly in the long term. Sustainability is positioned as a value driver to strengthen competitiveness, business resilience, and stakeholder trust amid economic dynamics and the transition to a low-carbon economy.

Through sustainable financing and ESG advisory services, BNI supports customers in managing ESG risks and opportunities, developing credible transition roadmaps, and improving their readiness to meet regulatory and investor expectations. By strengthening partnerships across the value chain, BNI optimizes broader and more sustainable positive impacts on the economy and society.

Forward-Looking Statements

This document may contain plans, projections, strategies, and objectives of the Company that do not constitute statements of historical fact and should be understood as forward-looking statements within the meaning of applicable laws and regulations. Such forward-looking statements are subject to various risks and uncertainties that may cause the Company's actual future conditions and results to differ materially from those anticipated or implied. There can be no assurance that the outcomes anticipated by the Company, or indicated by these forward-looking statements, will be achieved.

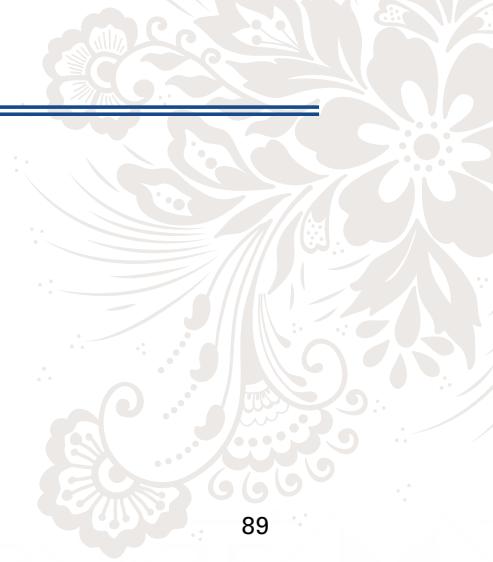
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Performance Highlights 2025



Rp65.0 trillion
Operating Income



BNI Agen46 reached more than
6,174 districts
in Indonesia (approximately 13% located in the
3T regions) with **21.4 million**
customer accounts



Rp20.0 trillion
Income for The Year



35%
Employee Engagement Index
(Net Promoter Score/NPS)



4.43 (scale of 1-5)
Customer Satisfaction index



146.7 hours
Average training hours per employee per year



27,201
BNI employees



52.2%
are women



6,908 Partners
MSME Fostered Partners from
Rumah BUMN



Rp116.8 billion
Social and Environmental
Responsibility Program Fund Realization



338.9 ton CO₂eq
emissions avoided from waste management
using the Zero Waste to Landfill concept



6.7%
Scope 1 & 2 of GHG emission
reductions from the 2023 baseline



13.6 GJ/Rp billion
Energy Intensity to Income



689.8 ton CO₂eq/Rp billion
GHG Emission Intensity to Income

Environmentally Friendly Products



Rp5.0 trillion

Realization of Green Bond in 2025
has potentially reduced
2,534,594 ton CO₂eq
of GHG Emissions



USD397 million

or equivalent to **Rp6.6 trillion**
BNI has distributed
Sustainability Linked Loan (SLL)



Rp7,064.5 billion

Green Investment
(Sustainable Bond & Securities)



Issuance of Sustainability Bond
Phase I, 2025 of **Rp5 trillion**



Rp641.0 billion

Sales Volume of WWF Credit Cards
Contributing to Environmental Conservation



Rp196.7 trillion

Sustainable Financing reached 22.3% of total
loans (Bank only)

consisting of:

Rp78.0 trillion (8.8% of total loans)

Green Financing and

Rp118.8 trillion (13.4% of total
loans) micro, small, and medium enterprises
(MSMEs) Financing



Rp74.9 billion

Realized Financing under BNI Jejak Kopi
Khatulistiwa Program



Rp39 billion

Financing Disbursed to 157 MSMEs
Supporting Environmentally Friendly Fashion
and Handicraft MSMEs under the BNI Green
MSME Program



196,163 Accounts

Under the "Ayo Menabung dengan Sampah"
(Save by Recycling) Program



Amex Vibes Credit Card

Manufactured Using **80%**
Environmentally Friendly Materials

Awards



Silver Award

Asia Sustainability Reporting
Awards (ASRA) 2025



Best Literacy for Climate Resilience

Best Social Impact Category

BEST Innovative Conservation Category

Investing on Climate Editors Choice Award 2025



Platinum Star Awards - Green Bond Issuer Category

Platinum Star Awards - Big Cap Category

Impact Excellence Awards Category

Datatrust | Investortrust



Best Economic in Local Community

Indonesia Corporate Sustainability Award
2025, Olahkarsa & ACEXI



Sustainability Reporting:

Governance Category

Republika



Leadership AA –

Excellence Leader in ESG Transparency

Indonesia ESG Leadership Awards 2025, Bumi
Global Karbon (BGK) Foundation

ESG Rating



MSCI A



SUSTAINALYTICS

Sustainalytics

21.3 Medium Risk

Corporate Governance Perception

Index (CGPI)

92.6/100



IDX ESG Leaders

IDX ESG Leaders Index Constituents

BNI is included in an index that measures the performance of companies with good ESG ratings, is not involved in significant controversies, and has good transaction liquidity and financial performance.

Effective Period: December 2025 – May 2026



**Platinum Alignment -
Top 100 Indonesia 2025**

La Tofi ESG Rating & Sustainability Communication
Awards 2025, La Tofi School of Social Responsibility



**Appreciated Diversity Inclusivity ESG Report
Appreciated Circular Economy ESG Report
Most Appreciated ESG Report**

Investor Daily Indonesia



**Finance Bank Sector:
Governance Winner**

Katadata ESG Index Awards 2025



**Best Greenship Performance
Award – New Building Category
Platinum Rating for Plaza BNI Building**

Greenship Award 2025, Green Building
Council Indonesia



IDX KEHATI

ESG Sector Leaders Index Constituents

BNI is included in the index, which contains stocks of companies with ESG performance ratings above the industry average, supported by good stock liquidity.

ESG Quality Index 45

BNI is included in the 45 best stocks based on sustainability performance, financial quality, and good company liquidity ratings.

SRI-KEHATI Index Constituents

BNI is included in the 25 publicly listed companies that apply the principles of Sustainable Responsible Investment (SRI) and ESG.

Effective Period: December 2025 – May 2026

Sustainability Performance Overview

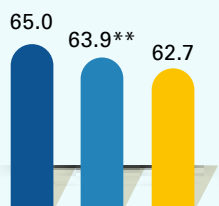


Economy

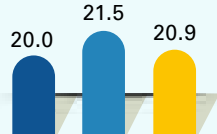
INTERNAL PERFORMANCE

2025 2024 2023

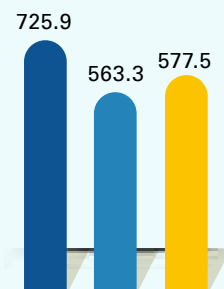
Operating income
(Rp trillion)



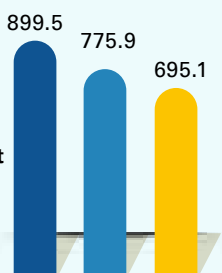
Income for the year
(Rp trillion)



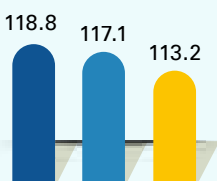
Current Account Saving Account (CASA)
(Rp trillion)



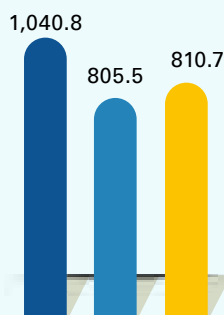
Loan disbursement - total
(Rp trillion)



Loan distribution - MSMEs
(Rp trillion)

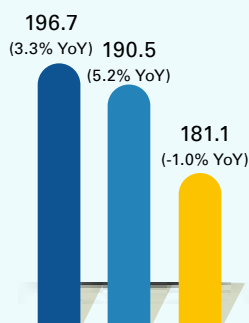


Third-Party Funds
(Rp trillion)

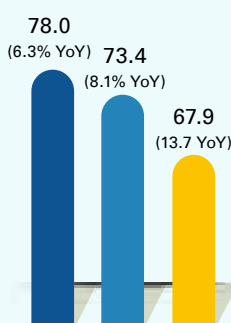


SUSTAINABILITY FINANCING PERFORMANCE (ENVIRONMENTALLY FRIENDLY PRODUCTS)

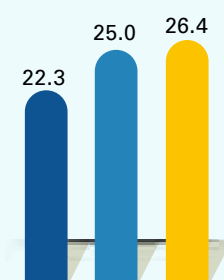
Sustainable Financing (KKUB)
(Rp trillion)



Green Financing (KUBL)
(Rp trillion)

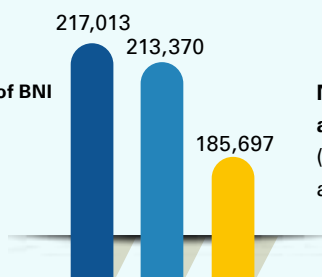


Percentage of total sustainability financing portfolio to total loan
(%)

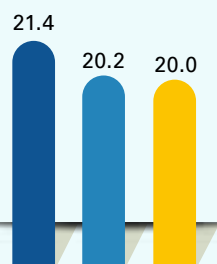


INCLUSIVE FINANCIAL PERFORMANCE

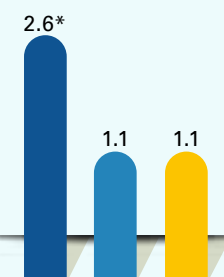
Number of BNI Agent46



Number of accounts
(Million accounts)



Amount of funds
(Rp trillion)



Notes:

*) The significant increase is attributable to BNI Agen46 being able to refer wondr by BNI starting in 2025.

**) Restatement of 2024 financial information.

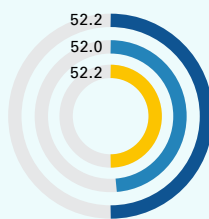


Social

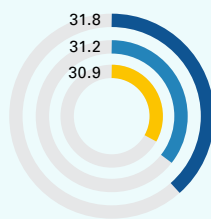
INTERNAL PERFORMANCE

2025 2024 2023

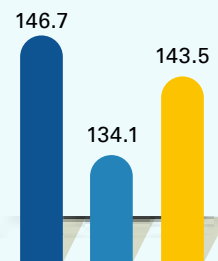
Female employees to total employees (%)



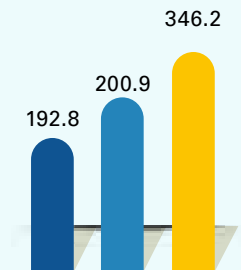
Female employees holding managerial positions and above (%)



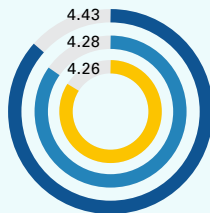
Average training hours (Hour)



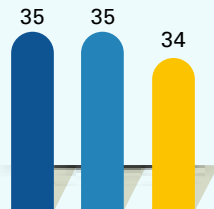
Employee training and education fees (Rp billion)



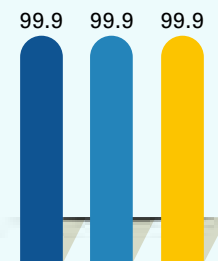
Customer satisfaction index (Scale of 1-5)



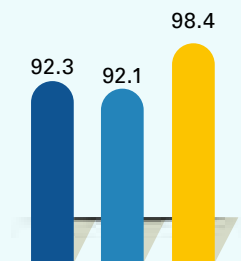
Employee Engagement Rate/NPS (%)



Customer complaint resolution rate (%)

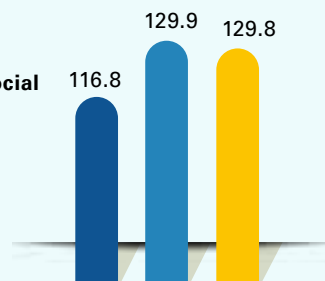


Involvement of local suppliers/parties (%)

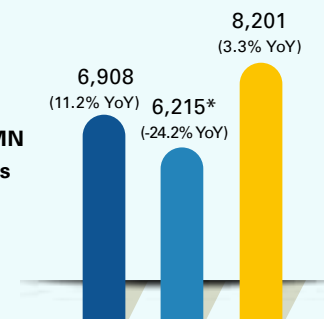


SOCIAL INVESTMENT FOR EXTERNAL STAKEHOLDERS

Realization of social funds (Rp billion)



Rumah BUMN beneficiaries (MSMEs)



Notes:

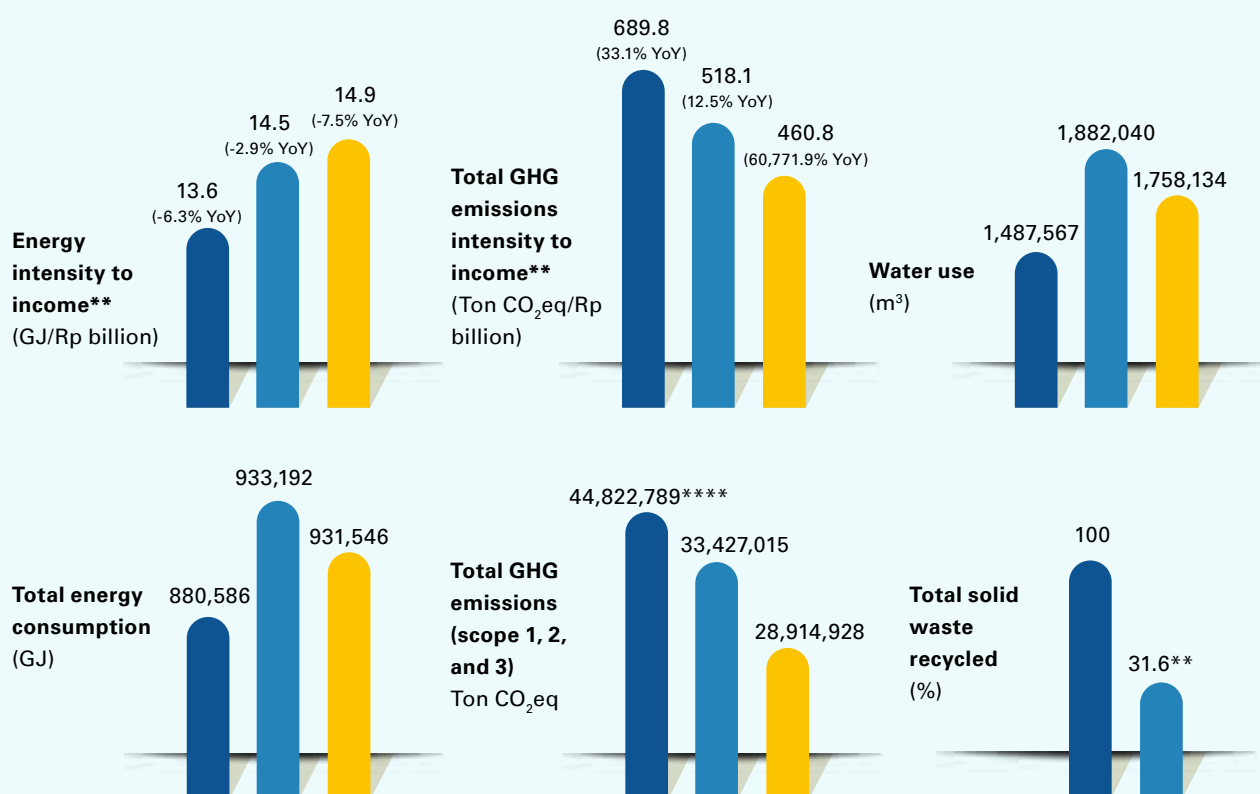
*) The decrease was due to the closure of non-potential of Rumah BUMN.



Environment

INTERNAL ENVIRONMENTAL MANAGEMENT INITIATIVE

2025 2024 2023



Total waste generated from 5 Head Office buildings (Ton)

	Organic	Inorganic	Residual
2025	91.5	169.2	372.4
2024	10.8***	51.5***	-

Reduction of scope 1 & 2 GHG Emissions compared to the 2023 baseline (Ton CO₂eq)

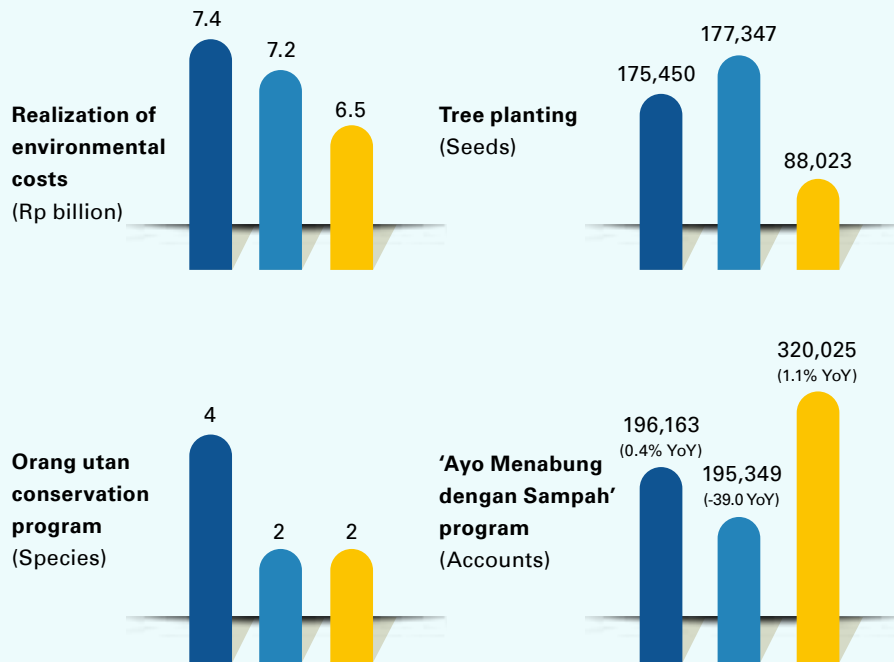
2025	2024
 12,744.8 (6.7%)	 2,818.8 (1.5%)

Notes:

- *) BNI updated its emissions calculation methodology starting in 2023; therefore, emission reductions for 2023 cannot be disclosed.
- **) Changes in figures are attributable to adjustments in metric units to IDR billion.
- ***) Data as of December 2024. BNI updated its waste calculation methodology based on the Zero Waste to Landfill principle starting in December 2024; therefore, the amount of waste reduction is not yet comparable.
- ****) The increase in GHG emissions is attributable to the expansion of Scope 3 GHG emission coverage from 70.3% to 90.5% of the total credit portfolio.

ENVIRONMENTAL CONSERVATION AND BIODIVERSITY

2025 2024 2023



Highlights of Support for Sustainable Development Goals

BNI supports the achievement of Sustainable Development Goals (SDGs) by integrating economic management with environmental, social, and governance (ESG) principles into all of its business activities. This effort is intended to ensure that the role of banking not only boosts business performance, but also generates sustainable impacts for society and the environment. With this approach, BNI focuses its contributions on achieving SDGs that provide tangible benefits, both in the short and long term.



REALIZATION OF SUPPORT IN 2025

Total MSME loan as of the end of 2025 is Rp118.8 trillion.

TARGET FOR 2026

MSME loan target for 2026 is Rp131.2 trillion.

TARGET ACHIEVEMENT STRATEGY

- Quality loan expansion to increase market share, with a focus on existing customers, optimization of Supply Chain Financing, expanding acquisition of business linkages, and export-oriented MSMEs.
- Alignment of policies and financing products to support MSMEs.
- Accelerating growth through digital initiatives and flagship programs, with a focus on increasing the effectiveness of referrals, lead quality, and the speed of financing execution in a measurable manner and in accordance with risk management principles.

REALIZATION OF SUPPORT IN 2025

- Realization of Subsidized Micro Loans (KUR) disbursement of Rp11.9 trillion to 52,685 debtors.
- Realization of BNI Wirausaha (BWU) distribution of Rp9.3 trillion to 19,598 debtors.

TARGET FOR 2026

- Gross KUR expansion target in 2026 of Rp11.1 trillion.
- BWU gross expansion target in 2026 of Rp19.9 trillion.

TARGET ACHIEVEMENT STRATEGY

- Strengthening sustainable business expansion by focusing on priority target markets and developing business ecosystems in the agricultural and non-agricultural sectors.
- Optimizing the utilization of customer bases and digital ecosystems to promote inclusive and responsible financing.
- Strengthening internal capabilities by improving human resource competencies, defining roles and functions, and aligning policies and financing products that support MSMEs.
- Improving the effectiveness of processes, systems, and governance through the use of information technology, monitoring distribution performance, and optimizing sustainable marketing programs.



REALIZATION OF SUPPORT IN 2025

- The accumulated number of scholarship recipients reached 786 by the end of 2025.
- Conducting infrastructure development for 127 schools or educational institutions and providing facilities and infrastructure in the BNI area.

TARGET FOR 2026

- 840 recipients of BNI Berbagi scholarships.
- 130 educational infrastructure assistance projects.

TARGET ACHIEVEMENT STRATEGY

- Initiating scholarship programs with relevant units.
- Initiating educational infrastructure assistance programs with relevant units.



REALIZATION OF SUPPORT IN 2025

The number of female employees occupying managerial positions and above increased by 31.8%.

TARGET 2026

> 30% of female employees hold positions above managerial level (AVP and above).

TARGET ACHIEVEMENT STRATEGY

- Providing equal opportunities for male and female employees to occupy the same positions.
- A performance appraisal mechanism that takes into account the achievement of Key Performance Indicators (KPIs) for all employees.
- Providing facility support for female employees through equitable policies such as menstrual leave, childcare facilities, maternity leave, Employee Assistance Program (EAP) to support the physical, mental, and financial health of employees, as well as breastfeeding rooms in every building.
- Building the BNI Srikandi community to enhance the capacity of all employees, especially women.



REALIZATION OF SUPPORT IN 2025

- The number of BNI digital channel users in 2025 reached 15,323,533, growing 39.8% from the 2024 target.
- The number of wondr by BNI users increased by 128% (yoy).

TARGET 2026

- Target number of BNI digital channel users is 20,343,804, a growth of 32.8% (yoy)
- Target number of wondr by BNI users is 17.5 million, an increase of 45% (yoy).

TARGET ACHIEVEMENT STRATEGY

Focus on increasing new users from new customers (new to bank) through direct account opening from wondr by BNI. In addition, increasing new users of wondr by BNI is also targeted at existing customers of the bank through the migration of active customers who use BNI Mobile Banking, other channels (ATM, Internet Banking, SMS Banking), and non-digital channels, especially in priority segments.

The enabler prepared to boost user growth, focuses on awareness and the implementation of various promotions. At the same time, it maintains service quality to provide a good experience for customers when transacting using wondr by BNI.



REALIZATION OF SUPPORT IN 2025

- Green portfolio increase (KUBL) 6.3%.
- Total avoided GHG emissions from green bonds 2,534,594 Ton CO₂eq.

TARGET 2026

Increase in green portfolio by 5% p.a.

TARGET ACHIEVEMENT STRATEGY

- Strengthening internal capabilities and transaction digitalization through BNI Direct to accelerate green financing.
- Positioning the Bank as a partner to debtors in supporting the transition toward sustainable business practices through the following initiatives:
 - a. Preparing ESG Advisory programs, including the assessment of debtors' ESG maturity levels.
 - b. Providing technical assistance related to the Indonesian Sustainable Finance Taxonomy (Taksonomi untuk Keuangan Berkelanjutan Indonesia/TKBI) to support debtors in enhancing ESG implementation.



REALIZATION OF SUPPORT IN 2025

TARGET ACHIEVEMENT STRATEGY

- Energy intensity per income 13.6 GJ/Rp billion.
- Emissions intensity per income 689.8 ton CO₂eq/Rp billion.

- Implementing energy efficiency programs across all BNI offices.
- Setting an operational Net Zero Emissions (NZE) target by 2028.
- Strengthening BNI's operational emissions data infrastructure through the development of an Emissions Management Platform.

TARGET 2026

Minimize the increase in energy intensity and GHG emissions.

REALIZATION OF SUPPORT IN 2025

TARGET ACHIEVEMENT STRATEGY

Realization of Sustainability Linked Loan (SLL) distribution amounting to Rp 6.6 trillion.

- Conducting socialization of the Sustainability Linked Loan (SLL) financing program for Relationship Managers (RMs).
- Carrying out promotional campaigns for BNI's Sustainability Linked Loan (SLL) program through ESG-related events organized by external parties.

TARGET 2026

Develop Sustainability Linked Loan (SLL) portfolio exposure.



REALIZATION OF SUPPORT IN 2025

TARGET ACHIEVEMENT STRATEGY

- Planting program for 175,450 trees.
- Total of 4 endemic and protected fauna conserved.

- Working together with the community, local government, and the Natural Resources Conservation Agency (BKSDA).

TARGET 2026

- Planting trees on 10 hectares of peatland and 10 hectares of critical dryland
- Adopting 6 Bornean Orangutans (supporting rehabilitation & nutrition for at least 12 months)
- Releasing 1 Bornean Orangutan (with post-release monitoring)
- Habitat restoration: tree planting on 10 hectares of the Borneo orangutan ecosystem and 3 years of maintenance
- Restoration of 10 hectares of mangroves and 3 years of maintenance



REALIZATION OF SUPPORT IN 2025	TARGET ACHIEVEMENT STRATEGY
Cyber Security Zero Incidents: 0 (Major Incidents with losses $\geq$ IDR 20 billion)*	- The implementation of multi-layer defense in 2025 was carried out through various initiatives in the project stream IT hygiene, including the implementation of Next Gen SOC, EDR, NAC, DLP, enhancement of cyber threat intelligence and Vulnerability Management, as well as other security enhancement projects. - A number of strategic initiatives are currently in the development stage and will be the focus of sustainability in 2026, including the development of Next-Generation Operations (SecOps), the implementation of SASE, and other security enhancement projects.
TARGET 2026	
Cyber Security Zero Incident Target: 0 (Major Incidents with losses $\geq$ Rp20 billion)*	

*) Incidents that do not fall within these criteria are nonetheless monitored, managed, and resolved in accordance with applicable internal procedures (through the Security Incident Response process).

REALIZATION OF SUPPORT IN 2025	TARGET ACHIEVEMENT STRATEGY
- Achievement of the Good Corporate Governance (GCG) Index based on BNI's Corporate Governance Perception Index (CGPI) of 92.60. - Achievement of the GCG Index based on the ASEAN Corporate Governance Scorecard (ACGS) of 118.24.	BNI continuously improves its governance practices, including through the implementation of Internal Controls Over Financial Reporting (ICOFR), refinement of governance policies, and strengthening of disclosures on BNI's governance practices.
TARGET 2026	
- GCG Index target based on BNI CGPI of 92.60. - GCG Index target based on BNI ACGS of 118.24.	

REALIZATION OF SUPPORT IN 2025	TARGET ACHIEVEMENT STRATEGY
Achievement of a complaint percentage of 0.019% of total transaction frequency.	- Utilize lessons learned from complaints and strengthen coordination across the value chain for improvement to reduce the number of complaints. - Utilize voice of customer data to detect potential issues to enable the entire value chain to take corrective action.
TARGET 2026	
The target percentage of complaints to total transaction frequency at 0.022%.	

REALIZATION OF SUPPORT IN 2025	TARGET ACHIEVEMENT STRATEGY
Increasing customer satisfaction levels through Customer Satisfaction Survey (CSS) measurements with an Index/Score of 4.43.	- Maintain service quality by implementing timeline-based work procedures and ensuring that all activities meet implementation standards. - Accelerate the achievement of set targets through comprehensive reviews and streamlined work processes, including simplified SOPs. - Provide education on customer protection and customer complaint handling for the entire value chain. - Monitor the implementation of business process improvement strategies while conducting evaluation through weekly and biweekly meetings. - Enhance employee competence by providing training that has been developed through LNA (Learning Need Analysis).
TARGET 2026	
The target of increasing customer satisfaction through the Customer Satisfaction Survey (CSS) measurement with an Index/Score of 4.07.	

Message from the Board of Directors [2-11, 2-12, 2-14, 2-22]



Putrama Wahyu Setyawan
President Director

Dear Esteemed Stakeholders,

The year 2025 marks an important period for BNI in strengthening our role as a financial institution, which is not only performance-oriented but also focused on long-term resilience and sustainable value creation. Amidst global economic dynamics, the acceleration of the transition to a low-carbon economy, and increasing stakeholder expectations for responsible business practices, BNI affirms our commitment to integrating sustainability principles into the Company's strategy and operations.



Sustainability for BNI is an integral part of how we manage risk, capture growth opportunities, and ensure business relevance in the future. This approach aligns with Indonesia's national policy agenda to promote sustainable finance, achieve the Sustainable Development Goals (SDGs), and the Government's commitment to reach Net Zero Emissions (NZE) by 2060 or sooner.

Integration of Sustainability into Strategy and Governance

BNI recognizes that sustainability challenges, particularly climate change, energy transition, and social inequality, are directly linked to the stability and performance of the banking sector. Therefore, environmental, social, and governance (ESG) principles continue to be integrated into strategic decision-making, risk management, and the development of products and services.

BNI has updated the Sustainability Pillar for 2025 to strengthen the implementation of this strategy. The transformation of sustainability is marked by the preparation of an ESG Blueprint as a strategic guide to ensure the comprehensive integration of environmental, social, and governance aspects across the Company's business activities, risk management, and decision-making. BNI's Sustainability Pillar consists of three main focuses, namely Sustainable Finance, Corporate Sustainability, and Inclusion & Resilience, which are designed to respond to economic, social, and environmental risks, including risks related to climate change, while supporting BNI's contribution to the Sustainable Development Goals (SDGs) priorities.

As part of strengthening sustainability governance, the Board of Directors manages and evaluates the implementation of ESG strategies through internal governance mechanisms, including the ESG Sub-Committee forum, which is held regularly at least four times a year. This forum serves as a platform

to discuss sustainable finance developments, ESG risk and opportunity trends, and the effectiveness of sustainability strategy implementation across all BNI business lines. Oversight is carried out by the Board of Commissioners, including for climate risk management.

Sustainability issues within BNI's internal governance are managed through the ESG Sub-committee, which is under the Risk Management & Anti-Fraud Committee. This sub-committee consists of cross-functional representatives based on the Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025. In line with the strengthening of sustainability governance, in 2025, BNI developed the ESG Management Department under the ERM Division into the Environmental, Social & Governance Division.

Strategies and Policies in Addressing Sustainability Challenges

Response to Climate Change and Transition to a Low-Carbon Economy

Climate change is increasingly regarded as a significant factor that can affect the financial and operational performance of banks, both through physical risks and transition risks. Recognizing this, BNI continues to strengthen its climate risk management by developing a climate risk management framework that is integrated with the Company's overall risk management.

In line with the directives of regulators and the development of sustainable finance policies in Indonesia, BNI continues to develop the climate risk management system (CRMS), including conducting climate risk stress tests (CRST) on the entire portfolio to assess the potential impact of climate risk on the financing portfolio in the short, medium, and long term. In addition, BNI also continues to align the debtor assessment process with the Indonesian Sustainable Finance Taxonomy (TKBI), particularly in four main sectors, namely Energy, Construction & Real Estate (CRE), Transportation & Storage (T&S), and some Agriculture, Forestry and Other Land Uses (AFOLU), specifically the forestry and oil palm plantation sectors.

In the operational aspect, BNI implements various initiatives to reduce our carbon footprint and improve efficiency, including through energy consumption management, business process digitalization, reduction of paper usage, and operational waste management. These efforts are part of BNI's commitment to achieving our operational NZE target by 2028 and supporting the financing NZE target by 2060.

Sustainable Finance Development and Financing Portfolio

BNI continues to expand its role as a catalyst for a sustainable economy through the development of financial products and services to remain the pride of the nation. The sustainable financing portfolio includes, among others, sustainable financing (KKUB), sustainability-linked loans, and the management of green bonds and sustainability bonds to support priority sector projects that help accelerate energy transition, resource efficiency, and sustainable development.

Through this approach, BNI not only encourages green financing growth but also acts as a strategic partner for debtors in making changes towards more sustainable business practices. Throughout 2025, BNI actively carried out educational activities, technical assistance, and transition forums for debtors, including those related to the implementation of TKBI and the publication of advisory playbooks for sub-sectors with high emission intensity and significant transition risks. These efforts are expected to encourage debtors to improve their environmental and social performance, while strengthening long-term business resilience.

Cybersecurity Resilience in Supporting Digital Services

As the digitalization of banking services accelerates, BNI faces challenges posed by the increasing complexity of cyber threats, including data security risks, system reliability, and customer protection amid the digital ecosystem expansion and third-party involvement. These dynamics require cyber

risk management that is more than just reactive; it must be integrated into corporate governance and aligned with the implementation of sustainability pillars.

Data security and cybersecurity are strengthened by considering the aspects of people, process, and technology. In addition to focusing on systems and infrastructure, this strengthening also involves raising cybersecurity awareness throughout the organization and providing continuous education to customers regarding data protection, privacy, and digital transaction security.

In process and technology aspect, BNI implements cybersecurity management in line with the Cyber Security Framework through the implementation of a multi-layered security system, continuous monitoring, and Cyber Threat Intelligence support that proactively identifies suspicious activities and cyber attacks through threat hunting and a Security Operations Center (SOC) to detect, respond to, and mitigate potential threats proactively, as well as providing comprehensive and integrated security monitoring visibility, enhanced with threat detection and intelligence-based monitoring capabilities, while continuously strengthening cyber resilience to support operational sustainability and stakeholder trust. Security aspects have also been integrated into the development of digital systems and services, including access management and data protection, to ensure that security remains part of every stage of BNI's operational and digital innovation.

As a manifestation of this commitment, BNI has established Cyber Security Zero Incident for incidents with a significant material impact. All incidents, including those below the material limit, are monitored and handled systematically through a standardized Security Incident Response mechanism to ensure service continuity and customer trust.

Achievements in the Implementation of Sustainable Finance and Strategies for Achieving Performance Targets

Sustainable Finance

Throughout 2025, BNI continued to strengthen its role in promoting sustainable finance growth through the development of financing, funding, and financial products that are aligned with ESG principles. The Sustainable Finance pillar focuses on creating long-term value for Indonesia, the environment, and customers, while supporting the achievement of a low-carbon and inclusive economy.

In implementing sustainable finance, BNI has increased the environmentally and socially conscious financing. By the end of 2025, BNI's sustainable financing (KKUB) portfolio reached Rp196.7 trillion, an increase of 3.3% YoY, consisting of Rp78.0 trillion in green financing and Rp118.8 trillion in MSME financing. BNI also distributed Sustainability-Linked Loans (SLL) amounting to Rp6.6 trillion. In 2025, BNI issued the 2025 Phase I Sustainability Bond with a value of Rp5 trillion, which was used to finance and/or refinance projects that meet sustainability principles in accordance with the BNI Sustainability Bond Framework. Meanwhile, the issuance of Green Bonds in 2022 has resulted in the avoidance of greenhouse gas (GHG) emissions of 2,534,594 tons of CO₂eq.

BNI continues its strategic role in supporting the structured and measurable development of Micro, Small, and Medium Enterprises (MSMEs), including increasing business productivity (Go Productive), accelerating digitalization (Go Digital), and expanding global market access (Go Global). In line with this, BNI implements mentoring and empowerment programs to improve the capacity and competitiveness of MSMEs. This approach is supported by active collaboration with ministries, agencies, and relevant stakeholders, which is expected to strengthen the economic resilience of the community and create a comprehensive social impact.

Under the Go Productive pillar, BNI carries out the

BNI UMKM Ramah Lingkungan (BUMI) Program, which focuses on empowering environmentally friendly fashion and handicraft MSMEs. In 2025, BNI distributed Rp39 billion in financing to 157 MSMEs, accompanied by dissemination and business matching activities to increase business capacity and market competitiveness. Under the Go Digital pillar, BNI supports the modernization of the agricultural sector through the Agricultural Machinery Financing Program (Kredit Alsintan) to boost productivity, farming efficiency, and strengthen national food security.

Meanwhile, through the Go Global pillar, BNI Xpora continues to be strengthened as an integrated export solution for MSMEs. By the end of 2025, BNI Xpora recorded financing of Rp35.0 trillion to 12,094 debtors, as well as supporting diaspora services with 39 active customers. Additionally, BNI has developed the BNI Jejak Kopi Khatulistiwa (BNI JKK) program as a green financing ecosystem based on social forestry, with financing realization of Rp74.9 billion reaching 493 coffee farmers in five provinces. All these initiatives reflect BNI's role in driving inclusive, sustainable, and export-oriented MSME growth.

Corporate Sustainability

The Corporate Sustainability pillar covers energy and emissions management, sustainable operational practices, strengthening the role of employees, and data protection and cybersecurity. In supporting the achievement of net zero emissions (NZE) targets, BNI continues to implement various energy and emissions management initiatives across all operational activities. Throughout 2025, BNI continued to inventory and monitor GHG emissions from its operational activities, as well as strengthen its data infrastructure to support more integrated emissions management.

In line with decarbonization efforts, BNI continues to drive operational efficiency through the digitalization of business processes and banking services. This digital transformation contributes to reducing paper usage, increasing energy efficiency, and optimizing internal processes. At the end of the reporting period, energy consumption intensity

per revenue was recorded at 13.6 GJ/Rp billion, while total GHG emissions intensity per revenue was 689.8 tons of CO₂eq/Rp billion. These results contributed to BNI's achievement in maintaining green building certifications for the BNI Tower (Gold certified), BNI Plaza (Platinum certified), and BNI PIK 2 Building (LEED Gold certified in the Building Construction category), as one of the achievements in implementing operational sustainability standards.

As part of other operational sustainability management, BNI implements solid waste management based on the Zero Waste to Landfill (ZWTL) concept with the principles of reduce, reuse, and recycle. This program is implemented at the Head Office as an initial stage with the support of Solid Waste Management SOPs and waste sorting facilities. Throughout the reporting period, the waste managed included organic waste through composting and Black Soldier Fly processing of 91.5 tons, inorganic waste through recycling of 169.2 tons, and residual waste utilized through Refuse Derived Fuel (RDF) technology of 372.4 tons.

In 2025, BNI strengthened its digital transformation as part of the strategy to improve sustainable performance through the development of digital services and the strengthening of internal technological capabilities. In terms of services, BNI focused on developing the wondr by BNI application as an integrated banking platform, including the launch of the wondr multicurrency feature, which allows users to manage up to 12 foreign currencies in a single account. At the same time, to improve operational effectiveness, the Company is integrating artificial intelligence (AI) and cloud computing technologies across various business lines, which are utilized to strengthen risk management and consumer protection through risk analytics, early detection of potential fraud, and improved customer service responsiveness. These initiatives have led to an increase in digital transactions and process efficiency, while also supporting the reduction of manual activities and the use of physical documents.

In line with the development of digital services

and the strengthening of internal technological capabilities, BNI consistently strengthens data and cybersecurity management as part of its operational resilience and customer protection. This management includes strengthening the implementation of the Personal Data Protection (PDP) Law, strengthening the reliability of information technology infrastructure, implementing application security technology for real-time protection of digital services, monitoring digital service security, and developing human capital capabilities in the field of cybersecurity. As a result of these management efforts, there were no data breaches that had a significant impact on BNI's operations throughout 2025.

Amid increasing cyber threats, cyber resilience is enhanced through the implementation of an international standard cybersecurity management system, as reflected in the ISO 27001:2022 certification for the Open API Services information security management system, Service and Organization Control (SOC) 2 Type II-based controls covering security, availability, confidentiality, and privacy, controls through the implementation of IT maturity assessments based on COBIT 2019 by independent assessors, as well as data center management certification in the form of Tier III Certification of Constructed Facility by the Uptime Institute. Cybersecurity management refers to the National Institute of Standards and Technology (NIST) Cybersecurity Framework, which includes the stages of identification, protection, detection, response, and incident recovery to ensure the continuity of digital banking services. To complement its preparedness in handling cyber incidents, which is a key focus, BNI has become part of the Computer Security Incident Response Team (CSIRT) of the National Cyber and Crypto Agency (BSSN).

In the human resources aspect, BNI continues to increase employee engagement in sustainability implementation through training programs, internal communication, and strengthening ESG culture. A total of 26,143 employees have participated in sustainable finance competency

development programs through Mandatory Sustainability Finance e-Learning. As part of social performance management, BNI strives to create a safe, comfortable, inclusive, and fair working environment for all employees. We implement a respectful workplace and respect human rights. Throughout 2025, there were no reports of discrimination or violence within BNI. We conduct regular employee satisfaction and engagement surveys every year, with an employee satisfaction index of 35% in the 'Good' category in 2025.

Inclusion and Resilience

Through the Inclusion & Resilience pillar, BNI is committed to expanding financial access, strengthening financial literacy, and improving the social and economic resilience of the community. This pillar affirms BNI's role not only as a financial institution but also as a development partner that contributes to inclusive and sustainable economic growth.

As a strategic partner to debtors, BNI has developed an ESG Advisory Playbook to assist in the transition to sustainable business practices integrated with financing. This playbook is designed to help debtors understand the initial conditions, the business benefits of sustainable practices, and steps to improve alignment with Indonesian Sustainable Finance Taxonomy (TKBI) classifications. The implementation of ESG Advisory focuses on priority sub-sectors with high transition risks, with the initial stage being the launch of the palm oil sub-sector playbook in 2025. This makes BNI the first bank in Indonesia to develop such a guide. BNI will then continue with the implementation of a pilot project in 2026.

To support the expansion of access and effectiveness of services, BNI manages various banking service channels through the optimization of physical and digital networks and community partnerships. Service access expansion is also strengthened through the BNI Agen46 network as a strategic partner in reaching communities in areas not yet served by branch offices or ATMs, including the unbanked and underserved segments. By 2025,

the number of agents in BNI Agen46 grew 1.7% with distribution in 465 cities/regencies, equivalent to 42.5% of national coverage. Of the total BNI Agen46, as many as 28,177 agents or around 13% are located in underdeveloped, outermost, and frontier (3T) areas. To support service quality, BNI has distributed 38,551 EDC units to BNI Agen46, including 7,000 units distributed during 2025, and provides various transaction channels via mobile applications, the web, EDC Mini ATMs, and EDC Android.

BNI consistently promotes the improvement of community financial literacy as the foundation for building healthy and sustainable financial behavior. Literacy programs are conducted through face-to-face and digital approaches, covering various segments, including students and the general public. The educational materials are aimed at strengthening financial management skills, the safe use of digital banking services, and increasing awareness of various financial risks, such as illegal investments and online gambling. This initiative aims to equip the public to make wiser financial decisions and remain resilient in the face of changing economic conditions.

In terms of economic empowerment, BNI plays an active role as the management of Rumah BUMN in 23 locations across Indonesia as part of the Ministry of State-Owned Enterprises' initiative. Through Rumah BUMN, BNI provides capacity building training, business mentoring, and market access facilitation for fostered MSMEs. MSME development is not only aimed at strengthening the local market, but also at expanding networks and opportunities for expansion to the national and international levels through participation in various domestic and global exhibitions, in order to increase the added value and competitiveness of products.

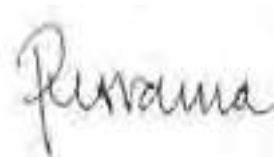
In addition to economic and social aspects, BNI also contributes to environmental and biodiversity conservation through various conservation initiatives. In 2025, BNI continued the mangrove rehabilitation program in Pangpang Bay, Banyuwangi, which has covered an area of 50 hectares with a plant survival rate of 98%, and supported coastal ecosystem protection through the planting of casuarina trees in Indramayu. During the same period, BNI also supported the rehabilitation of 4 Bornean orangutans and the restoration of 8 hectares of critical land in Samboja Lestari and Nyaru Menteng.

Appreciation

We believe that sustainability is a vital foundation for BNI's future growth. We will continue to create value that supports future wellbeing by creating a positive impact through every service we offer. By integrating sustainability principles into all aspects of our business, BNI is committed to continuing to create this value in the long term for all stakeholders.

The Board of Directors would like to express our appreciation to all stakeholders for their trust and support, especially to our customers and BNI employees, as part of the Indonesian community. With strong collaboration and shared commitment, we are optimistic that BNI can continue to contribute to the realization of an inclusive, resilient, and sustainable financial system.

Jakarta, February 2026



Putrama Wahyu Setyawan
President Director

BNI at a Glance

Company Profile [2-1]



Company Name

PT Bank Negara Indonesia (Persero) Tbk



Business Activities, Products, and Services

Engages in banking business in accordance with the Articles of Association No. 27 dated April 22, 2025.



Head Office Address

Grha BNI
Jl. Jenderal Sudirman Kav. 1 Jakarta 10220
Phone : (62-21) 251 1946
Email : bni@bni.co.id
Website : www.bni.co.id
PO Box 1946



Market Served [2-6]

Geographical markets served: Indonesia, New York – United States, London, Hong Kong, Singapore, Tokyo – Japan, Seoul – South Korea, Amsterdam – Netherlands, and Sydney – Australia

Sectors and types of customers served:

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

Shareholder Ownership



PT Danantara Asset Management (Persero)

60%

Public
40%

The State of the Republic of Indonesia
0%



Operational Area [2-6]

Operating in 9 countries, namely: Indonesia, Singapore, Hong Kong, Japan, United Kingdom, United States, South Korea, Netherlands, Australia

Office Network and Banking Facility Data:



Significant changes

During 2025, two sub-branch offices (Kantor Cabang Pembantu/KCP) were opened and six KCPs were closed. Aside from these changes, there were no other significant changes to the organizational structure or supply chain.

Vision and Mission



Vision

To become a trusted global financial institution that excels in innovation and sustainable performance.



Mission

- Providing innovative financial services and digital solutions to meet the needs of domestic and international customers.
- Creating optimal value for investors while upholding integrity and strong corporate governance.
- Becoming a strategic partner in driving Indonesia's economic growth.

In line with changes in the banking industry landscape, the acceleration of digital transformation, and the increasing intensity of international competition, BNI has refined and sharpened its Vision, Mission, and Strategy as part of an ongoing strategic evaluation process. This initiative is undertaken to clarify the Company's strategic direction, sharpen its business focus, and ensure BNI's readiness to compete at the global level.

Culture and Values

In a bid to reinforce the implementation of AKHLAK values, BNI is undergoing a work culture transformation to align the company's core values across all organizational activities. The AKHLAK values, as established by the Ministry of State-Owned Enterprises, and stand for Trustworthy, Competent, Harmonious, Loyal, Adaptive, and Collaborative, have been implemented and put into practice at all levels of the organization. This internalization process continues to be strengthened through the understanding and reinforcement of Core Value as a guideline and shared belief in shaping the work conduct of BNI Hi-Movers. By taking this step, BNI affirms its commitment to building a work culture that upholds integrity, strengthens collaboration, and supports the company's sustainability.

AKHLAK

TRUSTWORTHY

Upholding the trust given



COMPETENT

Continuously learning and improving capabilities



HARMONIOUS

Mutual caring and respecting differences



LOYAL

Dedicated and prioritizing the interests of the nation and country



ADAPTIVE

Continuing to innovate and be enthusiastic in driving and facing changes

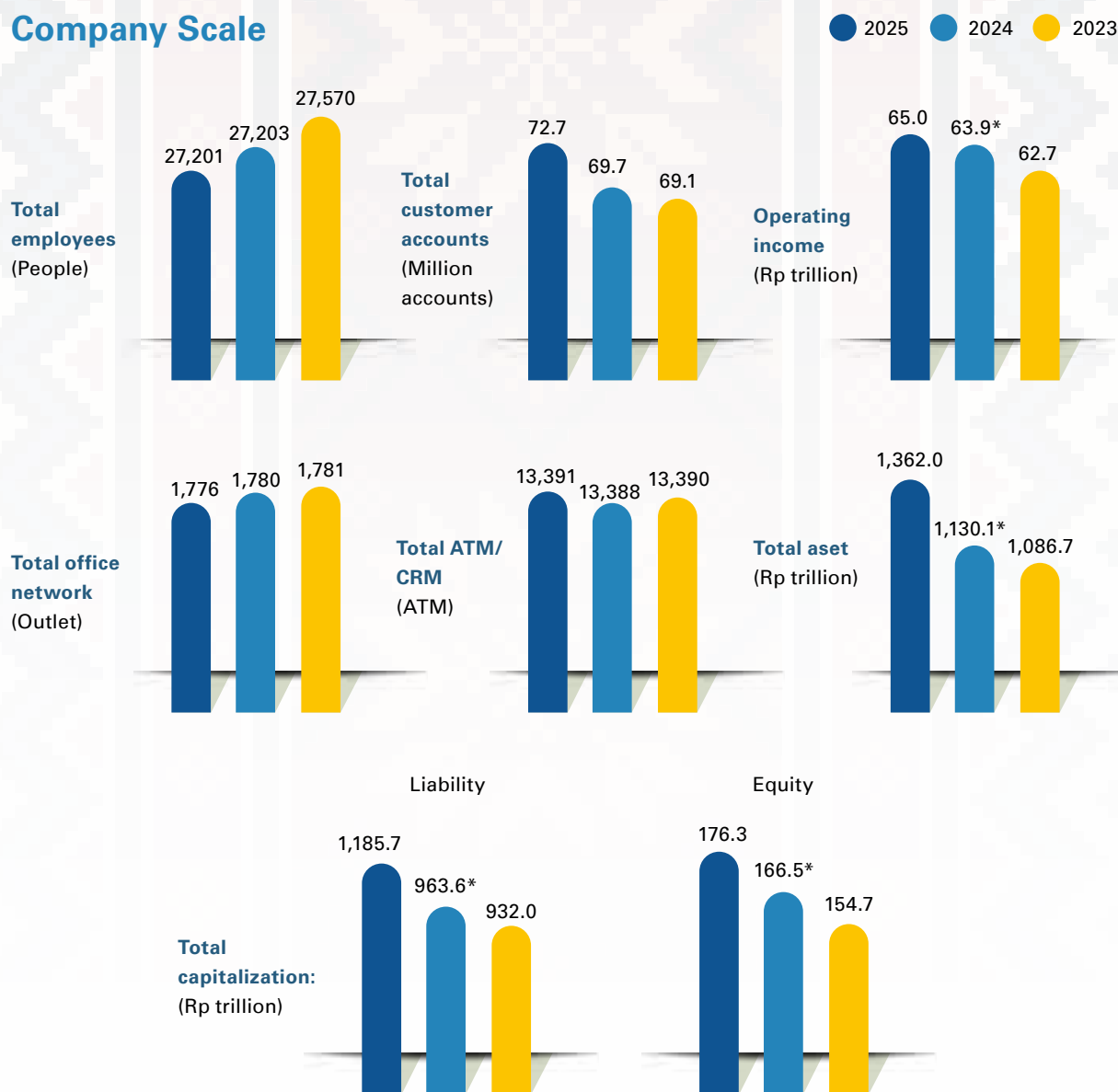


COLLABORATIVE

Cultivating synergistic cooperation



Company Scale



Note:

*) Restatement of financial information for 2024 due to the implementation of SFAS 117 at BNI Life. [2-4]

PRODUCTS AND SERVICES [FN-CB-000.A]

Current Accounts Rp trillion		Savings Rp trillion		Deposits Rp trillion		Gross Loans Rp trillion	
439.5 2025		314.9 2025		286.5 2025		899.5 2025	
2024	3057	2024	242.2	2024	257.5	2024	775.9
2023	345.5	2023	345.5	2023	345.5	2023	345.5



BNI Employee Profile ^[2-7, 2-8]

The contributions of all employees are the main drivers of BNI's performance. Therefore, the Bank consistently fosters a conducive work environment that encourages creativity and achievement, in line with one of the company's missions. Human resource management is carried out with respect for human rights, where the values of equality and anti-discrimination are applied comprehensively. This commitment is reinforced through the implementation of Respectful Workplace (RWP) to ensure a safe, comfortable, and inclusive work environment that is free from harassment, bullying, discrimination, and violence, as stipulated in Company Guideline No. Instruction IN/013/HCS/001 dated October 6, 2024, as a follow-up to the circular letter from the regulator overseeing state-owned enterprises. In maintaining diversity, BNI endeavors to achieve a balanced employee composition based on educational background, age group, work experience, gender, race, ethnicity, and religion. All BNI employees are full-time employees, and there are no part-time workers.

Employee Composition by Employment Status and Gender ^[2-7]

Employment Status	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
Permanent	12,109	13,157	12,200	13,178	12,150	13,310
Contract	540	728	521	697	647	728
Trainees	362	305	333	274	395	340
Total by gender	13,011	14,190	13,054	14,149	13,192	14,378
Total	27,201		27,203		27,570	

Employee Composition by Operational Regions and Gender ^[2-7]

Operational Regions	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
Head Office	4,353	3,461	4,168	3,277	5,664	4,798
Regional Office 01	464	544	471	556	394	473
Regional Office 02	576	622	647	683	518	604
Regional Office 03	657	711	667	746	555	637
Regional Office 04	693	760	735	767	623	657
Regional Office 05	479	531	496	540	400	472
Regional Office 06	614	915	616	940	533	817
Regional Office 07	568	691	569	666	455	539
Regional Office 08	604	663	610	668	520	593
Regional Office 09	665	737	662	740	578	632
Regional Office 10	352	574	346	569	298	536
Regional Office 11	331	489	336	496	276	417
Regional Office 12	390	474	395	469	351	450
Regional Office 14	450	758	456	768	379	707
Regional Office 15	496	701	512	698	417	631
Regional Office 16	188	226	207	221	187	212

Operational Regions	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
Regional Office 17	545	670	557	683	491	609
Regional Office 18	562	654	581	653	533	585
Overseas Branch (KLN)	24	9	23	9	20	9
Total by gender	13,011	14,190	13,054	14,149	13,192	14,378
Total	27,201		27,203		27,570	

Employee Composition by Age Group and Gender [2-7, 405-1]

Age Group	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
> 50 Years	1,179	989	1,310	1,031	1,359	1,035
> 45-50 Years	2,078	1,653	1,975	1,452	1,625	1,222
> 40-45 Years	948	942	1,081	1,186	1,543	1,550
> 35-40 Years	2,882	3,250	2,635	2,820	2,103	2,181
> 30-35 Years	2,685	3,235	2,809	3,494	3,064	3,834
> 25-30 Years	2,386	2,927	2,532	3,190	2,719	3,462
≤ 25 Years	853	1,194	712	976	779	1,094
Total by gender	13,011	14,190	13,054	14,149	13,192	14,378
Total	27,201		27,203		27,570	

Employee Composition by Position Level and Gender [2-7, 405-1]

Position Level	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
≥ Senior Vice President*	95	32	91	31	83	28
≥ Vice President	215	78	205	72	156	49
Assistant Vice President	883	446	887	434	846	407
Manager	2,273	1,744	2,259	1,647	2,027	1,491
Assistant Manager	5,536	5,774	5,519	5,806	5,691	5,860
≤ Assistant**	4,009	6,116	4,093	6,159	4,389	6,543
Total by gender	13,011	14,190	13,054	14,149	13,192	14,378
Total	27,201		27,203		27,570	

Notes:

The proportion of senior managers employed are Indonesian citizens (WNI) [202-2]

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

**) Consists of: Assistants and Basic Employees

Employee Composition by Education Level and Gender [2-7]

Education Level	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
Doctoral Degree	14	5	13	3	9	4
Master's Degree	1,594	1,305	1,634	1,274	1,625	1,219
Bachelor's Degree	10,649	11,812	10,531	11,620	10,515	11,731
Diploma Degree	497	1,066	593	1,249	724	1,421
Primary to High School	257	2	283	3	319	3
Total by gender	13,011	14,190	13,054	14,149	13,192	14,378
Total	27,201		27,203		27,570	

Other Employees Outsourced by BNI [2-8]

In addition to full-time employees, BNI is also supported by workers hired under outsourcing schemes through partnerships with the service providers. These workers play a role in supporting the Bank's smooth operations in various support functions. BNI ensures that all workers, both internal employees and outsourced workers, work in an environment that upholds the values of mutual respect and fulfillment of human rights principles. In establishing partnerships with third parties, BNI always ensures compliance with all applicable laws and regulations. In 2025, the number of outsourced workers was recorded at 16,636, most of whom were placed in operational support positions, including cleaning services, drivers, and other operational functions.

External Initiatives and Association Membership [2-28]

In promoting the implementation of Sustainable Finance and strengthening sustainability principles in all operational activities, BNI implements various frameworks and standards encompassing economic, social, and environmental aspects. Some of the references used include:

- Global Reporting Initiative (GRI) as a guideline for preparing transparent and accountable sustainability reports;
- Sustainable Development Goals (SDGs) as a framework for sustainable development that serves as a reference for creating positive impact;
- European Foundation for Management Development (EFMD) – Global CLIP (Corporate Learning Improvement Process) to support the improvement of corporate learning quality; and
- International Organization for Standardization (ISO) as an international standard in quality, environmental, and other management systems.

The implementation of these standards affirms BNI's commitment to integrating sustainability values into all business processes, while ensuring a positive and sustainable contribution to stakeholders and environmental preservation.

Details of certifications and accreditations held:



ISO 27001: 2022

Information Security Management System
August 25, 2025 - January 15, 2029



ISO 9001:2015

Provision of in-House Learning and in Learning/ Digital Learning for BNI Employees
March 26, 2023 - March 9, 2026



ISO 9001:2015

Quality Management System for BNI Contact Center Services in BSD, Surabaya, & Semarang
August 2, 2023 - March 13, 2026



ISO 9001:2015

Quality Management System for HPS Unit
November 14, 2024 - November 11, 2026



ISO 9001/2015:

Quality Management System for Vendor Management Unit
November 14, 2024 - November 26, 2026



ISO 9001:2015

Provision of BNI Credit Cards Business
June 27, 2024 - June 26, 2027



ISO 37001:2016

Anti-Bribery Management System
January 1, 2024 - December 31, 2026



ISO 30301:2019

Management systems for records for the Archives Unit
December 23, 2024 - December 22, 2027



Greenship Certificate

BNI Tower: Gold
January 2025 - January 30, 2028
BNI Plaza: Certificate on Process

Sertifikat LEED V.4

BD+C: Core and Shell

BNI PIK 2 Building: Gold
Applicable to the Building Construction category

Corporate Learning

Improvement Process

(CLIP) - EFMD Global

December 22, 2022 – December 22, 2027

Association Memberships Supporting to Sustainability

Association	Role	Scope
United Nations Environment Programme Finance Initiatives (UNEP FI)	Member	International
The Alliance for Green Commercial Banks	Member	International
Indonesia Sustainable Finance Initiative (IKBI)	Member/Founder	National
Indonesia Business Council for Sustainable Development (IBCSD)	Member/Founder	National
Indonesian Association of Green Building Experts (IABHI)	Member	National
Forum Human Capital Indonesia (FHCI)	Chairperson of Division 1: Organizational Development & Workforce Planning (BNI Director of Human Capital & Compliance)	National
Indonesian Banking Human Capital Forum (FHCPI)	Member	National
Corporate Social Responsibility (CSR) Forum	Member	National

Sustainability Governance

Sustainability Commitment and Culture

Building a Culture of Sustainability ^[2-27]

BNI continues to strengthen the integration of sustainability principles, including sustainable finance, at all levels of the organization. The Bank’s efforts to build a culture and work behavior that is increasingly sensitive to environmental and social impacts are reflected in our comprehensive implementation of these principles. Consistent with these efforts, Bank has implemented various initiatives, including:

Establishing an Environment, Social, and Governance (ESG) Subcommittee under the Risk Management & Anti-Fraud Committee based on the Board of Directors Decree No. KP/484/DIR/R dated October 26, 2021, and updated based on Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025;

Developing the Environmental Social & Governance Management Department (ESM) into an **Environmental Social & Governance Division** to monitor day-to-day sustainability practices within the company;

Formulating **credit policies that take into account Environmental, Social, and Governance (ESG) factors**, and integrating sustainability principles into the Code of Ethics, policies, and Standard Operating Procedures (SOPs);

Conduct **training** to increase employee knowledge related to **sustainability**;

Map credit portfolios that pose a high risk to the environment;

Implement **a green lifestyle program campaign**, including discontinuing the consumption of bottled water, conserving water, and sorting waste according to category.

BNI has carried out various activities to ensure the consistent implementation of sustainability principles. In addition to requiring the completion of mandatory e-learning modules, BNI actively promotes environmental, social, and governance (ESG) awareness through various communication media, such as websites, YouTube, email blasts, and the BNI ESG Booklet. These efforts are complemented by the dissemination of information on the Indonesian Sustainable Finance Taxonomy (TKBI), ESG-related training, and other sustainability initiatives.

BNI is working to strengthen the steps that have been taken by formulating a comprehensive ESG framework, roadmap, and policy to ensure a focused and comprehensive implementation of sustainability principles. BNI has also demonstrated its commitment to the national net zero emission (NZE) agenda and is closely following developments in sustainable finance, including the implementation of Climate Risk Management and Scenario Analysis (CRMS) and preparations for the implementation of IFRS S1 & S2 as directed by the OJK.

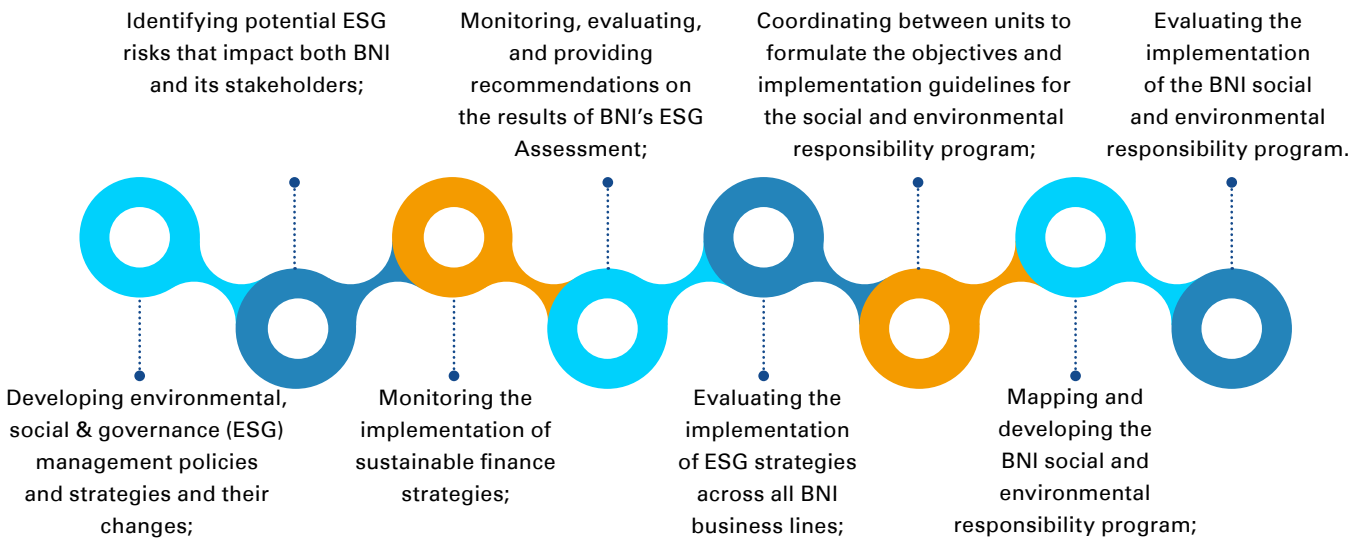
Sustainability Governance Structure ^[2-9]

The Board of Commissioners and Board of Directors support the implementation of sustainability governance at BNI by taking an active role in formulating and overseeing the implementation of Sustainable Finance. BNI also manages sustainability issues through the ESG Subcommittee under the Risk Management & Anti-Fraud Committee, which consists of cross-functional representatives based on the Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025. More detailed information on BNI’s organizational structure can be found in the 2025 Annual Report.

Chairman	Vice President Director
Vice Chairman	Risk Management Director
Secretary	Head of Environmental, Social & Governance Division (concurrently serving as a non-voting permanent member)
Permanent Members Equivalent to the Board of Directors and SEVP (Voting Members)	1. Director of Finance & Strategy 2. Director of Corporate Banking 3. Director of Treasury & International Banking 4. Director of Institutional Banking 5. Director of Commercial Banking 6. Director of Consumer Banking 7. Director of Network & Retail Banking 8. Director of Operations 9. Director of Information Technology
Permanent Members Equivalent to the Board of Directors (Non-Voting Members)	Human Capital & Compliance Director
Permanent Members Equivalent to Divisions/Units (Non-Voting Members)	1. Head of Enterprise Risk Management Division 2. Head of Operational Risk Management Division 3. Head of Corporate Credit Risk Division 4. Head of Enterprise Credit Risk Division 5. Head of Commercial Credit Risk Division 6. Head of Corporate Planning & Performance Management Division 7. Head of Investor Relations Division 8. Head of Subsidiaries Management Division 9. Head of Procurement & Fixed Assets Division 10. Head of Corporate Banking Division 1 11. Head of Corporate Banking Division 2 12. Head of Corporate Banking Division 3 13. Head of Corporate Banking Division 4 14. Head of Syndication & Structured Finance Division 15. Head of Enterprise Banking Division 1 16. Head of Enterprise Banking Division 2 17. Head of Commercial Banking Division 1 18. Head of Commercial Banking Division 2 19. Head of SME Business Division 20. Head of Business Program Division 21. Head of International & Financial Institutions Division 22. Head of Treasury Division 23. Head of Consumer Product Division 24. Head of Card Business Division 25. Head of Agen46 Division 26. Head of Compliance Division 27. Head of Policy Governance Division 28. Head of Human Capital Strategy Division 29. Head of Human Capital Services Division 30. Head of BNI University Division 31. Head of Corporate Secretary Division
Non-Permanent Members (NonVoting Members)	Director of Sector/SEVP/Head of Division/Unit relating to the discussion topic

Delegation of Responsibility for ESG Management [2-9, 2-13, 2-14, 2-15, 2-16]

The Board of Directors’ involvement in the ESG implementation is realized through its membership in the ESG Sub-committee, which acts as the key responsible party for ESG implementation at BNI. During 2025, the ESG Sub-committee held four quarterly meetings. The main duties of the ESG Sub-committee include:



In line with the role of the ESG Sub-committee as the main steering committee, sustainability impact management at the operational level is carried out collectively by all work units under the supervision of the Board of Commissioners and the Board of Directors to ensure the effective implementation.

BNI supports this implementation by transforming the Environmental, Social & Governance (ESG) Department under the Enterprise Risk Management (ERM) Division into the Environmental, Social & Governance Division, which has the following main tasks:

- Carrying out all activities related to the development, creation, and implementation of strategies, frameworks, and policies related to ESG blueprints and roadmaps at BNI, including their alignment with the BNI Group to achieve the objectives established by BNI Management;
- Formulating strategies and managing communications to support the ESG implementation across all units at BNI and the BNI Group;
- Preparing ESG-related reports for internal and external parties in accordance with applicable regulations;
- Managing the BNI-wide ESG portfolio, as well as advisory and consulting activities related to the implementation of sustainability, ESG, and/or energy transition for debtors, in coordination with relevant business units;

- Establishing cooperation and good relationships with government/non-government institutions, educational institutions, rating agencies, associations, and other institutions to support the achievement of BNI's ESG targets and development.

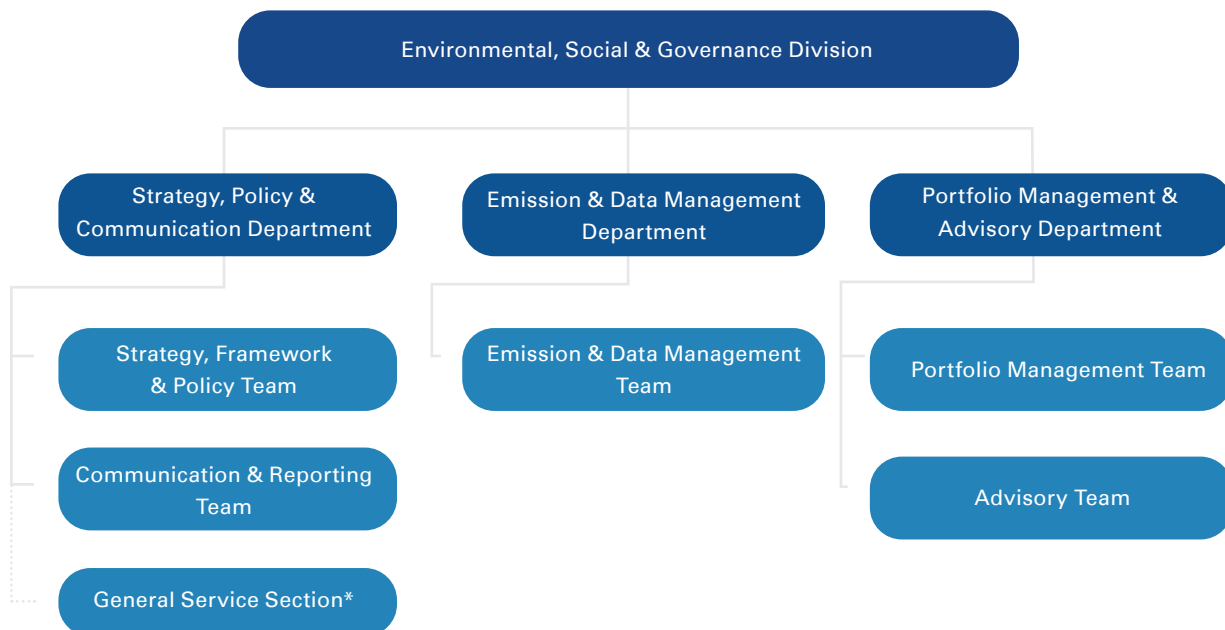
In carrying out its functions, the Environmental, Social & Governance Division is supported by three departments, as follows:

Strategy, Policy & Communications Department

Emissions & Data Management Department

Portfolio Management & Advisory Department

Organizational Structure of the Environmental, Social & Governance (ESG) Division

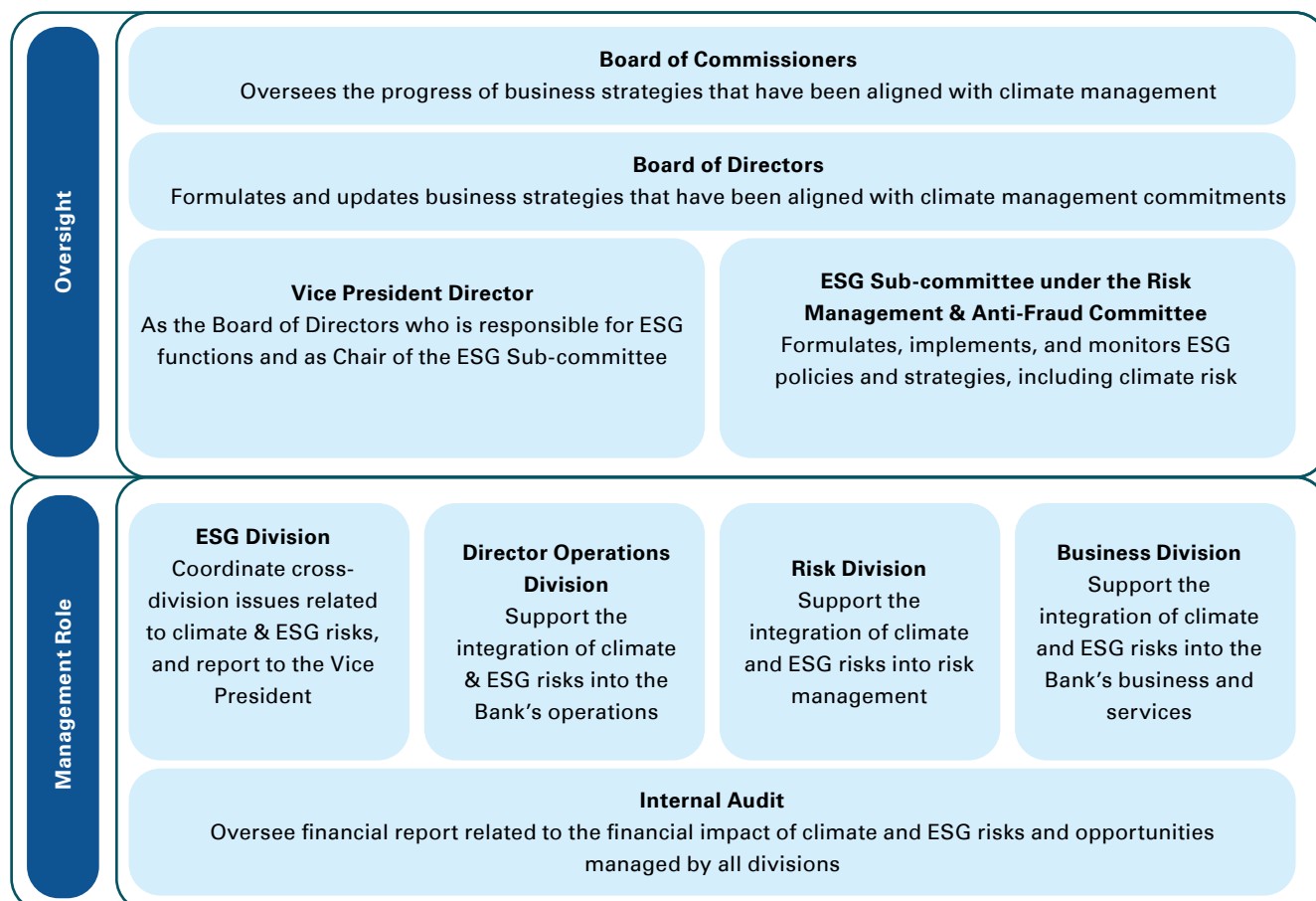


Note:

*) Adheres to the Head Office General Services semi-centralization governance

ESG Management Oversight and Evaluation

ESG Risk Oversight Process



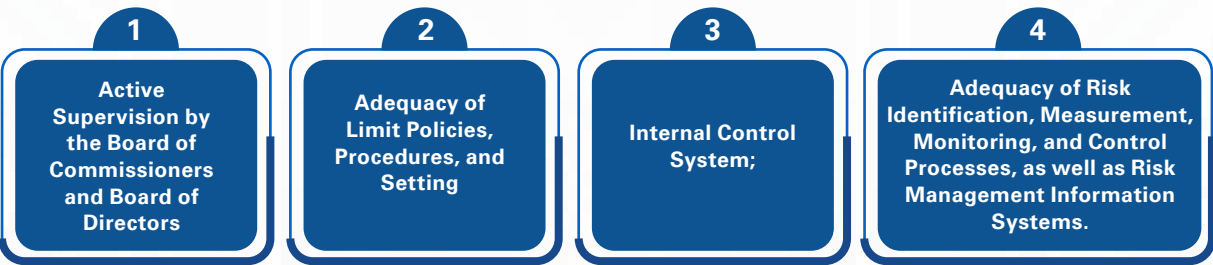
ESG Internal Risk Management Policy [2-13]

With ethics as the foundation of its operations and reporting, BNI maintains accuracy, transparency, and accountability in accordance with applicable laws and regulations. This commitment is reinforced by the strategic role of the Board of Directors and Board of Commissioners in ensuring the implementation of good governance, promoting responsible business practices, and prioritizing prudence in risk management across all work units.

BNI has established a governance structure and developed policies and procedures specifically designed to identify and manage the environmental, social, and governance risks of all its operational activities in order to strengthen its existing ethical and governance foundations. BNI also continuously improves the capacity and knowledge of its Board of Directors, Board of Commissioners, and relevant work units to ensure that they meet the competencies, expertise, and certifications required for Risk Management as stipulated in regulatory provisions.

Risk Identification Procedures for the Sustainable Finance Implementation and Management [2-16, 2-25, 2-26][FN-CB-550a.2]

Sustainable Financial Risk Management at BNI is carried out by the ESG Sub-committee through four pillars of risk management comprising risk identification, measurement, monitoring, and control processes, as follows:



Based on the results of the identification, there are several risks in the implementation of Sustainable Finance, namely:

ESG RISK IN BANKING OPERATIONS

Risk

The Bank's operations bring negative impacts to the environment and community

Risk Mitigation [2-25]

- All of BNI operational offices were located as per their functions.
- BNI generated waste was in a minimum amount and categorized as household waste.
- BNI processed its wastewater which was previously used for watering plants.
- Optimizing the use of digitalization in all the Bank's operations to reduce the use of paper.
- Implement responsible waste management in line with the zero-waste-to-landfill principle, particularly at the entire Head Office.

Risk

Digital finance products/services increase the risk of technological crime, threatening customers' privacy

Risk Mitigation [2-25]

- Identifying, assessing, reviewing, and improving digital risk of each BNI's digital product.
- Identifying, assessing, reviewing, and improving the resilience against cybercrime.
- Assessing and intensifying the security maturity on third parties.
- Assessing data privacy and the adequacy of data security through end-to-end process.

Risk

Emissions surge from the Bank's operations

Risk Mitigation [2-25]

- BNI has carried out energy saving in the form of:
 - Switching off lights during break sessions on working days.
 - Using solar energy for lighting purposes surrounding emergency stairs at BNI's main building.
 - Optimizing meetings through online media.
 - Optimizing the use of central AC in head office building.
- Monthly operational emissions monitoring.
- BNI set the operational NZE target, including the strategy to reduce emissions.

Risk

Threat of physical risks (flood, drought, and forest fire) against BNI's offices

Risk Mitigation [2-25]

- Conducted a natural disaster risk analysis upon selecting offices.
- BNI's offices are located in the urban areas, hence they were not exposed to the risk of forest fire.
- BNI has a Business Continuity Management as one of the efforts to mitigate natural disaster conditions.

ESG RISK IN LOAN DISBURSEMENT [FN-CB-410a.2]

Risk

Loan disbursement to sector with high emissions

Risk Mitigation [2-25]

- The Bank has a Risk Acceptance Criteria (RAC) by adding mitigation for climate change risk, containing minimum requirements for (potential) debtors with high-risk impact on the environment, such as RSPO/ISPO certification and the commitment to implementing No Deforestation, No Peat, and No Exploitation (NDPE) policy in land clearing for debtors in oil palm plantation, fulfilling environmental mandatory documents (AMDAL or UPL/UKL & PROPER) as per their business sector.
- The Bank selectively finances sectors with high emissions by considering the ESG implementation and the energy transition plan made by the debtors.
- BNI disburses financing in the form of Sustainability Linked Loan (SLL) to encourage debtors to initiate their energy transition.
- BNI issues advisory playbook to help debtors' transition.

Risk

Violation of ESG aspects by existing debtors

Risk Mitigation [2-25]

Business units will periodically monitor through a watchlist system and debtor rating assessment. If any violations of ESG criteria are found, BNI will verify the relevant parties and make adjustments to the debtors' rating.

Risk

Disbursement of green bonds disproportionate to the designations

Risk Mitigation [2-25]

Evaluating and selecting projects with green bonds disbursement is handled by the ESG Sub-committee with Vice President Director as the chairman. The disbursements are carried out on projects with the nature of project financing so that the flow of the fund use can be overseen by BNI. A second party opinion (SPO) has been made on the green bonds and sustainability bonds disbursement led by BNI.

Risk

Debtors of Sustainability Linked Loan fail to meet the SPT KPI target that has been agreed

Risk Mitigation [2-25]

A penalty system is in place to be imposed on debtors who fail to reach the targeted KPI SPT that has been agreed upon. An independent third party conducts an annual evaluation for loans, including the achievement of KPI SPT target.

Risk

The classification of taxonomy not in accordance with TKBI

Risk Mitigation [2-25]

- Developing TKBI questionnaires using language that is easier to understand.
- Providing technical assistant for filling out TKBI questionnaires for debtors in energy, AFOLU, construction & real estate, transportation & logistics sectors.
- Holding training for TKBI classification for Relationship Manager (RM).

SOCIAL RISK IN PERFORMING FINANCIAL LITERACY AND INCLUSION

Risk

The beneficiaries of financial literacy and inclusion are not evenly distributed

Risk Mitigation [2-25]

- Setting the target market for financial literacy and inclusion beneficiaries.
- Conducting area mapping of financial literacy and inclusion beneficiaries.
- Conducting financial literacy and inclusion gradually in accordance with the target market mapping results of financial literacy and inclusion beneficiaries.

BNI'S Sustainability Commitment and Strategy

[2-22, 2-23, 2-24]

Commitment

BNI continues to strengthen its commitment to achieving sustainable performance and creating a better future through the implementation of responsible banking practices and the reinforcement of its updated strategy based on sustainability pillars. In 2025, BNI further solidified the direction of its sustainability transformation through the development of an ESG Blueprint as a strategic roadmap integrating environmental, social, and governance aspects into all of the Company's business activities, risk management, and decision-making. This initiative ensures that the commitment to sustainability not only reflects in policies, but is also applied operationally and measurably across all lines of the organization.

In line with BNI's role as a national financial institution, the Bank consistently supports government policies and directives from relevant authorities in promoting the transition to a low-carbon economy, including efforts to achieve net zero emissions (NZE) targets. Through the implementation of its sustainability pillar strategy and ESG Blueprint, BNI strives to strengthen its contribution to sustainable development, create long-term value for stakeholders, and maintain a balance between economic performance, environmental preservation, and social welfare.

Internal Policy on Sustainability Implementation

BNI implements Sustainable Finance by referring to POJK No. 51/POJK.03/2017, which is realized through the consistent preparation of a Sustainable Finance Action Plan (SFAP) and Sustainability Report. To support this implementation, BNI developed the Environment, Social & Governance (ESG) Management Department under the Enterprise Risk Management (ERM) Division into the Environmental, Social & Governance Division. Cross-functional coordination is carried out through the ESG Sub-committee under the Risk Management & Anti-Fraud Committee, in accordance with the Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025. The implementation of sustainability governance is directly supervised and supported by the Board of Commissioners and Board of Directors, who are actively involved in planning and evaluating ESG performance to ensure the sustainability integration into BNI's business strategy.

Sustainability Strategy

BNI formulates its sustainability strategy by integrating ESG performance as the main foundation in conducting responsible and sustainable business. This framework is outlined in BNI's Sustainability Pillar, which contains all sustainability initiatives to support the vision and achievement of sustainable performance targets, while creating value for stakeholders and contributing to environmental protection.

BNI's Sustainability Pillar is built on three main focuses, namely Sustainable Finance, Corporate Sustainability, and Inclusion & Resilience, which cover economic, social, and environmental risk management, including climate change risk. This Sustainability Pillar is the result of the formulation of the essence of BNI's five Sustainability Pillars, describing BNI's three main focuses in sustainability management. The Sustainable Finance pillar focuses on how BNI internalizes ESG aspects in its business processes, including lending, financing, and services. The Bank incorporates ESG criteria into its credit assessment process, including environmental impact analysis, social compliance, and debtor governance, to ensure that financing decisions consider not only financial feasibility but also sustainability risks and opportunities. Additionally, the Bank develops sustainable finance products and services, as well as implements exclusion and engagement policies with customers to encourage responsible business practices.

The Corporate Sustainability pillar focuses on how BNI internalizes ESG aspects into all of BNI's operations. This strategy includes the implementation of sustainability practices in daily activities and internal governance of the bank. From an environmental perspective, the Bank manages its operational carbon footprint through energy efficiency, digitalization of processes, waste management, and responsible use of resources. Social aspects are incorporated through fair employment policies, occupational health and safety, employee competency development, as well as consumer protection and financial inclusion.

The banking inclusion and resilience strategy focuses on expanding access to safe, affordable, and sustainable financial services, while strengthening bank resilience against economic, social, and environmental risks. BNI has developed financial inclusion programs for digital financial services and financial literacy to reach unbanked and underserved groups, as well as to promote equitable economic growth. At the same time, resilience is strengthened through an advisory program for debtors to promote responsible business practices, towards a low-carbon economy.

Strengthening its role in environmental mitigation and adaptation actions, BNI implements land and endangered species conservation programs. Land conservation efforts contribute to carbon sequestration, the prevention of land degradation, and the reduction of disaster risks such as floods and landslides, thereby increasing environmental and community adaptation capacity. Meanwhile, the conservation of endangered animals preserves biodiversity, which is essential for ecosystem resilience.

BNI Sustainability Pillars



Vision

To become a trusted global financial institution that excels in innovation and sustainable performance.



Aspirations & Targets

- ESG Blueprint
- Net zero emission (NZE) target



Pillars

Sustainable Finance

Corporate Sustainability

Inclusion & Resilience



Strategy & Initiatives

- Development of sustainable financing, funding, and programs across all segments
- Internalization of national and international ESG standards
- Increasing transparency and accountability of sustainability practices
- Energy and emissions management to achieve net zero emissions (NZE) targets
- Development of programs to support sustainable operational practices
- Strengthening employee capabilities in ESG implementation
- Strengthening cybersecurity & customer data protection
- Strengthening financial inclusion and literacy, as well as community empowerment in sustainable business practices
- Debtors' strategic partner in implementing the transition to sustainable business practices
- Nature & biodiversity conservation



Enabler

Governance, People, IT & Data Infrastructure

ESG Roadmap

As part of our commitment to sustainability, BNI has developed a strategic roadmap to integrate ESG principles into all of the Company's business activities and decision-making processes. This Roadmap serves as a guideline for the implementation of short-, medium-, and long-term sustainability initiatives, ensuring alignment between business performance, risk management, and the creation of sustainable value for stakeholders.

The BNI's ESG Roadmap implementation focuses on policy directions and strategic targets to support the transition to a low-carbon economy, strengthen human capital capabilities, protect customer interests, and improve corporate governance effectiveness. Furthermore, BNI will develop this roadmap into a long-term ESG Blueprint to ensure BNI's readiness in responding to regulatory changes and sustainability demands from regulations and the market.

BNI ESG ROADMAP

Short-Term Focus (2024)

- Strengthening infrastructure
- Establishing NZE and Carbon Budget

Medium-Term Focus (2025-2026):

- Strengthening the Risk Acceptance Criteria (RAC) of debtors
- Strengthening the infrastructure of climate change risk management
- Strengthening Board involvement in ESG
- Optimizing data loss prevention

Long-Term Focus (≥2027):

Implementation of climate change risk management within Bank's operations

Evaluation of SFAP Target Achievement

Evaluation of the 2025 SFAP Target Achievement

BNI consistently prepares the SFAP as part of its compliance with POJK No. 51/POJK.03/2017 and its commitment to implementing sustainable finance. The 2025 SFAP focuses on strengthening BNI's position in facing climate change risks by implementing work plans that support BNI's role as a debtor partner in the transition to sustainable business.

Throughout 2025, BNI has completed the programs listed in the SFAP, including:

- A transition advisory program for debtors by **preparing an ESG Advisory Playbook** for the Palm Oil, Coal, and Coal-Fired Power Plant sectors, for debtors and Relationship Managers (RMs).
- **Debtor transition program education** through dissemination activities and Technical Workshops on the Indonesian Sustainable Finance Taxonomy (TKBI) version 2 for the Commercial Real Estate (CRE), Transportation & Services (T&S), and Agriculture, Forestry, and Other Land Use (AFOLU) sectors.
- **Strengthens its climate risk management** by adopting international standards and best practices, including through the implementation of gap analysis to ensure BNI's readiness in **adopting IFRS S1 and IFRS S2**, which are planned to be implemented in 2027.
- The development of other sustainability initiatives, including **the development of environmentally friendly MSMEs** and **MSMEs Go Global**, **the expansion of sustainable financial inclusion**, **the development of sustainable products**, and **the integration of sustainable finance principles** into the risk management framework.
- **Implementation of the Zero Waste To Landfill (ZWTL) concept** with a waste recycling volume of 611.5 tons, or 100% of the waste generated.

However, several SFAP 2025 programs still require further improvement, including:

- The preparation of a Transition Plan and adjustments to portfolio management for the Palm Oil sector require alignment with business expansion targets.
- The development of the Emissions Platform is still in the process of IT system development.
- The Climate Risk Framework with TCFD principles is in the drafting stage.
- Debtor Transition Program education for the Mining and Electricity sectors to be conducted in the first quarter of 2026.
- The implementation plan for the Solid Waste Management piloting program at Regional Offices/Branches in the first quarter of 2026.



The 2026 SFAP Work Plan

For 2026, SFAP is focused on three pillars of BNI sustainability, namely Sustainable Finance, Corporate Sustainability, and Inclusion & Resilience. In the Sustainable Finance pillar, BNI focuses on integrating ESG aspects into all of BNI's businesses, including credit, financing, and services. The strategy involves conducting in-depth analysis and CRST, preparing transition plans for priority sectors, and developing enablers to support the implementation and reporting of IFRS S1 and S2. The Corporate Sustainability pillar strengthens internal commitment through gradual energy and emissions management, the application of the zero waste to landfill concept, the development of the ESG Academy curriculum, and the transformation of New Generation Security Operation Center (NG-SOC) based on artificial intelligence. Meanwhile, the Inclusion & Resilience pillar affirms BNI's role in supporting a fair economic transition through the preparation of an ESG Advisory Playbook for debtors in high-emission sectors and the alignment of CSR programs to support the achievement of the SDGs. These three pillars form an integrated strategic framework to strengthen BNI's contribution to a sustainable economy and long-term resilience.

Issues, Challenges, Developments, and Influences In Implementing Sustainable Finance

BNI has identified a number of obstacles and challenges in implementing Sustainable Finance. The following are the obstacles faced and the management strategies implemented by BNI:

1. Different levels of understanding of ESG: BNI focuses on developing human resource capacity through training and e-learning, both internally and externally.

2. Debtors' awareness of ESG: debtors' awareness of ESG is still limited, particularly in managing climate change risks, thus requiring training and technological support.

3. Sustainable product development: there is a need for sustainable financial product innovations that are relevant to the needs of customers and debtors.

4. Digitalization of ESG data management: development of a digital system to manage ESG databases.

5. Complex ESG standards and regulations: a challenge in keeping up with trends in the implementation of sustainable finance in Indonesia.

6. Dynamic new provisions related to sustainability practices: guidelines such as CRMS and IFRS S1 & S2, require adequate preparation of human resources, knowledge, and capabilities to support their implementation.

BNI responds to these challenges by increasing its adaptability through technological innovation, strategic partnerships, and policy improvements that support sustainability. Although various challenges remain, there are potential opportunities for sustainable finance that could have a positive impact on banking and financing activities, including:

- Increasing opportunities for green financing in Indonesia;
- Encouraging financing for debtors who implement sustainable businesses through the provision of Sustainability Linked Loans;
- The growing trend of awareness in the business world regarding sustainable finance, particularly among corporations;
- Rising interest from the government, regulators, and investors in sustainability implementation;
- The presence of a sustainable niche market, creating opportunities for financial products/services tailored to specific sustainability needs;

- Building partnerships with knowledgeable and competent stakeholders in sustainability to design programs that support the Sustainable Development Goals (SDGs).

Composition and Role of the Board of Directors and Board of Commissioners

[2-9, 2-11]

The Board of Directors and Board of Commissioners play an active role in directing, monitoring, and evaluating issues, challenges, and developments related to the implementation of sustainable finance, including ensuring that any impact on the company's strategy and operations are appropriately managed through policies, supervision, and decision-making in line with sustainability principles. Complete information regarding the highest governance body and its committees is presented in the Annual Report.

Implementation of Sustainability Governance in Good Corporate Governance (GCG) [2-9, 2-10, 2-11, 2-12, 2-15, 2-19, 2-20, 2-21]

In implementing sustainability governance, sustainable finance, and corporate sustainability principles, BNI adheres to GCG principles as its main foundation. The Board of Directors plays a role in operational management, while the Board of Commissioners is tasked with overseeing the implementation of the Board of Directors' duties. Each Directorate is led by a Director and supported by divisions that manage ESG aspects. The Board of Directors is collectively responsible for ESG performance. Details of the governance structure are fully disclosed in the Annual Report.

Shareholders have the authority to nominate and appoint members of the Board of Directors and Board of Commissioners at the General Meeting of Shareholders (GMS). In its governance practices, BNI ensures that the relationship between the Board of Directors, Board of Commissioners, and Shareholders remains professional and free from conflicts of interest that could potentially influence decisions. Information related to this is disclosed in the Annual Report.

Board of Directors' Performance Assessment [2-18]

The assessment of the Board of Directors' performance is conducted using several approaches, including assessment at the GMS, evaluation of the Company's target achievement, and GCG assessment. Complete information regarding this evaluation is available in the Annual Report.

Code of Conduct

BNI implements a Code of Conduct that binds all BNI personnel at every level of the organization, including the Board of Directors and Board of Commissioners, to maintain integrity, professionalism, and compliance in all business activities. The Code of Conduct is formulated in line with the vision, mission, and values of AKHLAK and regulates standards of values, business ethics, and work ethics, acceptable and prohibited conduct, and interactions with customers, business partners, vendors, and other

stakeholders, including conflict of interest control, confidentiality, use of assets, and prohibition of corruption and gratification. Employees sign the Integrity Pact to reinforce implementation, and with support from the Gratification Control Unit (UPG). There's also ongoing dissemination and learning through e-learning, sharing sessions, internal media, GCG training, and coaching. In addition, BNI consistently carries out campaigns to strengthen integrity throughout the year, including utilizing the momentum of religious holidays and internal moments to remind employees of compliance with the Code of Conduct and the prevention of gratification and conflicts of interest. Compliance is monitored through oversight mechanisms and a Whistleblowing System that guarantees the confidentiality of whistleblowers, and any violations are handled through disciplinary sanctions under applicable regulations.

Responsibility for Ethical Issues [2-6]

Oversight of Ethical Issues

Oversight of business and conduct ethics at BNI is carried out by the Risk Management & Anti-Fraud Committee under the Board of Directors, and the Audit Committee and the Risk Monitoring Committee under the Board of Commissioners. The Risk Management & Anti-Fraud Committee and Audit Committee meetings are held at least four times a year, and Risk Monitoring Committee meetings are held at least once a month.

To support the effectiveness of this oversight, BNI provides a Whistleblowing System (WBS) as a means of reporting various violations, including fraud, corruption, conflicts of interest, gratification or bribery, violations of policies and codes of conduct, and other unethical actions, including issues related to human resources.

Internal Audit is responsible for managing the WBS and submitting quarterly reports to the President Director, Board of Commissioners, and Audit Committee. Each quarter, the Audit Committee and

Board of Commissioners, including Independent Commissioners, review these reports, which include a list of violations, follow-up actions taken, and an evaluation of the effectiveness of WBS management.

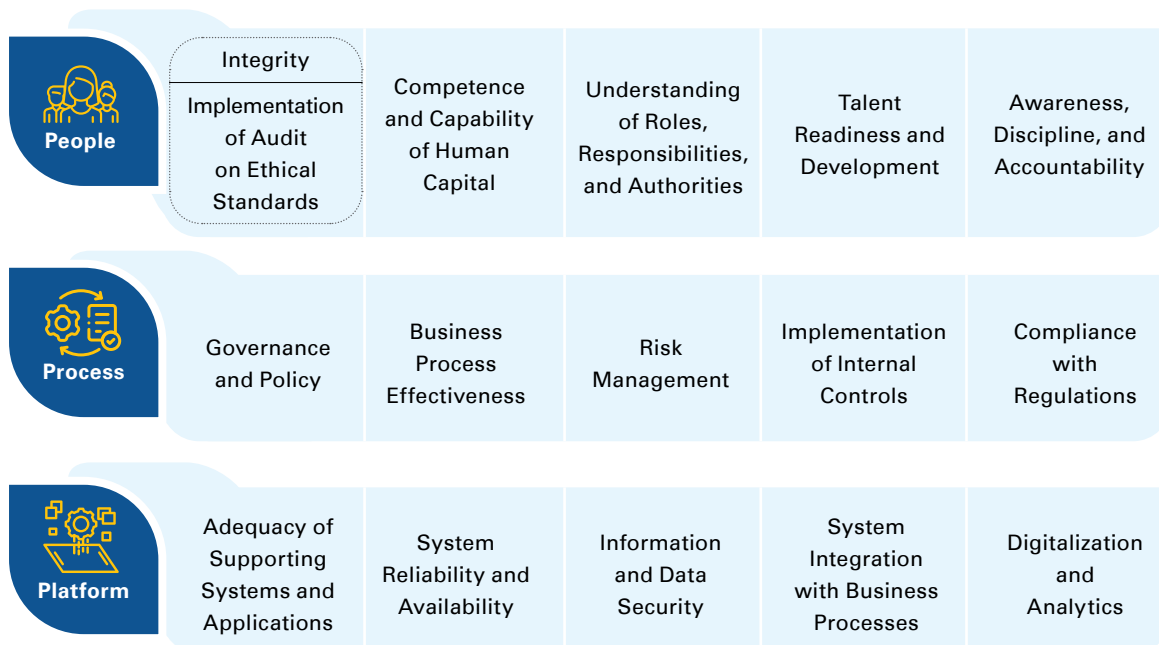
The Board of Commissioners ensures that all complaints received by the Bank during 2025 have been followed up carefully and professionally by the parties responsible, in accordance with internal procedures applicable at BNI. Follow-up on WBS reports submitted through the WBS to CEO channel demonstrates a commitment to enforcing compliance and applying the principles of good corporate governance.

The Board of Commissioners assessed that the WBS implementation in 2025 has been running properly and consistently supports the strengthening of BNI's governance. However, the Board of Commissioners continues to guide the Board of Directors to continue expanding the dissemination and internalization of integrity values through WBS. These ongoing efforts are expected to further increase the participation of employees and stakeholders, as well as ensure the creation of a clean and conducive work environment with a high level of integrity.

Regular Audit on Compliance with Ethical Standards

In conducting its yearly audit, BNI implements a three-dimensional framework consisting of people, process, and platform, which serves as the foundation for ensuring the effectiveness, consistency, and sustainability of corporate governance implementation. One of the strategic focuses in the people dimension is the implementation of audits on ethical standards, which aims to strengthen a culture of integrity, accountability, and effective risk control across all lines of the company's operations.

3 KEY DIMENSIONS FRAMEWORK



In overseeing the implementation of ethical standards, BNI assigns Internal Audit to conduct periodic audits of branch offices, credit centers, regional offices, and divisions. These audits include assessing compliance with the code of conduct, regulations, and internal policies, as well as identifying potential ethical violations, including conflicts of interest, bribery, and fraud. In addition to internal audits, BNI also undergoes external audits on the implementation of its Anti-Bribery Management System (ABMS) as part of its ethical standards audit. Further discussion on regular audits of the implementation of anti-corruption, anti-bribery, and anti-fraud policies is presented in the section “Regular Audits on the Implementation of Anti-Corruption, Anti-Bribery, and Anti-Fraud Policies.”

Training on Ethical Standards

Throughout the year, BNI consistently promotes the implementation of business ethics and conduct through training programs attended by all lines of the organization. These efforts aim to align employee conduct with industry standards, strengthen internal risk management, and solidify the foundations of a sustainable company. The achievements of the ethics training program are as follows:



123

Number of Training Titles

Titles with topics covering BNI Work Culture, Anti-bribery and Anti-corruption Strategies, Integrity Culture in the Workplace, Digital Ethics & Cybersecurity, Business Ethics, Leadership Ethics, and so on.



42,811

Number of Employees

These employees consisting of permanent employees, contract employees, trainees, and outsourced workers. Each employee attends an average of 10 training sessions per year.

Policy on Controlling Unethical Behavior Risks

Anti-Fraud Policy

BNI has established and implemented an Anti-Fraud Policy that applies to all employees, Board of Directors, and Board of Commissioners. BNI implements a comprehensive anti-fraud framework as part of its internal control system, with a focus on prevention, early detection, and handling. BNI implements strict policies and procedures for fraud prevention, which include:

- Integrity Pact signing by employees each year as a form of gratification control and anti-fraud commitment.
- Development of a Code of Conduct as a guideline for all employees.
- Work Guidelines for the Risk Management & Anti-Fraud Committee approved by the Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025.
- Guidelines for Implementing Anti-Fraud Strategies, as stated in Company Procedure Number IN/003/AFR/001 dated December 9, 2024.
- Policy on zero tolerance towards fraud.
- Implementation a single sanction in the form of termination of employment for fraudsters, and a reduction in the unit assessment (boom factor) for the unit where the fraud occurred.
- Integrity Pact signing by prospective debtors or existing debtors at the time of the loan agreement, in accordance with the Company's Credit Guidelines.
- Signing of Integrity Pacts by parties involved in the procurement process, as stipulated in the Company Guidelines on Procurement.
- Implementation of good corporate governance, including avoiding conflicts of interest in the loan process, in accordance with the Company Guidelines on Credit.

The Compliance Division developed the Compliance Index (CIX) as a measurement tool to ensure the effectiveness of anti-fraud policy implementation. CIX is used to monitor and evaluate compliance levels and the effectiveness of fraud controls on an ongoing basis, enabling the measurable implementation of BNI's anti-fraud strategy.

Anti-Fraud Audit and Oversight

Oversight of the implementation of the Anti-Fraud Policy is part of management's responsibility in managing BNI's operational risks. Throughout 2025, the Anti-Fraud Unit conducted oversight through periodic evaluations at least twice a year (half-yearly) on the adequacy and effectiveness of the systems, procedures, and control mechanisms implemented in all work units. These efforts are supported by more intensive and risk-based internal audits, as well as the use of analytical technology for real-time transaction monitoring and potential fraud detection. The effectiveness of implementing the anti-fraud policy is then measured through the CIX, developed by the Compliance Division. The results of the evaluation are then reported at least four times a year (quarterly) to the Board of Directors and Board of Commissioners.

Anti-Corruption & Anti-Bribery Policy

[2-16, 205-1]

BNI implement strict policies and procedures concerning anti-corruption and anti-bribery, including:

Procedures

- Integrity Pact signing by the Board of Directors, Board of Commissioners, and all employees every year as a form of control over gratification and anti-bribery.
- Declaration of Gratification and Anti-Bribery by all employees periodically through the DigiHC application.
- Development of a Code of Conduct as a guideline for the conduct of the Board of Directors, Board of Commissioners, and all employees.
- Implementation of an anti-bribery management system through ISO 37001:2016 certification for the Anti-Bribery Management System (ABMS).
- Integrity Pact Signing by prospective or existing debtors at the time of the loan agreement signing, as well as by the decision-making official and related parties in the procurement process.
- Imposing a single sanction in the form of termination of employment (PHK) for violations of gratification or bribery.

Policies

- Company Guidelines for Gratification Control No. IN/726/KPN/002 dated September 24, 2021.
- Company Guidelines for the Anti-Bribery Management System (ABMS) No. IN/118/CMP/006 dated December 27, 2024.
- The Company Code of Conduct Guidelines, Chapter Administrative Sanctions, IN/007/HCE/001 dated February 13, 2025.

BNI has strengthened its oversight function to ensure the effective implementation of anti-corruption and anti-bribery policies, by establishing a Gratification Control Unit and implementing an Anti-Bribery Management System (ABMS) under the Compliance Division. This unit plays a strategic role in monitoring compliance with gratification control policies and procedures and preventing bribery practices across the Bank's business processes. As part of its control mechanism, BNI has a reporting channel for suspected anti-bribery and anti-corruption violations through the WBS.

Anti-Corruption and Anti-Bribery Audit and Supervision ^[2-27]

BNI ensures compliance with anti-corruption, anti-bribery, and anti-fraud policies and their implementation in line with ethical standards by conducting audits of the ABMS implementation, which adheres to the international ethical standard ISO 37001:2016. Internal audits of the ABMS are conducted once a year by Internal Audit and followed by external audits by an independent party. The scope of the internal and external audits of the ABMS includes the implementation of clauses in the ISO 37001:2016 certification, including in the procurement of goods and services, corporate segment loans, and pension fund activities. The audit also covers anti-corruption regulations, such as gifts, gratuities, donations, and other forms of benefits, implemented in accordance with applicable laws and regulations. The 2025 surveillance audit found that the implementation of the ABMS at BNI was deemed consistent with no material deviations.

In 2025, BNI also assessed its work units, including head office, regional offices, branch offices, and supporting entities, through a risk assessment process carried out by Internal Audit and related units. Based on this assessment, all BNI operations covered in the assessment scope (100%) have been evaluated for corruption risks, including the risks of gratification, bribery, conflicts of interest, and other potential fraud. This assessment provides a basis for BNI to set priorities for internal control and continuous improvement in the implementation of ABMS and anti-fraud strategies, and strengthening measures have been implemented in accordance with the audit recommendations. Internal Audit then reports the assessment results to the Board of Directors and Board of Commissioners once a year.

The KPK's evaluation results show that BNI's gratification control in 2025 achieved an "Excellent" rating, confirming the effectiveness of the implementation of gratification control and ABMS. To maintain these achievements and reduce the possibility of corruption and bribery, BNI has implemented several corrective measures by strengthening various aspects, including:

- Increasing anti-corruption and anti-bribery awareness among all employees through various programs, such as dissemination, training, mandatory e-learning, webinar series, and advisories on BNI's official social media accounts.
- Dissemination of information on anti-corruption and anti-bribery to stakeholders through posters, videos, digital banners, the BNI website, and national mass media.
- Adjustment of internal provisions related to anti-corruption and anti-bribery in accordance with the latest regulations, best practices, and the results of audit evaluations/recommendations.

Communication, Dissemination and Training on Anti-Corruption, Anti-Bribery and Anti-Fraud [205-2]

As part of efforts to strengthen the culture of anti-corruption and anti-fraud, BNI conducts various dissemination and training programs involving the Board of Commissioners, Board of Directors, all employees, including permanent employees, contract employees, trainees, and outsourced workers, as well as business partners, including:

- 

1 Organizing a Compliance Forum with the theme “Decision Making based on the Business Judgment Rule in the Context of Good Corporate Governance and Anti-Corruption,” with guest speakers from the Corruption Eradication Commission (KPK) and attended by 1,453 people, including the entire Board of Commissioners, Board of Directors, SEVP, all Division and Regional Heads, Commissioners and Directors of Subsidiary Companies, Integrity Builders, Anti-Corruption Counselors, and BNI employees.
- 

2 Implementation of anti-fraud certification training programs to enhance employees’ understanding and competence in their respective business operations, attended by 476 employees.
- 

3 Implementation of a Mandatory e-Learning Program on Anti-Fraud Awareness, Anti-Money Laundering, and Gratification Control and ABMS through the BNI Learning Management System (BNI Smarter), which was attended by 41,469 employees.
- 

4 Implementation of 8 webinar programs with topics including Anti-Fraud, Anti-Corruption, and Fraud Mitigation, attended by 17,953 viewers.
- 

5 Implementation of the Thursday Morning Operational Awareness Sharing (SARAPAN) program, conducted regularly every Thursday, involving the Head Office, branch offices, and regional offices.
- 

6 Dissemination and awareness raising regarding anti-fraud and anti-gratification to employees and other stakeholders through internal communication media, such as email blasts, internal newsletters, desktop wallpapers, and posters.
- 

7 Appeal to all employees not to accept or request rewards from third parties, and to read the Integrity Pact, which informs BNI’s commitment to gratification control.
- 

8 Implementation of anti-corruption and anti-bribery dissemination to all vendors through Vendor Gathering activities or webinars held once a year.
- 

9 Dissemination of information through posters, videos, digital banners, the BNI website, national mass media, and the BNI Forum regarding anti-gratification, ABMS, and corruption prevention guidelines.

Whistleblowing System [FN-CB-510a.2]

The implementation of GCG principles at BNI is also realized through the Whistleblowing System (WBS), which is based on Minister of SOEs Regulations PER-09/MBU/2012 and PER-2/MBU/03/2023 concerning Guidelines for Corporate Governance and Significant Corporate Activities of SOE. This system serves as a means to maintain transparency, integrity, and accountability by providing a reporting mechanism for BNI employees, customers, debtors, business partners, and other external parties regarding alleged violations of the law, internal policies, and code of conduct. The types of violations that can be reported include fraud, corruption, conflicts of interest, gratification/bribery, regulatory violations, and other unethical acts. Through WBS, BNI strives to build a safe and highly ethical work environment.

WBS has the main function of preventing and detecting potential irregularities or violations at an early stage, as well as assisting BNI in maintaining

the stakeholders' trust, including customers, debtors, business partners, employees, and regulators, by ensuring that preventive measures can be taken immediately. Whistleblower protection is regulated through the Company Guidelines (PP) on WBS, as part of BNI's efforts to provide security and confidentiality guarantees to ensure that whistleblowers are free from the risk of retaliation or intimidation and can report safely and without fear.

To ensure that the WBS functions optimally, BNI has implemented "WBS to CEO". This mechanism allows the President Director to review and ensure that every report with relevant evidence is followed up on transparently and professionally. The independence of follow-up is strengthened through the management of WBS by Internal Audit, which also involves external independent parties. Detailed information about WBS and the number of complaints can be found in the 2025 Annual Report.

WBS reporting can be done through the following channels:

Website	: http://bni-transparan.tipoffs.com.sg
Email	: bni-transparan@tipoffs.com.sg
Phone	: 021-57853377
SMS	: 0811-970-1946
Mail	: BNI Transparan, P.O. BOX 2646, JKP 10026



Strict Sanctions [205-3]

BNI imposes strict sanctions on any individual involved in corruption, bribery, or fraud, including warnings, demotions, termination of employment, claims for damages, and legal proceedings. This enforcement reflects BNI's commitment to rejecting all forms of unlawful conduct. In cases of fraud, employees are subject to a single sanction in the form of termination of employment and may be reported to law enforcement authorities to ensure a deterrent effect.

Internal Fraud in 1 Year	Number of Cases Committed by								
	Members of the Board of Directors and Board of Commissioners			Permanent Employees			Non-Permanent Employees and Outsource Personnel		
	2025	2024	2023	2025	2024	2023	2025	2024	2023
Total fraud	0	0	0	12	14	11*	2	2	0
Resolved	0	0	0	11	14**	11*	2	2	0
Under resolution process within BNI	0	0	0	2	0**	0	0	0	0
No attempt at resolution	0	0	0	0	0	0	0	0	0
Followed up through legal process	0	0	0	1	5	3*	0	0	0

Note: Fraud cases with a loss over Rp100 million

*) Restatement of information due to data adjustments with the Annual Report.

**) Restatement of information due to fraud findings that were in the process of being resolved internally at BNI until the end of 2024 and were resolved in 2025.

Sustainability Report in Brief

Report Profile [2-2, 2-3, 2-4, 2-5, 2-27]

As a means of communication and accountability to all stakeholders, BNI consistently publishes a Sustainability Report annually. This report contains disclosures on the implementation of sustainable finance and the Bank's performance in economic, environmental, social, and governance aspects for the reporting period from January 1 to December 31, 2025.

The preparation of reports refers to the provisions of relevant regulations and sustainability reporting standards, including:

- OJK Circular Letter No. 16/SEOJK.04/2021 concerning the Form and Content of Annual Reports and OJK Regulation No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies;
- Global Reporting Initiative (GRI) Standards 2021, which are prepared in accordance with the GRI Standards;
- GRI G4 Financial Services Sector Supplement;
- Sustainability Accounting Standards Board (SASB) Financial Services Sector;

- Sustainable Banking Assessment (SUSBA) developed by the World Wide Fund for Nature (WWF);
- Sustainable Development Goals (SDGs); and
- ASEAN Corporate Governance Scorecard (ACGS).

In addition to meeting these standards, this report is also designed to provide information needed by stakeholders and ESG performance rating agencies, including Sustainalytics and Morgan Stanley Capital International (MSCI).

All data and information in the report are compiled from the BNI Head Office and branch networks across Indonesia. The financial information disclosed uses consolidated financial data that has been audited by independent auditors, covering BNI's subsidiaries, namely PT BNI Life Insurance, PT BNI Multifinance, PT BNI Sekuritas and its subsidiaries, BNI Remittance Ltd., PT BNI Modal Ventura, and PT Bank Hibank Indonesia. Each work unit is responsible for the provision, verification, and reliability of the reported data.

The report was prepared in accordance with the principles of balance, comparability, accuracy, timeliness, clarity, and reliability. This report contains a number of restated data to improve disclosure in the previous period, as a result of methodological adjustments and expansion of the scope of calculation on several parameters.

The entire process of preparing the Sustainability Report is coordinated by the Environmental, Social, and Governance (ESG) Division. All data and information presented has undergone a multi-layered review and validation process using a maker-checker-approver mechanism, starting from the division/unit PIC to the division/unit leader. The review is carried out in several stages, including:

- Data collection and confirmation per division through coordination meetings, both offline and online;
- Work unit interviews as part of the assurance process facilitated by an independent institution;
- Circulation of the Sustainability Report document to all Directors as members of the ESG Sub-Committee and the Board of Commissioners for final approval.

Verification of Sustainability Report

With reference to the Goods and/or Services Procurement Policy, BNI appointed PT Sejahtera Rambah Asia as an independent entity to carry out the assurance process for this Sustainability Report. The assurance agency was selected through a selection process involving top management and related units, taking into account the competence, track record, and qualifications of agencies registered with AA1000, as well as sufficient experience in sustainability report assurance services in Indonesia.

The assurance process is undertaken to ensure that the quality, accuracy, and reliability of the information presented in the report are in line with sustainability reporting principles and standards. The assurance process includes data verification and confirmation with all contributing parties. The

standards used refer to the AA1000 Assurance Standard with a moderate assurance level and type 2 assurance. All stages of the appointment and implementation of assurance are carried out independently, free from conflicts of interest between BNI and the assurance institution, and are under the supervision of top management to ensure the objectivity and integrity of the process. A summary of the assurance results is presented at the end of this report.

Material Topics and Key Issues ^[3-1]

In 2025, BNI updated its materiality assessment process, taking into account the dynamics of operational activities, regulatory developments, and sustainability issues that have a significant impact, both on the Company's perspective towards environment and society, as well as financially towards the company's performance.

The process of reviewing material topic priorities was carried out through an approach that involved internal and external stakeholders. External stakeholders were involved through the distribution of questionnaires to identify sustainability issues, the magnitude of their impact, and their relevance to BNI's financial performance. The external stakeholder groups participating in this process include debtors, investors, shareholders, the State-Owned Enterprise Supervisory Agency as a representative of shareholders and the government, the regulator, the media, and suppliers.

Internally, material issues are explored through a series of focused group discussions involving cross-functional divisions. This forum aims to evaluate BNI's operational impact on social and environmental aspects, while identifying potential financial risks and opportunities arising from sustainability issues (double materiality approach). All mapping results are then analyzed based on the context of sustainability, materiality, and stakeholder needs, as well as their relevance to BNI's business strategy.

Process of Material Topic Determination [3-1, 3-2]

Identifying and assessing sustainable impacts.



Priority Material Topics [3-2]

Impact, Risks, and Opportunities of Selected Material Topics

●●● High ●●● Medium to High ●●○ Medium



Data Security and Cybersecurity

Level of Materiality Impact	Level of Financial Materiality	Term	BNI's Response
Positive	Risk		
●●● Increased stakeholder confidence, digital banking system resilience, and improvement in BNI service performance	●●● Financial losses due to system failure incidents, system recovery costs, reputational risk, and increased capital expenditure		
Negative	Opportunity		
●●○ Complex authentication procedures, increased resources and training time, and potential increase in investment costs	●●○ Differentiation of secure digital services increases BNI's market share, strengthening cybersecurity governance	Short-Term – Medium-Term – Long-Term	Strengthening data and cybersecurity governance through oversight at the board of directors committee level, strengthening the scope and level of IT system certification



		●●●● High ●●●○ Medium to High ●●○○ Medium	
Level of Materiality Impact	Level of Financial Materiality	Term	BNI's Response
Positive ●●○○ Greater access to financial services for the small sector, creation of new jobs, achievement of Asta Cita, and improved employee wellbeing	Risk ●●○○ Risk of decreased profitability, strategic risk due to aggressive expansion, and increased credit risk due to aggressive expansion	Short-Term – Medium-Term	Increasing BNI's involvement in financing and empowering MSMEs, improving access to banking services through digitalization and branchless banking
Negative ●●○○ Pressure to increase productivity within the bank, implementation of overly strict efficiency measures	Opportunity ●●○○ Diversification of business growth sources through expansion of the small segment, an increase in BNI's market share, improvement of services, and number of customers		



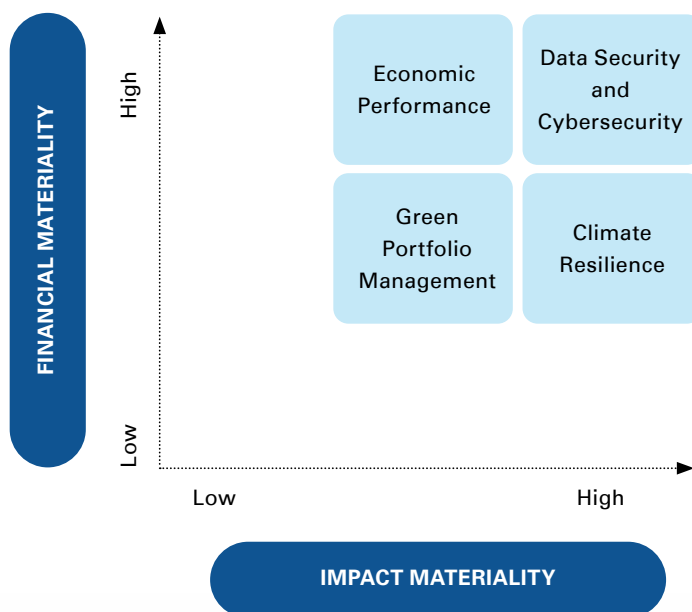
Tingkat dari Impact Materiality	Tingkat dari Financial Materiality	Term	BNI's Response
Positive ●●●● Achievement of NDC targets by 2060 or sooner, achievement of green economic growth in line with Asta Cita, climate risk control	Risk ●●○○ Increased opex/capex, strategic risk if the bank's transition does not take market readiness into account	Medium-Term – Long-Term	Climate risk management, through climate risk stress testing and emissions management. Implementing ESG advisory as a means of educating debtors
Negative ●●○○ Financing criteria become more rigid, pressure on bank performance due to strategy changes, increased costs for implementing climate resilience initiatives	Opportunity ●●○○ Strengthening long-term relationships with debtors through ESG Advisory, developing sustainable financing products, and increasing market share		



Green Portfolio Management

		●●● High ●●○ Medium to High ●○○ Medium	
	Tingkat dari Impact Materiality	Tingkat dari Financial Materiality	Term BNI's Response
	Positive	Risk	
	●●● Ease of access for debtors to green/transition financing, increased awareness of debtors' ESG, and support for the achievement of the Indonesian government's NDC	●●○ Risks of regulatory changes, such as taxonomy criteria, reporting errors, high-emission financing reputational risk, and increased credit risk in large-scale green financing	Medium-Term Development of sector-based transition pathways for managing financing emissions, strengthening governance mechanisms in determining sustainable financing, and reporting on emissions avoided from green financing/bonds
	Negative	Opportunity	
	●●○ Financing criteria are increasingly rigid, with a focus on green financing for specific segments that are considered more ready, and limited intermediary functions of banks for high-emission sectors	●●○ Opportunities for green financing product development, blended financing partnerships, and increased reputation and market share	

Double Materiality Matrix



Key Issues, Affected Stakeholders, and SDG Interlinkages

Data Security and Cybersecurity



Key Issues and Stakeholder Concerns

- Risk of personal data and sensitive information leaks
- Threat of cyber attacks and digital fraud
- Data security risks originating from third parties and the digital ecosystem

Stakeholder Impact

- Employees
- Customers
- Debtors
- Government/Regulator
- Shareholder/Investor
- Supplier

Climate Resilience



Key Issues and Stakeholder Concerns

- Physical risks to the financing portfolio, particularly in sectors vulnerable to climate change
- Physical risks to the Bank's operations
- Climate transition risks arising from changes in policy, regulation, and sustainability standards
- Financing emissions exposure (particularly in high-emission sectors)
- Green financing and transition financing to mitigate long-term climate risks
- Climate risk exposure to credit quality and the Bank's financial stability

Stakeholder Impact

- Employees
- Customers
- Debtors
- Shareholders/Investors
- Government/Regulator

Economic Performance



Key Issues and Stakeholder Concerns

- Financial stability and resilience as the foundation for business sustainability
- Balanced distribution of economic value to stakeholders
- Contribution to national economic development, particularly through the distribution of KUR, strengthening MSMEs, financial inclusion and literacy, and the development of banking services in 3T areas
- Dependence on external macroeconomic factors, such as interest rates, monetary and fiscal policies, taxes, and global market conditions, can affect the Bank's economic performance

Stakeholder Impact

- Employees
- Shareholders/Investors
- Government/Regulator
- Community
- Supplier
- Customers
- Debtors

Green Portfolio Management



Key Issues and Stakeholder Concerns

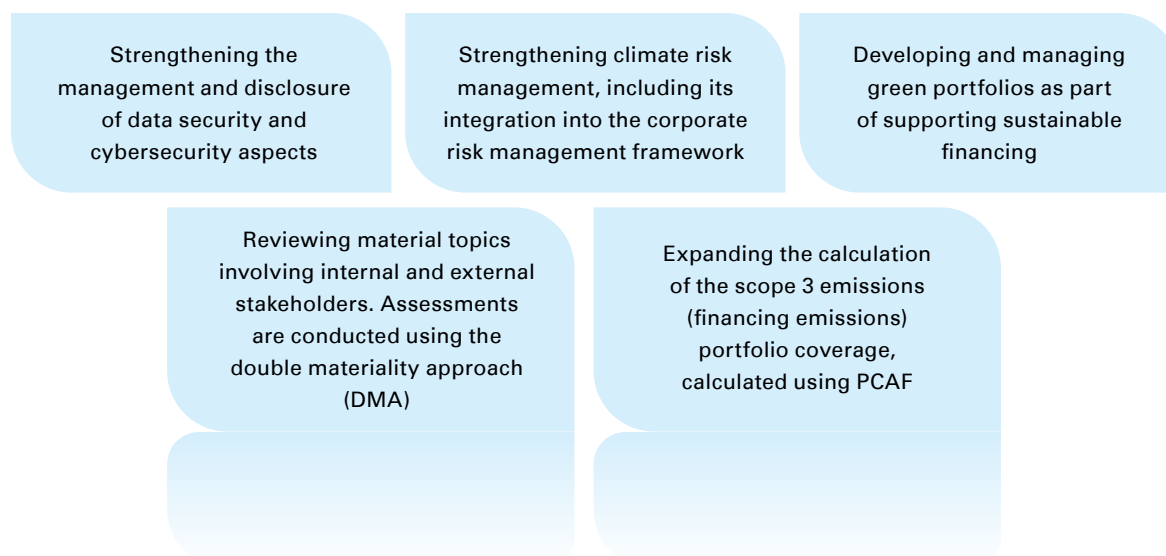
- Changes in sustainable finance regulations and policies, including the implementation of TKBI, which affect the direction and composition of the financing portfolio
- Integration of ESG and climate risk in the financing process
- The need for a transition financing approach for existing high-emission debtors, through instruments such as Sustainability Linked Loans, and other financing schemes
- Green financing and transition financing

Stakeholder Impact

- Employees
- Debtors
- Shareholders/Investors
- Government/Regulator

Management Response to Feedback from Previous Year's Report

BNI expresses its appreciation for the input and assessment provided by stakeholders and ESG rating agencies on the 2024 Sustainability Report. This feedback serves as an important basis for improving the Company's performance and disclosure quality in its current period reports. The following are priority areas that serve as the focus for improvement:



Gradually, BNI has followed up on this feedback through various initiatives to improve and strengthen its sustainability management system. Going forward, BNI is committed to continuously improving the quality and completeness of its sustainability report in order to provide increasingly relevant information and better meet the expectations of its stakeholders.

Additional information about BNI can be found on our website. For further information, input, and suggestions for improvement and advancement of this report, please contact:

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01

SUSTAINABLE FINANCE

As part of its long-term business strategy, BNI is systematically developing sustainable financing and funding, as well as various sustainability practices across all business segments. This implementation is supported by the internalization of national and international ESG standards into policies, business processes, and risk management frameworks. In line with this, BNI continues to strengthen transparency and accountability in the application of sustainable finance, in order to ensure responsible, measurable practices that provide added value for stakeholders and the national economy.

Economic Performance Achievements

Material Topic Management ^[3-3]

Material Topic: Economic Performance



Importance of Topic Management

Prudent economic performance management enables BNI to maintain financial stability, strengthen its intermediary function, and create long-term value for stakeholders. Economic performance also serves as the basis for BNI's ability to support sustainable national economic growth and resilience to external dynamics.



Impact and Opportunity

Effective economic performance management has a direct impact on the bank's financial resilience, an increase in stakeholder confidence, and the continuity of intermediary function. Macroeconomic conditions, interest rate changes, financial market volatility, as well as fiscal and monetary policy dynamics are external factors that can affect BNI's economic performance.

On the other hand, these conditions open up opportunities for BNI to strengthen its intermediary performance, develop adaptive financial products and services, and improve operational efficiency through digital transformation and business model optimization. Other opportunities also arise from the Bank's role in supporting national economic recovery and growth through lending to productive sectors.



Target and Commitment

BNI sets an annual economic performance target by considering the balance between growth, profitability, asset quality, and risk management.

- Revenue and net profit growth of Rp21.4 trillion
- Loan growth of 10.1%
- TPF growth of 14.7%
- Maintaining credit quality with an Non-Performing Loan (NPL) ratio of 2.0%



Policy

- Increased business productivity and market share in the region through outlet transformation
- Increased savings and retail deposits, as well as transaction-based current accounts
- Healthy and sustainable growth across all segments, with a primary focus on the corporate and derivative segments, as well as quality consumer & wealth segments
- Maintaining asset quality to reduce Loan at Risk (LaR)
- Sustainable development of wondr by BNI, BNIdirect, FSCM, and platforms that support the customer journey
- Strengthening enablers that result in increased productivity and operational efficiency



Impact Evaluation and Management

Economic performance management and evaluation are under the supervision of the Chief Financial Officer and Chief Risk Officer, with support from relevant units such as the Finance Division, Enterprise Risk Management Division, and business units. Evaluations are conducted periodically through financial performance monitoring, business target achievement, and bank risk profiling.

The evaluation results are used as a basis for management decision-making, business strategy adjustments, and risk control strengthening to ensure that economic performance remains sustainable amid economic and financial market dynamics.

Economic Value Generated ^[201-1]

Throughout 2025, BNI managed to record solid and sustainable financial performance growth. Amid dynamic macroeconomic conditions throughout 2025 that affected the banking business environment, BNI continuously monitored various developments and mitigated their impact on the realization of strategic policies, business achievements in 2025, as well as the continuity of business achievements with the medium-term plan, focusing on execution in areas aligned with prime economic potential, and collaboration in developing the ecosystem.

Economic Value Generated (in Rp billion) ^[201-1]

Description	2025	2024	2023
Interest income – net	40,333.2	40,480.2	41,275.7
Premium income - net	-1.5*	-1.8*	1,659.3
Insurance income (expenses) and investment income - net	744.7	768.1	-
Other operating income	23,900.0	22,649.2	19,812.4
Total	64,976.4	63,895.7	62,747.4

Note:

*) Restatement of financial information for 2024 due to the implementation of PSAK 117 at BNI Life.

BNI's net profit reached Rp20,041 billion, driven by a recovery in operating income and well-maintained asset quality. BNI's economic performance recorded an increase in operating income of Rp64,976 billion, growing 1.7% compared to 2024. This achievement demonstrates BNI's ability to maintain intermediary performance, operational efficiency, and financial resilience as part of sustainable economic performance management.

Distributed Economic Value ^[201-1]

The economic value generated by BNI is distributed to stakeholders. A total of Rp58,818 billion was allocated to stakeholders through employee remuneration and benefits, dividends for shareholders, taxes for the government, payments to local and non-local suppliers, as well as donations and empowerment contributions. This distribution of economic value affirms BNI's role in managing the material topic of 'Economic Performance' responsibly and inclusively, while strengthening our contribution to national economic development.

Economic Value Distributed (in Rp billion) ^[201-1]

Description	2025	2024*)	2023
Operating costs (excluding employee salaries)	25,934.7	23,411.4	24,140.3
Costs for employee salaries and benefits	14,529.2	13,781.5	12,833.7
Dividend	13,951.3	10,454.7	7,324.8
Tax	4,286.4	4,899.7	4,533.5
Expenditures for community activities	116.8	129.9	129.8
Total	58,818.5	52,677.2	48,962.1

Note:

*) Restatement of financial information for 2024 due to the implementation of PSAK 117 at BNI Life.

Retained Economic Value ^[201-1]

Retained economic value is the difference between the economic value generated and the economic value distributed to stakeholders. In 2025, retained economic value was recorded at Rp6,158 billion, which was used to strengthen capital, maintain liquidity, and support operational sustainability and business growth. The retention of this economic value is part of a prudent economic performance management strategy to ensure BNI's financial resilience in dealing with economic dynamics while supporting the creation of long-term value for stakeholders.

Taxation Approach and Contribution ^[201-4, 207-1, 207-2, 207-3]

BNI's approach to taxation is based on the principles of full compliance, transparency, and good governance, in line with the applicable tax laws and regulations in Indonesia. The government, through the tax authorities, is the main stakeholder in managing BNI's taxation aspects. In practice, BNI implements a comprehensive and structured tax management process, covering the identification, management, and monitoring of tax risks. This process is carried out through continuous monitoring and reconciliation mechanisms to ensure compliance with all applicable tax regulations. BNI is not involved in aggressive tax avoidance practices or public policy advocacy aimed at influencing tax policy.

In line with Law No. 7 of 2021 concerning Harmonization of Tax Regulations, specifically Article 17 paragraph (2b), Domestic Taxpayers who meet certain criteria are entitled to a lower Corporate Income Tax rate of 3% from the general rate of 22%. These requirements include being a publicly listed company, having at least 40% of its shares traded on the Indonesia Stock Exchange, and fulfilling other requirements in accordance with applicable regulations. On the basis of meeting these requirements, in 2025, BNI used a corporate income tax rate of 19% in calculating its tax liability. In 2025, BNI paid Rp3,066 billion in taxes to the government. In addition, BNI did not receive any other financial assistance from the government during 2025.

Further information regarding BNI's tax policies, positions, and performance is presented in detail in the Annual Report and Consolidated Financial Statements, which are published separately from this report.

Sustainable Finance Portfolio

Material Topic Management ^[3-3]

Material Topic: Green Portfolio Management



Importance of Topic Management

Green portfolio management is an important part of implementing sustainable finance in support of the transition to a low-carbon economy and sustainable development. As a financial institution, BNI has a strategic role in channelling financing to sectors that provide environmental benefits, while ensuring that environmental and social risks are adequately managed.



Impact and Opportunity

The development of a green portfolio has a positive impact in the form of increasing BNI's contribution to environmental protection, resource efficiency, and support for energy transition and sustainable business practices. Green financing also has the potential to strengthen the bank's reputation and increase investor and stakeholder confidence.

On the other hand, the challenges faced include debtor readiness limitations, the need for data and taxonomy harmonization, and transition risks that need to be carefully managed. These conditions also open up opportunities for BNI to expand its green financing portfolio, develop sustainable finance products such as green financing and Sustainability Linked Loans (SLL), and improve the quality of environmental and social risk assessments in the credit process.



Target and Commitment

- Increase in green portfolio value by a minimum of 5% per year;
- Expansion of financing in priority green sectors, including renewable energy, environmentally friendly transportation, and sustainable natural resource management;
- Distribution of Sustainability Linked Loans (SLL) to encourage debtors to transition to green practices;
- Development of Green MSME financing programs through technical assistance for MSME debtors in encouraging MSMEs to implement sustainable practices.



Policy

Sustainable financing, including green financing, is one of the main pillars of BNI's sustainability strategy. BNI's green portfolio management refers to POJK No. 51/POJK.03/2017 concerning the Implementation of Sustainable Finance, as well as internal policies on sustainable finance and green financing (KUBL). In its implementation, BNI also supports the application of the Indonesian Sustainable Finance Taxonomy (TKBI) as a reference for the classification of sustainable economic activities. Environmental, social, and governance (ESG) assessments are carried out at the initial stage of the credit process and form part of the debtor's feasibility analysis.



Impact Evaluation and Management

The management and evaluation of the green portfolio is under the supervision of the Vice President Director, in coordination with the Environmental, Social & Governance Division, Enterprise Risk Management, Policy Governance, and related business & risk units. Evaluations are conducted periodically through monitoring of portfolio quality, compliance with sustainable finance policies, and achievement of SFAP targets.

The results of the evaluation are used as a basis for policy refinement, strengthening the ESG assessment process, and developing future green financing strategies. With this approach, BNI ensures that green portfolio management is not only oriented towards the volume of financing but also towards the quality of environmental impact and long-term sustainability.

Loan Portfolio

The loan portfolio is one of the main pillars in carrying out BNI's intermediary function and reflects the direction of our business strategy. Loans are disbursed prudently, taking into account the balance between growth, asset quality, and risk management, in line with economic conditions and the needs of the real sector.

Loan Portfolio Based on Category (in Rp billion) [FS6][FN-CB-000.B]

Business Categories	2025		2024		2023	
	Total	%	Total	%	Total	%
Corporate	520,081	57.8	440,959	56.8	374,203	53.8
Medium (Enterprise & Commercial)	131,433	14.6	100,422	12.9	102,460	14.7
Small	78,705	8.7	75,752	9.8	84,892	12.2
Consumer	152,795	17.0	142,492	18.4	124,487	17.9
Subsidiaries	18,304	2.0	16,247	2.1	9,043	1.3
Total Loan	899,531	100.0	775,872	100.0	695,085	100.0

Sustainable Financing (KKUB) Portfolio [FS8]

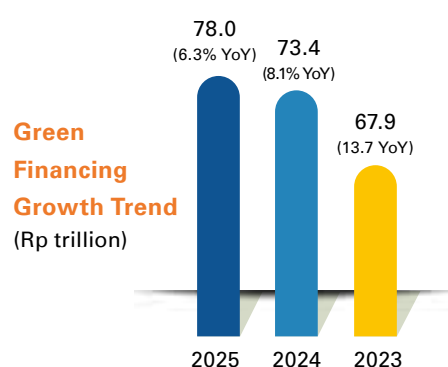
Sustainable Financing consists of green financing (KUBL) and micro, small, and medium enterprises (MSMEs). In 2025, BNI recorded sustainable financing of Rp196.7 trillion. This amount is equivalent to 22.3% of the total loan portfolio. Meanwhile, green financing disbursed in 2025 amounted to Rp78.0 trillion, with a growth target achievement of 101.2% in the SFAP.

Loan Portfolio of Sustainable Financing (in Rp billion) [FS8]

Description	2025		2024		2023	
	Total	%	Total	%	Total	%
1. Renewable energy	11,665	5.9	13,003	0.8	10,216	5.6
2. Energy efficiency	12,502	6.4	13,635	7.2	14,460	7.9
3. Pollution prevention and control	1,067	0.5	2,913	1.5	3,855	2.1
4. Natural resource management and sustainable land use	41,359	21.0	32,401	17.0	26,599	14.7
5. Conservation of terrestrial and aquatic biodiversity	0	0	0	0	0	0
6. Environmentally friendly transportation	4,475	2.3	2,333	1.2	2,317	1.3
7. Sustainable water and effluent management	971	0.5	897	0.5	572	0.3
8. Adaptation to climate change	0	0	0	0	0	0
9. Eco-efficient products	143	0.1	1,650	0.9	1,190	0.7

Description	2025		2024		2023	
	Total	%	Total	%	Total	%
10.Green buildings that meet nationally, regionally, and internationally recognized standards or certification	4,273	2.2	4,522	2.4	5,620	3.1
11.Other environmentally friendly business activities	1,540	0.8	2,039	1.1	3,053	1.7
Total Portfolio for Green Financing	77,994	39.6	73,393	38.5	67,882	37.5
12.MSME Activities	118,754	60.4	117,121	61.5	113,224	62.5
Total Portfolio for Sustainable Financing	196,748	100.0	190,514	100.0	181,106	100.0

Note: Data coverage is only from BNI as the parent entity that carries out banking activities.



In order to support the empowerment of MSMEs, BNI disbursed loans for the development of the Merah Putih Sub-District/ District Cooperative (KDKMP). The loans were disbursed to BNI's strategic partners responsible for the physical construction of KDKMP outlets, including the facilities and infrastructure, so that the implementation could proceed in accordance with the set targets. Throughout 2025, the total financing disbursed for the physical development of KDKMP outlets reached Rp46.7 trillion. The disbursement of this financing has met the criteria for socially-aware business activities (KUBS) as stipulated in POJK No. 18 of 2023.

Green Financing Management

We have integrated sustainability principles into our business strategy and financing processes. Throughout 2025, BNI managed to record a green portfolio of Rp78.0 trillion, exceeding the target set at Rp75.5 trillion, or equivalent to approximately 8.8% of the total loan portfolio. In 2025, the largest green financing was distributed to the sustainable natural resource management and land use sector at 21.0%, followed by the energy efficiency sector at 6.4% and the renewable energy sector at 5.9%.

Meanwhile, in the MSME segment, BNI also has several initiatives to promote green financing. The green financing from the MSME segment was recorded at Rp113.9 billion for 650 debtors. This green financing included debtors participating in MSME empowerment programs, such as the BUMI Program and the BNI Jejak Kopi Khatulistiwa Program. Moving forward, BNI is committed to continuing to develop its portfolio of green MSME financing in a sustainable manner to contribute more optimally to supporting a sustainable economy.

Supporting Debtor Transition through Sustainability Linked Loans

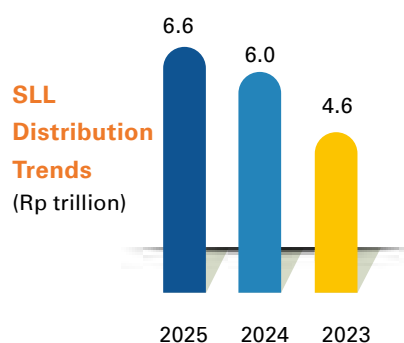
As part of its support for the government's agenda towards a low-carbon economy and NZE targets, BNI continues to expand financing through the Sustainability Linked Loan (SLL) scheme. The SLL scheme is designed to encourage debtors to improve their sustainability performance by setting measurable sustainability performance targets that are relevant to the debtor's ESG strategy, as well as providing financial incentives for debtors who successfully meet the targets as agreed by both parties.

BNI has distributed SLL financing to debtors from various business sectors, including agrifood, cement, steel, coal products, and packaging, which demonstrates BNI's real commitment to supporting the transition of the corporate sector to higher sustainability practices.

The role of SLL in 2025 has become increasingly strategic in supporting the debtors' sustainability transition, including:

- 1 Facilitating debtors in setting and achieving specific ESG performance targets, such as reducing emission intensity, improving resource efficiency, or obtaining sustainability certification;
- 2 Enhancing the integration of ESG principles into BNI's credit structure and risk assessment criteria;
- 3 Expanding access to financing for businesses committed to the low-carbon economy transition;
- 4 Strengthening BNI's position as a strategic partner for debtors in their sustainability transition journey.

The total realization of SLL by the end of 2025 reached Rp6.6 trillion, with a total of nine companies experiencing changes in sustainability performance in accordance with the indicators set out in this facility.



Micro, Small, and Medium Enterprises (MSME) Loan Portfolio

[FS7] [FN-CB-240a.1, FN-CB-240a.2]

The growth of the MSME sector continues to play a significant role in driving national economic recovery. MSME financing is also an important element in sustainable finance practices in Indonesia, given its role in promoting financial inclusion, local employment, and the empowerment of women, vulnerable groups, and marginalized communities.

By the end of 2025, BNI's outstanding MSME loans were recorded at Rp118.8 trillion, with 13.4% disbursed through the subsidized micro loan called Subsidized Micro Loans (KUR) scheme. In addition, BNI Xpora financing portfolio reached Rp35.0 trillion, distributed to 12,094 debtors, 4.6% of which were export-oriented KUR. Throughout 2025, BNI Xpora successfully encouraged 36.4 thousand Xpora-assisted MSMEs to enter the export market (Go Export).

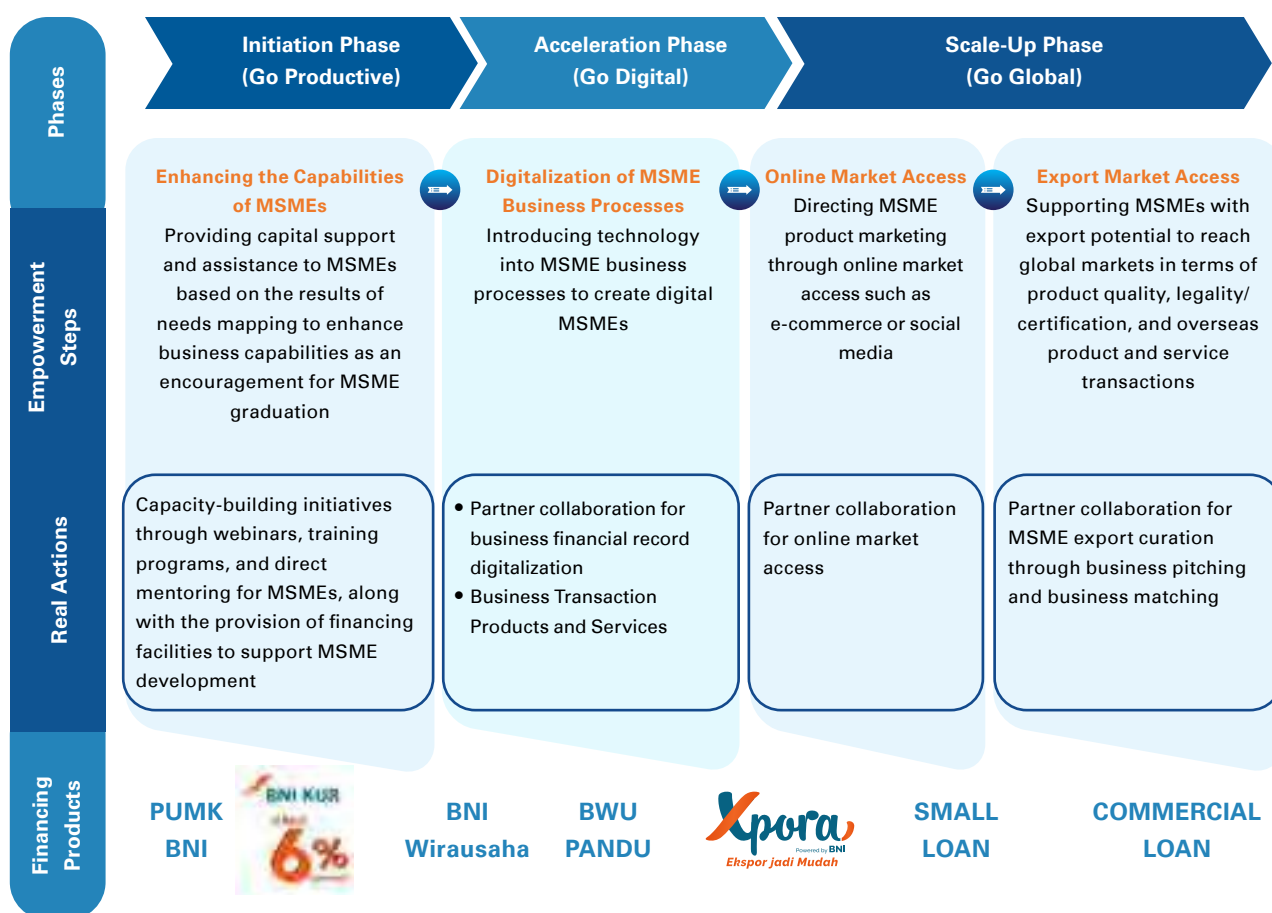
Subsidized Micro Loan (KUR) and BNI Wirausaha (BNI Entrepreneur) ^[FS7]

As part of its role as an agent of development, BNI strengthens access to financing for MSMEs through KUR and BWU, which reach business actors across various regions. This financing not only supports local economic growth but is also aimed at encouraging more sustainable business practices. In 2025, BNI distributed KUR and BWU through 194 outlets to provide financing for MSMEs all over Indonesia. The realization of KUR distribution reached Rp11.9 trillion or 99.3% of the Rp12.0 trillion target, supported by the implementation of end-to-end credit digitalization and the use of technology in the credit assessment process.

Development and Empowerment of MSME Partners ^{[FS7] [FN-CB-240a.1, FN-CB-240a.2]}

In supporting the local economy, BNI not only provides access to financing for MSMEs, but also organizes various programs such as: MSME capacity building, training, and mentoring; as well as the implementation of environmentally friendly business practices. BNI encourages MSMEs to grow and level up through a structured journey starting from increasing productivity (Go Productive), accelerating digitalization (Go Digital), and expanding access to global markets (Go Global). In carrying out these efforts, BNI actively collaborates with ministries, agencies, and various stakeholders to create a resilient, competitive, and sustainable MSME ecosystem.

BNI MSME Empowerment Roadmap



Go Productive

BNI UMKM Ramah Lingkungan (BUMI) Program

The BUMI program is BNI's initiative to expand indirect economic impact through the empowerment of eco-friendly MSMEs. This program aims to increase business capacity, expand access to financing, and strengthen market competitiveness for MSMEs applying environmentally friendly practices, thereby contributing to the strengthening of the local economy and the sustainable value creation. The BUMI Program focuses on eco-friendly MSMEs in the fashion and handicraft sectors. Throughout 2025, BNI continued to implement the BUMI Program initiative selectively and measurably by disbursing a total of Rp39 billion in financing to 157 MSMEs in the fashion and handicraft sectors, as well as facilitating dissemination and business matching activities as part of efforts to encourage MSMEs to level up in accordance with green economy principles.



BNI Kampung Budidaya Perikanan

BNI Kampung Budidaya Perikanan is an MSME empowerment program in the fisheries sector, in collaboration with the Ministry of Maritime Affairs and Fisheries. This program is designed to create economic impact for MSMEs by strengthening the ecosystem and developing the blue economy as a national priority of President Prabowo-Gibran's Asta Cita. In addition to providing access to financing, BNI also offers integrated banking services to create a closed-loop ecosystem, which includes enhancing the capacity of business actors and expanding access through BNI Xpora to the global market. Through this initiative, BNI plays a role in improving the welfare of coastal communities, strengthening the local economy, and supporting national food security.

Flow of Fisheries Cultivation Villages Empowerment from Upstream to Downstream

Strengthening Partnerships & Digital Ecosystems

BNI strengthens the ecosystem through collaboration with merchant partners and e-commerce platforms, as well as the use of big data to map potential MSMEs. Some MSMEs are also being prepared to become BNI Agen46 enabling them to play a dual role as business actors and financial service providers in their communities.

This stage aims to increase the visibility of MSME products and the efficiency of data-driven marketing.



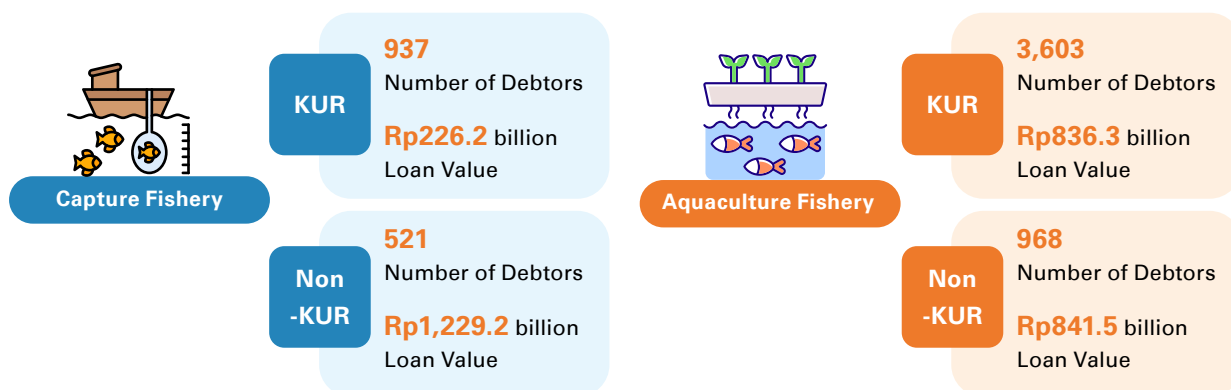
Downstream Sector Business Mentoring

Through the BNI Xpora – *Ekspor Jadi Mudah* program, BNI provides direct and online business mentoring, including:

- curation of MSMEs with export potential,
- coaching clinics for the fisheries sector,
- participation in exhibitions and bazaars, and
- business matching for export products.

This mentoring aims to build business capacity, improve product quality, and MSME readiness to penetrate national and global markets.

Realization of Financing for *Kampung Budaya Perikanan*



Go Digital

Alsintan Business Credit

The Alsintan Taxi Financing Program is part of BNI's commitment to supporting the sustainable development agenda, modernizing the national agricultural sector, and implementing the Government's Asta Cita program. Through the Alsintan Business Credit (Alsintan Credit) scheme, BNI plays an active role in supporting government policies to accelerate agricultural mechanization by providing access to financing for the use of modern, efficient, and affordable agricultural tools and machinery (alsintan). This program aims to boost the productivity and efficiency of farming businesses, strengthen national food security, support digital transformation in the agricultural sector, and improve the farmers' welfare. By the end of 2025, the total financing disbursed through this program reached Rp4.7 billion.



Go Global

BNI Xpora

In 2025, BNI continued strengthening the role of Xpora, as the integrated export solution, to assist MSMEs in expanding their access to global markets. By strengthening end-to-end services, export training and mentoring, and utilizing digital platforms, BNI Xpora encourages MSME competitiveness to be better prepared to penetrate the international value chain. In addition, BNI Xpora is also a One Stop Export Solution that serves as a service center for the diaspora abroad.

By the end of 2025, the number of diaspora customers reached 39 people. Various strategic initiatives, such as increasing collaboration with agencies, institutions, and related export stakeholders, implemented throughout 2025, were aimed at supporting sustainable, inclusive, and export-oriented MSME growth. This is in line with BNI's role as a partner in the transformation of MSMEs towards the global market. BNI Xpora continues to strengthen its support for SME exports, with financing achievements of Rp35.0 trillion to 12,094 debtors.



BNI Jejak Kopi Khatulistiwa (BNI JKK)

BNI Jejak Kopi Khatulistiwa (BNI JKK) is an economic empowerment program based on social forestry that focuses on developing coffee farming and MSMEs through the establishment of a closed-loop green financing ecosystem. This program was developed as part of BNI's theme-based approach to coffee commodities to strengthen the role of smallholder coffee in the global supply chain. Through BNI JKK, BNI promotes the improvement of farmers' welfare, the expansion of financial inclusion, and the development of an export-oriented green economic ecosystem. The program offers business financing, coaching, and mentoring for coffee MSMEs. BNI JKK has also earned government recognition and is integrated into the Nusantara Coffee and Cocoa Project Management Office (PMO) as part of strengthening the national coffee ecosystem at the BUMN Corporate Communication and Sustainability Summit (BCOMSS) 2024. In 2025, the BNI JKK program continued to develop with financing realization amounting to Rp74.9 billion, reaching 493 coffee farmers across 5 provinces.



Sustainable Financial Investment Portfolio

BNI also demonstrates its commitment to sustainability through the placement of investments in a sustainable finance portfolio. These investments are allocated to instruments that support the achievement of social and environmental objectives, including Sustainable Bonds, the proceeds of which are used to finance activities aligned with the Sustainable Development Goals (SDGs), socially responsible business activities (Kegiatan Usaha Berwawasan Sosial/KUBS), and environmentally responsible business activities (Kegiatan Usaha Berwawasan Lingkungan/KUBL). In addition, BNI supports MSMEs by investing in securities issued by non-bank financial institutions that promote MSME development. The total value of this sustainable investment portfolio amounted to Rp7,064.5 billion, reflecting BNI's active role in supporting sustainable development through investment instruments.

Instrument Name	Use of Proceeds	Investment Amount (in Rp billion)
Sustainable Bond	Eligible Sustainable Development Goals (SDG) Expenditures	5,187.5
	Socially Responsible Business Activities	362
	Environmentally Responsible Business Activities	515
Securities	Securities Issued by Non-Bank Financial Institutions Supporting MSMEs	1,000
Total		7,064.5

Green Bonds

BNI uses all proceeds from bond issuance, after deducting issuance costs, to finance and refinance projects in the category of Green Business Activities (KUBL), including projects involving renewable energy, energy efficiency, waste-to-energy and waste management, sustainable use of natural resources and land, conservation of biodiversity on land and in water, environmentally friendly transportation, sustainable water and wastewater management, climate change adaptation, green buildings, and sustainable agriculture, as stipulated in OJK Regulation No. 60/POJK.04/2017 concerning the Issuance and Requirements of Environmentally Friendly Debt Securities (Green Bonds).

In addition, green bond funds are distributed in accordance with BNI's Green Bond Framework, which has undergone an independent review through a second-party opinion from Sustainalytics, with robust, transparent assessment results that are in line with the four main components of the 2021 Green Bond Principles. As a part of its commitment to implementing this framework, BNI ensures that 100% of the proceeds from the issuance are allocated to finance environmentally responsible business activities (KUBL).

2025 Green Bond Distribution

Eligible Category	Financed/ Refinanced	Amount Allocated	Allocation of Proceeds
Renewable Energy	Financed	Rp1,915 billion	38.30%
	Refinanced	Rp93 billion	1.86%
Environmentally Friendly Transportation	Refinanced	Rp2,324 billion	46.48%
Green Buildings	Refinanced	Rp305 billion	6.10%
Waste to Energy and Waste Management	Refinanced	Rp83 billion	1.66%
Sustainable Natural Resources and Land Use	Refinanced	Rp280 billion	5.60%
Total		Rp5,000 billion	100.00%

Source: Green Bond Report June 2025

BNI's commitment to developing sustainable financing is also strengthened through the contribution of its subsidiary, BNI Sekuritas, which provides advisory services for sustainable investment products, including the issuance of environmental and social-based investment instruments and other similar investment assistance, to offer investment solutions that focus on creating positive social and environmental impacts. Throughout 2025, BNI Sekuritas played a role in the issuance of various sustainable investment instruments with a total issuance value of Rp25.7 trillion.

Sustainability Bond

In 2025, BNI issued the 2025 Phase I Sustainability Bond with a value of Rp5 trillion as part of a Continuous Public Offering with a funding target of up to Rp15 trillion. This issuance is intended to support medium and long-term funding needs while strengthening BNI's commitment to promoting sustainable financing integrated with the Bank's business strategy.

The Sustainability Bond issuance process is carried out in stages, with an initial offering period from June 12 to 19, 2025, and an effective date of June 25, 2025. The public offering period took place from June 30 to July 1, 2025, and the bonds were listed on the Indonesia Stock Exchange on July 7, 2025. These bonds are issued in two series, namely Series A with a 3-year tenor and Series B with a 5-year tenor, with quarterly interest payments and bullet payment of principal at maturity. BNI's Sustainability Bonds have been assigned an idAAA rating by Pefindo, reflecting the market's confidence in BNI's performance and risk profile.

The proceeds from the issuance of Sustainability Bonds are used to finance and/or refinance projects that meet sustainability principles, as outlined in BNI's Sustainability Bond Framework. The sustainability bond framework issued by BNI refers to POJK No. 18/2023, the Sustainability Bond Principles issued by ICMA and the ASEAN ACMF Sustainability Bond Standard 2018, and has received a Second Party Opinion (SPO) from Sustainalytics with credible & impactful results.

BNI allocates 70% of total proceeds to Socially Responsible Business Activities (KUBS). These funds support six social eligible projects: basic infrastructure, essential services, food security and sustainable food systems, MSME financing, affordable housing, and socio-economic empowerment. The remaining 30% goes to Environmentally-Friendly Business Activities (KUBL), which includes nine green eligible project categories, such as renewable energy, environmentally-friendly transportation, waste-to-energy projects, sustainable natural resource management and land use, and energy efficiency. Funds may be allocated to both new and existing credit facilities.

BNI is committed to disbursing all proceeds no later than one year after they are received. The project selection process is conducted through a rigorous mechanism with the approval of BNI's ESG Sub-committee, and will be reported in a separate Sustainability Bond disbursement report accompanied by a review from the appointed SPO, no later than Q2 2026.

The bonds have been rated by Pefindo with an idAAA (triple A) rating for long-term debt securities and have received an independent opinion from Sustainalytics stating that BNI's Sustainability Bond framework is credible and meets international and ASEAN standards. The entire project selection process is carried out through a rigorous mechanism involving BNI's ESG sub-committee, starting from submission by the business unit, feasibility evaluation by the risk management unit, and final approval.

ESG Risk Management in Financing Activities

Material Topic Management ^[3-3]

Material Topic: Climate Resilience



Importance of Topic Management

ESG risk management is an important part of BNI's sustainable finance implementation in supporting the transition to a low-carbon economy and climate resilience.



Impact and Opportunity

Climate resilience is a material topic for BNI because climate change can affect debtor performance, asset quality, and financing portfolio stability due to physical and transition risks. To manage these impacts, BNI integrates ESG and climate risk aspects into its financing processes through the implementation of climate risk management & scenario analysis (CRMS) and climate risk stress testing (CRST).

The implementation of CRMS and CRST also opens up opportunities for BNI to strengthen the resilience of its long-term portfolio, support debtors' transition to sustainable business practices, and develop low-carbon financing in line with net zero emission (NZE) targets and regulatory policies. This approach supports more prudent, adaptive, and sustainability-oriented financing decisions.



Target and Commitment

- Increase CRST scope to cover 100% of the portfolio
- Assist debtors in climate transition through technical assistance and awareness programs for debtors, as well as advisory playbooks for several high-emission sectors
- Gradually strengthen the availability and quality of debtor emission data
- Achieve the Net Zero Emission Financing target by 2060
- Develop sector-based transition plans for high-emission sectors



Policy

ESG risk management in lending is implemented throughout the entire financing cycle (end-to-end credit process). This process begins with the establishment and evaluation of Risk Acceptance Criteria (RAC) covering aspects of climate change mitigation and adaptation, human rights, and occupational health and safety as part of pipeline management. Furthermore, the results of the ESG risk and mitigation analysis serve as the basis for determining credit terms and conditions, followed by ongoing credit monitoring, including compliance with and realization of the required ESG aspects. In addition, ESG risk management is also carried out through the regulation of financing exposure by applying Loan Exposure Limits (LEL), particularly for sectors with high levels of emissions. This policy is intended as a measure to anticipate and address potential credit concentration risks.



Impact Evaluation and Management

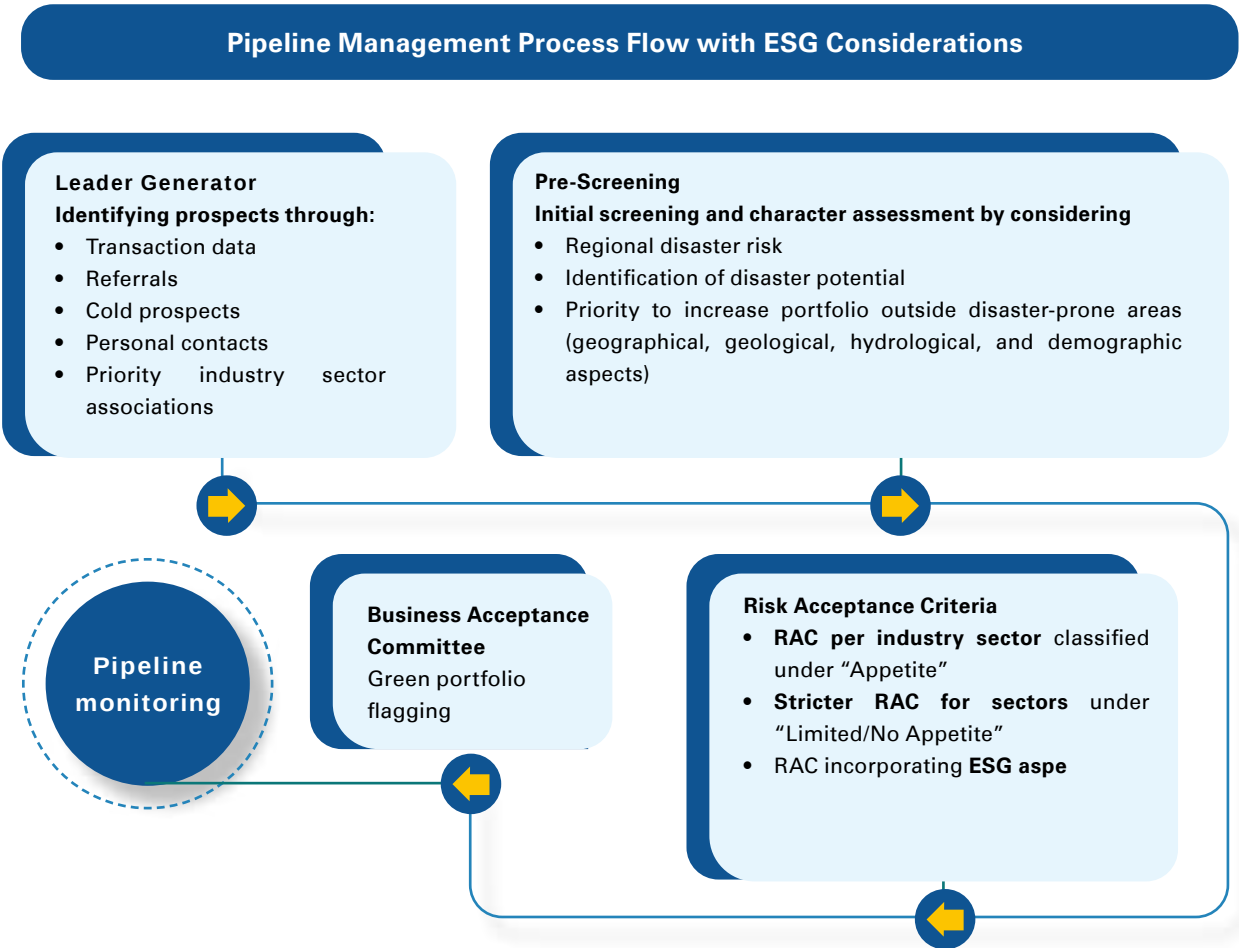
Environmental impact management in financing is overseen by the Board of Directors and the ESG Sub-committee, and is managed operationally by the Environmental, Social & Governance Division, in coordination with the Enterprise Risk Management Division. Oversight of climate risk impacts is carried out by the Board of Commissioners. This framework ensures that environmental and climate risks are considered as part of risk governance, not merely as compliance issues. BNI is gradually strengthening its organizational structure, reporting mechanisms, and cross-functional coordination to ensure that financing decisions align with risk appetite, NZE targets, and national and global policies on sustainable financing.

ESG Risk Policy and Integration in the Credit Process [FS1, FS2, FS3, FS10][FN-CB-

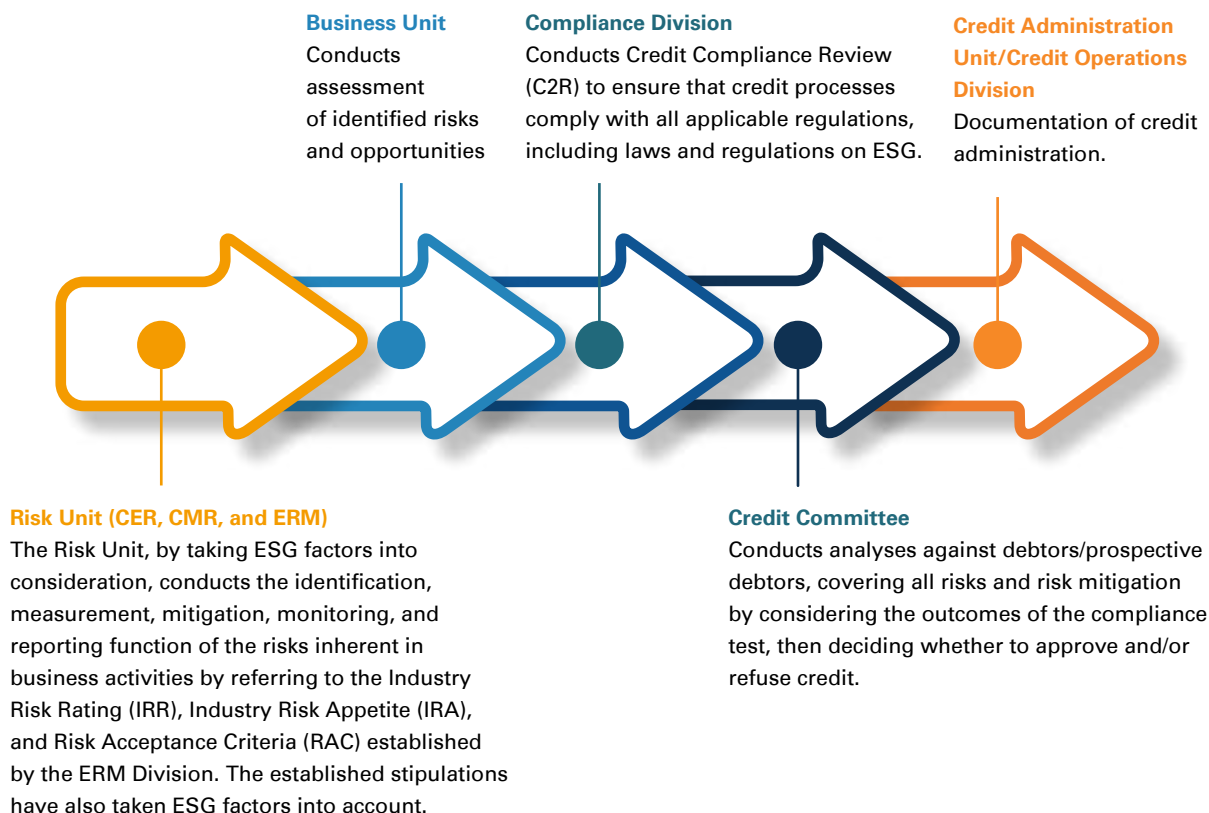
410a.2]

BNI recognizes that environmental, social, and governance (ESG) aspects are one of the main factors that can affect the sustainability of the Bank’s business, including lending. Therefore, BNI integrates these aspects into the entire lending cycle, from portfolio planning and the approval process to post-lending monitoring. This approach is designed to ensure that the financing channeled not only supports economic growth, but also minimizes physical and transition risks that could potentially have a material impact on the quality of the Bank’s assets and financial stability.

Before providing financing to prospective debtors, BNI conducts a series of creditworthiness assessment processes involving several related functions. Internal Audit plays a role in conducting audits to evaluate the adequacy of the credit-granting process, risk management, and internal control in each unit. In reviewing credit proposals, BNI identifies and monitors ESG risks. The pipeline management mechanism has been implemented, with ESG considerations taken into account throughout 2025.



ESG Aspects Management in Credit Approval Process



ESG Risk Management Policy in High-Risk Sectors [FS11][FN-CB-410a.2, FN-CB-550a.2]

BNI has sector guidelines that regulate the minimum sustainability requirements that must be met, prohibited activities, and aspects that are encouraged for sustainable practices. This sector guidance applies to all credit segments, including corporate and project finance. There are four sectors identified as having high ESG-related risks at BNI, namely agriculture, specifically the palm oil sub-sector, the mining, construction, and energy sectors.

At BNI, financing in the oil and gas sector is carried out selectively, with priority given to major players with above-average industry performance. Going forward, in the credit process, particularly at the pipeline management stage, BNI will develop specific Risk Acceptance Criteria (RAC) for the oil and gas sector and ensure financing is provided to debtors with sound ESG management policies.

Corporate and Enterprise Segment

Several ESG risk assessment criteria required by BNI for business sectors in this segment include:



Oil Palm Plantation and Processing Industry

Oil Palm Plantation and Processing Industry:

- Have an environmental impact analysis (AMDAL) document and other environmental permits.
- No environmental or social disturbances in the last 5 years.
- Have an environmental management program (PROPER) document of at least the BLUE category if it has been assessed.
- No forced labor or employment of minors.

Special additions for the Oil Palm Plantation Sector:

- Have or are in the process of RSPO or ISPO certification.
- The possibility of building oil palm plantations for energy (dedicated area) is prioritized so as not to interfere with food and export needs.
- Committed to implementing the No Deforestation, No Peat, and No Exploitation (NDPE) policy in land clearing activities in accordance with applicable regulations.
- Priority is given to the company that has a strategy to reduce emissions and reduce negative impacts on the environment and society.
- The financed plantation area is not included in protected forests or peatlands prohibited in accordance with the Indicative Map for the suspension of new permits (PIPPB) issued by the Ministry of Forestry.
- Priority is given to companies that already have a sustainability strategy for plasma farmers or independent farmers.



Metal Ore and Coal Mining

BNI has entered the mining sector in a selected manner mainly to support infrastructure development and other strategic development sectors.

Metal Ore and Coal Mining:

- No negative information regarding violations of environmental and social regulations locally and internationally in the last 3 years.
- A priority will be given to zero accidents or minimal work accidents in the last 3 years. Workers have used adequate Personal Protective Equipment (PPE), complied with work SOPs, work & safety training, health and work safety insurance, and worked in shifts.
- Meet the minimum PROPER BIRU (if assessed) requirements, which can be either central or regional PROPER.
- Have a special team to report to the BoD to manage corporate social responsibility issues.
- Prioritize companies that have a strategy for reducing emissions and minimizing negative environmental and social impacts.
- Prioritize companies that have obtained the necessary permits for mine reclamation in accordance with the conditions and potential of the area after mining.
- Have met or have a program that can be monitored for compliance with the qualitative environmental, social, and governance (ESG) parameters set by BNI in accordance with regulatory requirements.



Metal, Metal Ore and Coal Trade

- The goods/products sold do not come from mining or processing products that are legally problematic/illegal.
- Partners/suppliers have no bad news about violations of environmental regulations, both local and international.



Basic Metal Industry (Smelter Refiner) and Metal Goods Industry (Fabricator)

- The company has obtained approval for environmental impact analysis (AMDAL/UKL-UPL/RKL-RPL Detailed), either through its own permit or through the business estate/area.
- There is no bad news about environmental violations, both locally and internationally.
- Comply with regulations on air pollution & noise, including dust dispersion.
- Comply with regulations on water, sediment, and wastewater treatment.
- Comply with regulations on the management of hazardous waste.
- Managing social and cultural impacts on local communities.
- Wildlife conservation/local habitat ecological management.
- Priority given to those with zero Accidents or minimal work accidents in the last 3 years. Workers have used adequate Personal Protective Equipment (PPE), complied with work SOPs, work & safety training, health and work safety insurance, and worked in shifts.
- For smelters/fabricators using fossil fuels, priority is given to those that have implemented one or more of the following strategies:
 - a. Energy transition; or
 - b. Emissions reduction strategy; or
 - c. Strategy to reduce negative environmental impacts.

Additional criteria for the Fabricator Sector:

- Raw materials do not originate from mining or processing that is legally problematic/illegal.

Additional criteria for the Smelter Refiner Sector:

- Comply with laws on employment, both foreign and local workers.



Toll Road Construction & Civil and Building Construction

- Fulfill and comply with the regulations of the construction sub-sector, namely: land use rights, employee occupational safety & health, minimizing pollution, minimizing the consequences of hazardous materials, and using/maintaining natural water sources.
- No negative information on violation of social or environmental regulations in the last 3 years.
- Comply with good corporate governance (GCG) rules.
- No forced labor or employment of minors.
- Priority is given to companies that have established strategies to mitigate negative environmental and social impacts.
- Priority is given to the company that has zero accidents or minimum work accidents in the last 3 years. Workers have used adequate Personal Protective Equipment (PPE), complied with work SOPs, work & personal safety training, health and work safety insurance, and worked in shifts.



Power

- Already have an AMDAL or Environmental Management plan in accordance with regulations in the electricity sector.
- Have a certificate or OHS management plan (for debtors or contractors).
- No negative information on violations of social or environmental regulations, both local and international, in the last 3 years.
- Have met or have a program that can be monitored for the fulfillment of the ESG Qualitative Factor Parameters set by BNI in accordance with regulations.
- For coal-fired power plant financing, priority is given to those who already have one or more of the strategies below:
 - a. Energy transition; or
 - b. Emissions reduction strategy; or
 - c. Strategy to reduce negative environmental impacts.



Real Estate

Recurring Real Estate & Non-Recurring Real Estate Sector:

- No negative information on violations of social or environmental regulations, both local and international, in the last 5 years that have an impact on business continuity.
- Conformity with regional spatial plans (RT & RW).
- Appropriate land use (suitability of land with its function based on the master plan of the area/region), Basic Building Coefficient, Building Area Coefficient.
- Fulfill and comply with real estate sub-sector regulations namely: land use rights, employee occupational safety & health, minimizing pollution, minimizing the consequences of hazardous materials, using/maintaining natural water sources, etc.
- Have an AMDAL or other environmental permits.
- No forced labor or employment of minors.



Telecommunications and Data Centers

Telecommunications Contractor Sector & Operator and Data Center Sector:

- No negative information on violations of social or environmental regulations, both local and international, in the last 3 years.
- Comply with the rules of GCG.
- Have a permit from the local government for building telecommunication infrastructure.
- Already have building development permits (IMB), AMDAL and other environmental permits.

Special additional criteria for the Operator and Data Center Sector:

- Priority is given to the company that has a strategy to reduce emissions and reduce negative impacts on the environment and society.



Chemical Industry

- Minimum PROPER BLUE if it has been assessed.
- No negative information on violations of social or environmental regulations, both local and international, in the last 5 years.
- Have an AMDAL and other environmental permits.
- Have an Occupational Health and Safety Certificate.
- Have waste management management in accordance with applicable regulations.



Cement Industry

- Meet the minimum BLUE PROPER.
- No negative information on violations of social or environmental regulations, both local and international, in the last 5 years.
- Comply with GCG.
- It has received AMDAL approval, either through its own permit or through business estate or the business area.
- Comply with regulations on air pollution & noise, including dust dispersion.
- Comply with regulations on water, sediment and wastewater treatment.
- Comply with regulations on hazardous and toxic waste management.
- Managing social and cultural impacts on local communities.
- Wildlife conservation/ecological management of local habitats.
- Comply with labor laws, both foreign and local workers.
- Zero Accidents or Minimum work accidents in the last 3 years are prioritized. Workers have used adequate PPE, adhered to work SOPs, work training & personal safety, occupational health and safety insurance, working in shifts.
- For factories that use fossil fuel energy, priority is given to those who already have one or more of the strategies below:
 - a. Energy transition; or
 - b. Emissions reduction strategy; or
 - c. Strategy to reduce negative environmental impacts.
- No forced labor or employment of minors.



Fast Moving Consumer Goods (FMCG)

- The company has an AMDAL or other environmental permit.
- The company has Occupational Health and Safety Management System (OHSMS).
- Have a waste management policy in accordance with applicable regulations.
- No social or environmental disturbances in the last 5 years that have an impact on business continuity.
- Comply with labor laws, both foreign and local workers.



Hospital

- ISO 14001 on sustainable environmental management systems.
- No negative information on violations of social or environmental regulations, both local and international, in the last 5 years.
- There is no legal rulings of malpractice that has an impact on business continuity.
- Have a hospital waste management unit in accordance with government regulations



Pharmacy

- No negative information on violations of social or environmental regulations, both local and international, in the last 5 years.
- There has never been news of fatal side effects of drugs manufactured or sold.
- Meet the requirements that have been set by regulators, including AMDAL or other environmental permits.
- Have waste management management in accordance with applicable regulations.
- No forced labor or employment of minors.



Wholesale Trade

- No negative information on violations of environmental and social regulations, both local and international, in the last 5 years.
- There has never been news of fatal side effects of products sold.



Retail Trade

- No negative information on violations of environmental and social regulations, both local and international, in the last 5 years.
- There has never been news of fatal side effects of products sold.
- No forced labor or employment of minors.



Mining Contractor Services

- No negative information on violations of environmental and social regulations, both local and international, in the last 3 years.
- Comply with GCG.
- Zero Accidents or Minimum work accidents in the last 3 years are prioritized. Workers have used adequate PPE, adhered to work SOPs, work training & personal safety, occupational health and safety insurance, working in shifts.
- Priority is given to the company that has a strategy to reduce emissions and reduce negative impacts on the environment and society.



University

- Hold formal documents of policies and regulations to ensure the integrity and quality of the institution.
- No negative news related to environmental, social, and governance (ESG) aspects in the last 2 years.

RAC Commercial Segment

Several ESG risk assessment criteria required by BNI for business sectors in this segment include:



General Trade

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- No illegal products; the products sold have distribution permits/comply with applicable standards, etc.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Import-Export Trading

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- There have never been any news reports of fatal side effects from the products sold.
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



General Manufacturing

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- Possess an Environmental Impact Assessment (AMDAL) permit and other environmental permits or similar permits in accordance with the business sector.
- Implements occupational health and safety (OHS).
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Chemical, Rubber, and Plastic Industry

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- Possess AMDAL and other environmental permits
- Implements occupational health and safety (OHS).
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



General Services

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Accommodation Provider

- No social or environmental disturbances in the last 4 years that have an impact on business continuity.
- Compliance with the regional spatial plan (RTRW).
- Appropriate land use (suitability of land with its function based on the master plan of the area/region), Basic Building Coefficient, Building Area Coefficient.
- No forced labor or employment of minors
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Transportation & Distributor of Fuel

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- No forced labor or employment of minors
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Palm Oil Plantation (Upstream)

- Have an ISPO/RSPO certificate or are in the process of ISPO/RSPO certification.
- No social or environmental disturbances in the last 5 years that have an impact on business continuity.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).
- Possess AMDAL and other environmental permits
- No forced labor or employment of minors
- Committed to implementing the No Deforestation, No Peat, and No Exploitation (NDPE) policy in land clearing activities in accordance with applicable regulations.
- Priority is given to the company that has a strategy to reduce emissions and reduce negative impacts on the environment and society.
- The plantation area is not in a conservation area, is not in dispute, and does not exceed the concession zone.



Rental Services

- No social or environmental disturbances in the last 4 years that have an impact on business continuity.
- Fulfill and comply with regulations, namely: employee occupational safety & health, minimizing pollution, minimizing the consequences of hazardous materials, using/maintaining natural water sources, etc.
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Hospitals

- No social or environmental disturbances in the last 4 years that have an impact on business continuity.
- There is no news of malpractice that has an impact on business continuity.
- Have a hospital waste management unit in accordance with government regulations.
- No employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Construction

- No social or environmental disturbances in the last 4 years that have an impact on business continuity.
- Fulfill and comply with the regulations of the construction sub-sector, namely: land use rights, employee occupational safety & health, minimizing pollution, minimizing the consequences of hazardous materials, using/maintaining natural water sources, etc.
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Domestic Wholesale Trade

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- There has never been any news of fatal side effects of the products being sold.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Retail Trade

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- There has never been any news of fatal side effects of the products being sold.
- No forced labor or employment of minors.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Palm Oil Mills

- The company has an AMDAL or other environmental permit.
- No social or environmental disturbances in the last 7 years that have an impact on business continuity.
- No forced labor or employment of minors
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).
- The plantation area is not in a conservation area, is not in dispute, and does not exceed the concession zone.



Four-Wheel or Two-Wheel Vehicle Dealers

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Real Estate Recurring

- No social or environmental disturbances in the last 5 years that have an impact on business continuity.
- Conformity with the regional spatial plan.
- Appropriate land use (suitability of land with its function based on the master plan of the area/region), Basic Building Coefficient, Building Area Coefficient.
- Fulfill and comply with real estate sub-sector regulations, namely: land use rights, occupational safety & health of employees, minimizing the consequences of hazardous materials, using/ maintaining natural water sources, etc.
- The company has an AMDAL or other environmental permit.
- No forced labor or employment of minors
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).



Food and Beverage Industry

- No social or environmental disturbances in the last 3 years that have an impact on business continuity.
- The company has an AMDAL or other environmental permit.
- The company has Safety, Occupational Health & Environment.
- Comply with applicable regulations and permits according to the type of business.
- No employment of minors
- The company is not currently undergoing legal proceedings/involved in legal cases that could affect business continuity (including those without a final and binding decision).

Small, Medium Enterprise (SME) Segment

Several ESG risk assessment criteria required by BNI for business sectors in this segment include:

Sector	ESG Aspect Criteria
Domestic Wholesale Trade	No social/environmental disturbances in the last 2 years that have an impact on business continuity.
Retail Trade	
Food and Beverage Processing Industry	
Chemical Industry	
Import-Export Trade	
Public Transportation	
Palm Oil Plantations (Upstream)	- The planting area is not located on peatland and/or forest conservation areas. - No social/environmental disturbances in the last 5 years that have an impact on business continuity. - No negative news or issues related to burning or land encroachment in land clearing.
Construction	- No social/environmental disturbances in the last 4 years that have an impact on business continuity. - Compliance with and adherence to construction sub-sector regulations, including: land use rights, employee occupational health and safety, minimizing pollution, minimizing the impact of hazardous materials, using/preserving natural water sources, etc.
Accommodation Providers	No social/environmental disturbances in the last 3 years that have an impact on business continuity.

Exclusion List

BNI has also established a list of financing exclusions, as follows:

- Prohibited by the government
- Illegal logging.
- Forced labor, child exploitation, human rights violations.
- Violation of community rights.
- Prohibited by the government if destroying world heritage sites.
- Sale and production of narcotics.
- Manufacture and sale of weapons.
- Gambling and money laundering.
- Trade in protected animals.
- Terrorism financing.

Integration of ESG Risk in the Credit Process ^[FS3, FS9]

BNI integrates Environmental, Social, and Governance (ESG) considerations into structured sustainable loan monitoring through its Credit Company Guidelines (PP), which apply to the Corporate, Enterprise, Commercial, Small Medium Enterprise (SME), and Consumer segments. This monitoring includes monitoring payment accuracy, business prospects, and the financial condition of debtors as part of applying the principle of prudence.

Loan monitoring is carried out on an ongoing basis through portfolio evaluation, internal audits, and mechanisms for handling non-performing loans, including restructuring where necessary. As part of strengthening ESG risk oversight, Internal Audit conducts audits of debtors that have the potential to cause significant environmental impacts. During the reporting period, audits were performed on 19 debtors in the Corporate, Enterprise, and SME segments, from high-risk sectors such as the plywood industry, oil palm plantations, fertilizers

and nitrogen compounds, livestock, toll road construction, transportation, telecommunications, mining, and solid/liquid/gas fuel trading.

The audit is conducted using a risk-based approach through an Audit and Consultation Plan to ensure that ESG risk oversight is carried out proportionally, focused on priority sectors, and aligned with BNI's credit policy and risk management.

Environmental Compliance by Debtors ^[FS8, FS11]

BNI strictly manages environmental risks in its financing activities to mitigate the impact of climate change. Monitoring is carried out based on industry risk appetite and risk acceptance criteria to prevent potential negative impacts such as deforestation, pollution, and biodiversity loss. In addition, BNI requires relevant environmental certifications for each business sector, including RSPO and ISPO for palm oil, PROPER for power plants, manufacturing, and mining, as well as other supporting certifications such as FSC and ISO 14001.

Ownership of Environmental Aspect Management Certificate by Debtor ^[FS11]

Description	Total		
	2025	2024	2023
PROPER Gold	13	9	11
RSPO/ISPO	64	49	49
In the process of obtaining RSPO/ISPO	15	17	9
PROPER Red	2	1	0
PROPER Blue	56	59	50
PROPER Green	13	5	5
Timber Legality Verification System (SVLK)	11	15	16

Debtor Assessment Based on the Indonesian Sustainable Finance Taxonomy (TKBI)

In line with the strengthening of climate risk and opportunity disclosure standards, BNI is gradually integrating TKBI as an improvement to the Indonesian Green Taxonomy (THI) within the framework of climate risk management and sustainable financing. TKBI is used as a tool to identify the level of alignment of debtor activities with climate change mitigation and adaptation goals. By applying TKBI in the credit analysis process, portfolio monitoring, and debtor assistance, BNI encourages the gradual improvement of debtor environmental practices, including the preparation of measurable transition plans. This approach supports BNI's readiness in climate change mitigation and resilience, particularly in linking climate-related risks and opportunities to business strategies, risk management, as well as metrics and targets that impact the Bank's financial performance and resilience.

TKBI assessments are conducted in four main sectors, namely Energy, Construction & Real Estate (CRE), Transportation & Storage (T&S), and certain Agriculture, Forestry and Other Land Uses (AFOLU) sectors, in this case, the forestry and oil palm plantation sectors. In line with OJK directives, TKBI assessments are conducted in stages. For the implementation of TKBI, BNI provides technical assistance to all affected borrowers to enhance their understanding of TKBI.

Monitoring, Audit, and Escalation of Environmental, Social, and Governance (ESG) Risks ^[FS3, FS9]

As part of its commitment to sustainable financing, BNI has integrated ESG due diligence mechanisms into its credit analysis, approval, and monitoring processes. Debtor and prospective debtor compliance with environmental, social, and governance regulations is one of the main factors in credit risk assessment. Any indication of ESG violations will be subject to further evaluation to assess the cause, level of materiality, and potential impact on the bank's loan quality and risk exposure.

During the process, the Business Unit and Risk Unit conduct evaluations in the form of verification, in-depth analysis, and coordination with debtors and relevant external parties to assess the impact of ESG on financial performance, payment capacity, debtor reputation, and legal and reputational risks for BNI.

The results of this evaluation enable BNI to implement proportionate corrective measures, ranging from granting deadlines for improvement, adjusting financing terms, temporarily suspending credit facilities, postponing new financing processes, to requesting credit repayment. This mechanism ensures that ESG risks are managed systematically, documented, aligned with credit policies and applicable regulations, and adhere to good governance principles.

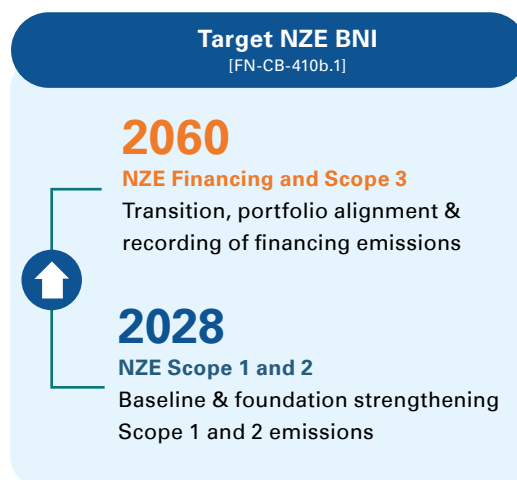
Climate Change Mitigation and Resilience

As a financial institution, BNI's main impact on climate change does not come from its direct operational activities, but rather from financing activities that indirectly finance debtors' emissions and climate risks. Therefore, BNI manages climate risk as an integral part of financial risk management, linking climate aspects to asset quality, portfolio resilience, and long-term financial performance. ^[201-2]

This approach is reinforced through the development of a Climate Risk Management & Scenario Analysis (CRMS) and Climate Risk Stress Testing (CRST) framework that is aligned with OJK policies and international methodologies. Through this approach, BNI ensures that the risks and opportunities of climate change are identified, measured, and managed systematically in business decision-making.

Through the continuous development of CRMS and CRST, BNI strengthens portfolio resilience, supports national NZE targets, and ensures that climate risk is systematically internalized in the company's strategy and risk management.

The operational NZE target for 2028 focuses on reducing greenhouse gas emissions from BNI's operational activities for scope 1 and scope 2. The target is set with reference to the 2023 emissions baseline as the base year for calculation. Meanwhile, for operational scope 3, it follows the NZE financing target by 2060.



Climate Risk Management & Scenario Analysis (CRMS)

BNI has developed a CRMS framework to identify, assess, and manage climate change risks and opportunities that could potentially affect its credit portfolio and financial performance. This framework comprises four main pillars: governance, strategy, risk management, as well as metrics and targets, as referred to in the IFRS S2 framework.

Governance

Climate risk management is under the Environmental, Social & Governance Division in coordination with the Enterprise Risk Management Division, with oversight by the ESG Sub-Committee, which is part of the Risk Management and Anti-Fraud Committee and the Board of Commissioners. In 2024–2025, BNI strengthened its ESG organizational structure by developing the organization from a department into a division and adding work units to support more in-depth and integrated climate risk management. Monitoring is carried out periodically, and the results are reported to the Board of Directors and Board of Commissioners for strategic decision-making.

Strategy

In terms of strategy, BNI positions itself as a transition partner for debtors, not merely a financing provider. Throughout 2024–2025, BNI increased its advisory role to debtors through various forums and educational programs, including BEST Events and Indonesian Sustainable Finance Taxonomy (TKBI) workshops, particularly for high-emission sectors such as energy. This approach aims to encourage debtors to develop transition roadmaps that are in line with government policies and Indonesia's NZE targets. In 2025, BNI became the first bank in Indonesia to publish an advisory playbook in the Palm Oil Plantation sector, as a guide for debtors in implementing green transition.

Risk Management

BNI integrates climate risk into its risk management framework through:

- strengthening risk acceptance criteria (RAC) by incorporating aspects of climate change mitigation and adaptation, human rights, and occupational health and safety;
- mapping high-emission sectors and regulating exposure through loan exposure limits (LEL);
- gradually implementing TKBI in the energy, AFOLU, construction & real estate, and transportation & logistics sectors;
- implementing CRST for BNI's entire credit portfolio to assess the impact of climate change on BNI's credit portfolio; and
- strengthening business continuity management (BCM) to mitigate physical risks due to climate disasters.

Metrics and Targets

BNI continues to improve its GHG emissions measurement, both operational and financing. Since 2024, BNI has been fully implementing the PCAF methodology and expanding the scope of its financing emissions calculations to cover the majority of its productive loan segments. The results of these measurements are used as a basis for portfolio management, setting NZE financing targets, and monitoring debtor transition performance.

Climate Risk Stress Testing (CRST) ^[201-2]

As part of the implementation of climate risk management & scenario analysis (CRMS), BNI conducts climate risk stress testing (CRST) to assess the resilience of its financing portfolio to physical and transition risks resulting from climate change. CRST enables BNI to identify the potential impact of climate risk on debtor performance, including a decline in cash flow, an increase in the probability of default, and its implications for asset quality. The results of this analysis are used as a basis for anticipating pressure on non-performing loan ratios, loans at risk (LaR), and the adequacy of Expected Credit Loss (ECL). Thus, CRST plays an important role in maintaining portfolio resilience, capital stability, and the sustainability of BNI's financial performance in the long term.

In 2025, CRST BNI covered the entire loan portfolio. Stress tests were conducted in accordance with the CRMS guidelines issued by the OJK, which also adopted the Network for Greening the Financial System (NGFS) scenarios, namely:

- Net Zero 2050 (Orderly Transition)
- Delayed Transition (Disorderly)
- Current Policies (Hot House World)

The transition risk analysis is conducted with three time horizons, namely short term (2025, 2026, 2027), medium term (until 2030), and long term (until 2050).

The stress test covers credit, market, operational, and liquidity risks. The results of the Climate Risk Stress Test (CRST) show that the Net Zero 2050 scenario has the most significant impact compared to other scenarios, with the electricity, gas, steam/hot water, and cooling sectors being the most affected by climate risk.

Meanwhile, physical risk analysis was conducted through stress testing of productive loans in the agriculture, forestry, and fisheries sectors using a forest fire scenario, as well as property ownership loans using a flood scenario over a one-year time horizon. The test results showed that the most significant impact of physical risk was on the property ownership loan portfolio.

Operational risks due to potential flooding within a one-year time horizon in the 2025 projection were estimated to impact 158 of 1,780 operational offices (8.9%) located in areas with high flood risk (IRBI value > 12). In terms of liquidity risk, the results of a one-month stress test show that the liquidity coverage ratio remains above the regulatory requirement (100%). Meanwhile, the impact of climate risk on the Market Risk ATMR for movements in the ratings and yields of government and corporate securities shows the largest decline in the 2030 Net Zero scenario at 8.2%.

Overall, climate risk is projected to have an impact on the Capital Adequacy Ratio (CAR) in the long term. However, the CAR remains within the Bank's capital adequacy limits, reflecting the Bank's capital resilience in facing the risks associated with climate change.

GHG Emissions Data from Financing ^[FN-CB-410b.4]

The calculation of GHG emissions from financing in 2025 covered 90.5% of the productive loan portfolio, consisting of the Corporate, Enterprise, Commercial, and Retail Productive segments, calculated using the Partnership for Carbon Accounting Financials (PCAF) methodology. The scope has increased compared to 2024, which only covered 70.3% of the productive credit portfolio.

Financed GHG Emissions by Asset Class

Asset Class PCAF	Outstanding 2025 (Rp billion)	Financed Emission 2025 (Ton CO ₂ eq)
Business Loans	553,439	37,207,662
Project Finance	104,015	7,433,482
Total	657,454	44,641,144

GHG Emissions from Financing Activities by Loan Segment ^{[305-3][FN-CB.410b.1, FN-CB-410b.2, FN-CB-410b.3]}

Segment	Outstanding Plafond 2025 (Rp billion)	GHG Emissions (Ton CO ₂ eq) 2025	GHG Emissions (Ton CO ₂ eq) 2024*
Corporate	477,493	39,217,943	27,532,032
Enterprise	60,239	2,312,995	2,269,614
Commercial	44,630	1,841,136	1,234,931
Total	582,363	43,372,074	31,036,577
Retail Productive	75,090	1,269,070	2,196,684
Grand Total	657,454	44,641,144	33,233,262

GHG Emissions from Financing Activities based on Business Sector ^[FN-CB-410b.2, FN-CB-410b.3]

Business Sector	Outstanding Plafond 2025 (Rp billion)	GHG Emissions (Ton CO ₂ eq) 2025	GHG Emissions (Ton CO ₂ eq) 2024
Processing Industry	141,280	20,429,838	11,924,154
Trade	107,847	1,522,073	1,027,502
Mining & Exploration	63,258	8,786,996	8,012,103
Transportation, Transportation Support & Warehousing	30,733	1,341,212	203,863
Electricity, Gas, and Water	47,656	7,214,101	2,415,033
Agriculture, Forestry, & Fisheries	49,372	1,903,307	1,682,017
Real Estate	21,106	156,779	35,692
Construction	108,451	434,817	251,809
Other	87,747	2,852,021	7,681,088
Total	657,454	44,641,144	33,233,262

GHG Emissions from Financing Activities by Data Quality

Data Quality	Outstanding 2025 (Rp billion)	Financed Emission 2025 (Ton CO ₂ eq)
Score 1	51,114	13,141,838
Score 2	105,297	6,714,654
Score 3	-	-
Score 4	501,042	24,784,652
Score 5	-	-
Total	657,454	44,641,144

Environmentally Friendly Credit Cards [301-1, 301-2, 301-3]

The use of environmentally friendly materials in the development of banking products is part of Bank Negara Indonesia's commitment to supporting climate change mitigation and the application of green banking and sustainable finance principles. This approach is carried out through the management of the environmental impact of the product life cycle, including the selection of more responsible materials. This commitment is realized through product development and collaboration with strategic partners, one of which is through the issuance of the BNI American Express Vibe Credit Card, 80% of which is produced from recycled plastic materials. However, BNI does not have any products that are sourced from recycled materials. This initiative reflects BNI's efforts to integrate environmental aspects into product innovation, in line with the applicable sustainability and corporate governance policy framework.

Volume of Recycled Plastic Use in 2025



Notes:

Assumption: Each credit card has a total weight of 5 grams, of which 4 grams (80%) consist of recycled materials. Accordingly, the volume of recycled plastic is calculated based on the number of credit cards produced multiplied by the weight of recycled material per card.

BNI also offers the BNI WWF credit card, developed in collaboration with World Wide Fund for Nature Indonesia (WWF Indonesia). Through this product, BNI facilitates customer indirectly participate in contributing to conservation, restoration, and ecosystem and biodiversity management programs in Indonesia, by channeling a portion of customer transaction fees (0.4% sharing fee) to WWF Indonesia.

Environmentally-friendly Credit Cards

Types of Cards	New CIF			Sales (Rp billion)		
	FY 25 Target	2025 Realization	Achievement (%)	FY 25 Target	2025 Realization	Achievement (%)
WWF	21,874	25,310	115.7%	524,23	640,95	122.3%
Amex Vibes	50,000	53,955	107.9%	96,00	708,10	737.6%
Total	71,874	79,265	110.3%	620,23	1,349,05	217.5%



02

CORPORATE SUSTAINABILITY

BNI believes that sustainability can be achieved if the company's operations are managed in a disciplined, adaptive, and responsible manner. Therefore, BNI continuously manages energy and emissions, develops sustainable operational practices, and encourages employee active involvement in implementing ESG principles. Along with strengthening digital services, BNI also enhances cybersecurity and customer data protection to ensure safe and reliable operational sustainability.

Efforts to Achieve Climate Resilience

Material Topic Management ^[3-3]

Material Topic Management



Importance of topic management

Climate resilience management is a strategic issue for BNI, given that climate change has the potential to affect the Bank's business sustainability. Integrating climate resilience aspects into the Bank's strategy and operations enables BNI to enhance risk management and support the transition to a low-carbon economy in line with the national Net Zero Emission (NZE) commitment.



Impact and Opportunity

Climate change causes impacts in the form of potential service disruptions due to extreme weather and a decline in the reliability of physical infrastructure and information technology. These conditions also have implications for increased maintenance and operational recovery costs, particularly for office networks and support facilities in areas that are prone to climate change impacts.

BNI takes advantage of these opportunities by integrating climate risk management into its business decision-making processes. This includes energy efficiency and emission reduction in its operations, which also provides opportunities to increase cost efficiency and reduce the Bank's carbon footprint. In addition, the development of digitalization in BNI's operations and services provides opportunities to mitigate arising climate risks.



Target and Commitment

BNI is committed to supporting the achievement of Net Zero Emissions (NZE) by integrating climate resilience management into its operations. BNI's main commitments include:

- Achieving Net Zero Emission scope 1 and 2 targets by 2028.
- Gradually expanding waste management based on the principle of zero waste to landfill to all regions/branches.
- Expanding the scope of BNI's waste management to other waste categories.
- Optimizing energy efficiency programs in BNI offices.

This target aligns with BNI's ESG roadmap and the Sustainable Finance Action Plan (SFAP).



Policy

In supporting climate resilience, BNI has established and implemented various policies, including: [ESG, PFA, NSD]

- ESG policies and roadmap that include efforts to reduce greenhouse gas emissions and support the transition for business partners;
- Energy efficiency and emissions management policies within the scope of operations, which refer to:
 1. Provisions on Efficiency Implementation No. JAL/2.2/1799;
 2. Provisions on Lighting and Room Cooling Efficiency No. JAL/3/3564;
 3. Provisions on the Use of Inverter Air Conditioners for Electricity Cost Efficiency No. JAL/3/1317.
- Waste management policy within the scope of regional and branch office operations, which refers to the Standard Operating Procedure (SOP) for Solid Waste Management in Regional and Branch Offices No. NSD/4/0127 dated October 10, 2025.



Impact Evaluation and Management

Climate resilience management and evaluation are under the direction of the Board of Directors, while oversight is under the Board of Commissioners. Climate resilience management is carried out by the Environment, Social and Governance Division with support from related units, such as the Operation Risk Management Division, Procurement and Fixed Assets Division, and Networks Service and Distribution Division. At the operational level, evaluation is carried out through monitoring energy consumption and emissions, as well as consistent implementation of energy efficiency programs in all BNI buildings and offices. The evaluation results form the basis for improving the Bank's resilience to short-term and long-term climate risks.

Decarbonization Strategy

Energy Management [302-4, 305-5]

As part of its efforts to improve operational energy efficiency and emissions reduction, BNI implements various initiatives as follows:

- Implementing the Earth Hour program by turning off office lights during lunch break (12:00–13:00).
- Participating in the annual Earth Hour event held every fourth week of March in all BNI offices.
- Optimizing the use of energy-efficient lighting in Grha BNI, Plaza BNI, Gedoeng BNI, and Menara BNI.
- Reducing chiller operation on Saturdays and Sundays to reduce energy consumption.
- Implementing magnetic bearing technology in the cooling system of Plaza BNI and Grha BNI to improve energy efficiency by reducing mechanical friction.
- Utilizing renewable energy by installing 76 solar panels with a total capacity of 3,040 Watts as a power source for emergency stairs at Plaza BNI.
- Installing solar panels on the BNI PIK 2 Building, with a total of 419 units with a capacity of 230 kW.
- Reducing emissions from business trips by shifting coordination and meetings to remote communication facilities (teleconferencing).

- Applying environmentally friendly building design principles to the BNI Tower Building, Plaza BNI Building, and PIK 2.
- Planning the application of green building principles in the construction of the BNI Building in the PIK 2 area.

Throughout 2025, energy management optimization resulted in a reduction in BNI's operational energy consumption from electricity (coverage 2) to a recorded level of 559,194 Giga Joules (GJ). This achievement is in line with the strengthening of the green building concept, as marked by the Green Building Gold certification for the BNI Tower and Green Building Platinum certification for the BNI Plaza from the Green Building Council Indonesia. Meanwhile, the BNI PIK 2 Building has obtained the Leadership in Energy and Environmental Design (LEED) Green Building certification from the United States Green Building Council (USGBC) with a Gold level in the Building Construction category. However, as of the end of 2025, BNI has not calculated its non-operational energy consumption. [302-2]

Energy Consumption and Intensity [302-1, 302-2, 302-3]

Description	Unit	2025	2024	2023
Energy from Non-Renewable Resources				
Use of fuel for genset and use of electrical energy in BNI offices across Indonesia	GJ	559,194	598,235	604,186
Use of fuel for overland business travels and operational in BNI offices		321,296	334,861	327,264
Energy from Renewable Resources				
Use of electrical energy from solar panel	GJ	95.9	95.9	95.9
Total electricity and fuel		880,586	933,192	931,546
Income	Rp trillion	64.9	64.5	62.7
Energy Intensity to Income*	GJ/Rp billion	13.5	14.5	14.9

Note:

Calculations use a conversion factor of 0.038 GJ/liter for fuel to energy and 0.0036 GJ/kWh for electricity to energy.

*) The change in figures is due to the adjustment of the metric unit to Rp billion.

GHG Emissions Management ^[305-5]

BNI's emissions management is supported by greenhouse gas emissions calculations that have been carried out in stages and on an ongoing basis since 2021. The main focus of this approach is methodological consistency and expansion of the scope of measurement in line with improvements in data quality. Scope 1 and 2 GHG emissions calculations have been carried out regularly, and since 2022 have been expanded to include Scope 3 GHG emission. In 2025, BNI expanded the calculation of its Scope 3 Category 15 (financed emissions) portfolio coverage from 70.4% in 2024 to 90.5% of the productive credit portfolio, comprising the Corporate, Enterprise, Commercial, and Retail Productive segments. This expansion resulted in an increase in the nominal amount of BNI's financed emissions.

In addition to strengthening the calculation of financed emissions, BNI has consistently managed emissions arising from operational activities and business travel. Scope 1, Scope 2, and Scope 3 GHG emissions from business travel totaled 181,645.31 tCO₂e, representing a 6.3% reduction compared to the previous year. Meanwhile, the reduction in Scope 1 and Scope 2 GHG emissions in 2025 compared to the 2023 baseline reached 6.7%. GHG emissions intensity for Scope 1, Scope 2, and Scope 3 business travel relative to income also declined, from 3.00 ton CO₂e/Rp billion in the previous year to 2.8 ton CO₂e/Rp billion.

Greenhouse Gas Emissions Generated ^{[305-1, 305-2, 305-3, 305-4][FN-CB-410B.1]}

Description	Unit	2025	2024	2023
Scope 1				
Use of fuel in Buildings	Ton CO ₂ eq	1,206.7	1,327.1	1,701.1
Use of freon		919.1	859.8	1,023.6
Fuel for operational use		15,650.6	15,175.0	15,874.9
Scope 2				
Emissions from electricity	Ton CO ₂ eq	158,839.1	169,179.5	170,760.4
Scope 3				
Business air travel	Ton CO ₂ eq	1,728.8	1,856.7	2,959.2
Overland business travel		3,301.1	5,355.2	4,220.8
Financing emissions		44,641,144	33,233,262	28,718,388
GHG Emissions of Scope 1 & 2		176,615.4	186,541.3	189,360.2
Total GHG Emissions		44,822,789	33,427,015	28,914,928
Income	Rp trillion	64.9	64.5	62.7
GHG emission intensity of scope 1, 2, & 3 of business travel to income*	Ton CO ₂ eq/Rp billion	2.8	3.0	3.1
GHG emission intensity of scope 3 of financing to income (Ton CO ₂ eq/Rp)*		687.0	515.1	457.7
Intensity of total GHG emission (scope 1, 2, & 3) to income*		689.8	518.1	460.8

Description:

The methodology for calculating operational GHG emission uses the GHG Protocol and IPCC 2014 references. Meanwhile, business travel uses references from myclimate

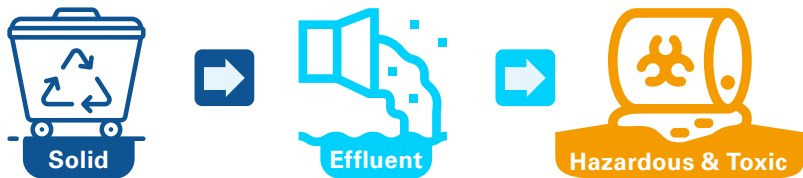
*) The change in figures is due to the adjustment of the metric unit to Rp billion.

Until the end of 2025, BNI has not calculated air pollutant emissions other than greenhouse gases (GHG), such as Nitrogen Oxides (NOx) and Sulfur Oxides (SOx), considering that the main sources of these emissions do not originate from BNI's operational activities. On the other hand, as a measure to control the potential impact on the ozone layer, BNI is gradually reducing the use of equipment containing Chlorofluorocarbons (CFCs) and replacing it with more environmentally friendly technologies, including inverter air conditioners. ^[305-6, 305-7]

Environmentally Friendly Banking Initiatives

Waste Management [306-1, 306-2, 306-4]

Waste Management Stages at BNI



BNI manages waste based on the classification of solid waste, liquid waste, and hazardous waste. Solid waste management at BNI follows the Zero Waste to Landfill (ZWTL) concept through the application of the reduce, reuse, and recycle (3R) principles. This program is currently being implemented in five BNI Head Offices as an initial step to optimize the recycling process for building waste and reduce direct disposal of waste to landfills. As a basis for implementation, BNI has established Solid Waste Management SOPs that apply to Head Offices. The expansion of the program to Regional Offices and Branch Offices is planned in stages based on the results of implementation evaluations. The first phase of expansion involves establishing Solid Waste Management SOPs for Regional Offices and Branch Offices in collaboration with waste banks, MSMEs, or waste management vendors.[306-5]

Volume of Solid Waste Generated [306-3, 306-5]

Description	Unit	2025	2024
Organic Waste	m³	-	617.2*
Inorganic Waste		-	3,283.3*
Organic Waste	ton	91.5	10.8**
Inorganic Waste		169.2	51.5**
Residual Waste		372.4	-

Description:
In 2025, solid waste will be measured in weight (tons) in line with the commencement of waste management cooperation covering the recycling of organic, inorganic, and residual waste.
*) Data period: January-November 2024
**) Data period: December 2024

BNI implements solid waste management by reducing waste sources, particularly plastic packaging, and implementing recycling processes using methods according to the type of waste. This management is supported by a sorting infrastructure consisting of three categories of waste bins, for organic, inorganic, and residual waste, as well as strengthening employee awareness through campaigns to reduce the use of plastic packaging.

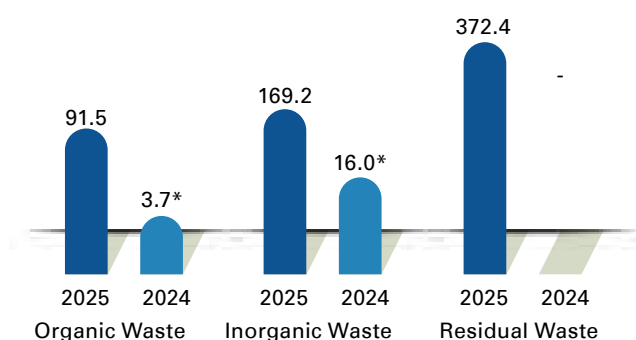
Solid Waste Recycling Management Methods

Organic Waste
Composting dan Black Soldier Fly (BSF) treatment

Inorganic Waste
Recycling process according to waste type

Residual Waste
Using Refuse Derived Fuel (RDF) technology, which will then be processed into alternative fuel

Volume of Recycled Waste (Ton) [306-4]

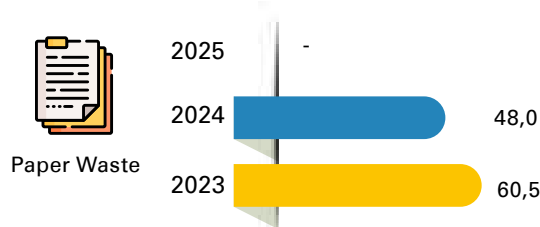


Note: *) Data period: December 2024

Paper waste is specifically generated from two activities. The first activity is daily operations in five BNI head office buildings, which are consolidated with inorganic waste data. The second activity is paper waste from past archive documents that have passed their retention period in accordance with applicable regulations. Paper waste from the second activity is presented in the Paper Waste Recycling Volume table. However, in 2025, there was no need to recycle archives.

Meanwhile, hazardous waste (B3 waste) is managed through cooperation with licensed third-party service providers, with a temporary storage mechanism at designated hazardous waste storage facilities prior to annual collection. In 2025, the volume of hazardous waste generated amounted to 1,065 kg. This hazardous waste data covers only Plaza BNI, Menara BNI, and Grha BNI buildings. Information regarding wastewater management is presented in the Water Management section. [306-4]

Volume of Recycled Paper Waste for Archives (Ton) [306-4]



By implementing waste management practices, BNI has avoided greenhouse gas emissions that conventional disposal methods would have otherwise generated. By 2025, this initiative contributed to emissions avoidance of 338.9 tons of CO₂eq compared to a scenario without sustainable waste management.

Water Management [303-1, 303-2, 303-3, 303-4]

In its office operations, BNI uses water for domestic needs, such as sanitary facilities, garden maintenance, and other supporting activities. BNI does not withdraw water from springs, as its water supply comes from the Regional Water Company (PDAM) and a limited use of groundwater. In 2025, the total water consumption at BNI Head Office sourced from PDAM was recorded at 318,661 m³. Due to the nature of its operations, which do not produce hazardous effluents, BNI does not conduct effluent quality testing. Various water efficiency initiatives have also been implemented, including the use of Sewage Treatment Plant (STP) water management technology in the BNI Plaza Building and the BNI Tower Building, water conservation campaigns, the implementation of responsible water use practices, reporting of faucet leaks, and the use of treated water for watering plants. BNI's total water consumption in 2025 was recorded at 1,487,567 m³, covering the Head Office and all Branch Offices.

Water Use Volume [303-5]

Description	Unit	2025	2024	2023
Head office	m ³	318,661	329,344	272,165
Region and branch offices		1,168,906	1,552,696	1,485,969
Total volume of water use		1,487,567	1,882,040	1,758,134
Total employees	Employees	27,201	27,203	27,570
Intensity of annual average water use	m³/Employees	54.7	69.2	63.8

Notes:

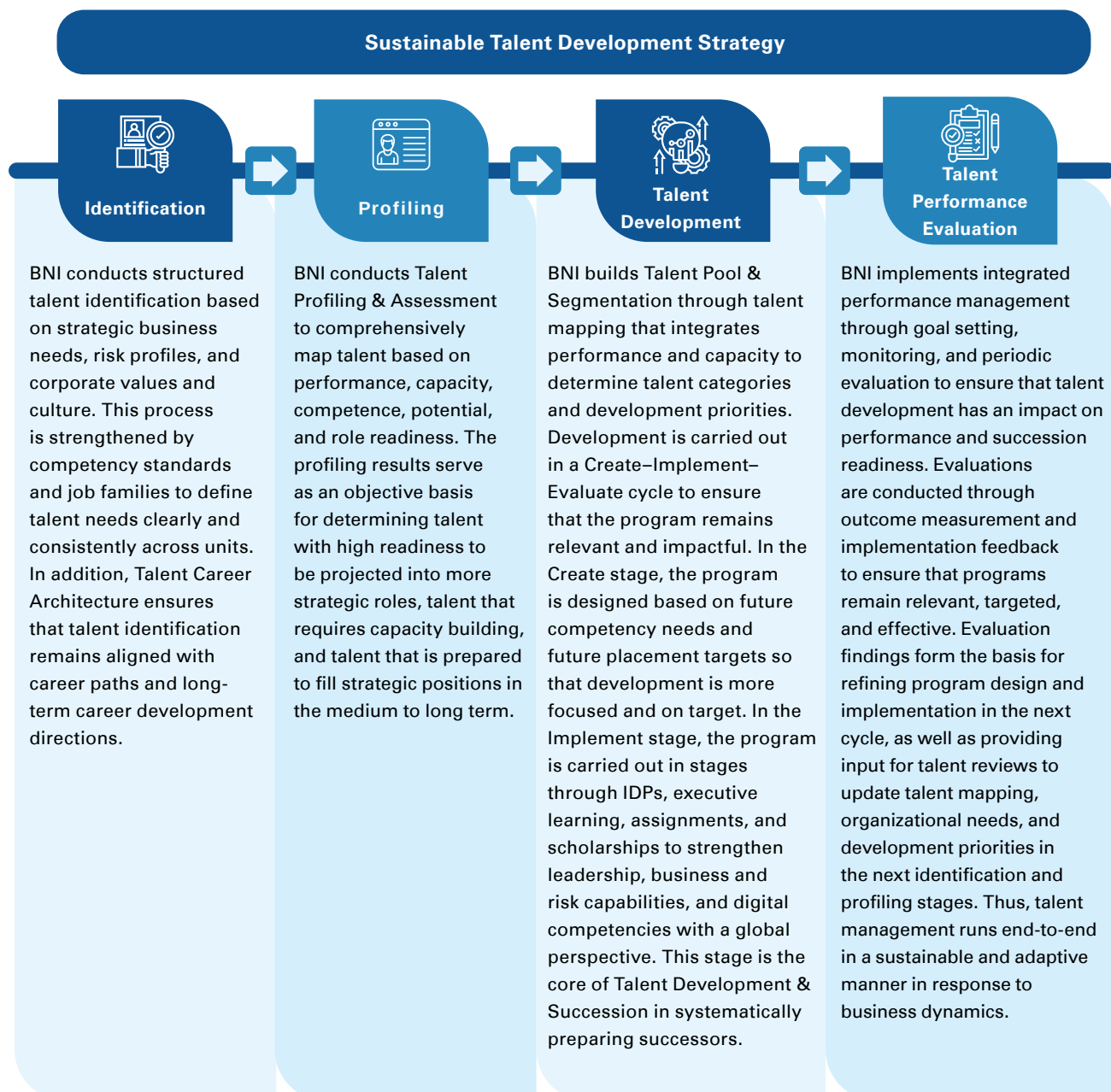
Water consumption is calculated based on PDAM data in cubic meters (m³)

Efforts to Achieve Operational Resilience

Human Resource Strengthening Strategy

Human Resource Development Framework

BNI considers human resource development to be a structured, continuous process designed to ensure the availability of talent to meet current and future business needs. BNI implements an end-to-end human resource development framework, starting with the establishment of competency standards as the foundation for career and talent management, followed by the strengthening of career patterns and paths, and talent mapping through profiling and assessment to evaluate capacity, potential, and role readiness. Based on the results of this mapping, BNI has established a talent pool through segmentation and then implements development programs based on Individual Development Plans (IDPs) to prepare talent as successors. This entire process is supported by continuous evaluation and improvement to ensure that talent development remains relevant, targeted, and impactful for the organization.



Talent Identification and Profiling

Human resource management at BNI is carried out comprehensively with reference to the Employee Value Proposition (EVP), which focuses on employee contribution, learning, and growth. Human capital policies are implemented in an integrated manner throughout the employment cycle, from the recruitment process to the end of an employee's tenure, in order to support talent motivation and retention.

The recruitment process at BNI is conducted in a structured and objective manner, taking into account the company's needs and the suitability of candidates to the company's values and culture as part of its talent pipeline development strategy. The initial stage begins with talent identification, which takes into account historical performance records, performance evaluations, and academic and non-academic achievements relevant to the company's needs.

Afterwards, BNI performs talent profiling as a follow-up step to establish a comprehensive and structured individual profile. This process refers to characteristics that reflect the readiness and suitability of talent for the organization's needs, including leadership qualities, work competencies, medium and long-term development potential, readiness to take on more strategic roles, and commitment to the organization.

In supporting talent availability, BNI has collaborated with leading universities such as the University of Indonesia, Gadjah Mada University, Bandung Institute of Technology, and others to recruit fresh graduates to become prospective BNI employees through the Assistant Development Program (ADP) and Officer Development Program (ODP) recruitment programs. The Internal ODP program is a path for the development and promotion of internal employees. BNI also participates in the Joint Recruitment of State-Owned Enterprises (RBB) coordinated by the State-Owned Enterprise Supervisory Agency.

Officer Development Program

632 employees

A recruitment channel for fresh graduates to fill officer-level positions with a high degree of independence.

Assistant Development Program

829 employees

Recruitment process for non-officer positions in support of BNI's business targets and operational continuity.

Officer Development Program Internal

129 employees

A program for the development and promotion of BNI internal employees to officer positions

Joint Recruitment of State-Owned Enterprises

43 employees

For professionals and fresh graduates.

BNI also offers internship opportunities through BINA BNI for fresh graduates, the Magenta program for final semester students in collaboration with the Ministry of State-Owned Enterprises, and the MagangHub program in collaboration with the Ministry of Manpower. These programs are designed to provide practical work experience and strengthen professional skills in the banking environment through an on-the-job learning approach. Throughout 2025, the BINA BNI Program was attended by 3,983 participants, the Magenta BNI Program was attended by 403 participants, and the MagangHub Program was attended by 4,178 participants.

3,983
participant
BINA BNI

403
participant
Magenta

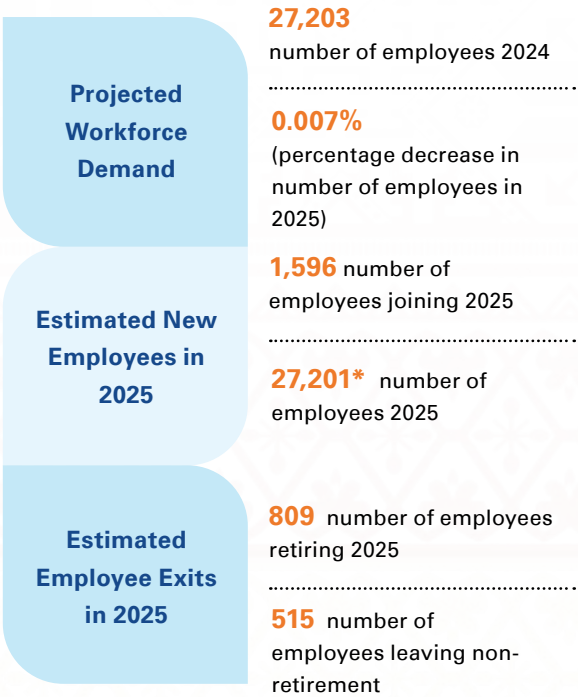
4,178
participant
MagangHub

BNI's talent pipeline program aims to identify and develop potential employees as future leaders. It is implemented in an integrated manner through performance management, talent management, and succession planning. In this process, BNI upholds the principles of inclusivity and diversity by ensuring equal opportunities for all employees and candidates without discrimination on any basis. More detailed information about each recruitment program is presented in the 2025 Annual Report, which is published separately from this report.

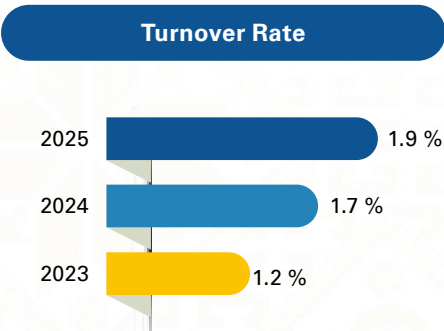
Recruitment, Retention, and Turnover

In 2025, BNI recorded 1,324 employees left the company for various reasons, including resignation. To maintain the company's continuity, BNI manages its human capital by implementing various retention efforts, including the management of healthy industrial relations, the providing remuneration and benefits according to industry practices, as well as competency development and career advancement opportunities.

Accordingly, BNI also reviews talent recruitment to ensure the Bank's sustainability in the form of analyzing projected workforce requirements. The projection analysis is prepared by considering employee retirement plans, business and operational strategy dynamics, and estimated employee turnover rates.



*)Note: There is a difference in calculation for employees whose employment relationship has ended for certain reasons.



BNI uses the employee turnover rate as an indicator of workforce retention. As of 31 December 2025, the turnover rate stood at 1.9%, relatively lower than the industry average, reflecting the consistent implementation of BNI's strategies to enhance employee experience. To maintain and further strengthen retention, BNI continues to reinforce the implementation of its Employee Value Proposition (EVP) as an effort to build a great place to contribute, learn, and grow. This is achieved through strengthening an organizational culture that fosters collaboration and productivity, expanding career development opportunities, providing competitive reward and recognition programs, creating a healthy and productive work environment, and promoting empowering leadership, thereby sustaining employee engagement and continuously reducing turnover levels.

Composition of New Employees Based on Age Group and Gender [401-1]

Age Group	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
< 30 Years	686	846	410	430	764	790
30-50 Years	34	16	84	39	78	33
> 50 Years	10	4	12	1	13	7
Total	1,596		976		1,685	

Composition of New Employees by Operational Regions and Gender [401-1]

Operational Regions	2025		2024		2023	
	Male	Female	Male	Female	Male	Female
Head Office	485	396	364	236	657	477
Regional Office 01	13	19	10	16	11	21
Regional Office 02	17	24	3	10	19	25
Regional Office 03	3	4	4	7	5	6
Regional Office 04	24	42	7	17	15	30
Regional Office 05	8	27	6	21	11	26
Regional Office 06	15	26	16	11	22	31
Regional Office 07	20	38	11	19	11	23
Regional Office 08	17	20	14	16	10	20
Regional Office 09	24	55	4	4	3	5
Regional Office 10	24	31	15	14	10	21
Regional Office 11	4	11	4	11	4	16
Regional Office 12	13	36	5	21	10	21
Regional Office 14	11	22	13	18	11	21
Regional Office 15	14	35	8	22	13	34
Regional Office 16	8	26	5	5	11	10
Regional Office 17	15	27	11	12	18	19
Regional Office 18	15	27	5	10	14	24
Overseas Branch	0	0	1	0	0	0
Total	1,596		976		1,685	

Composition of Employee Turnover by Age Group and Gender [401-1]

Age Group	2025		2024*		2023*	
	Male	Female	Male	Female	Male	Female
< 30 Years	75	122	59	98	35	100
30-50 Years	174	342	144	314	108	229
> 50 Years	369	242	178	137	380	154
Total	1,324		930		1,006	

Note:

*) Restatement of information due to the addition of calculation coverage (pension and non-pension).

Composition of Employee Turnover by Operational Regions and Gender ^[401-1]

Operational Regions	2025		2024*		2023*	
	Male	Female	Male	Female	Male	Female
Head Office	181	115	91	73	110	95
Regional Office 01	24	28	13	21	32	13
Regional Office 02	37	38	21	42	26	22
Regional Office 03	27	42	26	23	30	17
Regional Office 04	48	39	18	32	27	35
Regional Office 05	27	41	11	17	19	26
Regional Office 06	18	45	27	39	37	35
Regional Office 07	30	24	16	20	34	13
Regional Office 08	20	36	23	23	16	19
Regional Office 09	42	66	28	54	35	27
Regional Office 10	13	25	4	19	18	23
Regional Office 11	21	19	14	14	13	13
Regional Office 12	17	29	12	36	18	21
Regional Office 14	15	41	7	34	23	29
Regional Office 15	22	31	12	32	21	37
Regional Office 16	13	14	4	5	5	9
Regional Office 17	32	46	27	35	27	25
Regional Office 18	30	27	27	30	31	24
Overseas Branch	1	0	0	0	1	0
Total	1,324		930		1,006	

Note:

*) Restatement of information due to the addition of calculation coverage (pension and non-pension).

Talent Development

Competency Development Policy

BNI is committed to realizing human capital excellence through inclusive and sustainable competency development policies. BNI guarantees the rights of all employees, including permanent employees, contract employees, trainees, and outsourced workers, to have equal access to training and development programs in accordance with their respective roles and needs.

The competency development program is implemented in accordance with Financial Services Authority Regulation (POJK) No. 24 of 2022 concerning the Development of the Quality of Human Resources in Commercial Banks, as further stipulated in BNI's Human Capital Policy Company Guidelines, and is designed to equip that BNI employees to face the constantly evolving dynamics of the banking industry. In addition, BNI also offers internship programs programs to provide practical, experience-based learning that enhances knowledge and skills in relevant job areas, as well as to prepare a competent and adaptive workforce for the future.

In an effort to create a productive, innovative, and competitive work environment, all competency development initiatives are synergized through BNI University. BNI University acts as a learning orchestrator that designs capability development strategies and organizes various training programs tailored to BNI's business needs, including strengthening competencies in Sustainable Finance and ESG.

BNI implements an employee competency development framework through three main approaches:

1. Capability Development Based on Employee Category, which includes:
 - Employee Development, focuses on improving employee performance in carrying out roles and functions in their current positions; and
 - Talent Development, aimed at developing high-performing employees (talents) in preparation for higher roles and responsibilities.
2. Position-Based Capability Development, which is tailored to the competency requirements of each position. This development is carried out through mandatory, thematic, and individual programs, based on employee needs, both for their current and future roles.
3. Tiered Capability Development, according to employee job levels through various cross-functional programs, including Leadership, Risk Management, and Human Capital.

Types and Scope of Competency Development Programs

BNI establishes the types and scope of talent development programs in a structured and sustainable manner, with reference to development objectives that have been set in line with the company's business needs. This approach is designed to ensure that each learning program contributes significantly to improving employee capabilities, leadership readiness, and organizational sustainability.

The talent development program is designed to cover various job levels and functions, and is aligned with the dynamics of the banking industry and BNI's strategic direction.

Learning Program to Enhance Employee Capabilities in Support of BNI's Business

BNI organizes learning programs aimed at enhancing employee capabilities in supporting the company's performance and business growth. These learning programs are grouped into eight main areas of training and development, tailored to the needs of BNI's functions and business lines.

Throughout the reporting year, the eight learning program areas included Leadership, which was attended by 3,724 participants; Finance & Human Capital with 23,741 participants; IT, Digital & Operations with 10,971 participants; Legal, Governance, Audit & Compliance with 17,261 participants; Network & Services with 11,573 participants; Retail Banking with 20,604 participants; Risk with 29,419 participants; and Wholesale, Treasury & International Banking with 22,963 participants.

This extensive learning scope reflects BNI's commitment to ensuring equal access to competency development, while supporting the strengthening of operational capabilities, risk management, and sustainable business competitiveness.

Learning Programs to Support Leadership Capabilities

To enhance talent development, BNI designs and implements a leadership development program that is integrated with the succession planning system. This program aims to ensure effective and sustainable leadership, as well as equip BNI's future leaders to deal with upcoming business challenges.

Leadership development programs are structured on a level-based system and are provided to all employee levels as part of strengthening the leadership pipeline. Each program is designed with a results-oriented approach, ensuring that learning is not only focused on increasing employees' knowledge but also on strengthening their competencies and applying them in their work practices.

In support of this approach, BNI has established specific skillset standards for each employee position level to develop versatile leaders with integrity who are capable of contributing optimally to business sustainability and corporate governance.

Leadership Competency Development

[2-17]

Leadership competency development is carried out in two main phases: the Orientation (Onboarding) phase and the Development phase, which are tailored to the job level and leadership category of each employee, including permanent employees, contract employees, and trainees.

Orientation Phase (Onboarding)

The Orientation Phase is intended to equip every BNI employee who occupies a new position or role in the organization, from Entry Level to Board Level. Employees will be equipped with an understanding of leadership in accordance with their respective roles and responsibilities at each level. During this phase, the learning focus is aimed at building leadership foundations, understanding the business context, and introducing leadership roles in supporting organizational sustainability.

No.	Level of Position	Leadership Category	Development Focus	Program	Number of Participants
1	BOD, BOC, and SEVP	Leading Business	The orientation program at this level focuses on understanding business complexity, strategic decision-making skills, and the role of leadership in ensuring organizational growth and sustainability.	Directorship Onboarding Program	19
2	Experienced Hire	Leading Others	Focus on developing the ability to build effective relationships, provide direction, inspire teams, and support the achievement of collective goals.	Advanced Onboarding Training Program for Experience Hire	23
				Intermediate Onboarding Training Program for Experience Hire	39
				Basic Onboarding Training Program for Experience Hire	89
3	Entry Level	Leading Self	At this level, leadership capabilities begin with self-awareness and self-management, as well as an understanding of strengths and weaknesses.	Officer Development Program (ODP)	697
				Assistant Development Program (ADP)	574

Development Phase

The Development Phase focuses on continuously deepening and strengthening leadership capabilities, as the complexity of roles and responsibilities increases. Programs in this phase are designed to ensure leaders are prepared to manage change, lead organizations, and create sustainable business impact.

No.	Level of Position	Leadership Category	Development Focus	Program	Number of Participants
1	BOD, BOC, and SEVP	Leading Business	Leadership development at this level focuses on strategic decision-making, corporate governance, and strengthening the role of leadership as the main driver of business sustainability.	Board Level Leadership Program	19
2	Senior Leaders (BOD-1)		The program is designed to deepen strategic leadership capabilities, business complexity management, and high-impact decision-making.	Advanced Management Leadership Program (AMLPL)	53

No.	Level of Position	Leadership Category	Development Focus	Program	Number of Participants
3	Middle Management	Leading Others	The program is designed to enhance middle managers' ability to manage teams, encourage collaboration, and translate strategy into operational execution.	Middle Management Leadership Program (MMLP)	543
4	First Line Management	Leading Self	The program focuses on strengthening personal leadership, managing operational teams, and preparing participants to take on leadership roles at the frontline of the organization.	Firstline Management Leadership Program (FMLP)	2,297

In organizing this leadership program, BNI has established strategic collaborations with various leading global and national educational institutions to ensure the quality of learning is relevant to future business and leadership challenges.

For the Board Level and Senior Leaders, BNI collaborates with world-class business education institutes through global partnerships, including Harvard Business School, Wharton School, Northwestern Kellogg School of Management, Stanford Graduate School of Business, MIT Sloan School of Management, Columbia Business School, National University of Singapore (NUS), IMD, and Emeritus. This collaboration aims to provide global exposure, international best practice benchmarks, and strengthen strategic leadership capabilities.

Meanwhile, for Middle Management and First Line Management levels, BNI has established partnerships with credible domestic educational institutions, namely BINUS University and PT LAPI ITB, to ensure the relevance of learning to the context of the business, regulations, and characteristics of the national banking industry.

The leadership development program is implemented through an intensive and immersive learning model, combining various learning methods, including interactive in-class learning, expert sharing sessions, coaching and mentoring, as well as practice-based learning experiences through action learning projects and real assignments. This approach aims to ensure that learning not only broadens knowledge but also encourages the direct application of leadership competencies in the workplace.

Learning Programs to Support Employee Preparation for Retirement

In supporting employees' transition to retirement, BNI provides a Pre-Retirement program designed to equip employees with non-technical and financial readiness. The program covers self-empowerment, adaptation to psychological changes, healthy lifestyle implementation, retirement financial planning, and business opportunity mapping. In 2025, the program focused on the topics of Wisdom Living, Healthy Lifestyle, Financial Planning, Entrepreneurship, Second Career Inspiration, and Retirement Rights & Obligations. In 2025, BNI's Pre-Retirement Program reached 4,163 participants, using a hybrid method. Of these, 1,407 participants attended in-class learning, while the other 2,756 participants attended the program through online webinars.

Scholarship and Certification Program

BNI is committed to the continuous development of competencies for all employees by providing them with support to pursue academic degrees and professional certifications. This program is designed to ensure equal opportunities for skills improvement for both permanent and contract employees.

Program Beasiswa Pendidikan

As part of strengthening long-term learning paths for employees, BNI facilitates formal education development up to graduate level. This opportunity is provided to all BNI employees through two development schemes tailored to employee characteristics and potential, namely:



Participants in the
2025 education
scholarship program

45 Beneficiary

SDP

24 Beneficiary

GPP

Self Development Program (SDP), a program that reimburses education expenses for employees who have completed domestic academic education at the bachelor's, master's, or doctoral level. This program is open to BNI employees at all job levels who meet the program requirements. The program focuses on studies related to BNI's business needs, such as business & management; information & technology; data science & artificial intelligence; economics, accounting & finance; environmental, social & governance; legal studies.

Global Postgraduate Program (GPP), Global Postgraduate Program (GPP), a master's degree scholarship program at the top 30 international universities based on the QS World University Rankings. This program is intended for high-performing employees at the Manager (MGR) to Assistant Vice President (AVP) levels who meet the program requirements. The focus of study is on economics & econometrics; accounting & finance; master of business administration; business & management; marketing; law & legal studies; computer science & information systems; data science.

Certification Program

BNI has designed a certification program to ensure that every employee has a relevant standard of competence with regulations and supports the implementation of the company's business activities. Certification at BNI is grouped into two main categories:

Mandatory Certification

This certification is required by regulations for employees in certain fields of work as an effort to maintain employee competence aligned with job requirements and responsibilities. In 2025, BNI recorded a total of 20,240 mandatory certifications, comprising 31 certifications at the Board Level (BOD, BOC, and SEVP), 19,524 certifications held by permanent employees, 137 certifications held by contract employees, and 548 certifications held by frontliners

Certification Name	Purpose	Position Criteria	Certificate Ownership
Risk Management Certification (SMR)	Ensures the competency standards of bank administrators and officials in risk management	Position levels range from Assistant Manager (AMGR) to Board Level (BOD/BOC)	14,423
Certification related to Anti-Fraud Implementation (CAFM & CAFG)	Strengthening capabilities in detecting and preventing fraud in accordance with the Bank's Anti-Fraud Strategy	Heads of work units overseeing the implementation of the Anti-Fraud Strategy	6
WPPE-P Certification	Ensures that officers are competent in marketing capital market products transparently to customers	Employees who conduct marketing activities (Private Banking RM, Emerald RM, Emerald Acquisition RM, Personal RM)	514
WAPERD Certification	Ensures officers have the competence to educate and sell mutual fund products	Marketing officers and investment specialists (Emerald Head and Investment Specialist)	40
PBK Payment System Certificate	Guarantees technical expertise and compliance in the operational management of payment system transactions	Entities that manage payment system transactions and operations	5,115
Treasury Certification	Ensures professionalism and integrity in the execution of money market and foreign exchange transactions	Money market and/or foreign exchange market transaction participants	142

Non-Mandatory Certification

Non-Mandatory Certification is intended to improve employee skills to support the implementation of various company business activities more optimally. The number of participants in the 2025 non-mandatory certification program was 366 permanent employees.

Certification Name	Objective	Target Participants	Participants
Cyber Security and Personal Data Protection (CCISO, CISM, CCSP, COMPTIA CYSA+, and COMPTIA Security+)	Ensuring strengthened cyber resilience through cloud infrastructure protection and comprehensive technical threat analysis	Employees who have roles and functions in the cyber security field	18
Control Systems (CISA and CRISC)	Ensuring the effectiveness of supervision, information system audits, and technology risk management in all banking operations	Employees who have roles and functions in the banking system control field	4
Governance & Architecture (COBIT 5 Foundation and TOGAF)	Ensuring the implementation of IT governance and architecture at BNI that is aligned with the Bank's strategic objectives and digital transformation	Employees who have roles and functions in the field of IT governance and IT architecture	7
IT Services & Networks (ITIL V4 Foundation and MTCNA)	Ensuring network infrastructure reliability and efficient technology service management standardization for customers	Employees who have roles and functions in the field of network infrastructure and technology services	5
Audit (CBIA, Bank Internal Audit Certification, and IT Auditor Certification)	Ensuring the quality of internal supervision specifically for the banking sector to ensure compliance and prudent control.	Employees who carry out internal audit functions.	112
Trade Finance (CITF CertPay, CSDG, and CSCF)	Ensuring mastery of operational standards and technical aspects of international trade financing (exports-imports) globally	Department Head of the Supply Chain Financing Product Development Unit and Wholesale Transaction Product Specialist Department	25
Certified Contract Drafter	Ensuring the employees' accuracy in drafting, reviewing, and ensuring the quality of business contracts that are legally sound, risk mitigating, and in line with the company's interests and governance.	Legal employees or those who directly draft cooperation agreements/contracts.	27
Banking Compliance Certification	Ensuring the effective implementation of compliance functions to ensure that banking activities are conducted in accordance with regulations, prudential principles, and good governance	Employees in the compliance unit	18
Anti-Money Laundering Certification (CAMS, AMLCTF & CPFWMD)	Ensuring comprehensive implementation of AML CFT and CPFWMD programs to prevent, detect, and report potential crimes of money laundering, terrorism financing, and proliferation financing of weapons of mass destruction	Employees who have functions related to the implementation of AML CFT & CPFWMD	23

Certification Name	Objective	Target Participants	Participants
Certification of Legal Practitioners and Industrial Relations Resolution	Ensuring employees' understanding and skills in managing industrial relations and resolving labor disputes appropriately, fairly, and in accordance with the provisions of laws and regulations	Employees who have a role in managing employee relations.	22
Governance, Risk, and Compliance Certification (GRCM, GRCE, CCCO)	Ensuring comprehensive mastery of governance, risk management, and compliance aspects to support sound and sustainable decision-making.	Employees with functions related to governance	15
Risk Management (ERMAP, CCRA, GRCP, IRMP, IAIP, IPMP, ICEP, CRISC)	Ensuring employees' understanding and skills in risk management	Employees who have functions related to risk management	88
ESG Certification (ISSB Standards)	Ensuring employee understanding and skills related to ESG implementation	Employees with functions related to ESG implementation	2

Sustainable Finance Competency Development [2-17, 404-2, FS4]

To demonstrate its commitment to sustainable finance, BNI has developed training modules designed to build employee understanding of environmental, social, and governance (ESG) issues and risks, as well as sustainability and sustainable finance principles. The modules were developed in collaboration with subject matter experts, consultants, and other competent parties, enabling employees to understand sustainability concepts, manage ESG risks, and analyze corporate sustainability reports.

At the end of the reporting period, 97.0% of BNI employees, or 26,143 employees, had participated in the sustainable finance competency development program through Mandatory Sustainability Finance e-Learning. This achievement exceeded the target set in the Sustainable Finance Action Plan (SFAP), which was to develop the competencies of 93.5% of employees by 2025.

In addition to Sustainability Finance, the Mandatory e-Learning program attended by all BNI employees covers nine learning topics, as follows:



In 2025, employee participation in mandatory webinar activities was recorded at 37,733 employees, including permanent employees, contract employees, trainees, and outsourced workers. This activity complements the Mandatory e-learning program as part of employee competency development. The topics of the mandatory webinars held included:

1. BNI Inspiring Talk BOD - Roots, Values, and Life Journey of the Guardian of Integrity
2. BNI Road to Zero Waste - Let's Sort, Recycle, and Reuse
3. Compliance Forum: Decision Making based on the Business Judgment Rule Principle in the Context of Good Corporate Governance and Anti-Corruption
4. Early Warning Systems - Detecting and Preventing Liquidity Risks
5. ESG - Understanding Sustainability Financing
6. Foundation of Digital Leadership - Adapting to Digital Transformation in Banking
7. Governance, Risk & Compliance (GRC) Webinar Series
8. Building an Anti-Corruption Culture in Business Partnership Networks
9. Operational Risk - Protecting The Organization Through Effective Risk Governance
10. Strengthening Anti-Fraud Awareness Through the Implementation of POJK No. 12 of 2024 for Financial Services Institutions
11. Preparation and Guidelines for Reporting 2025 Annual Tax Returns for Individuals Through Coretax DJP
12. Risk Management - Dive Into Sustainability Disclosure
13. Servant Leadership - Inspiring People Through Service and Authenticity
14. Dissemination of 9 Wonders - Mandatory Soft Competencies for BNI Hi-Movers
15. Personal Data Protection Webinar Series
16. Strategic Digital Leadership - Digital Marketing and Business Growth Optimization
17. Leadership Accelerator Essentials - Growing Your Business

In 2025, BNI also conducted sustainability training and certification for divisions related to sustainability management. The training and certification covered topics such as

- a. Greenhouse Gas (GHG) Calculation, Mitigation, Audit, & Reporting, which was attended by 2 ESG managers;
- b. The IFRS S1 & S2 Implementation Workshop, which was attended by 19 employees from the Enterprise Risk Management Division, Operational Risk Management Division, and other related divisions; International Sustainability Standards Board (ISSB) certification attended by 2 ESG managers;
- c. Executive Forum on Sustainability Transformation in Action attended by 2 ESG managers;
- d. Climate Governance bootcamp and Leadership Roundtable Discussion attended by two employees from the Hong Kong Overseas Branch Office (KCLN).

Strengthening leadership capacity in sustainability issues at BNI was also carried out at the Board Level. During the reporting period, 13 members of the Board of Directors and 5 members of the Board of Commissioners participated in various forums and training sessions designed to deepen their strategic perspectives on sustainability, governance, and business transformation. The materials covered:

- a. Compliance Forum: Decision Making based on the Business Judgment Rule Principles in the Context of Good Corporate Governance and Anti-Corruption;
- b. Jakarta Sustainability Investment Forum: Advancing Sustainability for Top 20 Global Cities;
- c. Navigating Global Dynamics: The Resilience of Indonesia's Economic and Financial Systems;
- d. Leadership Forum: Indonesia's Oil & Gas Future;
- e. Master Class Compliance Management (CRMS);
- f. Executive Competency Enhancement: Risk, Governance & Compliance;
- g. The Cross Border Payment Landscape, Economic Outlook, Industry Development, Future Proofing Trade Operation, Compliance Overview and Best Practice, Cyber and Fraud Protection;

- h. International Conference on Infrastructure 2025: Sustainable Infrastructure for the Future - Innovation and Collaboration;
- i. Economy Mastery Forum 2025: Unlock Opportunities in Global Economic Changes;
- j. BNI ESG Sustainability & Transition "BEST" Event.

In addition to participating in training, the role of BNI's Board of Directors and Board of Commissioners in the sustainability agenda is also realized through contributions to external forums. In 2025, BNI leaders participated as speakers in 13 discussion and training sessions, which were aimed at broadening stakeholders' understanding of the challenges and opportunities of sustainability in the financial sector. These contributions included presentations on topics such as the BRICS Women's Entrepreneurship Forum - BNI's role in supporting women's MSMEs through digitalization; the ESG-related Risk Management Forum; Green Financing; the CNBC Talkshow Money Talk segment - Consumer Protection; Banking Digitalization and Financial Education; CNBC Talkshow Money Talk segment - BNI's Preparedness for Disaster Conditions and Year-End Operations; Women Leaders in Fintech and Banking Roundtable: Shaping The Future of Innovation; Financial Education; National Conference on Increasing the Added Value of Regional Advantages through the Synergy of Agricultural Downstreaming, Tourism, and the Creative Economy, Supporting Opportunities for Market Deepening the Financial Services sector;

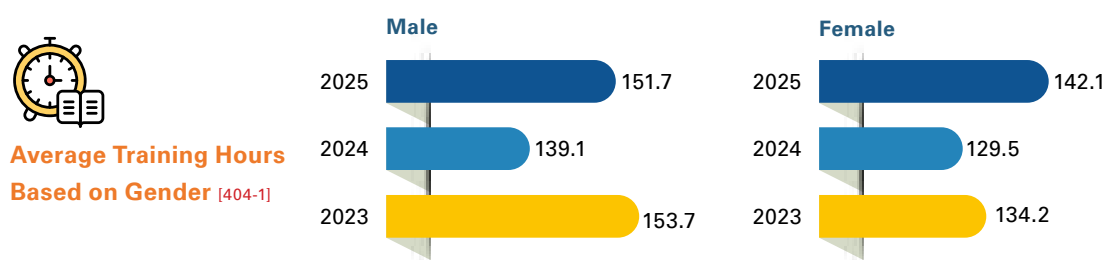
Wise Connect Singapore 2025: The future of retail - Designing experiences, not just transactions; AI Development in Banking; Shaping Character, Leading the Nation.

BNI has developed an integrated digital learning ecosystem to ensure that employee competency development is adaptive, efficient, and sustainable. The digital learning ecosystem used is BNI Smarter, a Learning Management System (LMS) that serves as a central access point for all development materials for BNI employees. The use of this technology has enabled BNI to create a culture of self-driven learning that supports the Bank's overall digital transformation.

The digitalization in learning at BNI takes the form of: a mandatory e-learning program, the results of which are reported periodically to regulators as a form of compliance; Daily Exercise Employee Program (DEEP46), which is a learning program in the form of short daily quizzes to ensure continuous understanding of crucial topics; access to international third-party digital learning platforms, such as GoFluent, LinkedIn Learning, Coursera, Udemy, and Moody's; and the use of the BNI University YouTube channel to organize learning webinars that can be accessed flexibly by all employees. All BNI employee training activities are managed and supervised by BNI University and documented in the Integrated Human Capital System (IHCS).

Employee Competency Development Realization Data

In 2025, BNI allocated Rp192.8 billion for the implementation of employee competency development programs. This program was attended by 26,937 employees from all job levels, ranging from new entry to executive level, and covering all employment statuses. The average training frequency was recorded at 16 times for permanent employees, 11 times for contract employees, and 12 times for trainees.



Average Training Hours Based on Position Level and Gender [404-1]

Position Level	Employees Participating in Training		Training Hours a Year		Average Training Hours	
	Male	Female	Male	Female	Male	Female
≥ Senior Vice President *)	93	31	7,135.4	2,083.2	76.7	67.2
Vice President	211	78	22,800.5	7,935.2	108.1	101.7
Assistant Vice President	861	432	128,018.9	63,400.3	148.7	146.8
Manager	2,244	1,702	311,608.3	242,058.5	138.9	142.2
Assistant Manager	5,490	5,728	1,076,353.5	1,014,569.1	196.1	177.1
≤ Assistant **)	3,988	6,079	408,895.5	665,981.1	102.5	109.6
Total	26,937		3,950,839.5		146.7	

Notes:

The data presented include active permanent, contract, and trainee employees (excluding employees in pre-retirement preparation period, unpaid leave, medical leave, and assignments outside BNI totaling 254 employees).

*) Comprising Senior Vice President, Executive Vice President, and Senior Executive Vice President.

**) Comprising Assistant and Basic-Level Employees.

BNI consistently organizes collection policy training as part of strengthening compliance and business ethics. In 2025, the training was conducted through various methods, including in-class training (online and offline) and webinars, with interactive learning methods to ensure adequate and sustainable employee knowledge.

The training program was attended by employees who play a direct role in debt collection, both BNI employees and third-party debt collection agencies, to ensure consistent, compliant, and proper understanding and implementation of debt collection policies in accordance with applicable regulations.

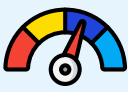
Training on Debt Collection Policy in 2025

Training Name	Training Format	Number of Training Hours	Number of Participants	Participant Scope			Training Frequency (within 1 year)
				Permanent Employees	Contract Employees	Partner/Vendor	
Agency Recovery Meeting Jakarta	Offline	24	248	v	x	v	12 times
Agency Recovery Meeting Non-Jakarta	Zoom	288	1,495	v	x	v	12 times
Ethics of Debt Collection & Debt Collection Law	In Class Training	4.5	57	v	v	x	1 time
Training in Negotiation Techniques & Ethics of Debt Collection	Zoom	160	1,936	v	v	x	20 times
Training in Onboarding Collection Assistants	Zoom	35	49	x	v	x	1 time
Training in Onboarding Collection Supervisors	In Class Training	35	25	v	x	x	1 time
Training in Restructuring	In Class Training	16	137	v	v	x	4 times
LaR Credit Resolution - Effective Strategies for Asset Recovery	Webinar	1.5	109	v	v	x	1 time

Employee Performance Evaluation ^[404-3]

The performance cycle at BNI is a continuous performance management cycle serving as the basis for employee performance management. This cycle consists of Goal Setting for setting performance targets, Performance Driving to encourage performance achievement, and Performance Evaluation as a means of evaluating employee performance. The implementation of this cycle aims to support the achievement of BNI’s business strategies and performance.

In 2025, 100% of employees completed performance reviews, goal setting, and evaluations to support performance development and target achievement through various evaluation mechanisms. Employee performance evaluations are managed by the Human Capital Strategy Division and the Human Capital Services Division.



Individual Performance Assessment
Method Self assessment
Frequency Once a year



Multirater 360
Method 360 degrees survey
Frekuensi Once a year



One-on-One Discussion with Line Manager
Method One-on-one
Frequency Once a year

Performance appraisal refers to the achievement of individual Key Performance Indicators (KPIs) and is carried out by ensuring that there is no discrimination based on gender, ethnicity, race, religion, or class that is against human rights principles. In supporting the enhancement of performance culture, BNI implements comprehensive performance appraisals for all employees. In certain divisions, performance appraisals also include sustainability aspects, such as in the Enterprise Risk Management Division, with indicators covering green portfolio performance, ESG Framework, and BNI’s ESG Rating. To maintain objectivity, the 360-degree multirater survey involves various parties who have direct work interactions with employees, including supervisors, colleagues, and subordinates.

In order to promote sustainable development, BNI implements a culture of continuous feedback through one-on-one discussions at the beginning of the year and post-performance assessment. These discussions are used to develop Individual Development Plans (IDPs) as employee development plans for the year. Furthermore, the results of the performance appraisal are used as a reference in the provision of rewards and remuneration, capability development, and career planning, including determining the eligibility of employees to participate in promotion or job advancement programs based on the objective criteria of the personnel committee. As part of BNI’s commitment to enhancing performance management and employee development, the employee feedback process is conducted on a continuous and integrated basis through the DigiHC platform. This enables performance monitoring, development, and follow-up actions to be carried out in a more structured, transparent, and accountable manner.

Employee Well-being and Protection

Respecting Human Rights and Diversity

[2-3, 408-1, 409-1]

BNI has a Company Policy (PP) on Human Capital that refers to Law No. 6 of 2023 and serves as a guideline in the preparation of Collective Labor Agreements (CLA) that govern employment principles and human rights. BNI ensures that there are no practices of forced labor and child labor, including in 2025. In its implementation, overtime work is carried out under an agreement between employees and company management for urgent work, while still maintaining work-life balance and complying with minimum working age requirements as stipulated by regulations.

Career Opportunities for Employees with Disabilities

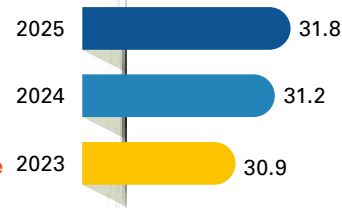
BNI upholds the principle of equal employment opportunities for persons with disabilities by considering individual competencies and skills in job placement and assignment. This principle is consistently applied throughout BNI, including its subsidiaries and consolidated affiliates, in line with its commitment to gender equality and inclusiveness. To support work comfort and productivity, BNI provides disability-friendly facilities, such as elevators, dedicated parking areas and toilets, access ramps, wheelchairs, and other mobility aids. By 2025, BNI employed 22 employees with disabilities.

Increasing Women's Role at the Managerial Level

The company is strengthening the career development of female talent to increase women's representation at leadership levels, particularly Assistant Vice President (AVP) and above. This effort is carried out through the Talent Acceleration Career Track (TACT) as a career acceleration path based on performance, competence, and potential, as well as part of strengthening the succession pipeline for strategic roles. The TACT program prepares high-potential female talent with a more targeted approach through exposure, capability development, and job readiness monitoring, thus increasing the proportion of women in leadership positions in recent years.



Female employees holding managerial positions and above (%) [405-1]



The Company supports gender equality and women's empowerment through various equality policies, including menstrual leave, daycare facilities, maternity leave, an employee assistance program (EAP) to support the physical, mental, and financial health of employees, the provision of nursing rooms in every building, and flexible working arrangements. The implementation of these policies reflects the Company's commitment to prioritizing equality, fairness, and the creation of an inclusive work environment.

To support equal career opportunities based on competence and performance, BNI created Srikandi BNI as a platform for employee creativity and collaboration. This initiative reflects BNI's commitment to fostering women's leadership that promotes the values of caring, inspiring, and collaboration, which are relevant to strengthen the organization. The Srikandi BNI is expected to encourage employees, especially women, to support each other and develop their personal and professional capabilities.

Throughout 2025, Srikandi BNI organized a series of inspirational and educational activities, including "WOTD: Wastra of the Day Challenge" in commemoration of Kartini Day to promote cultural appreciation and unit cohesion, as well as Women in Celebration Week to commemorate Mother's Day, which held a talk show with leaders and practitioners, while strengthening community support through activities such as the Glow & Grow Market. Additionally, Srikandi BNI strengthened employee wellbeing and resilience through various health talks and thematic discussions, including topics on healthy lifestyles, career and wellbeing balance, mental health, and support for working parents, as part of efforts to build an inclusive and empowering work environment.

Labor Union and Collective Labor Agreement [2-30, 407-1]

In building healthy industrial relations and guaranteeing the rights to freedom of association and assembly for all employees, BNI has taken the following measures:

1. Establishing regular communication with the Labor Union through a joint communication forum between Management and the Labor Union.
2. Promptly responding to input from the Labor Union as part of the industrial relations dialogue and partnership mechanism.
3. Implementing open and transparent communication to prevent and/or resolve industrial relations disputes constructively.

4. Granting permission for labor union administrators to leave work at certain times to carry out activities related to their functions as labor union administrators, provided that such activities do not conflict with applicable laws.
5. Providing financial and non-financial assistance to the labor union in carrying out its activities.

The Collective Labor Agreement (CLA) for the 2024–2026 period is the result of an agreement between Management and the Labor Union that was drafted based on the spirit of partnership, togetherness, and familial principle, and regulates the employment relationship and the rights and obligations that apply to all (100%) BNI employees.

Employee Grievance Mechanism

Complaints regarding violations of the law, internal policies, or the Company's code of conduct can be submitted through the Whistleblowing System (WBS) known as "WBS to CEO," which is managed independently by an external party and supervised by the BNI Board of Directors. Meanwhile, employee complaints regarding employment relationships can be submitted through their immediate supervisor or BNI's official communication channels, including the call center and email, and are facilitated by the Labor Union to be escalated to the Company's Management in a structured manner.

Compensation and Other Benefits for Employees [2-20, 401-3, 401-2, 405-2]

BNI implements a remuneration policy based on the principles of fairness, equality, and market competitiveness. The remuneration system is designed to ensure that every employee receives compensation commensurate with their contribution, job responsibilities, and performance achievements, without discrimination based on gender, age, background, or employment status. This policy applies to all categories of employees, both permanent and contract employees, as long as they meet the criteria and requirements set by BNI.

BNI implements a performance-based remuneration system with a merit-based increase approach, whereby pay rises are given based on individual achievements. Remuneration is determined by considering aspects such as job classification, job weight and complexity, length of service, competence, and annual performance evaluation results. This approach ensures that remuneration is given objectively, measurably, and transparently.

To ensure competitiveness in the industry, BNI regularly participates in annual Salary Surveys conducted by independent consultants. These surveys cover inflation and salary increase projections, industry remuneration trends, and industry-specific remuneration structures, including those in the national banking industry.

The results of this survey are used as a reference in evaluating and adjusting salaries, allowances, benefits, and rewards, ensuring that BNI's remuneration remains competitive compared to its banking peer group, both state-owned and private national banks.

BNI ensures that all employees receive wages in accordance with applicable laws and regulations, including compliance with the Provincial/Regency Minimum Wage in every BNI work unit. BNI also provides additional benefits to support employee wellbeing, taking into account the cost of living and accessibility of employees in their work units relative to their home bases. Thus, in addition to being compliant with regulations, the remuneration structure is also adaptive to regional economic conditions.

Aside from financial compensation, BNI also provides benefits related to employee wellbeing through non-wage benefits for permanent and contract employees in all BNI operational areas as per applicable regulations, including the following:

Non-wage Benefits at BNI

Type of Benefit	Program Name	Permanent Employees	Contract Employees
Life insurance	BPJS Employment Injury Security, BPJS Death Security, Bereavement Benefits	Yes	According to the contents of the Agreement
Health facilities	BPJS Health Insurance, BNI Life Private Insurance	Yes	According to the contents of the Agreement
Disability and incapacity coverage	BPJS Employment Injury Security, BPJS Health Insurance, BNI Life Private Insurance	Yes	According to the contents of the Agreement
Retirement programs	BNI Pension Fund, BNI Financial Institution Pension Fund (DPLK), BNI Retirement Health Fund (DKMP)	Yes	According to the contents of the Agreement
Leave	Maternity leave, leave to accompany wife during childbirth, annual leave including mandatory leave/block leave (5 consecutive days of leave), and permission to be absent from work in accordance with applicable regulations.	Yes	According to the contents of the Agreement

The employee remuneration at BNI is overseen by the Board of Commissioners, including through the Nomination and Remuneration Committee and/or meetings of the Board of Directors and Board of Commissioners. The remuneration policy is stipulated in the HC Policy, which has been approved by the Board of Commissioners, while the Board of Directors decides on the provisions and procedures for its implementation.

Leave Rights and Protection for Employees

BNI provided other benefits to all employees, which include leave entitlements as stipulated in Articles 27 to 33 of the Collective Labor Agreement (CLA), covering annual leave, long leave, menstrual leave, maternity leave and miscarriage leave, unpaid leave, leave to perform religious obligations, sick leave, and leave of absence in accordance with applicable laws and regulations.

Maternity leave for female employees is granted for 3 months, including in cases of miscarriage or abortus provocatus, with a guarantee of reinstatement and employment rights. Male employees are also granted two working days off to accompany their wives during childbirth. In special circumstances, additional leave of up to three months is granted to mothers who give birth, and additional leave of up to three working days is granted to husbands, under Law No. 4 of 2024 concerning the Well-being of mothers and children in the first thousand days of life.

During 2025, 524 female employees took maternity leave, while 542 male employees took leave to accompany their wives who were giving birth. All (100%) female employees who completed their maternity leave returned to work in the same position, and 100% of male employees who used leave to accompany their wives who gave birth also returned to work.

Maternity Leave Data (People) [401-3]

Description	Gender	2025	2024	2023
Number of employees eligible for maternity leave and leave of absence to accompany their wives during childbirth.*)	Male	7,060	6,881	6,698
	Female	7,080	7,162	7,398
Number of employees who took maternity leave and leave of absence to accompany their wives during childbirth.	Male	542	589	853
	Female	524	1,092	849
Returned to work after taking maternity leave and leave of absence to accompany their wives during childbirth.	Male	542	589	853
	Female	524	1,092	849
Percentage of employees who took maternity leave and leave of absence to accompany their wives during childbirth who have returned to work and can be retained.	Male	100%	100%	100%
	Female	100%	100%	100%

Note: *) Married employees and their spouses of childbearing age.

Long-Term Compensation Program

BNI implements a performance-based Long-Term Compensation Program as a form of appreciation for the contributions of Management and Employees, as well as to ensure the Company's continued performance. This program is implemented through a stock ownership scheme, namely the Management Stock Ownership Program (MSOP), Employee Stock Allocation (ESA), and Performance Stock Bonus Program. This policy aims to foster sustainable performance and align the employees' interests with the Bank's objectives.

Employee Stock Allocation (ESA)

The program provides stock allocation to employees who meet certain criteria and requirements as stipulated in the Program Implementation Guidelines. The Employee Stock Allocation (ESA) program has been implemented since 2022, with a total of 102,462,328 shares and a lock-up period that is gradually lifted over a period of 3 years until 2025.

Performance Stock Bonus Program

In order to improve savings performance, Management provides rewards as performance boosters for higher savings growth in the form of a stock ownership program for managerial-level employees and the leaders of the smallest units (Sub-Branch Managers) who meet the specified criteria, with stock allocations given for improvements in savings performance. This program was not implemented in 2025, while in 2024, a total of 24,877,600 shares were distributed.

Management Stock Ownership Program (MSOP)

The Management Stock Ownership Program (MSOP) is a performance-based long-term compensation program that complies with POJK No. 45/2015 and Minister of SOEs Regulation No. 3/2023. This program is intended for the Board of Directors and Non-Independent Board of Commissioners, while Independent Commissioners are given cash compensation. In 2023 and 2024, there were 1,816,099 and 12,778,954 shares distributed, respectively. As for 2025, there were no MSOP allocations, pending further policies and decisions from Danantara.

Stock ownership-based incentives through ESA, which started in 2022 and continued gradually until 2025, covered 90% of BNI employees, while MSOP in 2024 targeted 100% of recipients, consisting of the Board of Directors and Non-Independent Commissioners. In the future, Bank BNI is committed to continuing this stock ownership program, with coverage adjustments for employees and management in accordance with Danantara's policies and decisions. More detailed discussions regarding ESA, Performance Stock Bonus Program, and MSOP can be found in the Annual Report under the section on Long-Term Performance-Based Compensation Policy.

Retirement Program ^[201-3]

As stipulated in Articles 52 to 56 of the Collective Labor Agreement, BNI implements a retirement program to provide post-retirement benefits for employees who have contributed to and grown with the Company, which includes the following:

Pre-Retirement Program (MPP)

A program to prepare employees for normal retirement, which can be carry out one year prior to normal retirement age, whereby the employees concerned are no longer actively working at BNI but continue to receive their full income.

Pension Program, with the following patterns:

1. Defined Benefit Pension Program (PPMP):
Applicable to employees who were appointed as permanent employees before September 1, 2005. This program is funded through contributions of 7.5% of the basic pension income borne by employees, as well as company contributions based on actuarial calculations.
2. Defined Contribution Pension Program (PPIP):
 - a. Applicable to permanent employees appointed before September 1, 2005. The employee contribution is 0.5% of total income, while the company contributes according to the position level of each employee.
 - b. Applicable to permanent employees appointed since September 1, 2005. The employee contribution is 3.5% of total income, while the company contributes 11.5% of total income.

Retirement Health Fund Program (DKMP)

A defined contribution funding program to help prepare health benefits for employees and their spouses during retirement, which is prepared from the active period until retirement age, with the target benefits being BPJS Health and Cash Plan facilities.

Mandatory Social Security Program

In addition to internal programs, BNI also enrolls employees in social security programs organized by BPJS Ketenagakerjaan, which include Old

Age Security (JHT) and Pension Security (JP) as part of retirement protection in accordance with government regulations.

Wellbeing Culture Program

BNI supports the implementation of employee wellbeing programs as part of its efforts to maintain the welfare and health of its employees. The implementation of this program refers to SE BUMN No. SE-1/MBU/01/2024 concerning the Employee Wellbeing Policy (EWP) within State-Owned Enterprises, taking into account the strategic role of employees in achieving the Company's vision and mission.

As part of the strengthening efforts, BNI launched the Employee Wellbeing Guidebook as a guide for leaders and employees in understanding the importance of wellbeing in the workplace. This initiative is part of BNI's support for employee wellbeing programs to create a workplace that employees can be proud of and that drives performance achievement. By strengthening Employee Wellbeing, BNI aims to increase employee engagement, which contributes to organizational productivity.

Employee Wellbeing programs that have been initiated include:

BNI Steps Challenge

The BNI Steps Challenge is a flagship initiative of BNI Wellbeing in the implementation of the Employee Wellbeing Policy (EWP). The initiative is conducted in collaboration with Naluri through a challenge to record and collect daily steps to build sustainable active lifestyle habits, strengthen employee health and productivity, and foster a healthier, more energetic, and positive work culture within BNI.

BNI Community (46Society)

BNI facilitates the development of employee interest and talent through various communities that are members of 46Society. These communities cover sports, arts, and other hobbies, and serve as a forum for social interaction that supports a work-life balance. One of the initiatives implemented is the BNI Football League 2025, which provides a space for participation and collaboration among units through sports activities, while promoting fitness, togetherness, and a spirit of sportsmanship in the workplace.



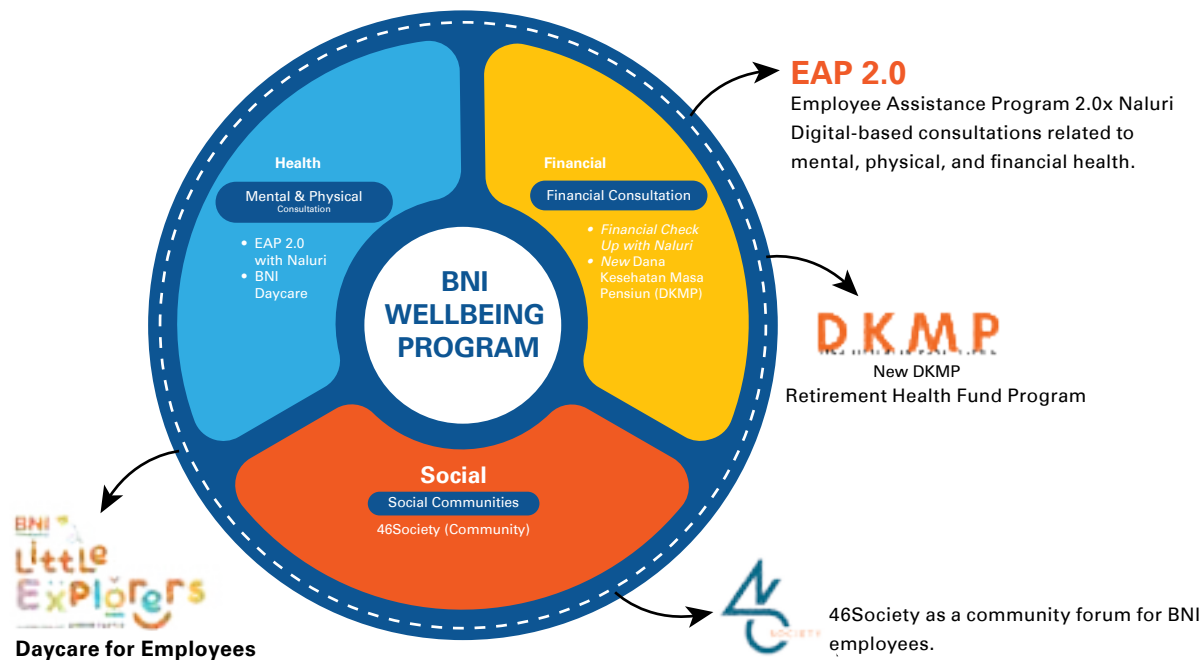
BNI Professional Style Work Attire Guidelines – “Suit Up, Stand Out, Win The Market”

BNI has updated its work attire guidelines as part of efforts to strengthen its culture of professionalism and institutional representation, in line with the organization’s transformation towards more adaptive and world-class work standards. These guidelines support consistency in neat and professional work attire, as well as boosting employee confidence in providing services and interacting with customers.

Employee Medical Check-Up (SWAMED Clinic)

As part of strengthening the employee wellbeing program, BNI facilitates medical check-ups for employees in collaboration with the SWAMED Clinic. This program is aimed at supporting the prevention and early detection of health conditions, so that employees can continuously maintain their fitness and health at work.

BNI initiated the BNI Holistic Employee Wellbeing Program as an approach to managing employee wellbeing. This program focuses on three main pillars, namely mental and physical health, financial health, and social health, in line with BNI's belief that employee wellbeing is an important aspect in supporting sustainable productivity growth.



Employee Assistance Program 2.0

As part of a more adaptive approach to wellbeing, BNI has developed EAP 2.0 to provide professional support services focused on employee resilience in facing work challenges and personal dynamics that could potentially affect productivity and working relationships.

Since 2024, this service has been transformed into an app-based digital model through collaboration with professional consultants. The platform allows employees to gain independent and continuous access to mental and physical health consultation services, while also developing personalized health improvement plans in line with the needs and goals of each employee.

BNI Little Explorers

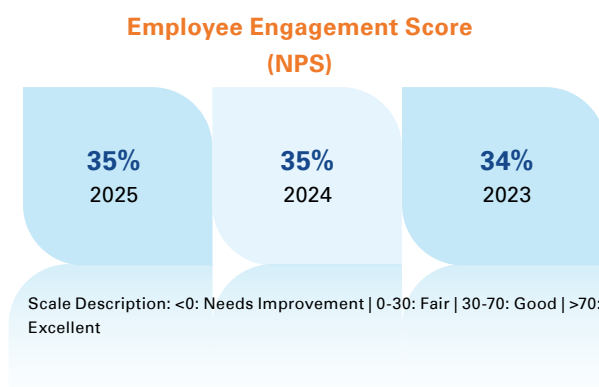
In order to support employee wellbeing and work productivity, BNI provides BNI Little Explorers Daycare as a childcare facility for employees with children aged 1-4 years. This daycare is managed in collaboration with professional partners and equipped with an educational play area based on open-ended toys, a safe and hygienic environment, professional supervision with regular visits from child psychologists and pediatricians, as well as the provision of nutritious meals monitored by nutritionists. To complement its support for working parents, BNI also organizes the Wellbeing Parenting Series through educational sessions and webinars that equip employees with practical insights into supporting their children's growth and development.

Employee Engagement and Satisfaction Survey

BNI regularly conducts employee satisfaction surveys that all employees can participate in by filling out questionnaires on the DigiHC platform. These surveys serve as a means of interaction to monitor employee satisfaction and engagement levels, as BNI recognizes that job satisfaction contributes to positive engagement with the organization.

Since 2024, employee engagement has been measured by assessing the employees' average satisfaction level based on nine drivers, including leadership, work climate, work infrastructure, training & career development, performance appraisal, work-life balance, reward & remuneration, and organization policies. The measurement results are then used as a basis for improvement to increase employee engagement.

BNI recorded an employee engagement score of 35% in 2025, under the "Good" category, indicating employee engagement with BNI. To obtain results that more accurately reflect actual engagement conditions, BNI refined its measurement method by using the employee Net Promoter Score (NPS). The engagement measurement is conducted once a year.



A Healthy, Decent, and Safe Workplace

Access to Safety and Health Facilities, Employee Engagement and Satisfaction

[403-1, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8]

BNI builds a work environment that meets health and safety standards to ensure employees can work safely and comfortably by providing occupational health and safety (OHS) facilities applicable to all (100%) employees within BNI, including permanent employees, contract employees, and outsourced workers. This effort is part of implementing a Workplace Policy supported by supporting facilities, including a dining room, nursing room, daycare, and sports facilities.

BNI also regularly holds webinars and health broadcasts to raise employee health awareness. These efforts are complemented by providing access to medical services through clinics at Grha BNI, Menara BNI, Plaza BNI, and Gedoeng BNI, as well as referral mechanisms to partner hospitals in Jakarta and neighboring cities for operations outside Jakarta.

As part of its emergency preparedness efforts, BNI conducts fire and earthquake drills twice a year at its main operational building in collaboration with the building management and the local Fire Department. These efforts are supported by the availability of portable fire extinguishers (APAR) and personal protective equipment (PPE) in various work facilities.

In building safety management practices, all BNI operational buildings have adopted Technical Operational Guidelines (PTO) from their respective Building Management as a reference for dealing with emergencies, which are applied to all employees (100%) and strengthened by building emergency response procedures. Until the end of 2025, BNI does not have a dedicated OHS committee or policy governing building management.

Incident Reporting Mechanism [403-2, 403-4]

BNI has a communication mechanism procedure governing the granting of permission to employees in the event of health conditions or leaving the office for safety reasons, by reporting such conditions to their immediate supervisor.

BNI has established an internal reporting mechanism to identify and address potential safety risks and building facility disruptions. Reports can be submitted by employees through communication channels such as telephone/WhatsApp or through damage reports managed by Building Management. Throughout 2025, all complaints related to building facilities have been handled with a 100% resolution rate.

Potential hazards can also be reported to the Emergency Task Force established in each division/unit. If the situation develops into a large-scale incident, BNI can activate Business Continuity Management by forming a Crisis Management Team. Each CMT is equipped with a crisis management playbook that outlines roles and responsibilities, escalation procedures, and cross-functional coordination mechanisms. The implementation of an internal reporting system, the structure of the Crisis Management Team, and the availability of a crisis playbook are part of BNI's efforts to maintain work safety, operational continuity, and the company's sustainability.

Occupational Diseases and Work Accidents [403-9, 403-10]

BNI considers employee health to be a factor that supports work productivity. Therefore, BNI has created a decent and safe working environment by providing preventive and curative health services, including health insurance, medical check-ups (MCU), counseling services with psychologists, online health consultations, and BPJS Health membership.

BNI conducts annual mandatory medical check-ups for employees through partner hospitals, clinics, and laboratories as a preventive measure for early detection of health conditions. In general, the MCU results show health complaints including long-distance and/or near vision impairment (myopia and astigmatism), high blood cholesterol levels (hypercholesterolemia), overweight, fatty liver, and dental caries. These examination results are the basis for quick action in the form of medical follow-up recommendations and health education as needed. To date, no specific occupational diseases have been found. Throughout 2025, no BNI employees experienced work accidents, injuries, or occupational diseases.

BNI has taken various preventive and curative measures in response to identified health concerns, including organizing health webinars featuring practitioners and experts. In addition, BNI encourages employee participation in wellbeing programs to promote healthy lifestyles, including participation in various activities organized by the BNI Community (46Society).



As part of an integrated wellbeing ecosystem, BNI implements Employee Assistance Program 2.0 (EAP 2.0) through collaboration with digital consulting service providers. This program is designed to support the mental, physical, and financial health of employees. Through EAP 2.0, employees can access consultations with psychologists and assistance from a multidisciplinary team of trainers consisting of nutritionists, medical advisors, executive coaches, and fitness trainers to help them achieve health goals such as weight management, blood pressure, sugar and cholesterol levels, and stress management. Beyond EAP 2.0, BNI also provides health facilities through partnerships with health insurance providers, in addition to mandatory BPJS Health membership, to support the health needs of employees and their families.

In 2025, BNI carried out the dissemination of healthy lifestyles and mental health, as well as organizing various health education activities through the Healthy Talk Series Webinar. Topics discussed include:

- Chronic & Metabolic Disease Education, discussing prevention through topics such as "Prevent and Control Diabetes for the Future" and "Prediabetes - Time to Consult a Metabolic Specialist".
- Physical Health & Digital Lifestyle, addressing relevant issues such as "Eye Health and Digital Lifestyle" and "Sports Injuries: Prevention, Treatment, and Recovery."
- Nutrition & Seasonal Health, providing guidance on "Healthy Eating for Optimal Energy During Fasting" and preventive measures through "Be Aware of Acute Respiratory Infections (ARI) - Symptoms, Causes, and Prevention".
- Emergency Preparedness & Future Wellbeing, providing technical skills training in "Basic Life Support: Mastering CPR Techniques" and long-term health support through the topic "Staying Fit in Your Golden Years."

Excellent Service for Customers

Material Topic Management ^[3-3]

Material Topic Management: Data and Cyber Security



Importance of Topic Management

Data and cybersecurity are strategic issues for BNI in line with the increasing digitalization of banking services and the use of information technology in operations and interactions with customers. Cybercrime threats, data breaches, and privacy violations have the potential to significantly impact customer trust, operational stability, the Bank's reputation, as well as financial and compliance risks. Therefore, data and cyber security management is an integral part of respecting human rights, particularly the right to the protection of personal data of customers and other stakeholders.



Impact and Opportunities

Data and cybersecurity risks can result in service disruptions, potential financial losses, regulatory sanctions, and a decline in stakeholder confidence. These risks are becoming increasingly complex with the development of technologies such as cloud computing, open APIs, and the use of artificial intelligence (AI), which expand risk exposure not only within the Bank but also to third parties and the technology supply chain.

On the other hand, strengthened data and cybersecurity systems present opportunities for BNI to boost customer trust, strengthen digital system resilience, and support the development of secure and reliable digital banking services. Enhanced cybersecurity capabilities also serve as an important foundation in supporting digital transformation, operational efficiency, and the Bank's long-term business sustainability.



Targets and Commitments

BNI is committed to preventing data leaks and customer privacy violations by strengthening its information security management system and personal data protection. This commitment is realized through:

- In 2025, BNI did not face any complaints related to data leaks, personal data violations, or misuse of customer data by third parties due to BNI's negligence. ^[FN-CB-230a.1]
- A total of 42,422 employees, including permanent employees, contract employees, trainees, and outsourced workers, participated in regular information security and personal data protection awareness programs and training.



Policy

Data and cyber security management at BNI refers to internal policies and provisions, including:

- Information Technology (IT) & Digital Risk Management Procedures
- Cyber Security Policy
- Information Security Policy
- Personal Data Protection Procedures



Impact Assessment and Management

The Chief Information Security Officer (CISO) Division is responsible for data and cybersecurity, which reports to the Director of Information Technology. Data security oversight is carried out by the Technology Management Committee. BNI has also implemented the ISO 27001 standard to strengthen information privacy management.

The evaluation and management of data and cyber security impacts are carried out continuously through the application of the three lines model concept. BNI conducts annual cyber security assessments and reports to the Financial Services Authority (OJK). BNI involves independent parties in cyber security testing activities at least once a year. The assessment results are used as the basis for preparing a roadmap for strengthening cybersecurity, which is implemented in stages. In addition, thematic audits related to Personal Data Protection and Cybersecurity are conducted periodically by the internal audit function, supported by control testing and awareness programs for employees. At the operational level, BNI has implemented Network Access Control, endpoint detection and response, data loss prevention, and privilege access management to support the implementation of IT Hygiene. The evaluation results form the basis for system improvements, policies, and strengthening the Bank's resilience against future cyber threats.

Data Protection and Privacy Policy

BNI views the protection of personal data and customer privacy as an integral part of respecting human rights and the foundation of trust in the provision of digital banking services. In line with the acceleration of digital transformation and the use of new technologies, BNI applies a prudent approach in all personal data processing, whether in operational activities, product development, or collaboration with third parties.

BNI Personal Data Protection Framework

BECOMING PRIMEST FINANCIAL INSTITUTION THAT EXCELS IN PERSONAL DATA PROTECTION THROUGH SUSTAINABLE AND CONTINUOUS IMPROVEMENT

**Customer Trust | Effective Personal Data Governance | Regulatory Compliance
| Awareness & Data Protection Culture**

Governance			
PDP Policy	Data Protection Officer		Management Oversight
I. ASSESS	II. PROTECT	III. SUSTAIN	IV. COMMUNICATE
Gap Assessment	Lawful Basis for Personal Data Processing	Privacy by Design & Privacy by Default	Education & Literacy
Record of Processing Activities (RoPA)	Data Processing Agreement	Personal Data Classification	Privacy Notice
Data Protection Impact Assessment (DPIA)	Data Subject Rights	Personal Data Retention Restriction	Data Breach Report
Third Party Risk Management (TPRM)	Data Protection	Training & Awareness	Corporate Action
Transfer Impact Assessment (TIA)	Data Breach Management & Recovery	PDP Audit	
Management Commitment	Data Quality	Reliable Technology	Corporate Culture

BNI has established a personal data protection management framework that complies with laws and regulations, including but not limited to Law No. 27 of 2022 concerning Personal Data Protection, POJK No. 22 of 2023 concerning Consumer and Community Protection in the Financial Services Sector, and Bank Indonesia's consumer protection provisions. This policy affirms BNI's commitment to ensuring that the entire data processing cycle, from collection, storage, use, to deletion, is carried out legally, transparently, and securely in accordance with the purpose of processing and guarantees the personal data subject rights.

In managing personal data, BNI plays a role in processing personal data as stipulated in the Personal Data Protection Law. As a Personal Data Controller, BNI has a role in determining the purpose and control of personal data processing. As a form of compliance with laws and regulations, BNI requires the preparation of a Record of Processing Activities (RoPA) in all organizational units, which aims to help identify and record processing activities involving Personal Data at BNI. In addition, after identifying high-risk personal data processing activities, all organizational units are required to prepare a Data Protection Impact Assessment (DPIA).

The preparation of RoPA and DPIA is carried out in a systematic and structured manner, involving the participation of employees who are directly involved in every data processing activity across all lines of the organization. This approach is implemented to ensure that all business processes and data flows are thoroughly identified, to minimize potential loopholes in the management and protection of personal data from the planning stage.

In response to technological developments such as artificial intelligence (AI), cloud computing, and open banking, BNI implements strict risk control principles. The use of AI within BNI is currently limited and is intended as an analytical tool, without involving customer personal data and without being used as a final decision maker. This approach is taken given the absence of an AI regulatory framework, particularly regarding data storage locations and potential cross-border risks. Therefore, BNI has chosen to ensure full compliance with data protection regulations before undertaking wider adoption.

To strengthen governance, BNI integrates data protection and privacy risks into its IT & Digital Risk Management framework, with one of the risk taxonomies being Information and Data Privacy Risk. Risk control is implemented through a combination of preventive, detective, and corrective controls, covering aspects of people (increased awareness and competence), process (internal guidelines and procedures), and technology (system and infrastructure security). BNI has also implemented ISO 27001 as an information security management system standard for more comprehensive information security management.

In managing digital ecosystems and third-party involvement, including the use of APIs and Software as a Service (SaaS)-based services, BNI implements third-party and supply chain risk mitigation. This includes establishing shared responsibility in the cloud environment, strengthening Open API security, and implementing IT Hygiene for comprehensive information system security, including the implementation of Network Access Control (NAC), endpoint detection and response, data loss prevention, and privilege access management to mitigate various cybersecurity risks within the BNI environment.

BNI implements a continuous evaluation mechanism to ensure that data protection and privacy policies are effectively implemented throughout the operational cycle. This evaluation includes conducting cybersecurity assessments and materiality assessments that are reported to OJK, with the support of independent consultants, to ensure the independence and quality of the assessment results. Internally, control testing, thematic audits of Personal Data Protection (PDP) and cybersecurity, as well as employee awareness campaigns, are conducted periodically as part of efforts to maintain organizational compliance and resilience.

Going forward, BNI will continue to strengthen its data protection policies and implementation through the application of security by design, privacy by design, and privacy by default principles so that security and privacy aspects are automatically applied and have been taken into consideration from the initial stages of system and product design. This approach is expected to not only increase BNI's resilience to cyber risks, but also strengthen the trust of customers and stakeholders in BNI's digital banking services.

Person in Charge of Management and Supervision of Privacy, Cybersecurity, and Data Protection

BNI implements privacy, cybersecurity, and data protection governance through a multi-layered structure that ensures clarity of roles, accountability, and escalation mechanisms from the operational level to strategic decision-making at the Board of Directors level.

Divisi Chief Information Security Officer (CISO)

The CISO Division is responsible for the operation of information security and cybersecurity management, including cybersecurity risk management, implementation of security controls, threat monitoring, and handling and reporting of information security incidents. This division also ensures compliance with internal policies and applicable standards and regulations related to data protection and system security.

Data Protection Officer (DPO)

The DPO is a personal data protection officer who performs personal data protection functions and is responsible for ensuring compliance with personal data protection principles and mitigating the risk of breaches.

The DPO's functions include raising awareness among all BNI employees regarding personal data protection (PDP), providing input within the scope of PDP, monitoring the implementation of PDP at BNI, as well as coordinating and acting as a liaison with regulators or institutions related to PDP on issues related to personal data processing.

Supporting Staff Group (SSG)

The Supporting Staff Group plays a role in supporting the coordination, monitoring, and consolidation of the implementation of privacy, cybersecurity, and data protection policies across all work units. The SSG acts as a liaison between operational functions and managerial forums, and submits reports and strategic issues for follow-up at the committee level.

Committees Under the Board of Directors

a. Technology Management Committee

At the Board of Directors level, strategic oversight and direction are carried out through the Technology Management Committee, which is tasked with evaluating policies, monitoring the effectiveness of controls, and ensuring that privacy and cybersecurity management, as well as customer data protection, are aligned with BNI's business strategy and risk management framework.

b. Risk Management Committee

The committee conducts evaluations and prepares recommendations on the implementation of risk management, including operational risks in information technology parameters and supporting infrastructure, covering IT system vulnerabilities to threats and attacks, as well as cybersecurity.

c. Personal Data Protection Steering Committee

The Steering Committee consists of permanent members (comprising the Director of Human Capital & Compliance, Director of Finance, Director of Information & Technology, and Director of Risk Management) and non-permanent members (Directors/SEVPs related to the topic of discussion) with a scope of providing strategic direction for the PDP implementation; making decisions on the resolution of PDP-related issues in accordance with the Company's objectives and applicable regulations; and others.

Data Security Management System

As part of its data security management system, BNI implements an integrated approach comprising people, process, and technology aspects.

1. On the people aspect, advanced training programs for employees must be strengthened to foster a culture of data security throughout the organization, from the executive level to operational staff, that will help reduce risks caused by human factors. Education for customers on the importance of maintaining data security is delivered through branch officers and official digital channels, such as social media, text messages, and the official website.
2. On the process aspect, BNI continuously develops mature policies and procedures that are aligned with the Cyber Security Framework (CSF). This includes creating or updating all procedures that support data security. Regular cybersecurity audits are conducted to identify gaps and ensure compliance with security standards. In addition, the Bank has conducted an IT maturity assessment based on COBIT 2019 by independent assessors, covering the effectiveness of IT governance and management processes, including data security and cybersecurity in Managed Security and Managed Security Services objectives. Currently, BNI has a Cybersecurity Governance team tasked with monitoring policy implementation and ensuring effective coordination between divisions in responding to cyber threats.
3. On the technology aspect, the data security management system at BNI covers a series of integrated controls to ensure data protection and information system resilience, which include:
 - a. Security Operation Center (SOC)
BNI operates a Security Operation Center (SOC) that conducts continuous security monitoring 24 hours a day, 7 days a week. This monitoring covers endpoints, networks, applications, and servers. Every incident that is successfully mitigated is

documented along with the analysis results in the data security management system as learning material and a basis for continuous improvement. In addition, BNI has a Security Incident Response Team (SIRT) that actively handles all internal security incidents.

- b. Identification of Threats and Suspicious Activities
BNI proactively identifies suspicious activities and cyber attacks through threat hunting activities, including handling and shutting down fake websites that claim to represent BNI. As a preventive measure against fraud, the Cyber Threat Intelligence Team reports indications of debit card transactions exposed through fake websites to minimize potential risks to customers.
- c. Information Security Education
BNI continuously educates its employees and customers to raise awareness of information security risks, including by encouraging secure transaction practices such as keeping passwords and PINs confidential. Education is provided through various media, such as when customers contact BNI Call or through social media platforms on the Instagram account @cxc.customerprotection. Transaction security information and guidelines are also available on the official website bni.co.id for various BNI e-Banking services, including Internet Banking, ATM, SMS Banking, Mobile Banking, and wondr by BNI.
- d. *Fraud Detection System (FDS)*
BNI protects the security and convenience of its customers by operating a Fraud Detection System (FDS) that monitors suspicious transactions on debit cards, credit cards, and other e-channels.
- e. Regular Security Audits
Security audits are conducted regularly to assess the effectiveness of information security system controls and identify areas that require improvement or enhancement.

f. **Security Integration in Product and Service Development**

Data protection aspects are integrated into the product and service development process by involving data security and privacy functions to ensure compliance with internal standards and applicable regulations.

g. **Data Loss Prevention (DLP)**

BNI implements a Data Loss Prevention system as perimeter security to prevent credential data theft and unauthorized access to confidential information.

h. **Endpoint Detection and Response (EDR)**

BNI implements Endpoint Detection and Response to monitor endpoint activity in real time and respond quickly to security incidents and potential threats.

i. **Network Access Control (NAC)**

Network Access Control is implemented to strengthen network access control and management, prevent unauthorized access, and ensure that connected devices meet BNI security standards.

j. **Encryption Technology**

BNI uses encryption technology to protect internal data and customer data, both stored and transmitted, in order to maintain the confidentiality of information from unauthorized parties.

k. **Security in the Software Development Life Cycle (SDLC)**

Every newly developed product, application, or service at BNI goes through the Software Development Life Cycle (SDLC) process, covering comprehensive security controls, such as risk assessment, review of design, code, configuration, and penetration testing.

l. **Application Security Assessment**

BNI regularly conducts security assessments to identify potential loopholes or vulnerabilities in applications through Penetration Testing, Vulnerability Assessment, and Application Security Testing, including Static Application Security Testing (SAST) and Dynamic Application Security Testing (DAST).

m. **Lightweight Directory Access Protocol (LDAP)**

BNI implements identity management using a centralized Lightweight Directory Access Protocol (LDAP) to facilitate consistent access rights settings in accordance with security principles in granting user access.

n. **Privileged Access Management (PAM)**

BNI implements Privileged Access Management (PAM) to provide special security and control for accounts with elevated access rights (Admin/Super User) through activity recording and permission restrictions to prevent abuse of authority.

Information Management System Certification

1. ISO 27001

BNI implements an Information Security Management System based on the international standard ISO 27001 as the main foundation for managing information security risks in all operational activities controlled and managed by BNI. At the end of 2025, ISO 27001 certification covered the Open API of all (100%) BNI digital platforms.

2. Service and Organization Control (SOC) 2

BNI has adopted control standards based on SOC 2 covering security, availability, confidentiality, and privacy, with a system scope that includes core banking, go remit (remittance), go trust (treasury), and go trade (trading).

3. Uptime Institute's Tier Certification of Operational Sustainability (TCOS)

BNI obtained Tier III Gold Certification of Operational Sustainability for data center management, which currently covers the BNI Dual Data Center (DDC) Slipi building.

Going forward, BNI plans to gradually improve the implementation and verification of its information security management system to cover all operational units under the Company's control. This improvement is aimed at strengthening security in digital service units, supporting infrastructure, and operational functions that have high exposure to cyber risks and data protection, in line with business developments, operational complexity, and the dynamics of the risks faced.

The company is also committed to making strategic investments to strengthen internal information management security and protect customer interests. By referring to cybersecurity frameworks and international standards, such as ISO 27001 and NIST (identify, protect, detect, respond, recover), BNI ensures the reliability of the digital systems it uses. In 2025, there were no complaints regarding privacy violations or loss of customer data. [418-1]

Raising Customer Awareness

BNI is committed to raising customer awareness of the importance of data security in order to prevent information leaks and cybercrime. In line with the Financial Services Authority's directives, BNI actively educates customers about personal data protection through various offline and online communication media. BNI urges customers through these dissemination efforts to keep sensitive information confidential, including transaction PINs and OTPs, and to immediately contact BNI Call if their card is lost or stolen, or if they discover any suspicious transactions.

Personal Data Protection

BNI is committed to maintaining the confidentiality and security of customer personal data by complying with laws and regulations as well as internal policies. BNI prohibits disclosing customer data to third parties without the customer's consent and/or other valid legal grounds for processing. In addition, BNI has established policies that guarantee customers' rights to access, correct, withdraw consent, and request the deletion or updating of personal data.

To enhance the protection of personal data, BNI implements data protection policies and procedures that comply with laws and regulations, including the Personal Data Protection Law (PDP Law), and cover the entire cycle of personal data processing within BNI. Policies and procedures related to personal data protection are also developed and standardized in each member company of the BNI conglomerate to ensure compliance with these provisions. BNI's internal procedures further regulate the assessment of partners/vendors in processing personal data to ensure they consistently comply with their personal data processing obligations under the PDP Law.

All collection of customer personal data in providing products and/or services is carried out based on a lawfully valid basis for processing, including customer consent, contractual relationships, and fulfillment of legal obligations. BNI is committed to minimizing data requests by ensuring that the personal data requested from customers is limited to information that is truly necessary, relevant, and proportional to the purpose of data processing that has been previously communicated to customers, such as for account opening, loan applications, and bill payments. This information is provided to customers in the terms and conditions of the product and/or service and in the privacy notice, which are prepared in accordance with applicable regulations and the Bank's internal policies as stipulated in the Personal Data Protection Procedure. BNI also does not collect personal data from customers or third parties, unless required by law.

BNI demonstrates its commitment to personal data protection (PDP) regulations by establishing a Personal Data Protection Steering Committee responsible for providing strategic direction and decisions related to PDP implementation. This Steering Committee consists of the Director of Human Capital & Compliance, the Director of Finance, the Director of Information Technology, and the Director of Risk Management, with non-permanent members being Directors/SEVPs related to the topics being discussed.

BNI only discloses or transfers data to third parties as long as it has fulfilled the proper processing basis, ensuring that the restricted and responsible data processing is carried out. Moreover, further processing of personal data is tailored to customer preferences, behavior, and segmentation to support the marketing of relevant products.

As a form of transparency, BNI provides a privacy notice that explains the mechanisms for obtaining, using, and processing customer personal data, which can be accessed through the official BNI website at <https://www.bni.co.id/id-id/individu/pemberitahuanprivasi>. Customer consent for the processing of such data is obtained through various BNI service channels, including branch offices, the wondr by BNI application, BNI Mobile Banking, and DigiCS.

All customer personal data is stored with adequate security, both in hardcopy and softcopy form, through access restrictions and technological security controls in accordance with internal policies. In line with the principle of personal data protection, BNI provides facilities for customers to manage their personal data, including the right to access, correct, withdraw consent, and request deletion or updating of data in accordance with legal provisions.

Customers have the right to request BNI to terminate the processing, delete, and/or destroy user personal data if it is no longer needed for the purposes set out in the Personal Data Use section or if there is no other legal basis for Personal Data Processing or if this is not restricted by the provisions. Upon receiving such a request for termination, deletion, and/or destruction, we will confirm receipt, and we will provide another confirmation once the user's personal data has been deleted and/or destroyed as required by applicable regulations. Consequently, users may not be able to receive/use BNI services if they delete/destroy their personal data, either in part or in whole.

In order to comply with data storage requirements, BNI stores users' personal data for 5 years after the termination of the cooperation relationship with the user or for a longer period if required by applicable regulations ("Retention Period"). As long as the user remains a customer or user of the bank's services, BNI processes personal data to support the provision of banking services with the application of optimal data protection standards. BNI regulates the deletion and destruction of users' personal data with the following provisions:

1. General Provisions on Data Deletion

BNI may delete and/or destroy users' personal data from the system after a specified period of time, which is 5 years, whereby the data can no longer be used to identify the user.

2. Exceptions on Deletion

Deletion or destruction of personal data shall not be carried out if the data is still required to fulfill legal obligations, future needs for evidence, taxation, audit, and accounting purposes, or is still within the retention period as stipulated by laws and regulations.

3. Data Destruction Standards

When destroying personal data, BNI implements reasonable and standard measures to destroy, delete, and ensure that the data is irrecoverable, using methods tailored to the type of data and storage media.

BNI implements data protection policies by applying the following standards and procedures:

- Data Security Standards Based on Classification
- Data Classification and Security Procedures
- Standard Encryption
- Endpoint Device Security Procedures
- Application Security Standards
- API Access Security Standards
- Company Data/Information/Document Distribution Security Procedures
- Data/Information Security Procedures (Data Loss Prevention)

Training and Competency Development on Personal Data Protection

BNI prioritizes data confidentiality by strengthening employee awareness and competency in managing and handling complaints related to financial data. This learning program is conducted regularly at least once a year to ensure that all BNI employees remain adaptive to the latest personal data security risks.

These efforts are supported by the implementation of a massive information security campaign program through various internal communication media, such as email blasts, posters, and other means. In 2025, BNI provided comprehensive training to all employees, including permanent employees, contract employees, trainees, and outsourced workers, through certification and training programs on the protection of financial and consumer data.



Training and Competency Development on Personal Data Protection and Training Delivery Methods

In-Class Learning

- Cybersecurity for Data Protection Officers (DPOs)
- Enhancement Skills for Compliance Officers - Personal Data Protection (PDP)
- Auditor Training - Data Security & Governance
- Auditor Training - IT & Digital Audit Forensics
- Auditor Training - IT Audit Fundamentals
- Auditor Training - Personal Data Protection
- Finalization of ROPA & DPIA Briefing - Implementation of PDP Law
- Privacy by Design & Privacy by Default
- Refreshment & Re-Certified Anti Fraud Manager (CAFM)
- Regulatory Compliance & Fraud Risk in Corporate Actions
- Risk Management of BNI Channeling Cooperation with Fintech Partners

e-Learning Mandatory

- Anti-Fraud Awareness
- Security Awareness
- Personal Data Protection (PDP)

Webinar

- Financial Crimes Sharing Session
- Strengthening Anti-Fraud Awareness through the Implementation of POJK No. 12 of 2024 for LJK
- Personal Data Protection Webinar Series – Data Privacy Awareness and Data Protection

Daily Quiz/Daily Exercise for Employee Program (DEEP 46)

- Anti-Fraud Awareness
- Personal Data Protection (PDP)
- Security Awareness – Protecting User IDs and Passwords
- Security Awareness – Securing Data Distribution

Certification

- Certified Anti Fraud Manager (CAFM)
- Certified Chief Information Security Officer (CCISO)
- Certified Indonesia Personal Data Protection Officer (CIPDPO)
- Certified Information Security Manager (CISM)

Consent of Customer Personal Data Use for Third-Party

The use of customer personal data at BNI must be based on customer consent, which is as stipulated in the Company's Guidelines (PP) on Personal Data Protection Procedure, protecting the customer's right to control their personal data. This control mechanism begins at the time of account opening, when prospective customers are asked to give their consent to the disclosure of their personal data if necessary. In line with the PP on General Provisions for Personal Data Protection, BNI processes personal data in accordance with the purpose of processing and does not use the data for secondary purposes. Personal data is not rented, sold, or given to third parties for any purpose other than to complete transactions, provide services, or fulfill legal obligations to the authorities.

The disclosure of personal data to authorized agencies includes but is not limited to legal and compliance purposes, such as taxation, criminal and/or civil court proceedings, capital market crime investigations, handling of corruption cases, and prevention of terrorism and money laundering, while still adhering to bank secrecy provisions.

In practice, the disclosure of personal data to Subsidiaries and/or business partners is limited to specific business activities in accordance with predetermined purposes and based on valid and documented customer consent. The implementation of personal data protection and consent mechanisms is monitored and reviewed periodically to ensure data security and fulfillment of customer rights as a Subject of Personal Data.

Supplier and Business Partner Data Protection

BNI ensures that its data security management system for supply chain management includes protection for supplier and business partner data, including personal, corporate, and transaction data. The implemented procurement system is equipped with information technology security to protect data related to transactions and work contracts. Personal data protection is also applied to suppliers or partners who have BNI accounts in accordance with applicable regulations.

BNI also integrates clauses on personal data processing into its cooperation agreements with third parties in the form of confidentiality agreements/Non-Disclosure Agreements or Customer Personal Data Processing Provisions. These provisions stipulate that in cooperation with suppliers and business partners, customer data may only be used for the purposes of implementing the agreed cooperation and not for any other purposes.

In its cooperation with vendors/partners, BNI assesses personal data protection to ensure compliance and to evaluate the vendors/partners' readiness and commitment to personal data protection when processing such data. BNI has established specific criteria for vendors/partners working with BNI to implement personal data protection and apply information technology security measures.

Every 6 months, BNI units that cooperate with vendors/partners conduct a periodic assessment of personal data protection, based on a risk matrix, and monitor the commitment to personal data protection made during the assessment.

Cybersecurity

In maintaining operational resilience amid increasing cyber risks, BNI has adopted the National Institute of Standards and Technology (NIST) Cybersecurity Framework as a cybersecurity management framework that covers risk identification, system protection, incident detection, response, and recovery. This framework serves as the basis for BNI in ensuring the continuity of digital banking services. Its implementation is strengthened by ISO 27001:2022 certification for Open API Services and Computer Security Incident Response Team (CSIRT) certification No. 345/CSIRT.01.03/BSSN/04/2024 from the National Cyber and Crypto Agency (BSSN), which confirms that BNI's information security management system is evaluated and audited periodically every three years in accordance with international standards.

Along with the increase in service digitalization, BNI has consistently reduced its dependence on physical document-based processes and manual interactions through a customer-to-system and employee-to-system approach. To mitigate the risk of data leaks, security is implemented on all endpoints through system configuration hardening, domain integration, the use of antivirus software, network access management, device activity monitoring, and the implementation of various data security and workstation monitoring tools. These measures are designed to maintain the confidentiality and integrity of customer information at all points of access to the system.

Data Breach Handling Mechanism

In facing the risk of information and data security breaches (data breaches), BNI has implemented a structured, coordinated, and sustainable cyber incident handling framework. This framework aims to ensure the confidentiality, integrity, and availability of data and minimize the impact of incidents on the Company's operations, customers, and reputation.

BNI has formed a Security Incident Response Team (SIRT) consisting of cross-functional units

responsible for managing and handling cyber incidents, including data security breaches. SIRT is led by the SIRT Coordinator and supported by various related functions, including the Chief Information Security Officer (CISO) Division, Security Operation Center (SOC), information technology, risk management, legal, compliance, customer service, and business units. Under the coordination of the CISO Division, the SIRT Coordinator is responsible for handling incident conditions, ensuring risk mitigation follow-up, compiling and reporting the results of incident handling follow-up.

The process of handling information security incidents and data breaches at BNI is carried out through four main stages, as follows:



Preparation and Planning

BNI ensures organizational readiness in dealing with cyber incidents by establishing SIRT roles and responsibilities, developing incident response procedures, and coordinating across functions. At this stage, BNI also ensures the readiness of infrastructure, systems, and human resources involved in the incident handling process through simulations and trials.



Detection and Analysis

Early detection of incidents is carried out continuously through security monitoring by the Security Operation Center (SOC). The SOC conducts monitoring, preliminary investigations, and analysis of security events using various supporting tools, including detection systems and threat intelligence. Any indication of an incident, including a potential data breach, is analyzed to determine the severity, scope of impact, and risk to operations and customers. This process involves coordination with Risk Management Function, Anti-fraud Unit, regional offices/branches, and relevant business units.



Mitigation and Recovery

During the mitigation phase, BNI implements control measures to prevent the incident from spreading, including isolating affected systems (containment), stopping the source of the attack, and fixing vulnerabilities. BNI also carries out system and service recovery processes to ensure that operations can return to normal while maintaining data security. If necessary, the mitigation process is supported by digital forensics to identify the root cause of the incident and prevent similar incidents in the future. Under certain conditions, BNI may also activate its Disaster Recovery Plan (DRP) to maintain service and business continuity.



Reporting and Evaluation

Every cyber incident, including a data breach, is comprehensively documented and reported by the SIRT Coordinator. BNI conducts post-incident evaluations to assess the effectiveness of handling, identify areas for improvement, and strengthen information security control. BNI also ensures compliance with regulatory requirements by notifying the relevant authorities in accordance with applicable regulations and preparing communications to stakeholders, including customers and the public, when necessary.

Violations of Personal Data Protection provisions will be followed up in accordance with applicable employee disciplinary provisions. BNI implements a disciplinary sanction mechanism, ranging from demotion to termination of employment, based on the level of violation and internal provisions, as part of its commitment to responsible data governance and protection.

Audit and Oversight of Information Security Systems

The evaluation and management of data and cyber security impacts are carried out continuously through the application of the three lines model, which is a governance model that divides organizational functions into three independent lines, namely 1st Line Roles (Risk Owner), 2nd Line Roles (Risk Control), and 3rd Line Roles (Risk Assurance).

Cybersecurity management is carried out by the Chief Information Security Officer (CISO) Division, which is responsible for taking preventive measures, identifying, analyzing, investigating, and recovering information security incidents. Periodically, the CISO Division reports its responsibilities to the Director of Information Technology at BNI as part of management oversight.

The effectiveness of cybersecurity management is evaluated through information security audits and self-assessments conducted annually by Internal

Audit. In 2025, internal audits focused on audits of the CISO Division, audits of Very Critical Category Transactional Application Access Management, audits of the Financial Information Service System (SLIK), ISO 27001:2022 Information Security, audits of Personal Data Management (System), and audits of payment system IT. Meanwhile, external audits are conducted annually to ensure compliance with applicable regulations/standards, covering audit policies and procedures, service availability levels, interconnection and interoperability, security of supporting network systems and applications, data and information security, disaster recovery plans, fraud management systems, and transaction audit trail.

BNI also involves third parties to assess IT security through security assessments (penetration testing) of systems/applications. BNI regularly reports the results of these assessments to regulators.

Cybersecurity Competency Training and Development

In line with the increasing complexity of cybersecurity threats in the banking sector, BNI prioritizes enhancing cyber resilience through employee competency development. BNI consistently organizes comprehensive cybersecurity training and certification programs to ensure that all BNI employees have the awareness and expertise to identify, prevent, and respond to potential information security threats. Employees who receive this training and certification include permanent employees, contract employees, trainees, and outsourced workers.



Training and Competency Development related to Cybersecurity and Delivery Methods

In-Class Learning

- Comprehensive Webmethods: Integration, Debugging, and API Service.
- Cyber Defense Academy (CDA)
- Cyber Security Fundamentals
- Cybersecurity for Data Protection Officers (DPO).
- ISO 27001:2022 Information Security Management System
- IT Governance, Risk Management, Assurance & Cybersecurity Summit
- IT Software Development Life Cycle (SDLC)
- Auditor Training - Data Security & Governance
- Auditor Training - IT & Digital Audit Forensics
- Auditor Training - IT Audit Fundamentals
- Auditor Training - IT Governance & New SDLC
- Auditor Training - Penetration & Vulnerability Testing
- Cybercrime Seminar: Cyber Security Threats and Solutions
- Webmethod Integration Server – Advanced

e-Learning Mandatory

- Security Awareness
- Cyber Security

Webinar

- Financial Crimes Sharing Session
- Leading Business: The Future of Banking - Artificial Intelligence & Blockchain Innovation

Daily Quiz/Daily Exercise for Employee Program (DEEP 46)

- Blockchain
- Security Awareness – Data Distribution Security
- Security Awareness – Endpoint Device Security

Certification

- Certified Chief Information Security Officer (CCISO)
- Certified Cloud Security Professional (CCSP)
- Certified Information Security Manager (CISM)
- Certified Information System Auditor (CISA)
- Certified In Risk & Information System Control (CRISC)
- COBIT 5 Foundation Certification
- COMPTIA CYSA+
- COMPTIA Security+
- ITIL V4 Foundation Certification
- The Open Group Architecture Framework
- Mikrotik Certified Network Administrator (MTCNA)

Customer Satisfaction Survey

BNI has once again achieved a noteworthy accomplishment through the results of a Customer Satisfaction Survey, which ranked BNI as one of the financial institutions with the highest satisfaction ratings. This was demonstrated through the results of the “Bank Service Excellence Monitor (BSEM) 2025” survey conducted by Marketing Research Indonesia (MRI), in which BNI ranked first as the Best Conventional Commercial Bank. This achievement is a true reflection of BNI’s commitment to providing excellent, relevant, and customer-oriented services at every point of interaction.

As part of its service quality management system, BNI uses a Customer Satisfaction Survey (CSS) as a periodic evaluation tool to assess service performance from the perspective of both external and internal users. The survey results are one of the main inputs in the process of improving service quality and refining the Bank’s business processes. The survey is conducted based on two aspects of evaluation, as follows:

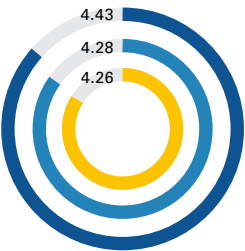
1. Business Satisfaction Survey (BSS). This survey is conducted among customers or debtors from the Business Banking segment (Corporates, Medium, Small) and the Retail segment (Emerald and Non-Emerald). This survey evaluates customer satisfaction based on the 7Ps: product, price, place, promotion, people, process, and physical environment.

2. User Satisfaction Survey (USS). A survey conducted internally at BNI that aims to measure the level of satisfaction with the performance of services provided by divisions/units/functional units, and at the same time provides insight into improving service quality in each unit surveyed. The assessment aspects in this survey include: coordination, communication, cooperation, work results/output, work processes, commitment/SLA, employees, and provision of data/information.

A satisfaction measurement approach that includes external and internal perspectives allows BNI to gain a comprehensive picture of the quality of services provided. Feedback from CSS is used as the basis for continuous improvement across all service lines. In 2025, BNI's CSS score was recorded at 4.43 on a scale of 1-5, an increase from the previous year's score of 4.28.



Customer Satisfaction Survey
(Scale 1-5)
Description: CSS Score (Scale 1-5)



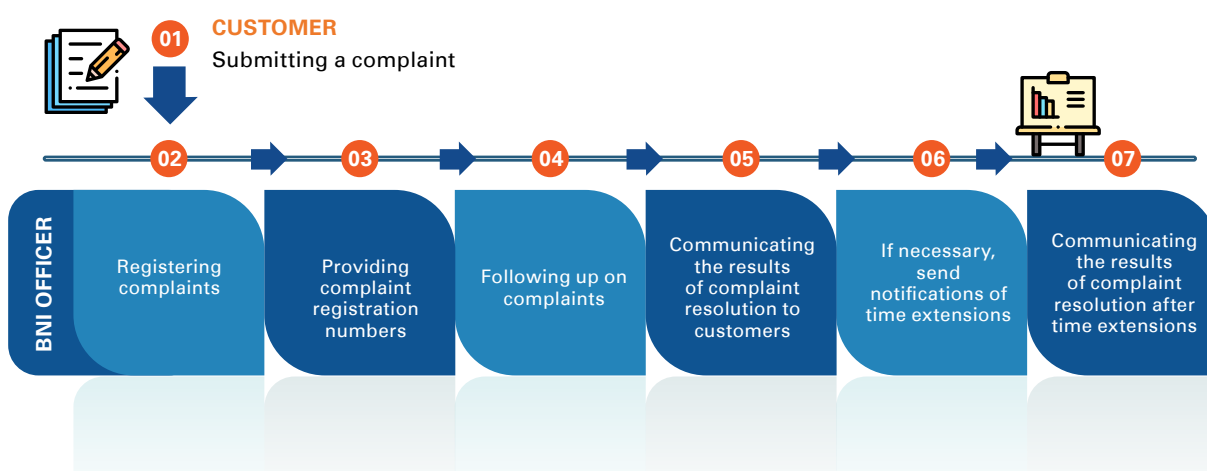
Handling Customer Complaints ^[2-25]

BNI treats every customer interaction, including complaints, criticism, and feedback, as part of a learning process to improve service quality. Therefore, BNI has established a complaint handling mechanism based on a Service Level Agreement (SLA), with verbal complaints resolved within a maximum of 5 working days and written complaints resolved within a maximum of 10 working days from the date the documents are declared complete, and can be extended for a further 10 working days. Customers can file complaints through the Contact Center, branch offices, or various official BNI digital channels, including social media, WhatsApp, websites, email, and the Tanya BNI feature on the BNI Mobile Banking app. The entire complaint handling process is centrally monitored by the Customer Experience Center Division under the supervision of the Director of Operations.

Media for BNI Customer Complaint		
Verbal	Customers contact BNI Call - Domestic: 1500046 - International: +62 21 30500046	Customers visit the nearest BNI Branch
Written	Customers send complaint via - X: @BNI dan @BNICustomerCare - Facebook: BNI - IG: @bni46 - E-mail: bnical@bni.co.id	Customers visit the website: www.bni.co.id and select the Chat With Us menu
	Customers visit the nearest BNI Branch	Customers submit complaints through: - Tanya BNI on BNI Mobile Banking. - BNI WhatsApp +62 811-5881-946.

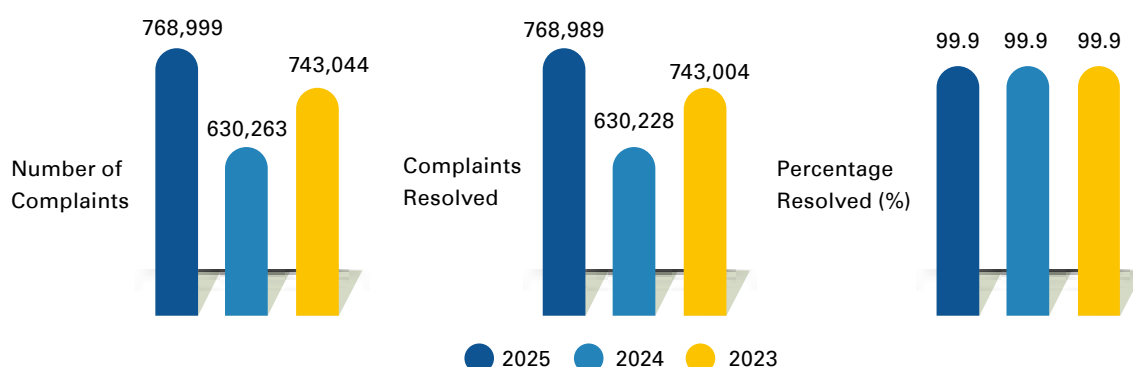
BNI respects the rights of customers to a fair dispute resolution. Therefore, if the complaint resolution does not reach an agreement, customers may continue to settle the dispute through extrajudicial channels at the Financial Services Sector Alternative Dispute Resolution Institution (LAPS SJK) or in court, in accordance with the applicable legal provisions and their choice.

Customer Complaint Mechanism and Resolution



BNI utilizes an integrated customer journey application to centrally manage customer complaints across all service points. With an omnichannel approach, customer data received from various channels can be accessed in a single system, enabling consistent recording, monitoring, and resolution of complaints. The system automatically sends notifications to customers when the complaint process has been completed.

Number of Complaints and Percentage of Resolution



Throughout 2025, BNI received various interactions from customers, dominated by requests for product and service information (67.2%), followed by requests for changes to customer data (20.0%), complaints (11.4%), and transactions (1.4%). BNI remains committed to resolving customer complaints in accordance with the Service Level Agreement (SLA). To resolve complaints in accordance with the SLA, BNI continues to improve its business processes, enhance employee capabilities in processing complaint resolutions, and improve its technology systems to enable automatic complaint resolution.

To ensure that customers do not encounter difficulties in conducting transactions and are protected from criminal acts, BNI consistently educates customers about banking solutions, safe transaction tips, and always being vigilant against banking crimes as part of its consumer protection activities. Consumer protection

dissemination and education are regularly carried out by BNI through online and offline media, and BNI's Board of Directors also participates in providing such dissemination and education.

In addition to complaints received directly, the Customer Experience Center also handles complaints submitted through the regulators, including the Consumer Protection Portal Application (APPK) owned by OJK. Furthermore, BNI regularly reports on the handling of complaints related to financial aspects to Bank Indonesia through the Antasena application four times a year and to the OJK through the siPeduli application twice a year.

Governance Oversight of Complaint Resolution

BNI treats customer complaint management as an integral part of its governance and risk management system. The Board of Directors is responsible for complaint management performance, and is monitored by the Risk Monitoring Committee at the level of the Board of Commissioners. The

Customer Experience Center Division, as the unit responsible for managing customer complaints, is required to submit consumer protection reports, including customer complaint reports, at least twice a year to the Board of Directors and the Board of Commissioners before reporting to Bank Indonesia and the OJK.

BNI also pays special attention to handling customer complaints related to retail credit collection by opening a special hotline number that will be directly handled by the Complaint Handling Unit in the Retail Collection & Recovery Division.

Aside from the compliance aspect, customer complaint management is also used as a parameter for measuring reputational risk. Reputational risk profile discussion is conducted in a structured manner through Board of Directors and Board of Commissioners meetings held at least four times a year to ensure that potential reputational risks can be identified and mitigated promptly.

Consumer Protection

Customer Financial Protection Policy

Financial protection for BNI customers is provided from the early stage of the banking relationship through analysis of the profile and financial capabilities of prospective customers, to ensure they understand the product and to prevent the granting of financing that exceeds their financial capacity. BNI applies the principle of prudence in setting limits, risk criteria, and the use of data analysis to objectively assess customers' ability to pay. Under certain conditions, BNI also provides restructuring or financing facility adjustment options for customers facing financial pressure, enabling them to keep up with their obligations.

This approach is supported by consistent protection mechanisms throughout the financing cycle, including during the credit quality monitoring and customer obligation settlement stages. Consistent with this principle, the credit collection process is carried out with a high regard for ethics, privacy, and customer dignity. On the other hand, customer data protection and information security are top priorities, which are managed through system strengthening, internal policies, and continuous monitoring to maintain customer confidence and banking service stability.

Employee Training on Customer Financial Protection ^[404-2]

BNI consistently enhances employee capacity in the aspect of customer financial protection through structured and continuous training. This training is designed to strengthen conduct risk management by ensuring employees understand their obligation to provide clear, accurate, and non-misleading information about financial products and services. Through this competency development, BNI encourages transparent and responsible sales practices while building a culture of service that prioritizes the customers' interests, security, and financial protection.

Employees who receive this training are permanent employees, contract employees, trainees, and outsourced workers, including Relationship Manager (RM) and Frontliner, such as Customer Service, Tellers, and Emerald Service, who interact directly with customers. During 2025, the scope of training related to customer financial protection includes:



47 Titles
with topics covering Education & Awareness of Consumer & Community Protection, Anti-Fraud, and Security Awareness.



42,324 Employees
consisting of permanent employees, contract employees, trainees, and outsourced workers. Each employee receives an average of 3 training sessions per year.

Ethical Credit Collection

BNI implements a credit collection policy that prioritizes a persuasive approach while respecting the rights and dignity of customers. Credit collection for the retail segment is carried out by internal Bank employees and third-party collection service providers under a cooperation scheme in accordance with applicable regulations. The entire collection process, both internal and external, is monitored by the Retail Collection & Recovery Division.

The collection process is carried out in accordance with BNI's internal policies and procedures as stated in the Company Guidelines (PP) for Retail Collection and Recovery Division Work Procedures, as well as referring to external provisions, specifically POJK No. 22 of 2023 concerning Consumer Protection in the Financial Services Sector. This policy stipulates that credit collection from consumers must be carried out in accordance with prevailing social norms and statutory regulations, applying principles of ethics and propriety, and taking into account the circumstances and ability of consumers in the collection process. One form of ethical collection guidelines includes:

- a. collection shall not be carried out using threats, violence and/or actions that disgrace the consumer;
- b. collection shall not be carried out using physical or verbal pressure;
- c. collection shall not be carried out to parties other than the consumer;
- d. collection shall not be carried out continuously in a disturbing manner;
- e. collection shall be carried out at the billing address or domicile of the consumer;

- f. collection activities shall only be conducted from monday to saturday, excluding national holidays, between 8:00 AM and 8:00 PM local time; and
- g. collection activities shall be conducted in accordance with applicable laws and regulations.

In general, the collection mechanism begins with notifications through digital channels, such as text messages (via WhatsApp), voice messages, phone calls using AI technology (in this case, Robo Coll), and phone calls by collection officers, as well as direct visits by officers for debtors who are difficult to contact. In its collection efforts, BNI also issues a series of warning letters (Warning Letters 1, 2, and 3) based on the number of days the debtor is in arrears, which include key information such as the due date, number of days in arrears, principal amount, and fines in accordance with POJK regulations.

In addition, collection is also carried out by collaborating with specialized collection service providers for defaulting debtors. BNI ensures that every collaboration with collection service providers is carried out by prioritizing the principle of customer data protection, complying with Bank regulations and oversight, and mandatory adherence to the applicable code of ethics.

To ensure that the credit collection process is carried out professionally and ethically, BNI conducts continuous training programs for staff involved in credit collection. This information can be found in the Employee Competency Development Realization Data section.

Loan Restructuring and Modification Options

BNI offers restructuring and loan modification options for debtors facing financial difficulties. The restructuring scheme is designed based on repayment ability (income-based repayment) and implemented in accordance with applicable regulations, including referring to policies and procedures related to restructuring as outlined in the Credit Company Guidelines on Credit Recovery and Settlement in the form of reduction of interest arrears, deferral of principal payments, deferral of interest payments, and adjustment of installment schedules/amounts. Restructuring is carried out based on the principles of objectivity, independence, avoidance of conflicts of interest, and fairness. Each loan to be restructured must be analyzed based on the debtor's business prospects and repayment ability in accordance with cash flow projections, and restructuring is decided by the restructuring decision maker (in this case, an official who is not involved in granting the loan) or an official higher than the loan decision maker.

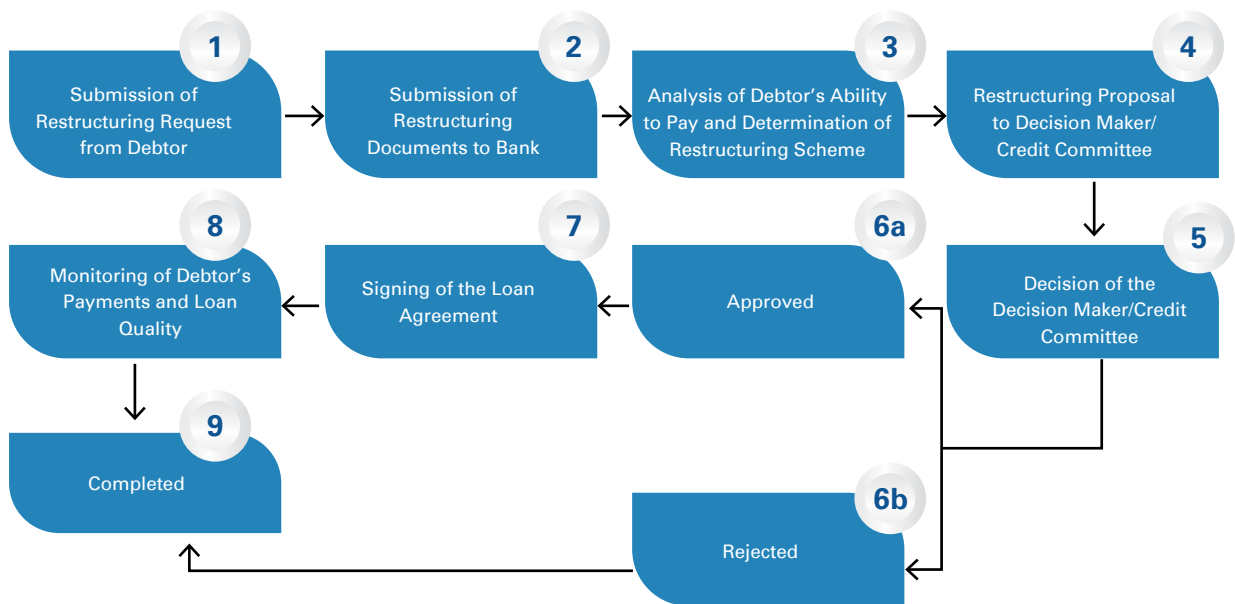
BNI ensures that customers have access to clear information regarding restructuring options and application mechanisms, as well as restructuring installment simulations from collection officers. Assessments are conducted objectively and based on risk to support the sustainability of customers' businesses while maintaining the quality of the bank's assets and risk management, thereby creating a balance between business interests and consumer protection.

The restructuring scheme offered to debtors is based on their financial situation and the latest business conditions. Also, a written simulation of the installments after restructuring is given to customers before they and BNI sign the restructuring agreement.

At the end of 2025, BNI also provided a loan restructuring relaxation policy for debtors affected by disasters in Aceh, North Sumatra, and West Sumatra. The policy aimed to help Business Banking and Retail segment debtors maintain the opportunity to recover their financial condition and continue their business activities after being affected by disasters. Special treatment for loan restructuring schemes for certain regions and/or sectors affected by disasters refers to the external provisions of POJK No. 19 of 2022 concerning Special Treatment for Financial Services Institutions in Certain Regions and Sectors in Indonesia Affected by Disasters and has been outlined in the internal provisions document of the Credit Procedures Committee (KPP) Decision No. 13/30/KPP/2025 dated December 17, 2025.



Flow of Restructuring Implementation & Supervision Process



Meanwhile, further information regarding the handling of non-performing loans has been provided in BNI's Annual Report, Chapter Credit Risk Management.

Flow of Handling Non-Performing Loans



Responsible Marketing Policy

Fair and Transparent Marketing of Products and

In its marketing activities, BNI ensures that all information related to loan products and services is communicated clearly, accurately, and without misleading information, including about the benefits, risks, costs, and rights and obligations of customers. Fair and transparent communication of products and services is carried out by optimizing the digital platforms owned and managed by BNI (own media).

Oversight of Marketing Policies

Product marketing practices are in line with OJK regulations on customer protection and BNI's internal policies on banking product marketing ethics as outlined in the Company Guidelines (PP) on Marketing Management & Portfolios for the Retail Segment; Integrated Marketing Communications; Event Management; Sponsorship; and Advertising. In addition, BNI also adheres to external regulations, including POJK No. 22 of 2023 concerning Consumer & Community Protection in the Financial Services Sector and the Financial Services Advertising Guidelines issued by the OJK. This ensures BNI's accountability and compliance with applicable standards. Policy evaluation and refinement are conducted periodically to ensure alignment with regulatory developments, stakeholder expectations, and best practices in the national and international banking industry.

The implementation of marketing policies is under the supervision of the Board of Directors through the Marketing Strategy Committee, which consists of the Director of Consumer Banking, Director of Finance & Strategy, Director of Network & Retail Funding, and Director of Corporate Banking, with the committee meeting at least twice a year. The Marketing Strategy Committee has the following duties and responsibilities:



In order to enhance transparent and responsible communication, BNI continues to develop employee competencies through various training programs and seminars, as presented in the following table.

No.	Training Name	Training Format	Number of Participants	Participant Scope		Training Frequency (within 1 year)
				Permanent Employees	Contract Employees	
1	Marketing+Media Alliance Innovate Indonesia 2025	Conference	3	v	x	1
2	Performance Marketing (Paid Advertising)	Public training	1	v	v	1
3	Comprehensive Marcomm Program for Bankers: Skills for Daily Execution	In-house training	50	v	v	2
4	Digital & Social Selling - Becoming a Reliable Marketer in the Digital Age	Webinar	2,254	v	v	1
5	Strategic Digital Leadership - Mastering Digital Leadership: Digital Marketing And Business Growth Optimization	Webinar	2,260	v	v	1

Ethical Advertising

BNI conducts advertising activities responsibly by prioritizing ethical principles and compliance. Advertising provisions are regulated in the Company Guidelines (PP) for Advertising Management, which ensure that information about the Bank's products and services is delivered honestly, clearly, and accurately, so that it can be easily understood by customers.

In its implementation, BNI ensures that all information provided is not misleading and minimizes the potential for misinterpretation between the Bank and its customers. This policy also aims to protect the interests of customers and the public and reduce the potential for disputes. Marketing materials for banking products and services, including those delivered through digital media, are prepared and adapted in accordance with the advertising code of ethics and applicable laws and regulations.

Innovation and Development of Banking Services

Product and/or Service Innovation and Development

Throughout 2025, the Company consistently strengthened the fundamentals of product and service innovation as a manifestation of its commitment to sustainable digital transformation. This initiative is not only designed to expand the accessibility of responsive financial services but also to build an inclusive, reliable, and secure digital ecosystem. Keeping pace with the dynamics of a digital-first market, the Company continues to modernize its infrastructure to improve service efficiency and accelerate the penetration of financial inclusion across all segments of society.

The main pillar in the Company's digital roadmap remains focused on enriching the capabilities of the wondr by BNI application. As an integrated banking platform, wondr by BNI provides comprehensive solutions for customers in meeting their daily transaction needs, financial management, and investment instruments.

In the reporting year, the Company reached a new milestone with the launch of the wondr multicurrency feature. This innovation allows customers to manage up to 12 foreign currencies in a single account, offering cost efficiency and transactional convenience for customers with high global mobility, as well as supporting cross-border economic integration.

This digital transformation has had a significant impact on the Company's operational capabilities. The optimization of digital channels has driven an increase in transaction volume to trillions of Rupiah, followed by substantial growth in the active user base. This reflects the Company's successful adaptation to the evolving behavior of the current mobile first customers.

In addition to financial benefits, the digitalization of these services makes a real contribution to environmental sustainability. By minimizing manual processes and the use of physical documents (paperless), the Company has succeeded in reducing operational resource consumption and its environmental footprint. BNI is committed to maintaining long-term competitiveness while driving national financial inclusion through the development of relevant and sustainable digital products. Every digital product development is communicated through notifications on the application, as well as conveyed directly through dissemination to institutions that collaborate with BNI and education to customers by frontliner at branch offices.

The Convenience of Digital Banking

BNI strengthens the provision of inclusive financial services by utilizing digital technology to reach a wider community ecosystem. Through a sustainable transformation agenda, the Company integrates service innovation with efforts to improve business process efficiency. The development of digital banking conveniences always prioritizes the sustainable aspect of solutions, where each innovation has undergone an in-depth cross-unit review process to ensure its relevance to customer needs. With a reliable and continuous monitoring system, the Company ensures that the convenience of digital transactions provided remains within a strong consumer protection framework.

Strengthening Competitiveness Through Digitalization

The Company has established digital transformation as a strategic pillar in strengthening its long-term competitiveness to face escalating technological disruption and the penetration of non-bank financial service providers and digital banks. This commitment aligns with the 2024-2028 Corporate Plan, which aspires to become “The Bank with Best Technology & People at the Core to Serve You”. This strategy is implemented in a structured manner through three main areas of focus: productivity, platform, and proposition, which are fundamental to the development of the Company’s business capabilities and technology resilience.

In an effort to improve operational effectiveness, the Company integrates artificial intelligence (AI) and cloud computing technologies across various lines of business. The utilization of AI is aimed at strengthening risk management and consumer protection through:

- Predictive analytics: Personalized services and more accurate risk analytics.
- System security: Early detection of potential fraud.
- Conversational banking: Improved customer service responsiveness.

Meanwhile, the adoption of cloud technology ensures the scalability and reliability of the system in serving the retail, MSME, and corporate segments in an agile and efficient manner.

The Company is also transforming its physical network by optimizing outlet formats tailored to demographic characteristics and regional needs. This step is followed by repositioning the role of frontline marketers into a more productive and solution-oriented service model. The digitalization of operational processes, such as biometric-based account opening, digital loans, and internal process automation through data analytics, has had a significant impact on general and administrative cost efficiency, as well as overall operational cost effectiveness.

As part of its commitment to environmental responsibility, the Company’s digital transformation simultaneously promotes the paperless operation to reduce dependence on paper. BNI is gradually converting physical documents and manual administrative processes into an integrated digital system. This initiative is a concrete step in reducing the operational carbon footprint and improving resource efficiency, while ensuring that every stage of the customer journey remains in line with the principles of sustainability. [306-1, 306-2]





Digital Banking:

Optimizing BNI e-office utilizations, an internal correspondence application portal covering memo correspondence application portal, internal notes, and letters recorded and circulated in BNI.

Digitalizing employees' presence using DigiHC, covering the presence/absence, leave/permission, and tardiness.

Operating the DigiCode application, an internal Standard Operating Procedure (SOP) management system integrated with a paperless concept.

Using BNI e-Procurement and e-Arsip applications to optimize automation in the goods and services procurement process, and the management of supporting documents.

Digitalizing the process of employees' overtime application through DigiHC, to improve transparency and efficiency in HC administration.

Applying electric loan – Integrated Credit Document Management (eLO PDKT), which currently is applied to loan documents of consumer, starting from review up to verification process.

Simplifying marketing materials by switching information delivery to digital platforms, particularly through content optimization on the BNI website and on the wondr by BNI super app, to reduce the use of print-based marketing collateral.

Optimizing digital banking in serving customers through the digital acquisition of credit cards and e-billing statements.

Using Digiposter, a digital screen that replaces paper posters and standing banners, and serves as an informative promotional and communication medium for customers and employees.

Operating DigiCS, a self-service customer service machine at BNI branch offices for easier and faster access to banking services without having to rely on customer service officers.

Use of internal digital media, such as internal WhatsApp groups, to send meeting invitations across work units, as an alternative to printed invitations.



Conventional Initiatives:

Paper-saving by reusing paper and increasing digitalization in administrative activities.

Reducing hardcopy printing for key publications, including the Annual Report and Sustainability Report.

Paper Use in BNI's Regional (Kg)

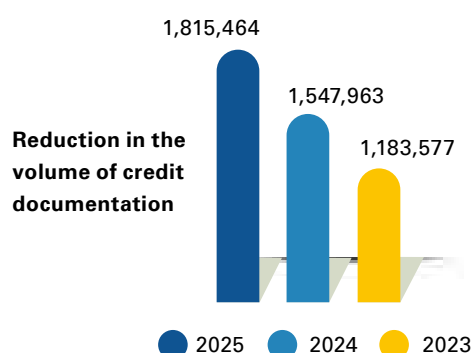
Description	2025	2024	2023
Head Office	52,985	60,348	146,939
Regional and branch offices	1,512,140	1,531,636	1,789,345
Total	1,565,125	1,591,984	1,936,284

Impacts of E-Office on Paper Reduction

(Unit of Sheet of Paper) [306-4]

Description	2025	2024	2023
Electronic SOP/ BNI e-PP	71,269,380	57,288,420	46,503,360
Electronic billing statement/BNI e-billing	13,996,655	13,486,086	13,583,123
Envelope Efficiency through billing optimization/ BNI e-billing implementation	49,092	57,735	70,142
Total	85,315,127	70,832,241	60,156,625

Impacts of eLO PDKT on Paper Reduction



Total Documents Circulating through Application

Description	2025	2024	2023
Memo	97,616	81,761	100,742
Internal note	4,129	3,150	7,110
External letter	32,554	32,711	43,664
Total documents	134,299	117,622	151,516
Letter of disposition	331,824	284,769	423,585

In supporting financial inclusion and expanding service coverage, BNI continues to strengthen BNI Agen46 as a branchless banking channel, providing access to banking services even in areas beyond the banking network's reach. In addition, BNI also enhances the role of Xpora, an integrated solution for export-oriented MSMEs, with the support of BNI's digital platform to facilitate financing, international trade transactions, and global market expansion.

Enhancing Customer Experience

BNI has established enhancing customer experience as a key pillar in its digital transformation strategy. This commitment is implemented through the development of a digital platform that prioritizes integration, security, and functionality for all customer segments. In the retail segment, the Company continuously strengthens the wondr by BNI application ecosystem through three main pillars, Insight, Transaction, and Growth. In 2025, BNI expanded its multicurrency features to facilitate cross-border transaction needs and support global financial inclusion as part of its innovation roadmap.

In August 2025, at the BNI Wondr X event, BNI launched BNIdirect Business, a platform designed specifically to support the transactions of MSME customers, as part of BNI's commitment to supporting digital transformation in the micro, small, and medium enterprise (MSME) sector. With a fresher and more modern look, this platform makes it easier for MSME entrepreneurs to monitor cash flow in real time, manage liquidity better, and meet various transaction needs, with single user capabilities that make customer transaction management more efficient. The available financial recap feature also helps customers quickly monitor business income and expenses. This capability is expected to provide a more personalized experience and facilitate transactions for MSME customers.

In supporting MSMEs to go global, BNIdirect Business is equipped with excellent features such as fast international transfers, real-time exchange rate information, multi-currency management in one account, and integration with various other digital financial solutions.

To improve the quality of interactions and service responses, BNI also operates a digital contact center application based on AI and natural language processing (NLP). This application enables faster, more consistent, and more responsive interactions with customers, while also improving the efficiency of service request handling. The application of this technology is part of BNI's efforts to maintain service quality in line with the increasing volume of digital transactions.

In addition to internal development, BNI actively engages in strategic collaborations with external partners to enrich its digital service ecosystem. Among these collaborations is the integration of BNI API One Gate Payment with Bluebird, which facilitates transactions, cash flow monitoring, and real-time disbursements for tens of thousands of driver partners. This collaboration reflects BNI's role as an enabler of digital transformation for its business partners, while creating mutually beneficial added value.

Holistically, the digitalization of services and transformation of customer experience are not only aimed at improving the effectiveness and acceleration of services, but also a strategic effort to create long-term added value. This initiative has a positive impact on optimizing operational efficiency, strengthening customer retention, and increasing fee-based income and Current Account Savings Account (CASA) as a low-cost fund structure. With a harmonious synergy between technology, business process improvement, and human capital capability development, the Company is committed to building a relevant, consistent, and sustainable customer journey to deal with the dynamics of the digital economy.

Accessibility and Affordability of Banking Services

The Company has set expanding access to financial products and services as a strategic priority in supporting national financial inclusion. This is realized through enhancing synergy between digital channels and conventional networks to cover all segments of society geographically. As of the reporting period, the Company has operated a service network covering all regions of Indonesia, including disadvantaged, frontier, and outermost areas (3T). In addition, the Company's global expansion in seven countries is proof of BNI's commitment to facilitating banking services, payment systems, and customer financing access in the international arena.

In line with the dynamics of the financial services industry, the Company continuously develops its portfolio of digital and financial products and services, as well as other financial services, such as credit card services with various digital features, including digital payments (QRIS), installments, and cash advances through wondr by BNI, as well as adaptive loyalty programs. In its implementation, BNI actively disseminates information on products and services, including terms and conditions, benefits, costs, and risks of credit cards, in accordance with POJK No. 22 of 2023 concerning Consumer and Public Protection in the Financial Services Sector.

The Company ensures that all products and services launched have undergone a rigorous governance mechanism, including:

- Approval from the relevant regulatory authorities.
- A comprehensive risk management process.
- Compliance tests and reviews of other supporting aspects to ensure customer safety and convenience.

In an effort to improve literacy and transparency, the Company disseminates product information in a clear, accurate, and easy-to-understand manner through an omnichannel communication strategy. These information channels include branch offices, the BNI Agen46 network, print and electronic media, social media, the wondr by BNI application, and the Company's official website.

To support continuous interaction with customers, the Company provides a responsive consultation service center through BNI Call and the latest digital channels, such as WhatsApp Business BNI and virtual assistants. This service is designed to ensure that customers receive real-time information support while enhancing a reliable and trusted consumer protection ecosystem.

Digital Banking Performance



1,972 Trillion
(27.1% YoY)
Transaction Volume



2,380 Trillion
(26.4% YoY)
Growth in BNIdirect
Transaction Volume



21.4 Trillion
(16.5% YoY)
Transaction Volume

Business Ethics and Compliance

Financial Product and/or Service Responsibility

Financial Product/Service Security Evaluation [FS15]

Every BNI financial product and service developed to be launched to the public is required to undergo a comprehensive security evaluation. This process is designed to ensure customer privacy protection as stipulated in the Privacy Notice available on the Company's official website. The evaluation is conducted across functions, involving the Compliance Division, Legal Division, Enterprise Risk Management Division, Operational Risk Management Division, CISO Division, and Anti-Fraud Unit to assess compliance risks, legal risks, business risks, operational risks, and cybersecurity.

Meanwhile, the Information Technology Unit conducts operational and technological testing, including post-implementation review (PIR) after the product has been implemented. The results of the PIR are used as the basis for making further decisions. Products that still require improvement will be refined and re-evaluated through PIR until they meet all requirements. Products and services that have met operational, technological, and risk requirements are then submitted for approval by the Financial Services Authority and/or Bank Indonesia before being marketed. In 2025, there were no new BNI financial products or services that were withdrawn after launch due to complaints.

As part of reinforcing sustainable governance, Internal Audit acts as an independent party that conducts independent review activities to ensure compliance with regulatory requirements, particularly regarding security adequacy and customer education on the issuance of digital banking products.

Positive and Negative Impacts of Sustainable Finance Products/Services

Before launching new financial products or services, BNI consistently evaluates the potential impacts and risks involved. Each product development is designed with a prudent approach to reduce environmental, social, and governance (ESG) risks and minimize negative impacts, while optimizing positive benefits for customers and the community. Several sustainable finance initiatives developed by BNI include Environmentally Friendly Business Loan, BNI Environmentally Friendly MSMEs (BUMI), BNI Jejak Kopi Khatulistiwa (JKK), BNI Kampung Budidaya Perikanan, Sustainability-Linked Loan, financing to support energy transition, and an advisory playbook for high-emission sectors as a transition guide for BNI debtors.

In terms of financial inclusion, BNI carries out various programs that also have an environmental and social impact, such as a savings program using waste that contributes to increasing environmental awareness among students and the community. The presence of BNI Agen46 also expands access to banking services to various segments of society that are not yet covered by bank outlets or ATMs, including those in the disadvantaged, frontier, and outermost (3T) areas. Along with the development of digital products and services, BNI also recognizes the inherent risks, including those related to data security, customer privacy protection, and potential cybercrime. Therefore, BNI ensures the use of reliable and secure information technology infrastructure as part of its efforts to enhance data protection systems and digital risk management.

Respecting Human Rights

With the diverse backgrounds and characteristics of its employees, BNI is committed to building a work environment that upholds mutual respect and is free from discrimination, exclusion, harassment, bullying, and other forms of violence. This commitment is realized through the implementation of employment policies under the supervision of the Board of Directors, particularly the Director of Human Capital and Compliance.

In formulating its employment policies, BNI refers to human rights principles that are aligned with the standards of the International Labor Organization (ILO) and the United Nations Global Compact (UNGC), as well as national laws and regulations on employment and human rights. Consistent with this commitment, BNI supports the strengthening of gender equality and women's empowerment in the workplace through Srikandi BNI initiative as part of the Srikandi Danantara Indonesia ecosystem. This initiative aligns with the collaboration between UN Women and Srikandi Danantara Indonesia in promoting the implementation of Women's Empowerment Principles (WEPs) and capacity building to create a more inclusive and equal workplace.

All employees have access to the company's human rights policies as outlined in the Code of Conduct (e-PP) and Collective Labor Agreement (CLA) through the DigiHC and DigiCM platforms. Any new policies or policy updates are communicated through infographics on DigiHC and regularly disseminated to employees and relevant functions according to operational needs. To support easy access and understanding of policies, BNI provides BNI Diva (DigiCode Virtual Assistant) as a ChatAI-based application using Generative AI technology that functions as a virtual assistant to help BNI employees find company guidelines more quickly, effectively, and efficiently.

Additionally, BNI also provides an HC Virtual Assistant in the form of a chatbot named "Kinara" to enhance employee engagement in understanding Human Capital policies and "Jaring Opini" to garner feedback and suggestions from employees regarding the published Human Capital policies.

As part of its commitment to creating a respectful work environment, BNI firmly rejects all forms of harassment and discriminatory actions, both in the workplace and in work-related activities. This commitment is outlined in the implementation of a respectful working place in the General Human Capital Policy, which refers to the Ministry of State-Owned Enterprises Circular Letter No. SE-3/MBU/04/2022 concerning the Policy on Respectful Workplace within State-Owned Enterprises. BNI imposes firm administrative sanctions for any violations of this policy and provides reporting channels through WBS or direct reporting to line managers or unit leaders.

In its implementation, BNI upholds equality, security, and respect for individual dignity as its main principles. BNI provides a secure reporting mechanism, a transparent handling process, and continuous education to strengthen the prevention of sexual harassment and discrimination in any form.

As a follow-up to the directive from the Ministry of State-Owned Enterprises through Circular Letter No. SE-1/MBU/01/2024 dated January 18, 2024, BNI has established corporate guidelines in the form of Instruction No. IN/013/HCS/001 on the implementation of a respectful workplace. These guidelines aim to create a safe, comfortable, and inclusive work environment, as well as to protect human dignity, free from discrimination, exclusion, bullying, harassment, or other forms of mental and physical violence for all BNI Group employees.

BNI strives to create a safe and respectful workplace for all employees through the implementation of a respectful workplace policy. This policy affirms BNI's commitment to preventing all forms of discrimination, exclusion, bullying, harassment, and violence, both physical and non-physical, as part of its efforts to build an inclusive and productive work environment that upholds human rights.

This commitment was then translated into the enhancement of employee welfare programs through the BNI Holistic Employee Wellbeing Program. This program focuses on mental and physical health balance, financial resilience, and healthy social relationships in the workplace. Initiatives implemented include Employee Assistance Program 2.0, BNI Little Explorers childcare facilities, financial health support through New DKMP, and strengthening employee social networks through 46Society.

The application of human rights principles in BNI's human capital management is realized through various employment policies and practices, including:

1. The application of the principles of diversity and equal employment opportunities by upholding a policy of non-discrimination.
2. The provision of inclusive employment opportunities through the empowerment of 22 employees with physical disabilities.
3. Respect for the rights to freedom of association and assembly through the facilitation of Labor Unions.
4. Fulfillment of religious rights by providing worship facilities and infrastructure in every BNI work unit.
5. Provision of competitive remuneration above the Provincial/Regency/City Minimum Wage (UMP/UMK), along with the implementation of equal pay principles without gender-based discrimination. [202-1, 405-1]
6. Fulfillment of employee leave rights, including up to two days of menstrual leave and three calendar months of maternity leave, while ensuring all statutory employee rights remain guaranteed upon return from leave. [401-3]
7. Provision of paid leave of absence in accordance with applicable laws and regulations, without deduction of annual leave entitlements, through a proper approval mechanism.

Fair Operating and Fair Competition [2-23, 2-27, FS15][FN-CB-510a.1]

In conducting its business activities, BNI ensures the implementation of fair operating practices by complying with applicable laws, regulations, and ethical standards. This approach includes the management of intellectual assets, fair treatment of stakeholders, and control of conflicts of interest with suppliers, competitors, and related parties. BNI is also committed to ensuring that all customers receive equal and non-discriminatory access to products and/or services in accordance with applicable laws and regulations.

In support of this commitment, BNI consistently applies anti-corruption, anti-bribery, and anti-fraud principles, and complies with business competition and anti-monopoly regulations. Relationships with partners and suppliers are built on the basis of trust, a code of ethics, and integrity pacts, with implementation coordinated by the relevant divisions in accordance with their roles and authorities.



Fair operating policies include anti-corruption policies and debtor rights policies, which can be accessed on the BNI website:
<https://www.bni.co.id/en-us/home/company-information/policy>

Integrity and sustainability are BNI's foundations in managing its entire business value chain, which includes human capital management, product and service development, and the use of information technology. In carrying out these activities, BNI consistently considers the protection of human rights, customer privacy, and environmental preservation as part of its corporate responsibility.

Political Contributions ^[415-1]

BNI maintains its independence and neutrality by refraining from involvement in any form of political activity, whether through financial or material contributions, directly or indirectly, and by ensuring that BNI employees do not become members of political parties. In terms of funding, BNI implements policies and procedures that uphold good corporate governance principles, including the management of potential conflicts of interest, to ensure sound and responsible fund management.

Implementation of AML-CFT and CPFWMD

The implementation of the Anti-Money Laundering, Counter-Terrorism Financing, and Countering the Proliferation of Weapons of Mass Destruction (AML-CFT and CPFWMD) program at BNI is guided by company guidelines. This program is implemented through five integrated pillars, including active supervision by the Board of Directors and Board of Commissioners, Policies and Procedures, Internal Controls, Management Information Systems, and Human Capital and Training. BNI consistently submits reports on the implementation of the AML-CFT and CPFWMD programs to the Financial Services Authority on a semi-annual basis, in accordance with the reporting requirements set by the regulator.

BNI continuously raises awareness among all BNI employees regarding the implementation of AML-CFT and CPFWMD through various dissemination and capacity building activities, which include:

- Training programs, both through electronic/online media, such as AML-CFT and CPFWMD e-Learning on the BNI Smarter platform, as well as face-to-face training (in-class or online), including for prospective new employees (ODP/ADP/BINA BNI), interns, and certain units and divisions, such as operations, information technology, custody, pension fund, overseas business, and cross-border correspondent banking.
- Supervision and dissemination of the implementation of the AML-CFT and CPFWMD programs at Branch Offices based on the results of Individual Risk Assessment (IRA), as well as in related divisions.
- Monitoring the implementation of the AML-CFT and CPFWMD programs at overseas offices and subsidiaries.
- Refreshment programs on AML-CFT and CPFWMD for the Board of Commissioners and Board of Directors of BNI and its subsidiaries.

As part of enhancing governance and internal control, BNI integrates the implementation of the AML/CFT and CPFWMD programs into all business processes. Further information regarding the policies and implementation of these programs is available on BNI's official website, <https://www.bni.co.id/en-us/company/corporate-governance/patriot-acts-certification-aml>.

The effectiveness of AML-CFT and CPFWMD implementation is assessed through FIR on ML/TF, which is an assessment conducted by the financial transaction reporting and analysis center on the commitment, quality of implementation, and level of compliance of reporting parties. In 2025, BNI earned a score of 9.43 with a rating of "Very Good."

Stakeholder Engagement ^[2-29]

BNI consistently builds and maintains constructive relationships with all stakeholders. Prioritization of stakeholders are determined through mapping that takes into account the level of influence, dependency, responsibility, and proximity. In the current year, BNI engaged internal and external stakeholder representatives in in-depth interviews to identify strategic issues, gather feedback on the previous year's sustainability performance, and discuss material topics that influence stakeholder decision-making processes.

Customer: Economic Relations

Engagement Method		Significant Topics/Issues and Needs
- Call center services, branch offices, phone banking, websites, social media (Facebook, Instagram, and X) - Customer Satisfaction Survey - Information from the Website & Frontliners - BNI Agen46 gathering	Frequency - At any time - Twice a year - At any time - At least once a year	- Banking transaction security - Micro Small Medium Enterprise loans - Banking facilities and ease of access - Clear and transparent information on banking products and services - Financial products/services innovations - Customer data confidentiality
BNI's Response		
- Innovations of products and services according to technological developments and needs - Financial education on banking products - Storage and protection of customer data as per the Personal Data Protection Law and relevant stipulations - Maintaining the existing ISO 27001 certification - Reaching and fostering SMEs, as well as helping provide financing		

Investor/Shareholder: Economic Relations, Ownership & Legal

Engagement Method		Significant Topics/Issues and Needs
- BNI's quarterly Performance Report in Capital Market and Share Investor Analyst Meeting, - Regular meeting with Capital Market Analyst and share Investors - Public Expose at least once a year - Holding Annual GMS (once a year) and Extraordinary GMS when needed - Regular meetings with Share & Fixed Income Investors through Conference and Roadshow agendas - Implementation of Retail Webinars and Podcasts on specific topics, including ESG topics		- Financial and non-financial performance - Environmental, Social, and Governance (ESG) performance - Positive growth of share capitalization value - Increased Investment value (total shareholder return) - Investment/financing in ecofriendly sectors - Minimize impact from financing in commodity sector - Climate risk management - Disclosure of target, methodology and results of calculation of GHG emission scope 1, 2 and 3 comprehensively - Human capital management and developments - KPI driving the achievement of sustainable profitability - Participation in reforestation efforts and preserving biodiversity - Implementation of management remuneration policies in line with corporate governance - Cyber security and personal data protection
BNI's Response		
- Periodic information disclosure on BNI performance - Intense direct communication to investors and through analysis of securities companies (brokers) to ensure company's proper information disclosure - Consistently performing strategies to achieve business targets - Comprehensively disclosing information on ESG performance in Sustainability Report as well as in periodic updates - Strengthening employees' capabilities and skills - Following up recommendations of ESG aspect from Rating Agency, SPO, and investors - Performing audits on Financial Reports - Developing Annual Reports and Sustainability Reports - Implementation of Risk Acceptance Criteria (RAC) within the credit approval process.		

Employee: Legal relations & stakeholders involved in achieving the company goals

Engagement Method	Significant Topics/Issues and Needs
• Labor Union • Internal Media (eSinergi Digital Magazine, HCMS, Sinergi Magazine, BNI Forum) • Employee Satisfaction Survey • BNI Smarter • DigiHC & HCMS • BNI community	• Employee rights • Training and competency development for employees • Equal opportunities in career development • Valuable and enjoyable work experience • Work-life balance
BNI's Response	
• In-class training and e-learning • Performance Assessment System and Promotion • Availability of official communication facilities provided by BNI for employees, such as Info HCT and Internal Communication (eSinergi, SMS Blast) • Establishment of labor union • Establishment of 46Society, a community based on sports, arts, and hobbies, as well as Religious Body • Availability of facilities and infrastructures for activities	

Labor Relations: Legal relations

Engagement Method	Significant Topics/Issues and Needs
• Discussion of Collective Labor Agreements (CLA) • Meetings and discussions, including through: a. Remuneration team b. Health facilities team c. Sanctions team • Communication forums • Bipartite cooperation institutions (LKS Bipartit)	• Career development • Remuneration • Productivity or performance • Integrity • Other employee rights
BNI's Response	
• Accommodating and identifying proposals and feedback from Labor Union • Establishing the process of communication in case of industrial relations disputes • Holding regular meetings in communication forum between BNI and labor union • Creating optimal operations in an effective and efficient manner BNI's growth and employee wellbeing through CLA	

Government/OJK: Legal relations/Interests as Financial Services Institutions

Engagement Method	Significant Topics/Issues and Needs
• Submission of the Bank's Business Plan (RBB) and its realization to Bank Indonesia and OJK • Submission of SFAP to OJK • Other reporting as per prevailing stipulations to regulators • Various activities of dissemination/ webinar/hearing/ discussion forum held by the government and authorities • At least once a year	• Compliance with laws and regulations • Managing ESG risk in financing activities • Environmental & social risk analysis in granting loans • Anti-Bribery and Corruption (ABC), Anti-Money Laundering (AML) and Anti-Terrorism Green banking inclusive banking • Implementing Sustainable Finance • Supporting SDGs • Setting more quantifiable and focused targets, mainly in supporting green economy and NZE targets in Indonesia

BNI's Response

- Complying with all prevailing regulations
- Paying taxes, retributions, and Non-Tax State Revenue (PNBP) as per laws and regulations
- Developing Sustainable Finance Action Plan (SFAP)
- Establishing the ESG Sub-Committee to monitor the implementation of SFAP
- Adjusting internal policies and regulations as per regulations issued by the government
- Implementing the GCG principles across all work units
- Submitting performance reports and other activities: Sustainable Finance Action Plan Report, Annual Report, Sustainability Report, and others

Supplier: Economic relations and legal relations

Engagement Method	Significant Topics/Issues and Needs
Seminars and dissemination of policies, when needed, through vendor gathering	• Anti-Bribery Management System Policy (ABMS) in the procurement of goods and/or services • Policy on Increasing the Use of Domestic Products (P3DN) in the procurement of goods and/or services • Policy on social and environmental aspects in the BNI partnership process
BNI's Response	
• Implementation of Anti-Bribery Management System (ABMS) in the procurement of goods and/or services • Implementation of Increased Use of Domestic Products (P3DN) in the procurement of goods and/or services • Implementation of social and environmental aspects in the BNI partnership process	

Community: Social relations, social license & social responsibility as well as proximity with the company

Engagement Method	Significant Topics/Issues and Needs
Strategic cooperation in BNI's social awareness	• Environmental impact and performance • Social and Environmental Responsibility programs implemented and planned • Opportunities to collaborate in Social and Environmental Responsibility programs • Information on company activities • Understanding of sustainable finance
BNI's Response	
• Implementation of financial inclusion and literacy • Organizing social and environmental responsibility programs through the BNI Berbagi program • Organizing internship or contract programs for fresh graduates through the BINA BNI Program • Providing job opportunities according to needs	

Media: Social relations, social license

Engagement Method	Significant Topics/Issues and Needs
Press release, when needed, and quarterly media gathering	• Financial and non-financial performance • Environmental impact and performance • Social and environmental responsibility programs implemented and planned • Opportunities for collaboration in social and environmental responsibility programs • Press releases on sustainability performance
BNI's Response	
• Updating information on banking solutions or company performance on the website www.bni.co.id • Regularly fostering good relations with the media through media gatherings and editor-in-chief gatherings • Providing press release material on the website www.bni.co.id and online media	

Local Parties' Involvement in the Supply Chain [2-6, 204-1]

BNI's partnerships in the supply chain are built with a long-term orientation through the empowerment of local suppliers owned by domestic parties. To ensure that these partnerships run effectively, BNI regularly reviews the performance of its partners as a basis for improving the quality and sustainability of cooperation. BNI also uses vendor gathering forums as a medium for dialogue and alignment of values, particularly regarding the implementation of the Anti-Bribery Management System (ABMS) and preferences for domestic products. This initiative strengthens trust and integrity in the supply chain, while also having a positive impact on the local economy.

Goods and Services Procurement

Type of Suppliers/ Partners	2025		2024		2023	
	Number of Suppliers/ Partners	Goods Procurement Value (Rp Trillion)	Number of Suppliers/ Partners	Goods Procurement Value (Rp Trillion)	Number of Suppliers/ Partners	Goods Procurement Value (Rp Trillion)
Local	604	9.3	606	4.2	473	7.0
Overseas	50	6.4	52	0.9	8	-
Total	654	15.7	658	5.1	481	7.0

Notes:

- Local refers to companies whose ownership is entirely domestic.
- Foreign refers to companies whose ownership is partially or wholly held by foreign entities.

New Suppliers' Screening using Environmental and Social Criteria

[308-1, 308-2, 414-1, 414-2]

In order to manage sustainability risks and minimize potential negative impacts arising throughout the supply chain, BNI has begun implementing a supplier evaluation policy based on environmental and social aspects since December 2024. This evaluation covers compliance with environmental permits, management of GHG emissions and waste, operational locations that are not adjacent to protected areas, no underage workers, no forced labor, freedom from discrimination based on ethnicity, religion, race, or social status, as well as equality in promotion and remuneration.

Commitments have been made to both existing suppliers and prospective suppliers that have been verified by BNI and have met the minimum criteria or have obtained a temporary Supplier Registration Certificate (TDRS).

BNI ensures the implementation of this policy through an assessment of all (100%) prospective suppliers who before received TDRS in the initial verification process. In addition, BNI has also conducted periodic reassessments of suppliers who have become partners annually.



03

INCLUSION AND RESILIENCE

BNI is committed to ensuring that positive impacts for customers, communities, and the environment are realized through initiatives beyond its business activities. The main focus is on strengthening financial inclusion and literacy, community empowerment, and environmental preservation, as well as assisting debtors as strategic partners in the transition to sustainable business practices. This focus is part of BNI's efforts to build long-term social, economic, and environmental resilience.

Strengthening Cooperation with Stakeholders

Debtor Assistance in the Sustainable Business Sector

As part of the implementation of POJK No. 51/POJK.03/2017, BNI is strengthening its strategic role in supporting the business sector's transition to more sustainable practices through a debtor assistance approach. This approach aligns with the application of the Indonesian sustainable finance taxonomy (TKBI) as a reference for classifying business activities and managing sustainability risks, including transition and physical risks related to climate change, as underlined in the IFRS S2 Climate-related Disclosures framework.

In this context, BNI not only functions as a financing provider, but also as a strategic partner for debtors in planning and implementing measured, gradual transition steps that are tailored to each debtor's business profile. This assistance is aimed at encouraging a reduction in emissions from the debtor's operations, while maintaining business sustainability and the quality of BNI's financing portfolio, in line with BNI's support for achieving net zero emissions (NZE).

Implementation of ESG Advisory

[FS5]

BNI developed and implemented the ESG Advisory initiative by compiling an ESG advisory playbook that serves as a transition guide for debtors and the Relationship Manager (RM). This playbook is designed to help debtors understand their current position and the benefits of conducting sustainable business. The advisory playbook is expected to encourage debtors to begin the transition to sustainable business practices, including increasing the level of alignment of their business activities with TKBI classifications. For RM, this playbook is a supporting tool in providing consistent and structured assistance in encouraging gradual improvements in debtor classifications.

The implementation of ESG Advisory is focused on sub-sectors with high emission intensity and significant transition risks, such as agriculture and forestry (palm oil sub-sector), mining and quarrying (coal sub-sector), and coal-fired power plants (PLTU). As a first step, in 2025, BNI launched a playbook for the palm oil sub-sector, making BNI the first bank in Indonesia to launch such a

playbook. Furthermore, BNI will begin an ESG Advisory pilot project, specifically in the palm oil sub-sector, in 2026.



In addition, BNI provides technical assistance to debtors to prepare them for the implementation of TKBI. Technical assistance is provided to all debtors in affected sectors, namely energy, agriculture, forestry, and other land use (AFOLU); construction and real estate (CRE); transportation and storage (T&S).

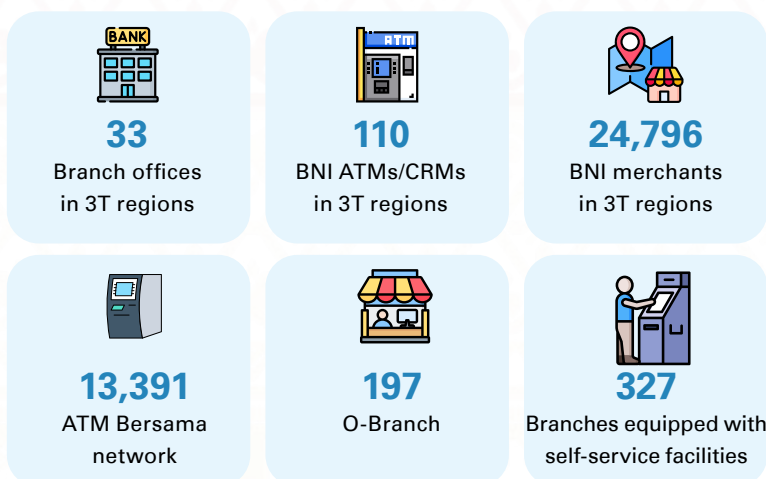
To raise awareness among debtors, the Bank held the BNI Sustainability & Transition (BEST) event as a means of disseminating information and sharing experiences on the implementation of sustainability in Indonesia and globally with debtors/customers.



Through this initiative, BNI encourages debtors to be better prepared to face the demands of transition, climate risk management, and developments in sustainability reporting standards, while supporting the transformation of the real sector towards a low-carbon economy in a gradual and inclusive manner.

Strengthening Inclusion and Literacy [FS16][FN-CB-240a.3, FN-CB-240a.4]

BNI consistently strengthens its role in promoting financial inclusion and literacy as part of its contribution to inclusive economic development, in line with the policies of the government and the Financial Services Authority (OJK). These efforts are aimed at ensuring that various segments of society, including previously underserved groups in Indonesia, such as those living in disadvantaged, frontier, and outermost areas (3T), can gain access to formal financial services that are safe, easy, and suit their needs.



As a continuation of the office network transformation process that was implemented in 2024, BNI applied an office network concept that took market potential into consideration, namely Super Flagship, Business Flagship, Thematic, Digital First, and Smart Conventional. In 2025, the transformation of the office network focused on increasing the productivity of branch offices in capturing market share through organizational restructuring and the implementation of more aggressive business strategies. By the end of the reporting period, 327 branch offices had been equipped with independent account opening services (DigiCS) and savings book printing services (Sprint).

BNI recognizes that expanding financial inclusion can also bring challenges and risks, including those related to transaction security and potential misuse of information. Therefore, BNI continuously integrates financial literacy programs into every inclusion initiative it implements, with a focus on raising public awareness of safe, prudent, and sustainable financial management.

Financial Inclusion Program

BNI has developed various approaches and service channels to bring banking closer to the community, both through the use of physical and digital networks, as well as community-based partnerships. In addition to expanding access, BNI also prioritizes financial education and assistance as important elements in the implementation of financial inclusion. Collaboration with various stakeholders, including regulators and representatives abroad, is carried out to increase public understanding and readiness for banking products and services, as well as to equip them with knowledge of more responsible financial management.

BNI Agen46

BNI Agen46 is a strategic partner of BNI in providing inclusive banking services to various segments of society including those in areas that are not yet covered by bank outlets or ATMs. By strengthening its agency network, BNI is expanding access to financial services that are secure, affordable, and meet the needs of the community.

In 2025, the number of BNI Agen46 grew by 1.7%, covering 465 cities/regencies, 6,174 districts, and 35,729 villages/sub-districts across Indonesia. This achievement is equivalent to approximately 42.5% of the villages/sub-districts covered in Indonesia. Of this total, 28,177 agents, or around 13%, are located in 3T areas, with a growth of 13.1% compared to the previous year. This achievement reflects BNI's commitment to expanding the banking services to reach more remote areas and enhancing the role of Agen46 in promoting financial inclusion and local economic growth.

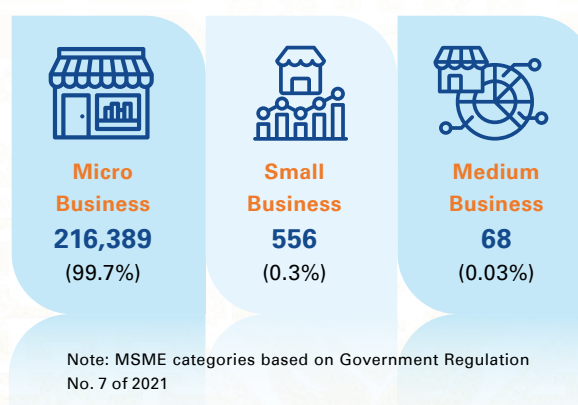


BNI Agen46 is spread across **42.5%** of sub-districts/villages in Indonesia, with **28,177** agents or approximately **13%** located in 3T areas.

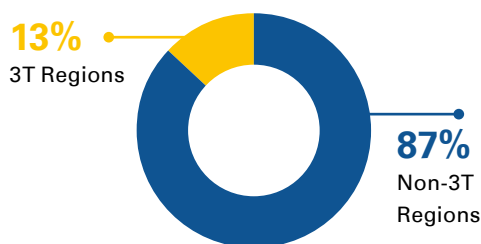
BNI Agen46 Profile by Gender & Age



BNI Agen46 Profile based on MSME



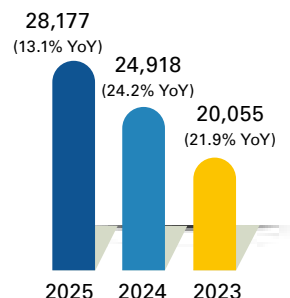
Distribution of BNI Agen46



The expansion of the BNI Agen46 network has had a multiplier effect, particularly on non-interest income. Throughout 2025, BNI's fee-based income (FBI) from transactions through the BNI Agen46 channel amounted to Rp189 billion, a 15.5% increase compared to the previous year. This achievement also reflects a twofold increase in the income received by Agen46 from its agency business compared to BNI's FBI. In addition to its financial contribution, the Agen46 ecosystem also has the potential to create jobs for residents living near the agents, estimated to reach approximately 217 thousand workers. To maintain agent motivation and appreciate their performance, BNI regularly holds an annual reward program called SPEKTA.

Through its growing network of agents, BNI Agen46 not only provides easier, faster, and more accessible daily banking services, but also supports the implementation of government programs aimed at alleviating poverty, including the distribution of social assistance under the Family Hope Program (PKH), the basic food assistance program, and direct cash assistance for people's welfare (BLTS Kesra). Throughout 2025, approximately 32 thousand agents supported the distribution of social assistance to 2.9 million beneficiary families (KPM) of PKH worth Rp2.2 trillion, 5.6 million KPM of basic foodstuffs (Sembako) worth Rp3.3 trillion, and 4.9 million KPM of BLTS Kesra worth Rp4.4 trillion spread across 106 regencies/cities in Indonesia. BNI Agen46 shortens the distance to access services for KPM in distributing assistance. The proximity of service points to communities contributes to the efficiency of community mobility and has the potential to provide a positive environmental impact by reducing the trips previously required by people to visit branches/ATMs.

Growth of BNI Agen46 in 3T Regions



BNI supports the red and white village/sub-district cooperative program (KDMP/KKMP) by making cooperatives the center of banking services for residents. Throughout 2025, as many as 1,167 KDMP/KKMP have joined and operated as Agen46.

BNI continues to demonstrate its commitment to supporting equal financial inclusion by partnering with the Indonesian Association of Persons with Disabilities (PPDI) through a special coaching and mentoring program for persons with disabilities to become BNI Agen46 agents. By 2025, 74 persons with disabilities had joined as BNI Agen46 agents. This initiative also earned a MURI record as the first empowerment program for persons with disabilities as BNI Agen46 branchless agents.



In support of a sustainable economy and the digitalization of the green economy, BNI is promoting the strengthening of the waste bank ecosystem through the integration of financial services to enable the conversion of waste savings into accounts registered in the banking system. Throughout 2025, 215 waste banks have joined BNI Agen46. The total transaction volume of deposits by Agen46 waste banks reached Rp7.4 billion, which is estimated to be equivalent to 2.4 tons of waste. BNI is also actively providing education on waste management and saving, including educational activities at the 13 Bekasi people's senior high school (SRMA) in August 2025.

As a BNI partner, Agen46 is also equipped with the capability to make referrals for regular savings products through wondr by BNI as well as KUR/BWU loan products. As of December 2025, Agen46 has made referrals for 293,392 savings accounts with a total value of Rp1.7 trillion. On the financing side, there are 31,586 debtor agents with a total debit tray of Rp33.5 trillion.

In providing banking services, BNI Agen46 can conduct transactions using various device channels, such as mobile applications, websites, EDC Mini ATMs, and EDC Android devices. BNI has distributed 38,551 EDC units to support the upgrading of devices used by Agen46, with 7,000 units being distributed in 2025. This initiative is expected to improve transaction stability and enrich the service features available to Agen46 and customers. To support the digitalization process of BNI Agen46 registration, a self-registration process has been implemented through the Mobile Agen application.

Digitalization through Agen46 makes it easier for underserved communities, starting with the younger generation, to open accounts and perform e-KYC with the assistance of agents without having to visit a branch office. Through local agents, people can also make cash deposits and withdrawals close to where they live, especially in areas that are far from ATMs and office networks. In addition, Agen46 supports daily digital transactions such as bill payments, as well as facilitating faster transfers and receipt of social assistance.

In line with service enhancement, BNI has also developed a BNI Life microinsurance purchase feature on its mobile application and introduced a PLN feature on Android EDC. In addition, BNI has implemented personal data protection provisions in accordance with the Law on Personal Data Protection within the Agen46 ecosystem to maintain customer privacy, data security, and consumer protection. To maintain customer loyalty and trust, BNI is committed to improving system security through IT security updates, including on the iOS platform, to strengthen the protection of agents and customers from the risk of cyber attacks.

Banking Access for Migrant Workers

BNI is partnering with OJK to provide financial education to the Indonesian diaspora and migrant workers by utilizing BNI's network of overseas representative offices. Assistance is provided from the preparatory stage before departure. As of December 31, 2025, a total of 418,821 BNI Taplus accounts have been opened by migrant workers.

Banking Access for Persons with Disabilities

BNI also ensures access to services for customers with disabilities by providing accessible ATMs. These ATMs are equipped with headphones and Braille buttons. To date, BNI has provided 3,472 disability-friendly ATMs spread across 405 regencies/cities across Indonesia, as well as overseas branches in Singapore and Hong Kong. In addition, BNI has also prepared access ramps to the Banking Hall and ATM Gallery to support wheelchair users.

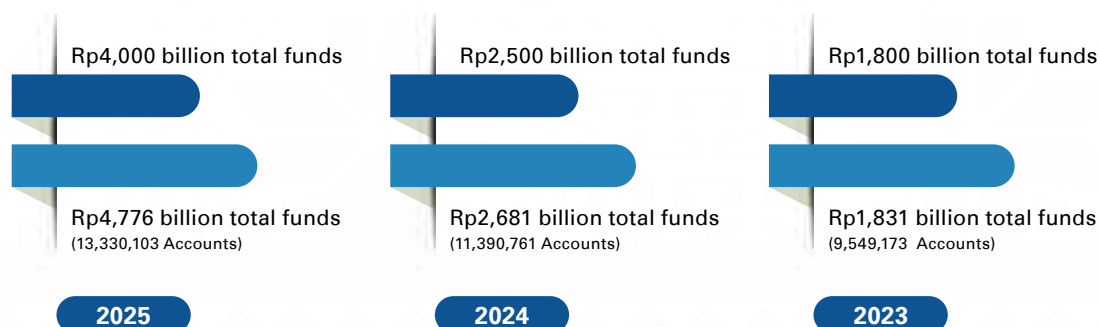


Savings Products for Students

BNI encourages students to start saving early and introduces savings products for students through several programs, such as Bank Goes to School, Ayo Menabung dengan Sampah (Let's Save with Waste), and the Indonesia Pintar (Smart Indonesia) Program.

● Targets ● Realization

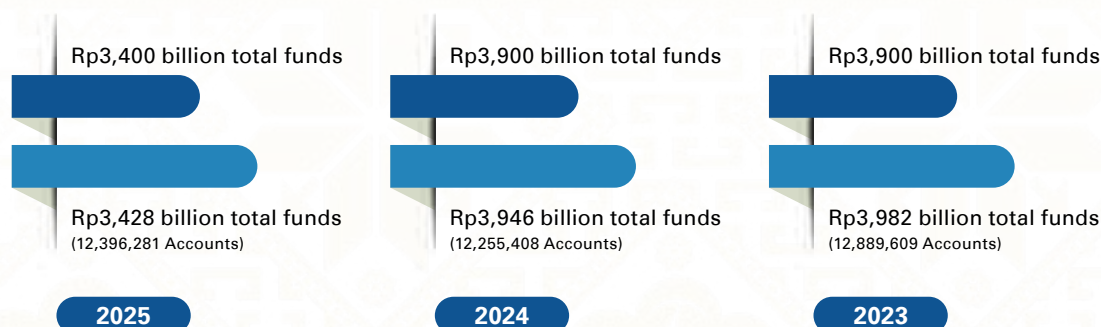
Simpanan Pelajar



BNI Pandai



TabunganKu



Ayo Menabung dengan Sampah

The Ayo Menabung dengan Sampah program is a BNI initiative that integrates community-based waste management with financial inclusion. In implementing the program, BNI collaborates with waste banks, local governments, schools, and communities. Through this program, the funds raised reached Rp1,636 million, exceeding the target of Rp1,600 million. These funds consist of Rp1,485 million distributed to Simpanan Pelajar (SimPel) accounts and Rp151 million to BNI Pandai accounts. In addition, this program also resulted in the opening of 196,163 accounts, consisting of 194,807 SimPel accounts and 1,356 BNI Pandai accounts.

Super Bidan Program

BNI continues its collaboration with Women's World Banking (WWB) in implementing the *Super Bidan* Program, which provides banking solutions to support financial planning related to childbirth and postnatal care. In 2024, this program has been implemented by involving 100 midwives spread across 4 cities. As a follow-up, WWB conducted a direct monitoring visit from its headquarters in New York to review the program's implementation in the field. The evaluation covered aspects such as the utilization of banking products, midwives' understanding of the program material, and the relevance of the solutions offered to the participants' needs. In 2025, as a continuation of the pilot program, a kick-off for the super midwife program between BNI, WWB, and the Indonesian Midwives Association was held on November 6, 2025, in conjunction with the Indonesian Midwives Association's annual event in Jakarta. In early 2026, educational and dissemination activities were conducted, both online and offline, in all BNI regional offices, which led to collaboration between BNI regional offices and regional/provincial administrators of the Indonesian Midwives Association.

Financial Literacy Program

BNI consistently implements financial literacy programs to improve public understanding of prudent financial management, safe use of banking services, and financial risk mitigation. Education is delivered through face-to-face and digital approaches, targeting various segments of society, including students, university students, and communities. Literacy materials cover an introduction to digital banking services, the basics of financial management, and increased vigilance against illegal investment practices and online gambling.

To expand the education coverage, BNI also utilizes media and digital devices available in its office network and service outlets. Educational materials are disseminated through various communication channels in branches, including ATM and CRM screens, DigiCS machines (both in-branch and off-branch), DigiCS Lite machines (in-branch), and digital poster media. As part of improving customer experience and accelerating the adoption of digital transactions, BNI presents the O-Branch Banking Café service. O-Branch Banking Café is a mobile banking service concept in the form of a café-designed minibuss. This service provides an alternative experience for customers to obtain information and conduct transactions in a more comfortable and interactive manner. The use of this facility also enables the consistent delivery of financial literacy messages to the public and customers in daily service activities.

Utilization of Digital Devices for Financial Literacy



13,391

ATM and
CRM machine
screens



330

DigiCS machines
(in-branch &
off-branch)



1,380

DigiCS Lite
machines (in-
branch)



727

Digital Poster
devices (in-
branch)

Financial Literacy Content through Social Media



2,019,227 followers
Instagram @bni46



1,139,017 followers
X @BNI



448,905 followers
Facebook @BNI



1,139,017 followers
Tiktok @bni46



63,564 followers
Youtube BNI

In addition, financial literacy is also strengthened through direct interaction at branch offices, involving frontliner who play a leading role in providing explanations and education to customers. Meanwhile, BNI actively uses social media as a channel for disseminating information and financial education content, so that literacy messages can reach a wider community and be more adaptive to developments in digital information consumption patterns.

Financial Literacy 2025

In addition to providing banking services, BNI is also strongly committed to being an agent of development that supports government programs in strengthening financial literacy and inclusion. BNI understands that financial literacy is the foundation for achieving financial stability and future prosperity. It continues to innovate in providing education and facilitating access to relevant financial products for future planning, business development, and optimal use of technology. The financial literacy and inclusion programs implemented during 2025 are as follows:

One Student One Account (KEJAR)

BNI partners with the Ministry of Education, Culture, Research, and Technology in a program initiated by the Financial Services Authority (OJK). The program aims to shape a culture of saving, particularly among students, who are not only academically intelligent but also financially literate, preparing them to face future economic challenges while equipping them with a basic understanding of financial management from their school days. In addition, this activity also aims to accelerate an increase in student savings accounts (SimPel) to support the achievement of Indonesia's financial inclusion target of 93% by 2029.



In 2025, this program had been promoted in 226 schools and had added 10,422 student accounts. BNI's commitment to promoting student savings and facilitating accounts with low fees and attractive features for students has come to fruition during an event held at State Islamic Junior High School (MTS) 3 Malang, which led to BNI receiving an award from the Financial Services Authority (OJK) as the Best Partner in Implementing KEJAR (Education and Financial Literacy Program) for Religious-Based Educational Institutions.

BNI SULTAN

BNI SULTAN (Friends for Financial Literacy and Inclusion) is a strategic initiative from BNI designed to put the bank as a trusted friend of the community in fostering financial understanding and inclusive access. BNI actively conducts massive, widespread, and targeted financial literacy education, including collaboration with OJK through the OJK PEDULI (Financial Literacy Ambassador Drivers) program. As part of its massive education efforts, BNI empowers frontliners in various regions as literacy ambassadors to provide financial education both directly and through social media channels, ranging from simple financial management to understanding financial risks.



In 2025, BNI had:

2,434
literacy
ambassadors

356
content posts

2,010,683
engagement

7,889,878
social media users
reach

In this program, BNI earned recognition and an award from the OJK as a Financial Services Business Operator (PUJK) for the 2025 Most Massive Literacy Ambassadors Formation.

Financial Literacy Campaigns

BNI is actively involved in various financial literacy campaigns and programs, focusing primarily on activities to educate and create a financially literate society from an early age, encourage savings habits, and ensure equitable and sustainable financial inclusion across all segments of society.

Campaigns are conducted both offline and online. One of the latest examples of BNI's offline financial literacy campaigns is BNI's active participation in the National Financial Health Event (NFHE) 2025, organized by the Financial Services Authority (OJK). For online campaigns, BNI uses the BNI Instagram social media platform to reach more people with content and themes such as:

- Financial planning and management.
- Public awareness of financial crimes.

During its 2025 campaign, BNI published 44 social media campaign posts, reaching 2,178,401 viewers.

National Financial Literacy Movement (GENCARKAN)

In line with the government's Asta Cita program, BNI, together with OJK, continues to accelerate the massive and collaborative distribution of financial literacy and encourages the equitable use of financial products and services for all segments of society through the National Financial Literacy Movement (GENCARKAN).

GENCARKAN is a national movement involving all stakeholders (OJK, financial service institutions, agencies/institutions, the public) with the aim of orchestrating and enhancing the synergy of financial literacy and inclusion activities carried out by all stakeholders to create a financially literate society that can make sound financial decisions and avoid various cases of financial crime. In 2025, BNI, together with relevant stakeholders, implemented the GENCARKAN program in 96 regencies/cities with 174 activities and 30,115 participants.

GEMA PASAR BNI

The Market Community Movement for Financial Literacy and Inclusion (GEMA PASAR BNI) is a program designed to encourage the use of digital technology in traditional markets in Jakarta, ranging from the implementation of digital payment systems to transaction data management, to build a more efficient, transparent, and inclusive trading ecosystem. In line with the market digitalization program initiated by the Jakarta Provincial Government and Perumda Pasar Jaya, together with BI and OJK. This program serves as a means to provide digital literacy to the community in the markets managed by Perumda Pasar Jaya DKI Jakarta.



In this program, BNI introduces financial solutions for market vendors and visitors, such as QRIS for cashless transactions, the wondr by BNI app, and the unique JELITA program, which exchanges used cooking oil for chicken eggs in collaboration with waste banks. In this program, BNI received an award from the Provincial Government of DKI Jakarta as the 1st Place Winner for the 2025 Best Financial Digitalization.

KEJAR OJK DKI Jakarta

The KEJAR OJK DKI Jakarta Pilot Project Program is a strategic initiative of the Jabodebek Regional OJK launched in 2025 as part of the One Account One Student (KEJAR) program. This program aims to improve financial literacy and inclusion among students by encouraging the opening of savings accounts for each student. The KEJAR - OJK DKI Jakarta program synergizes relevant stakeholders (schools, Jakarta Education Agency, OJK, and financial service providers) by targeting all levels of education (elementary, junior high, high school, and vocational high school). DKI Jakarta was selected as one of four provinces for the OJK pilot project (along with West Java, Bali, and West Kalimantan). During the pilot program period, which began in November 2025, BNI actively participated by targeting 14 schools in DKI Jakarta, with a total of 1,138 accounts opened. For its contribution to this program, BNI received a certificate of appreciation for a DKI Jakarta KEJAR Pilot Project Award from OJK Jabodebek.



Social and Environmental Responsibility: Creating Value through BNI Berbagi



BNI implements Social and Environmental Responsibility as an integral part of the company's sustainability strategy in creating long-term value for the community, the environment, and all stakeholders. Through an adaptive and needs-oriented approach, BNI continues to innovate in delivering effective and relevant solutions to address various social and environmental challenges as part of the company's sustainability strategy in creating long-term value for society. All activities are carried out in an integrated manner under the umbrella of BNI Berbagi, as the company's strategic social investment platform. Through BNI Berbagi, the Social and Environmental Responsibility program is not only focused on distributing aid, but is also aimed at strengthening social resilience, supporting community economic recovery, and promoting environmental sustainability in a sustainable and measurable manner.

In its implementation, BNI Berbagi adopts the principle of Creating Shared Value (CSV), which aligns the needs of the community with the

company's business objectives. This initiative is also a strategic instrument to mitigate the company's operational impact and support the achievement of 17 Sustainable Development Goals (SDGs). Through empowerment and strategic infrastructure development, BNI continues to promote economic independence while strengthening the company's position as a trusted financial partner. This commitment is realized through measurable allocation and execution.

In 2025, BNI allocated Rp166 billion for social and environmental responsibility programs, with a realization of Rp116.8 billion (70.4%). This effective implementation reflects BNI's dedication to generating tangible social and environmental impacts and reinforcing the company's role as a reliable development partner, which ultimately contributes to the stability of the financial system and the sustainability of BNI's own business. BNI Berbagi plays a vital role in strengthening community economic resilience while improving financial industry stability through the expansion of access to banking services.

The BNI Berbagi program has had various measurable positive impacts, through:

Improved community welfare, through expanded access to capital, business mentoring, and market access that encourages improvements in the standard of living of beneficiaries;

Transformation of community behavior, by encouraging a more productive, independent, and entrepreneurship-oriented mindset;

Increased income, which has a direct impact on the financial stability and economic sustainability of beneficiaries;

Enhanced capacity and independence of MSMEs, enabling them to increase competitiveness, expand business scale, and create jobs;

Increasing public trust and mitigating companies' social and operational risks through harmonious and sustainable relationships with the community.

Increased financial inclusion and literacy, particularly for MSMEs and vulnerable communities, through access to formal banking services;

Strengthening the social and economic resilience of communities, including in facing social risks, disasters, and economic disruptions; and

With these impacts, BNI Berbagi not only creates social and economic benefits for the community but also contributes to the achievement of the SDGs and the strengthening of BNI's long-term value and business sustainability.

BNI recognizes that the success of the Social and Environmental Responsibility program is largely dependent on the scope and equitable distribution of benefits. Therefore, BNI proactively identifies and mitigates potential social risks that may arise, including unequal development and assistance between regions, limited access to information for vulnerable groups, and potential social jealousy that could lead to conflict between communities.

As a mitigation measure, BNI implements an active, open, and participatory communication with all stakeholders. This approach is carried out continuously at every stage of the program, from planning and implementation to evaluation, to ensure that BNI's social and environmental responsibility program is carried out in an inclusive, targeted, and sustainable manner.

Through BNI Berbagi, BNI supports national economic growth through active contributions in the infrastructure sector. Infrastructure development is one of the main focuses of BNI's Social and Environmental Responsibility program as a tangible manifestation of BNI's role as an agent of development. Several roads have been successfully repaired and connected access roads in villages in the Java region. Two locations in Bekasi Regency, namely Tambun Selatan and Pebayuran, received funding assistance for casting and repairing village roads. Meanwhile, BNI provided assistance for the installation of paving and concrete rebates in three districts in Probolinggo Regency.

Economic Aspect: Creating Added Value for the Community [413-1, 413-2]

BNI is committed to implementing sustainable business processes that balance economic, social, and environmental performance. This commitment is realized through the implementation of various social and environmental responsibility programs. Throughout 2025, BNI allocated Rp166 billion to support these programs, with a realization of Rp116.8 billion, equivalent to 70.4% of the total budget.

BNI's presence has had various positive impacts, including improved community welfare, changes in behavior towards greater productivity, and an increase in income for beneficiaries. However, BNI also recognizes the potential negative impacts that may arise, not from its activities but from the limited reach of its programs to beneficiaries, such as inequitable coaching and assistance, limited access to information, and the potential for social jealousy that could lead to conflict between communities. To mitigate this, BNI continuously maintains active and open communication with beneficiaries during program implementation.

KAWAN BNI Program [203-1, 203-2, 413-1]

The KAWAN BNI Program is a rural community empowerment initiative designed as a sustainable assistance platform to strengthen local economic capacity. Through a collaborative approach, KAWAN BNI develops the potential of villages by integrating business assistance, community capacity building, and expanding access to markets and financial services.

The KAWAN BNI program focuses on mentoring communities in tourist destinations, such as cultural villages and ecotourism sites, as well as empowering vulnerable groups, particularly women and local communities. This program is aimed at promoting village economic independence, creating inclusive growth, and building sustainable social and economic resilience within communities.



Summary of Kawan BNI Activities

Location:

Wringin Putih Village, Muncar District, Banyuwangi Regency, East Java

Potential developed: Mangrove ecotourism, mangrove nurseries, soft-shell crab farming



Number of beneficiaries:

5,037 stakeholders



Impact:

Wellbeing: Improved quality of life for coastal communities through a healthier and more productive environment resulting from mangrove ecosystem restoration.



Nature: Restoring the ecological function of the Pangpang Bay coastal area through the rehabilitation of 50 hectares of mangrove forest damaged by land conversion, increasing annual carbon sequestration capacity and preserving coastal biodiversity.



Society: Empowering coastal women and youth through inclusive and participatory environmental education tourism activities, and development.



Economy: Promoting economic diversification among coastal communities through the development of mangrove ecotourism and soft-shell crab farming, mangrove nurseries, and derivative products.

Location:

Ponggok Tourism Village, Polanharjo District, Klaten Regency, Central Java

Potential developed: Spring-based water tourism (umbul), tourism village



Number of beneficiaries:

877 stakeholders



Impact:

Wellbeing: Increased knowledge and skills of BUMDes Ponggok Tirta Mandiri employees in tourism management and services, increased human resource capacity in the Ponggok tourism ecosystem related to financial digitalization through training in the use of QRIS in tourism business transactions.



Nature: Preservation of springs (umbul) through controlled and sustainable tourism management, increased community awareness of water resource conservation as a key village asset.



Society: Effective engagement of various stakeholders in the Ponggok Tourism Village Program, Klaten, to create inclusive economic benefits.



Economy: Increased revenue for BUMDes Ponggok Tirta Mandiri from managing tourist destinations, financial efficiency, and transparency in tourism due to the use of BNI QRIS for tourism service transactions.

Location:

Laweyan Batik Village (Surakarta City, Central Java) and Giriloyo Batik Village (Imogiri District, Yogyakarta)

Potential developed:

People's Economy through Environmentally Friendly Batik Assistance



Number of beneficiaries:

100 stakeholders



Impact:

Wellbeing: Increased capacity and confidence of artisans through technical training (palm wax, motif design, wax recycling), development and implementation of SOPs for production, finance, and governance.



Nature: Substitution of paraffin wax with palm wax (based on renewable raw materials).



Society: Empowering coastal women and youth through seed cultivation activities and strengthening women's role as key actors in the household economy.



Economy: Increasing product value through RSPO-certified labeling, branding, and differentiation of "sustainable batik."

Location:

Lembung Village, Galis District,
Pamekasan Regency, Madura, East
Java

Potential developed: Mangrove
Ecotourism



Number of beneficiaries:

40 stakeholders

**Impact:**

Wellbeing: Improved financial literacy and inclusion among ecotourism operators through basic financial management education.



Nature: Preservation and improvement of mangrove ecosystem functions as coastal protection and biota habitat, increasing mangrove vegetation area and quality through rehabilitation and maintenance efforts.



Society: Strengthening social cohesion through collective activities (planting, maintenance, tourism services), fostering local leadership in managing village natural resources.



Economy: Diversifying the village economy to be more resilient to environmental and seasonal risks, developing ecotourism as a long-term economic asset for the village.

Location:

Solor Island, East Flores
Regency, East Nusa Tenggara
Province

Potential developed: creative
economy (palm fiber weaving
& derivative products), culture
(preservation and strengthening
of traditional ikat weaving)



Number of beneficiaries:

420 stakeholders

**Impact:**

Wellbeing: Improving the welfare of artisan families through more stable incomes and support for the nutritional needs of children and pregnant women, creating a healthier and more decent working environment through access to clean water and Rumah Anyam (weaving house) facilities.



Nature: Raising public awareness of the importance of preserving local ecosystems as the basis for a sustainable creative economy.



Society: Strengthening social and economic institutions through cooperatives and collective activities such as Joint Weaving Activities (KMB), preserving the cultural heritage of lontar (palmyra) weaving and ikat weaving through intergenerational knowledge transfer.



Economy: Increasing the added value and competitiveness of local products through improved production standards and business management, expanding market access, and promoting inclusive and sustainable local economic growth.

Location:

Yaro Wora Traditional Village,
Patiala Bawa Village, Lamboya
District, West Sumba Regency,
East Nusa Tenggara Province

Potential developed: Culture-
based Tourism Village



Number of beneficiaries:

200 stakeholders

**Impact:**

Wellbeing: Improving the community's quality of life through the creation of business opportunities and new sources of income from the cultural tourism sector, increasing the indigenous community's pride and psychosocial wellbeing in relation to their identity and cultural heritage.



Nature: Maintaining a balance between tourism activities and the preservation of the surrounding environment.



Society: Strengthening social cohesion and the participation of indigenous communities in the management of the tourism village, ensuring the preservation of cultural values and customs through the active involvement of young generations and traditional figures.



Economy: Driving the local economy through the development of tourist attractions, tour packages, and supporting services, encouraging the formation of an inclusive and sustainable tourism village ecosystem based on local potential.

Location:

Jawapogo Village, Mauponggo District, Nagekeo Regency, East Nusa Tenggara

Issues addressed: High prevalence of stunting and child malnutrition, poor maternal nutrition, lack of knowledge and poor nutritional practices among families, and limited capacity of Posyandu cadres


Number of beneficiaries:

90 stakeholders


Impact:

Wellbeing: Improvement in the children's nutritional status and growth, and the health condition of pregnant women with chronic energy deficiency (CED) through targeted supplementary feeding (PMT), increased knowledge and practice of healthy family care through parenting classes.



Society: Strengthening the capacity of Posyandu and healthy kitchen to address stunting (DASHAT) cadres as agents of change at the village level, strengthening women's role in community leadership and family resilience.



Economy: Strengthening the long-term economic foundation of villages by improving the quality of human resources.

Location:

Lembah Asri Serang Tourism Village, Purbalingga, Central Java

Potential developed: Tourism village with great potential in the agrotourism and horticulture sectors


Number of beneficiaries:

55 stakeholders


Impact:

Wellbeing: Increased human resource capacity in the D'LAS tourism ecosystem related to financial digitalization through the dissemination of the use of banking services.



Society: Involvement of various stakeholders in creating inclusive and collaborative economic benefits.



Economy: Availability of facilities for underprivileged communities to start businesses by providing stalls in the food court area. Increased income for MSMEs due to receiving a strategic business location that is easily accessible to visitors.



Rumah BUMN [203-1, 203-2, 413-1]

As part of the Ministry of State-Owned Enterprises' initiative, Rumah BUMN was established to strengthen the role of micro, small, and medium enterprises (MSMEs) as the main drivers of the national economy. In its implementation, BNI plays an active role as the manager of Rumah BUMN in 23 locations spread across regions in Indonesia. Rumah BUMN's activities include capacity building training, business mentoring, and market access facilitation.

Through Rumah BUMN, MSME development is not only focused on strengthening the local market but also aims to open up opportunities for expansion to the national and international levels. The fostered MSMEs are facilitated to introduce their best products through various domestic and global exhibitions, expand their business networks, and increase the added value of their products.



Disability MSMEs Managed by Rumah BUMN

First, Mrs. Sukarmini Bulu runs a disability MSME and is also an environmental activist in Southwest Sumba (East Nusa Tenggara). She has been running an MSME at Rumah BUMN Southwest Sumba since 2018. In addition to being a craftswoman, Sukarmini also actively shares her skills as a resource person and has visited various villages in the province to train people in plastic waste management and the production of recycled bags. The Rumah BUMN in Southwest Sumba actively supports Sukarmini as a disability-owned MSME environmental activist. The contribution of Rumah BUMN BNI is not only about technical training, but also about bringing hope and opportunities that encourage positive change with a direct impact on the environment.

Second, the Gollu Rade MSME Group in Ombarade Village, Wewewa Tengah District, Southwest Sumba Regency continues to spread its wings in the world of small and medium enterprises. Led by Solaeman Mawo, the group utilizes natural resources that have not been properly managed, such as ginger, moringa leaves, chili peppers, coconuts, and corn. Gollu Rade has been able to create and employ workers in Southwest Sumba Regency. Slow but steady, the Gollu Rade MSME Group has grown to become one of the leading MSMEs in Southwest Sumba and even a partner of banks such as BNI and Rumah BUMN Southwest Sumba.

Social Aspect: Strengthening Social Resilience and Cohesion in the Community [413-1, 413-2]

The social pillar is aimed at strengthening the social capacity of communities to enable them to deal with various structural challenges, ranging from social vulnerability and inequality in access to basic services to the impact of disasters and rapid social change. BNI believes that social resilience is built not only through the fulfillment of basic needs but also through the strengthening of social networks, unity, and active community participation in the development process.

Through an inclusive and community-based approach, BNI encourages improvements in the community's quality of life by expanding access to education, healthcare, protection for vulnerable groups, and strengthening local capacity. Social interventions are designed to foster a sense of belonging, solidarity, and trust among stakeholders, thereby creating strong social cohesion as the foundation for long-term stability and sustainability. Thus, social and environmental responsibility programs not only generate individual impact but also build collective community resilience.

Education

Children's Character Education Program and Teacher Certification

As part of BNI's commitment to supporting the improvement of education quality and strengthening human resources, in 2025, BNI implemented the Children's Character Education and Teacher Certification Program in West Nusa Tenggara Province. This program reached 10 schools in Lombok, involving 3,400 students, 150 teachers, and 390 parents through character education that emphasized synergy between schools and families. Additionally, BNI supports international TOEIC certification for 100 English teachers across West Nusa Tenggara as an effort to enhance educators' capacity to deliver competitive teaching aligned with international standards. This initiative is expected to contribute to fostering a generation that excels academically while possessing strong character in the future.



Scholarships

As part of BNI's commitment to supporting increased access to and sustainability of education, throughout 2025, BNI distributed scholarships to 786 recipients with a total allocation of Rp1.5 billion. This program is aimed at encouraging the sustainability of education and the development of the younger generation's potential, as a long-term social investment in building superior and competitive human resources.

Educational Facilities and Infrastructure

In 2025, BNI contributed to improving the quality of education by providing assistance to 127 schools and educational institutions in various BNI working areas, including the construction and renovation of school buildings, classrooms, and laboratories, the provision of learning support facilities and infrastructure, educational teaching aids, and reading parks. This support is spread across a number of regions in Indonesia, including West Java, Central Java, East Java, Bali, Riau, North Sumatra, and Maluku, to improve the comfort and quality of the teaching and learning process for students and educators. Through this initiative, BNI strives to support the creation of a competitive and superior generation that will contribute to future development.

Health

Stunting Reduction Program

BNI is committed to supporting efforts to accelerate stunting reduction in Indonesia through the implementation of two complementary strategic programs that are oriented towards sustainable impact.

- Through the KAWAN BNI Program, BNI targets direct assistance to vulnerable groups in Nagekeo Regency by providing nutritional interventions to 50 children suffering from stunting, wasting, and underweight, as well as 25 mothers with Chronic Energy Deficiency (CED). This program not only focuses on meeting nutritional needs, but also on building the capacity of families and local cadres in nurturing practices and balanced nutrition.

- Through BNI Berbagi, BNI supports the improvement of basic health determinants in Banten Province by providing nutritious food for 200 beneficiaries for 6 months, accompanied by the renovation of uninhabitable houses and the construction of toilet facilities. This intervention is designed to improve the quality of life and environmental sanitation as important factors in the long-term prevention of stunting. In addition, BNI also implements integrated interventions in stunting prevention and treatment efforts in Tasikmalaya, West Java. This program includes the distribution of nutritious supplementary food to 47 stunted children for two months, the provision of basic food assistance to parents of stunted children, and the organization of nutrition seminars for pregnant women as an early prevention measure. Furthermore, BNI strengthens parenting and mental health aspects through smart parenting and mental health training, improves basic health service capacity through training for midwives and Stunting Response Cadres, and distributes educational toys (APE) to 8 posyandu (community health posts) to support child development stimulation and the sustainability of posyandu services.

Cataract Program

In 2025, BNI collaborated with the Pundi Amal Peduli Kasih Foundation (YPP) and the Indonesian Ophthalmologist Association (Perdami) (SPBK) to hold a cataract surgery social service program at Komodo Regional General Hospital, Labuan Bajo, West Nusa Tenggara, to help the community prevent vision impairment so they can carry out their daily activities normally. This program has helped 100 cataract patients, enabling beneficiaries to resume normal and productive activities while improving their quality of life and independence.

Empowering People with Disabilities

Through BNI Berbagi, BNI supports the empowerment of people with disabilities through various social programs that focus on strengthening business capacity and economic independence. This support is a manifestation of BNI's continuous commitment to ensuring that vulnerable groups have equal access to decent livelihood opportunities.

- One of the interventions was the distribution of briquette production machines to the Independent Disabled Community located in Banjardowo Market, Genuk District, Semarang City. This assistance was aimed at increasing production capacity and efficiency, while strengthening the sustainability of the community's business, which has been the main source of livelihood for its members. Previously, this community produced briquettes on a small scale with limited equipment, which resulted in low production volumes and income. With the more adequate production facilities, BNI helps boost productivity, expand business opportunities, and improve the economic welfare of the members of the disabled community and their families sustainably.
- BNI supports women's empowerment, including women with disabilities, through Rumah BUMN in Bekasi. Since its establishment in 2017, Rumah BUMN BNI in Bekasi has become a development platform for more than 400 micro, small, and medium enterprises (MSMEs). Aside from providing training and business mentoring, this program also serves as tangible proof of BNI's presence as an agent of development. One of the inspiring stories from the beneficiaries of the BNI Rumah BUMN is Painsi, a woman with disabilities who has now successfully developed her culinary business, Bumbu Pecel Yuk Ni. With the support of production equipment from BNI, Painsi has been able to significantly increase her production capacity.

- BNI, together with the Indonesian Ministry of Social Affairs, provided support in the form of business equipment, business development assistance, social media management assistance, and disability aids to 10 MSMEs run by people with disabilities. This program is part of BNI's efforts to encourage people with disabilities to develop, improve their welfare, expand business opportunities, create a more inclusive MSME ecosystem, and promote economic independence for people with disabilities.

Social Resilience

BNI is committed to contributing to food security strengthening and food insecurity mitigation as part of its social protection and community wellbeing improvement efforts. This commitment is realized through the implementation of integrated food security programs that are responsive to community needs, including during religious holidays such as Ramadan and Eid al-Fitr, as well as Christmas and New Year. These programs are aimed at ensuring that basic needs are met, alleviating the economic burden on vulnerable communities, and strengthening social solidarity and community cohesion.

In 2025, BNI distributed 291,850 food packages to vulnerable communities in various regions of Indonesia. This distribution is part of BNI's corporate social and environmental responsibility strategy to strengthen social resilience, maintain community welfare stability, and ensure the company's presence in responding to the basic needs of the community inclusively and sustainably.

Disaster Emergency Response

Fulfilment of Basic Needs

BNi assists disaster victims across Indonesia, including those affected by flash floods in Sumatra, the eruption of Mount Lewatobi Laki-laki in East Flores (East Nusa Tenggara), flash floods in Nagekeo and Bali Island, and fires in the tourism village of Yaro Wora, West Sumba (East Nusa Tenggara). Support is focused on meeting the basic needs of affected communities by distributing food packages, hygiene kits, and other emergency supplies to ensure survival, health, and accelerate post-disaster stabilization.



Satu Hati untuk Sumatera

BNI is supporting emergency relief efforts for victims of flash floods and landslides that have struck various areas in Aceh, West Sumatra, and North Sumatra. The assistance provided includes food supplies and daily necessities such as rice, instant noodles, eggs, and ready-to-eat meals, as well as baby and elderly care items like diapers, infant formula, and baby porridge. Distribution is prioritized in areas with the most severe impact that have been declared disaster emergencies. Specifically for Aceh, together with other state-owned enterprises (SOEs) through the BUMN Peduli 'Satu Hati untuk Sumatera' program under the coordination of Danantara, BNI is distributing emergency relief to disaster-affected residents in the Aceh region. This aid distribution is part of BNI's rapid response and concrete action in supporting the emergency response phase as well as the initial recovery of affected communities, with a focus on meeting basic needs and providing support for vulnerable groups, especially children.

Infrastructure Emergency Response

BNI distributed aid in Aceh in the form of 30 tents, consisting of 5 units of 3x4 tents, 5 units of 3x6 tents, and 20 units of 6x14 platoon tents. In the field of education, BNI distributed 400 elementary school uniforms, 700 junior high school uniforms, and 100 high school uniforms. To support trauma healing activities for children, BNI also distributed 200 dolls, 200 children's storybooks, 100 sets of toys, and 24 square meters of puzzle mats. In addition, BNI distributed other supporting aid in the form of 1,000 blankets, hygiene supplies such as soap, brushes, cleaning fluids, and brooms, four water tanks, 10 rechargeable flashlights, and 10 boxes of masks.



Trauma Healing for Children in Disaster Areas

BNI is facilitating the psychosocial recovery of children affected by flash floods in Leuser Village, Southeast Aceh Regency. This effort underscores BNI's commitment to post-disaster recovery that focuses not only on physical and logistical assistance, but also on mental recovery and psychological well-being of vulnerable groups, especially children. The trauma healing services provided are part of the Corporate Social and Environmental Responsibility policy, which is oriented towards sustainable recovery. Together with other SOEs through the BUMN Peduli 'Satu Hati untuk Sumatera' program under the coordination of Danantara, BNI provides psychosocial assistance to children affected by disasters.

Trauma healing activities were one of the quick impact initiatives of the BNI Berbagi program implemented at the BUMN Volunteer Command Post in Leuser Village. Involving facilitators experienced in assisting children in disaster areas, these activities were designed to provide a safe space for children to play, interact, and positively express their feelings.

Post-disaster: Home Renovation

BNI provides housing recovery support by repairing homes affected by the eruption of Mount Lewotobi Laki-Laki in East Flores, East Nusa Tenggara. This program aims to restore livable, safe, and healthy housing while supporting the recovery of the community's quality of life in the post-disaster rehabilitation phase.

Post-Disaster: Danantara Housing in Aceh

BNI has declared its support for the government's target through the Danantara Indonesia Investment Management Agency (BPI) to provide 15,000 Danantara Houses (Huntara) for communities affected by disasters in Aceh, West Sumatra, and North Sumatra. This effort is in line with the government's commitment to provide decent and dignified housing for disaster victims as a tangible manifestation of the state's presence. BNI's participation in the construction of Huntara in Aceh Tamiang Regency is one form of this support. In the first phase, BNI contributed around 20% or 120 housing units out of a total of 600 Huntara units built in the region. In addition to housing units, the Danantara Housing complex is also equipped with various supporting facilities, including a playground, Wi-Fi network, prayer room, public facilities, as well as bathrooms and sanitation facilities.



Employee Volunteering Program

Since 2023, BNI has been implementing an Employee Volunteering Program (EVP) for employees to actively participate in social and environmental activities integrated into the BNI Berbagi framework. This program is one of the Key Performance Indicators (KPIs) of the Ministry of State-Owned Enterprises' CSR, while also reflecting BNI's commitment to encouraging the voluntary involvement of employees (BNI Hi Movers) to contribute their time, energy, and ideas. Through EVP, BNI not only creates tangible benefits for the community but also strengthens employee engagement, loyalty, cross-unit collaboration, and the development of empathetic leadership among BNI personnel as part of the company's human capital and social capital development.



The implementation of EVP includes various social and environmental activities, such as tree planting, religious holiday celebrations, revitalization of places of worship, as well as humanitarian and community empowerment actions in BNI's operational areas. This program is designed not only to focus on activities, but also on creating sustainable social, economic, and environmental added value, in line with the principles of good social governance and the SDG agenda.

In 2025, EVP expanded its functions by actively participating in the Seventh Batch of the SOE Volunteer Program (RBB) organized by the Ministry of SOEs in Pamekasan Regency, East Java, on February 17-19, 2025. This activity was part of a simultaneous program in 10 locations involving 150 SOE employees. As the host, BNI deployed 5 volunteers who collaborated with 10 volunteers from other SOEs to carry out various cross-sector social activities.

BNI also deployed volunteers to be directly involved in disaster management and early recovery efforts for affected communities in Aceh. The involvement of BNI volunteers is part of a joint action by the BUMN Family through the BUMN Peduli "Satu Hati untuk Sumatera" program under the coordination of Danantara Indonesia. BNI volunteers were dispatched along with hundreds of volunteers from 11 SOEs and focused on strengthening humanitarian activities in the affected areas, particularly North Aceh and Southeast Aceh as the main disaster management command posts. As a form of operational support, BNI distributed logistical aid using three trucks carrying cleaning supplies, sanitation support equipment, and supporting equipment such as water tanks, water pumps, generators, and volunteer safety equipment. BNI volunteers came from various work units in the Sumatra region, including the Head Office, BNI Region 01 Medan, Region 02 Padang, Medan Branch Office, North Sumatra University Branch Office, and other branch offices, reflecting the spirit of cooperation and solidarity of BNI employees in responding to humanitarian emergencies.

Philanthropic Assistance [203-1, 203-2, 413-1]

Through BNI Berbagi, BNI carries out its social responsibility by distributing various forms of philanthropic assistance to support the fulfillment of basic needs and social resilience of the community. In the health sector, BNI provided 30 wheelchairs for patients, as well as clean water and sanitation facilities in 78 affected areas in various regions of Indonesia.

In supporting food security, BNI distributed 291,850 food packages, with 22,600 of the food packages going to disaster victims and the rest to other social activities. BNI also supported the construction and renovation of interfaith worship facilities, with a total of 145 worship facilities receiving assistance throughout 2025. In the field of education, BNI distributed assistance to 127 schools and educational institutions, including support for learning facilities and technology.

In line with the government's priority program, BNI contributes to accelerating the reduction of stunting by providing food packages for toddlers and pregnant and breastfeeding mothers, providing nutritious lunches, and training Posyandu cadres in Tasikmalaya, Tangerang, and Nageko regencies. These efforts reflect BNI's commitment to improving the welfare and quality of life of the community sustainably.

Measuring the Impact of Social Investment ^[413-1]

BNI strives to create sustainable impact and added value for the community through various social investment programs carried out under the umbrella of the BNI Berbagi program. Each intervention is designed not only to address short-term needs, but also to encourage capacity building, independence, and socio-economic resilience among the beneficiary communities.

As part of its commitment to accountability and program quality improvement, BNI consistently evaluates and measures the impact of its Bakti BNI programs. These evaluations aim to identify achievements, areas for improvement, and the effectiveness of programs in creating sustainable social, economic, and environmental benefits.

In addition to outcome-based impact measurement, BNI also applies a community satisfaction index (CSI) as an evaluation tool to capture the level

of satisfaction, perception, and experience of beneficiaries regarding program implementation. IKM measurement provides an overview of service quality, program relevance to community needs, and the effectiveness of the mentoring approach.

The results of impact and CSI measurements form the basis for the continuous improvement process, as well as serving as a strategic reference for program design refinement, implementation governance strengthening, and program replication to other regions to ensure more targeted, inclusive, and long-term impact.

In 2025, BNI conducted another measurement of the impact of its Corporate Social and Environmental Responsibility (CSR) programs using the social return on investment (SROI) and CSI methods. The measurement process was carried out in collaboration with an independent party for three selected CSR programs, namely:

Program Name	SROI Value*	Community Satisfaction Index	
		CSI Value	Satisfaction Category
Lembah Asri Serang Tourism Village Program, Purbalingga, Central Java	2.43	87.20%	Good
Ponggok Tourism Village Program, Klaten, Central Java	2.52	82.25%	Good
Ngawi State-Owned Enterprise Housing Program	5.35	92.56%	Very Good

Note:

*) For example, an SROI value of 2.43 means that every Rp1 invested by BNI generates Rp2.43 in social benefits for stakeholders.

Community and Environmental Program Complaint Handling Mechanism ^[411-1, 413-1]

During 2025, BNI did not record any complaints or incidents related to violations of the rights of indigenous peoples in the areas surrounding the company's operations. During the same period, BNI also did not receive any complaints from the general public regarding negative impacts on the environment. This reflects BNI's commitment to maintaining harmonious relations with local communities and ensuring that all operational activities are carried out responsibly.

Environmental Aspect: Maintaining Environmental Carrying Capacity for Sustainability [413-1, 413-2]

The environmental pillar focuses on efforts to preserve and strengthen environmental carrying capacity as a key prerequisite for social and economic sustainability. BNI recognizes that environmental degradation, climate change, and increased risk of natural disasters have a direct impact on community wellbeing and the sustainability of local economic activities.

Through the Social and Environmental Responsibility program, BNI encourages responsible, adaptive, and locally based environmental management, including ecosystem protection, sustainable natural resource management, and increasing community awareness and capacity in dealing with environmental risks. This approach is aimed not only at environmental restoration, but also at prevention and strengthening ecosystem resilience. By maintaining a balance between environmental utilization and conservation, BNI is committed to ensuring that the benefits of development can be enjoyed sustainably by current and future generations.



Earth Hour Participation

BNI participates in Earth Hour activities to reduce the impact of climate change through its energy-saving campaign, "A Moment Without Light for the Preservation of the Universe." BNI has been conducting this activity regularly for 15 years since 2010. All BNI office buildings, from the Head Office, branches, and credit centers, to all overseas branches, turned off their lights from 8:30 p.m. to 9:30 p.m. on Saturday, March 22, 2025. Energy savings can still be achieved without disrupting customer service, as all ATMs remained operational. Customers were still able to access banking services easily through various available digital channels.

Conservation of the Environment and Biodiversity ^[304-1, 304-2, 304-4]

BNI's business activities do not directly impact the environment. BNI's offices are located far from protected areas and/or areas with high levels of biodiversity, ensuring that BNI's operations do not have a negative impact on biodiversity. However, as a form of commitment to environmental preservation, BNI has realized environmental costs of Rp7.4 billion during 2025 to support the implementation of various programs aimed at improving environmental quality and ecosystem carrying capacity in a sustainable manner.

BNI implements biodiversity conservation initiatives through efforts to protect flora and fauna, in accordance with Regulation of the Minister of Environment and Forestry No. 106 of 2018. These efforts include the protection of endemic Indonesian plant and animal species, including the Bornean orangutan.

The Bornean orangutan is an endangered species classified as critically endangered on the International Union for Conservation of Nature (IUCN) Red List. The Bornean orangutan is also categorized as an umbrella species, which is an animal with a wide range of habitats, playing an important role in maintaining the balance and success of other species' conservation. Protecting the Bornean Orangutan not only impacts the survival of the species' population but also provides broader ecological benefits.

Conservation of Bornean Orang Utans (*Pongo pygmaeus*) ^[304-4]

BNI plays an active role in supporting Bornean Orang Utan rehabilitation efforts through cooperation with the Ministry of Environment and Forestry (KLHK) and the Bornean Orangutan Survival Foundation (BOSF). In 2025, BNI contributed to the rehabilitation of four Bornean Orang Utans at the Nyaru Menteng Orang Utan Rehabilitation Center in Central Kalimantan, as well as the restoration of 8 hectares of critical land in the Samboja Lestari area.



At the rehabilitation site, BNI supports the forest ecosystem recovery process through reforestation, land maintenance, and fire risk management activities to restore the area's function as a natural habitat. These efforts aim to provide learning spaces, sanctuary areas, and adequate food sources for orang utans. In addition to habitat restoration, BNI also provides support for animal health by supplying vitamins, teaching about natural food preparation, and assisting with infrastructure improvements in conservation areas.

BNI Berbagi also plays a role in protecting endangered species conservation that are endemic to Indonesia, one of which is the Bornean Orang Utan (*Pongo pygmaeus*). Recognizing the importance of orang utan sustainability as an umbrella species in maintaining environmental sustainability and biodiversity, since 2018, BNI has consistently supported orang utan conservation in Indonesia through collaboration with the East Kalimantan Natural Resources Conservation Agency (BKSDA) and the Borneo Orangutan Survival Foundation (BOSF), focusing on the rehabilitation and conservation of critical land that is the orang utan's ecosystem. This year, BNI rehabilitated four individual orang utans and planted trees in an area of 8 hectares of critical land. This sustainable initiative has been ongoing for several years, with two Bornean Orang Utans rehabilitated and trees planted on 4 hectares of land.



Mangrove Forest Rehabilitation [304-3]

In 2025, BNI continued its support for reforestation and land rehabilitation activities as part of the company's commitment to preserving the environment. One of the programs that continues to be implemented is mangrove forest conservation in Banyuwangi Regency, East Java, specifically in the Pangpang Bay area, which has been designated as an Essential Ecosystem Area (KEE).

BNI, alongside the community, continues its series of mangrove conservation activities, which include the procurement of seedlings, planting, and maintenance of mangroves. By the end of 2025, this program had recorded progress in the form of planting approximately 150,000 seedlings on 50 hectares of area, and a plant survival rate of 98%, demonstrating the effectiveness of the program's implementation and the active involvement of the community in maintaining the sustainability of the ecosystem.

In 2025, activities focused on strengthening plant maintenance, increasing the capacity of local communities in mangrove management, and continuous monitoring to ensure optimal ecological and social benefits. Rehabilitation efforts are carried out through an agroforestry approach, which integrates the ecological functions of mangroves with the economic potential of local resources. This approach aims to improve soil and air quality, maintain the balance of coastal ecosystems, and strengthen the region's resilience to potential natural disasters, such as tidal flooding, abrasion, and the impacts of climate change.

Through this mangrove rehabilitation program, BNI not only contributes to environmental conservation efforts but also empowers coastal communities, raises environmental awareness, and creates long-term value for social, economic, and environmental sustainability in the company's operational areas.



Coastal Reforestation ^[304-3]

BNI also planted 50,000 casuarina seedlings on Tiris Beach, Indramayu, to commemorate BNI's 79th anniversary. This initiative is designed to support coastal ecosystem conservation by increasing vegetation cover, which plays a role in carbon sequestration, protecting coastal areas from abrasion, and strengthening environmental resilience. This activity involves the local community, students, and BNI employees as a form of collaborative participation in environmental preservation and the creation of a sustainable, positive impact on coastal ecosystems.

Working with the Community to Manage Waste

As part of its commitment to sustainable environmental management, BNI supports waste management programs by providing 16 waste collection motorcycles in various regions to improve the effectiveness of waste collection and transportation at the community level. In addition, BNI also implements waste management programs in three schools in Bali Province by providing waste shredders, composters, separate waste bins, and conducting waste recycling education along with financial literacy.

This support aims to strengthen community-based waste management systems and education, encourage behavioral change in waste management from an early age, and create a clean, healthy, and sustainable environment.

Verification by Independent Parties



Independent Assurance Statement

The 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk

Number	: 02/000-758/II/2026/SRAI
Assurance Type	: Type 1 and Type 2 for the specific topic of Data Security and Cyber Security, and Green Portfolio Management.
Assurance Level	: Moderate
Reporting Standards	: GRI Universal Standard 2021 Consolidated, GRI Financial Services Sector Supplement, Sustainability Accounting Standard Board (SASB) Financial Sector Commercial Banking, Sustainability Banking Assessment (SUSBA), Early adoption of International Financial Reporting Standards (IFRS) S1: General Requirements for Disclosure of Financial Information Related to Sustainability; and IFRS S2: Climate-Related Disclosures, and ASEAN Corporate Governance Scorecard (ACGS) regarding Resilience Sustainability
Reporting Regulation	: Otoritas Jasa Keuangan Regulation (POJK) Number 51/POJK.03/2017 and SEOJK No. 16/SEOJK.04/2021

Dear stakeholders,

PT Sejahtera Rambah Asia or “SRAI” is issuing an **Independent Assurance Statement** (“the Statement”) of the **2025 Sustainability Report** (“the Report”) of **PT Bank Negara Indonesia (Persero) Tbk** (“the Company”). The Company is a state-owned bank listed in Indonesia Stock Exchange (IDX). The Report presents the commitment and efforts of the Company in managing its sustainability performance for the reporting period of **January 1st to December 31st, 2025**. As agreed with Management, SRAI’s responsibility is to make an assessment based on the data and content of the Report for the year.

Intended User and Purpose

The purpose of the Statement is to present our opinion including the findings and recommendations based on the results of assurance work to the Company’s stakeholders. The assessor team in accordance with specific procedures and a specific scope of work carried out the assessment. Except for the areas covered in the scope of the assurance, we encourage all NOT to solely interpret the Statement as the basis to conclude the Company’s overall sustainability performance.

Responsibilities

Our obligations to the Management involve assessing the Report’s content, generating findings, and recommendations, and issuing a Statement. Additionally, we are tasked with establishing conclusions and recommendations according to agreed-upon standards, methods, and approaches. Consequently, SRAI’s evaluation is solely based on the most recent editorial and data received as of February 3rd, 2026, regarding the final draft. SRAI’s responsibility lies solely in providing assurance work, distinct from an audit, in accordance with the Non-Disclosure Agreement, the Assurance Engagement Agreement, Representation Letter, and Subsequent Event Testing. Management bears the sole responsibility for presenting data, information, and disclosures within the Report. Therefore, any parties relying on the Report and Statement must assume and manage their own risk.

Independence, Impartiality, and Competency

SRAI confirms NO relationships between the assessor team and the clients that can influence their independence and impartiality to conduct the assessment and generate the Statements. The assessor

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team is mandated to follow a particular assurance protocol and professional ethical code of conduct to ensure their objectivity and integrity. We carried out a pre-engagement assessment before the assurance work was taken to verify the risks of engagement as well as the independence and impartiality of the team. The assessor team members have knowledge of ISO 26000, AA1000 AccountAbility standards and principles, and also have experience in sustainability report assessment based on various reporting regulations.

Type and Level of Assurance Service

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

Scope and Limitation of Assurance Service

1. Data and information in the Report for the period of **January 1st to December 31st, 2025**.
2. Material topics presented in the Report: **Data Security and Cyber Security, Economic Performance, Green Portfolio Management, and Climate Resilience**.
3. Evaluation of publicly disclosed information, system, and process of the Company to ensure adherence of the Report content to the reporting principles.
4. SRAI does NOT include financial data, information, and figures in the Report content. We assumed that the Company, independent parties, or other parties associated with the Company have verified and/or audited financial statements, data, and information.
5. Adherence to the following reporting principles, standards, and regulations:
 - a) Regulation of Otoritas Jasa Keuangan (OJK) No.51/POJK.03/2017 regarding the Implementation of Sustainable Finance for Financial Service Institution, Listed, and Public Companies (POJK 51) with reference to OJK Circular Letter (SEOJK) 2022 No.16/SEOJK.04/2021
 - b) Consolidated set of GRI Sustainability Reporting Standards 2021 (GRI Universal Standards).
 - c) GRI G4 Financial Disclosure (GRI G4-FS) issued by the Global Reporting Initiative.
 - d) Sustainability Accounting Standard Board – Commercial Banks.
 - e) Sustainable Banking Assessment (SUSBA) World Wide Fund for Nature (WWF).
 - f) ASEAN Corporate Governance Scorecard (ACGS) regarding Resilience Sustainability.
 - g) Early adoption of International Financial Reporting Standards (IFRS) S1: General Requirements for Disclosure of Financial Information Related to Sustainability; and IFRS S2: Climate-Related Disclosures.

Exclusion

1. The expression of opinion, belief, expectation, advertisement, and also forward-looking statements, including future planning of the Company as specified in the Report content.
2. Analysis or assessment against regulations, principles, standards, guidelines, and indicators other than those indicated in the Statement.
3. Topics, data, and information outside the reporting period, or in the public domain not covered in the reporting period.
4. Financial performance data and information as presented in the Company's financial statements and documents, other than those mentioned in the Report.

Methodology and Source Disclosure

1. Form an Assessor Team whose members are capable in sustainability report development and assurance.



2. Perform the pre-engagement phase to ensure the independence and impartiality of the Assuror Team.
3. Hold a kick-off meeting and initial analysis of the Report draft based on the SRAI Protocol on Assurance Analysis refers to the standards, principles, and indicators of AA1000AS v3, AA1000APS (2018), and standards/regulations used in the Report.
4. Discuss online the results of the analysis with the Management and data contributors.
5. Verify evidence and trace data and information as covered in the Report.
6. Conducted the On-Site Engagement (OSE) through direct interviews with both internal and external stakeholders.
7. The Company incorporated our recommendations in the draft Report and released the final Report content.
8. Prepare the Statement and send it to AA1000 AccountAbility for review to get approval before submitting it to the Company.
9. Prepare a Management Letter detailing all aspects seen, recorded, and observed during the assurance work to the Management of the Company for further improvement of sustainability processes.

Adherence to AA1000AP (2018) and GRI Universal Standards

Inclusivity – The Company has systematically involved internal and external stakeholders in determining material topics through Focus Group Discussions (FGDs) and the distribution of questionnaires. Stakeholder concerns have been the focus of the Company and have been addressed in the report on the approach taken. In determining material topics, the Company also evaluates the effectiveness of stakeholder engagement by involving each division to identify risks and opportunities in each topic.

Materiality – In determining materiality levels, the Company uses the Double Materiality Approach (DMA), taking into account impact materiality and financial materiality. The Company has considered short-term, medium-term, and long-term perspectives in materiality. However, in subsequent reporting, it is expected that the Company will be able to determine material topics at the time of budget preparation, rather than at the time of report preparation, to accommodate interests in budgeting, action, and reporting, as well as to present in detail the topics of concern.

Responsiveness – The Company has responded to the needs, issues, concerns, and expectations of stakeholders. This is done through intensive communication conducted regularly once a year. These responses are discussed at board meetings, and the results are then communicated to all unit heads for follow-up or response. In developing responses to important topics, these have been incorporated into the Company's plans, and performance is monitored through Key Performance Indicators (KPIs) from the relevant divisions. To support this, the Company has a feedback channel that can be accessed by all internal and external stakeholders. The Company also provides contact numbers that can be accessed by domestic and foreign customers.

Impact – The Company has measured, assessed, and managed its impacts appropriately in accordance with materiality. In explaining each topic, the Company has identified every impact arising from the performance of each material topic, as well as mapping and evaluating the level of materiality of the impact (positive and negative) and the level of financial materiality (risks and opportunities).

Statement of Use: "In Accordance to the GRI Standards" – We evaluated the Report content in adherence to the GRI Universal Standards principles, disclosures, and requirements for reporting. The

SRAI Independent Assurance Statement, version 2026, page 3 of 4

Company has referred to the nine requirements: apply the reporting principles, report the disclosures in GRI 2: General Disclosures 2021, determine material topics, report the disclosures in GRI 3: Material Topics 2021, report disclosures from the GRI Topic Standards for each material topic, provide reasons for omission for disclosures and requirements that the organization cannot comply with, publish a GRI content index, provide a statement of use, and notify GRI.

On Site Engagement: On-Site Engagement (OSE) constitutes one of our procedures performed to assess the Company's adherence to the AA1000 Principles (Inclusivity, Materiality, Responsiveness, and Impact), based on a sample of material topics and significant stakeholders. Based on the OSE performed, we conclude that the Company has implemented the process in a generally sufficient and appropriate manner, covering the aspects of Inclusivity, Materiality, Responsiveness, and Impact as identified, mapped, and applied in its engagement with stakeholders.

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

Type 2 Assurance – SRAI verifies the topic of **Data Security and Cyber Security**, the Company has implemented monitoring using existing procedures, reinforced by a Cybersecurity Intelligence Platform that helps protect the Company's information systems. The Company reports each incident to the board of directors on a regular basis. In identifying information system vulnerabilities, the Company has created a risk register for each period in collaboration with consultants who assist in reviewing the risk register. The Company is expected to collaborate with external parties to examine the resilience of the Company's information systems. Regarding **Green Portfolio Management**, the Company has established and implemented a green portfolio management framework through coordinated roles across ESG, risk, and business units. The framework is supported by documented SOPs, risk acceptance criteria, structured debtor assessment, and regular monitoring mechanisms. Our examination results indicates that these processes are operating effectively to support credit quality, ESG compliance, and ongoing oversight of green portfolio debtors in accordance with the Bank's policies and applicable regulations.

Recommendation

1. To determine material topics can be done at the budget planning stage to ensure more effective selection in the budget, activity plans, and reporting.
2. To conduct the Double Materiality Approach (DMA) best practice by analyzing all issues raised (not only material topics). This aims to produce clear mapping results and highlight the significance of the material issues raised.

The assurance provider,

Jakarta, February 6th 2026



Lim Hendra
Assurance Director
PT Sejahtera Rambah Asia
(SRAI)



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Responsibility Statement of the Board of Commissioners on the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk ^[2-14]

We the undersigned, the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk hereby declare that we have reviewed and approved the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk and that all information in the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk is presented in its entirety, and that we take full responsibility for the accuracy of the content of this Sustainability Report.

This statement is hereby made in all truthfulness.

Jakarta, February 2026

Board of Commissioners



Omar Sjawaldy Anwar

President Commissioner/Independent Commissioner



Tedi Bharata

Vice President Commissioner



Vera Febyanthy

Independent Commissioner



Didik Junaedi Rachbini

Independent Commissioner



Donny Hutabarat

Commissioner



Febrio Nathan Kacaribu*

Commissioner*

*Not yet effective

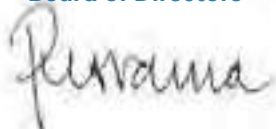
Responsibility Statement of the Board of Directors on the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk ^[2-14]

We the undersigned, acting as the Board of Directors and Members of the ESG Sub-Committee of PT Bank Negara Indonesia (Persero) Tbk, hereby declare that we have reviewed and approved the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk. We confirm that all information in the 2025 Sustainability Report of PT Bank Negara Indonesia (Persero) Tbk is presented in its entirety and take full responsibility for the accuracy of the content of this Sustainability Report.

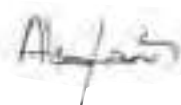
This statement is hereby made in all truthfulness.

Jakarta, February 2026

Board of Directors



Putrama Wahyu Setyawan
President Director



Alexandra Askandar
Deputy President Director



Hussein Paolo Kartadjoemena
Finance and Strategy Director



Corina Leyla Karnalies
Consumer Banking Director



David Pirzada
Risk Management Director



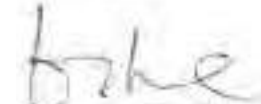
Ronny Venir
Operations Director



Toto Prasetyo
Information Technology Director



Agung Prabowo
Corporate Banking Director



Muhammad Iqbal
Commercial Banking Director



Rian Eriana Kaslan
Network & Retail Funding Director



Abu Santosa Sudradjat
Treasury & International Banking Director



Eko Setyo Nugroho
Institutional Director



Munadi Herlambang
Human Capital and Compliance Director

Reference of POJK No. 51, Indexes of GRI Standards, SASB, SUSBA, ACGS

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GRI Standard

Statement of use	PT Bank Negara Indonesia (Persero) Tbk has reported in accordance with the GRI Standards for the period 1 January – 31 December 2025
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standards	-

GRI Standards	Indicator	Disclosure	Page	Omission			GRI Sector Standard Ref.No
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	2-8	Wokers who are not employees	29				
	2-9	Governance structure and composition	31-32				
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	2-12	Role of the highest governance body in overseeing the management of impacts	43-44				

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	2-14	Role of the highest governance body in sustainability reporting	18-23				
	2-15	Conflicts of interest	3, 43				
	2-16	Communication of critical concerns	33, 35-38, 46-47				
	2-17	Collective knowledge of the highest governance body	101-103, 107-109				
	2-18	Evaluation of the performance of the highest governance body	43				
	2-19	Remuneration policy	43				
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	2-21	Annual total compensation ratio		Confidentiality constraints	The company cannot disclose the data since it is confidential		
	2-22	Statement on sustainable development strategy	18-23				
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	2-24	Embedding policy commitments	38-50				
	2-25	Processes to remediate negative impacts	35-38, 137-139				
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	2-27	Compliance with laws and regulations	31, 47, 50				
	2-28	Membership associations	29-30				
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GRI 3: Material Topics	3-1	Process to determine material topics	51-54				
	3-2	List of material topics	51-54				
	3-3	Management of material topics	58, 61, 72, 90, 123				
Material Topic: Economic Performance and Green Portfolio Management							
GRI 3: Material Topics	3-3	Management of material topics	58				

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	201-2	Financial implications and other risks and opportunities due to climate change	84-86				
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Material Topic: Climate Resilience							
GRI 3: Material Topics	3-3	Management of material topics	72, 90				
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	302-2	Energy consumption outside of the organization	91				
	302-3	Energy intensity	91				
	302-4	Reduction of energy consumption	91				
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	305-2	Indirect (Scope 2) GHG emissions	92				
	305-3	Other indirect (Scope 3) GHG emissions	87-88, 92				
	305-4	GHG emissions intensity	92				
	305-5	Reduction of GHG emissions	91-92				
	305-6	Emissions of ozone-depleting substances (ODS)	92				
	305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	92				
Material Topic: Data Security and Cybersecurity							
GRI 3: Material Topics	3-3	Management of material topics	123				
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	129				

GRI Standards	Indicator	Disclosure	Page	Requirement(s) Omitted	Omission		GRI Sector Standard Ref.No
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	202-2	Proportion of senior management hired from the local community	28				
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GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	173-177, 184				
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GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	46-47				
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	205-3	Confirmed incidents of corruption and actions taken	49-50				
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GRI 207: Tax 2019	207-1	Approach to tax	60				
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	207-3	Stakeholder engagement and management of concerns related to tax	60				
Water and Effluents							
GRI 303: Water and Effluents 2018	303-1	Interactions with water as a shared resource	94				
	303-2	Management of water discharge-related impacts	94				
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				Requirement(s) Omitted	Reason	Explanation	
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	304-2	Significant impacts of activities, products and services on biodiversity	187				
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GRI 308: Supplier Environmental Assessment	308-1	New suppliers that were screened using environmental criteria	159				
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	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	113-115				
	401-3	Parental leave	113-115, 154				

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				Requirement(s) Omitted	Reason	Explanation	
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GRI 403: Occupational Health & Safety 2018	403-1	Occupational health and safety management system	120-121				
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	403-3	Occupational health services	120-121				
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	404-2	Programs for upgrading employee skills and transition assistance programs	107-109, 140				
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GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	28, 112-113, 154				

GRI Standards	Indicator	Disclosure	Page	Requirement(s) Omitted	Omission		GRI Sector Standard Ref.No
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GRI 407: Freedom of Association and Collective Bargaining 2016	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	113				
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GRI 408: Child Labor 2016	408-1	Operations and suppliers at significant risk for incidents of child labor	112				
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GRI 409: Forced or Compulsory Labor 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	112				
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GRI 411: Rights of Indigenous Peoples 2016	411-1	Incidents of violations involving rights of indigenous peoples	185				
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GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	173-185, 189				
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	414-2	Negative social impacts in the supply chain and actions taken	159				
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FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	83-84
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FS11	Percentage of assets subject to positive and negative environmental or social screening	74-83
FS12	Voting policy(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting	Not applicable to SOEs
FS13	Access points in low-populated or economically disadvantaged areas by type	162-170
FS14	Initiatives to improve access to financial services for disadvantaged people	162-170
FS15	Policies for the fair design and sale of financial products and services	152, 154
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FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal and (b) small business	62
Data Security		
FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	123
FN-CB-230a.2	Description of approach to identifying and addressing data security risks	123-136
Financial Inclusion & Capacity Building		
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	64-68
FN-CB-240a.2	(1) Number and (2) amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development	64-68
FN-CB-240a.3	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	162-170
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	162-170
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FN-CB-410a.2	Description of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis	37, 73-82
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FN-CB-410b.1	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	85, 87-88, 92
FN-CB-410b.2	Gross exposure for each industry by asset class	87-88
FN-CB-410b.3	Percentage of gross exposure included in the financed emissions calculation	87-88
FN-CB-410b.4	Description of the methodology used to calculate financed emissions	87-88
Business Ethics		
FN-CB-510a.2	Description of whistleblower policies and procedures	49
Risk Management System		
FN-CB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Not applicable
FN-CB-550a.2	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis into capital adequacy planning, long-term corporate strategy, and other business activities	35-38, 74-82

Asean Corporate Governance Scorecard (ACGS)

Level 1

B. Keberlanjutan dan Ketangguhan

No.	Principles and Recommendations	Page
B.1	Sustainability-related disclosure should be consistent, comparable and reliable, and include retrospective and forward-looking material information that a reasonable investor would consider important in making an investment or voting decision	
Material Sustainability-related information should be specified		
B.1.1	Does the company identify/report ESG topics that are material to the organization's strategy?	51-54
B.1.2	Does the company identify climate change as an issue?	51-54, 71-87
B.1.3	Does the company adopt an internationally recognized reporting framework or standard for sustainability (i.e. GRI, Integrated Reporting, SASB, IFRS Sustainability Disclosure Standards)?	50
If a company publicly sets a sustainability-related goal or target, the disclosure framework should provide that reliable metrics are regularly disclosed in an easily accessible form		
B.1.4	Does the company disclose quantitative sustainability target?	14-17, 57, 60-61, 63-64, 71, 167
B.1.5	Does the company disclose sustainability-related performance progress in relation to its previously set targets?	14-17, 61, 63-64, 167
B.1.6	Does the company confirm that its Sustainability Report / Reporting is reviewed and /or approved by the Board or Board Committee?	50-51, 190-191
B.2	Corporate governance frameworks should allow for dialogue between a company, its shareholders and stakeholders to exchange views on sustainability matters	
B.2.1	Does the company engage internal stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	51, 156-158
B.2.2	Does the company engage external stakeholders to exchange views and gather feedback on sustainability matters that are material to the business of the company?	51, 156-158
B.3	The corporate governance framework should ensure that boards adequately consider material sustainability risks and opportunities when fulfilling their key functions in reviewing, monitoring and guiding governance practices, disclosure, strategy, risk management and internal control systems, including with respect to climate-related physical and transition risks	
Boards should assess whether the company's capital structure is compatible with its strategic goals and its associated risk appetite to ensure it is resilient to different scenarios		
B.3.1	Does the company disclose that the board reviews on an annual basis that the company's capital and debt structure is compatible with its strategic goals and its associated risk appetite?	72-73

No.	Principles and Recommendations	Page
B.4	The corporate governance framework should recognise the rights of stakeholders established by law or through mutual agreements and encourage active co-operation between corporations and stakeholders in creating wealth, jobs, and the sustainability of financially sound enterprises.	
Does the company disclose a policy and practices that address:		
B.4.1	The existence and scope of the company's efforts to address customers' welfare?	123-145
B.4.2	Supplier/contractor selection procedures?	159
B.4.3	The company's efforts to ensure that its value chain is environmentally friendly or is consistent with promoting sustainable development?	159
B.4.4	The company's efforts to interact with the communities in which they operate?	162-184, 189
B.4.5	The company's anti-corruption programmes and procedures?	46-47
B.4.6	How creditors' rights are safeguarded?	83, 141
B.4.7	Does the company have a separate report/section that discusses its efforts on environment/economy and social issues?	Yes
B.5	Where stakeholder interests are protected by law, stakeholders should have the opportunity to obtain effective redress for violation of their rights.	
B.5.1	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?	137-138
B.6	Mechanisms for employee participation should be permitted to develop.	
B.6.1	Does the company explicitly disclose the policies and practices on health, safety and welfare for its employees?	120-122
B.6.2	Does the company explicitly disclose the policies and practices on training and development programmes for its employees?	100-110
B.6.3	Does the company have a reward/compensation policy that accounts for the performance of the company beyond short-term financial measures?	114-116
B.7	Stakeholders including individual employee and their representative bodies, should be able to freely communicate their concerns about illegal or unethical practices to the board and their rights should not be compromised for doing this.	
B.7.1	Does the company have a whistle blowing policy which includes procedures for complaints by employees and other stakeholders concerning alleged illegal and unethical behaviour and provide contact details via the company's website or annual report	49
B.7.2	Does the company have a policy or procedures to protect an employee/person who reveals alleged illegal/unethical behaviour from retaliation?	49

Level 2 - Bonus Items

No.	Principles and Recommendations	Page
(B) B.1		
(B) B.1.1	Does the company disclose how it manages climate-related risks and opportunities?	72-88
(B) B.1.2	Does the company disclose that its Sustainability Report / Sustainability Reporting is externally assured?	Yes, 51, 190-193
(B) B.1.3	Does the company disclose the engagement channel with stakeholder groups and how the company responds to stakeholders' ESG concerns?	156-158
(B) B.1.4	Does the company have a unit / division / committee who is specifically responsible to manage the sustainability matters?	31-34
(B) B.1.5	Does the company disclose board of directors/commissioners' oversight of sustainability-related risks and opportunities?	31-34
(B) B.1.6	Does the company disclose the linkage between executive directors and senior management remuneration and sustainability performance for the previous year?	Confidentiality constraints
(B) B.1.7	Is the company's Whistle Blowing System managed by independent parties / institutions?	Yes, 49

Feedback Sheet

PT Bank Negara Indonesia (Persero) Tbk publishes this Sustainability Report to provide stakeholders with an overview of its sustainability performance and the implementation of sustainable finance. We welcome any feedback, comments, and suggestions from readers after reviewing this Sustainability Report.

**YOUR
PROFILE**

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

STAKEHOLDER CATEGORY

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

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

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

Other suggestions to improve the information presented in this report:

Thank you for your feedback.

We extend our appreciation for your feedback, comments, and suggestions to support the improvement and advancement of this report in the coming years. The completed feedback form and any other matters related to the Sustainability Report may be submitted to:

Divisi Environmental Social & Governance

PT Bank Negara Indonesia (Persero) Tbk
Grha BNI, Lt.26
Jl. Jenderal Sudirman Kav.1 Jakarta 10220 Indonesia
Phone : (62-21) 572 8544
Email : esg@bni.co.id



GREEN BOND REPORT

JUNE 2025

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-   **01 Introduction**
-   **02 Summary of BNI Green Bond Framework & Issuance**
-   **03 Allocation of Proceeds**
-   **04 Impact Reporting**

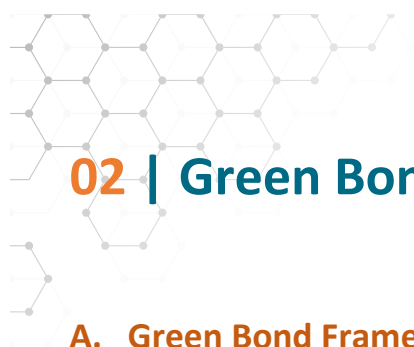
01 | Introduction

As one of the Banks who plays strategic roles in promoting sustainable finance in Indonesia, PT Bank Negara Indonesia (Persero) Tbk (BNI) continuously strengthens its commitment to become a catalyst in the transformation towards green economy. BNI realizes that the shift towards low-carbon economy is not only a part of environmental and social responsibility, but also a long-term business strategy to improve the company's resilience and competitiveness. Through this approach, BNI mobilizes all lines of organization to take an active role in creating financial practices that are responsible and adaptive to the challenges of climate change.

The transformation towards green economy is reflected in BNI's commitment to channel financing to green projects that support transition of energy, efficiency of resources, and preservation of the environment. In line with the green financing efforts, BNI also ensures the availability of funding resources that are in line with sustainability principles. As part of this commitment, BNI issued the first rupiah denominated Green Bond in June 2022 in the amount of IDR5 trillion. The green bond issuance is a concrete step to support the development of green projects that contribute to the development of low-carbon economy in Indonesia.

Proceeds from green bond are allocated to finance various initiatives that are in line with environmental principles and that support the agenda of transition towards green economy. Through consistent commitment, BNI confirms its role, not only as a financial service provider, but also as an agent of change that actively contributes to the creation of national green finance ecosystem.





02 | Green Bond Framework & Issuance

A. Green Bond Framework

Prior to the Green Bond Issue in June 2022, BNI has developed a Green Bond Framework and engaged Sustainalytics to issue a Second-Party Opinion (SPO). BNI has aligned the Green Bond Framework with the Provisions of the Financial Services Authority Regulation (Peraturan OJK, "POJK") No. 60/POJK.04/2017 concerning Issuance and Requirements of Green Debt Securities, Green Bond Principles 2021 (GPB) issued by the International Capital Market Association (ICMA) and the ASEAN Green Bond Standards 2018. The summary of BNI's Green Bond Framework is presented below:

Use of Proceeds

Proceeds from the Green Bond shall be used specifically to finance or re-finance assets that are directly related with "Eligible Green Projects" in compliance with the Green Bond Principles.

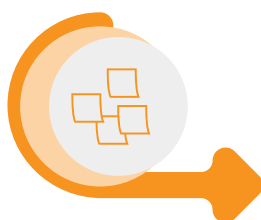
Eligible Green Projects must meet at least one of the following categories:

1. Renewable Energy
2. Energy Efficiency
3. Waste to Energy and Waste Management
4. Sustainable Natural Resources and Land Use
5. Terrestrial and Aquatic Biodiversity Conservation
6. Sustainable Transportation
7. Sustainable Water and Wastewater Management
8. Climate Change Adaptation
9. Green Buildings
10. Sustainable Agriculture

Evaluation Process & Project Selection



BNI has established the ESG Sub-Committee that is responsible for evaluating and selecting projects that meet the criteria of Green Bond Framework



Debtors are required to meet the requirements as BNI's debtors, as determined by the business unit and in accordance with the credit risk evaluation conducted by the risk unit



Debtors meet the Risk Acceptance Criteria (RAC) based on the evaluation of the Bank's Risk Management

B. Management of Use of Proceeds



Receipt of Proceeds

BNI's Treasury Division and Corporate Planning and Performance Management Division will be responsible for the receipt and management of the proceeds to be allocated to projects that meet criteria based on the ESG Sub-Committee's evaluation.

Tracking

Bank will track and report the percentage of funds used to finance and refinance eligible projects.

Unallocated Proceeds

Unallocated proceed will be temporarily held in the form of cash or cash equivalents.

C. Reporting

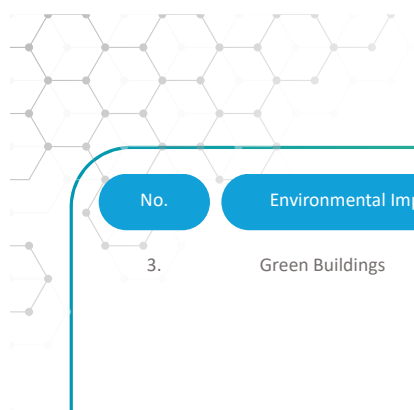
Allocation Reporting

BNI will issue a Green Bond Report on an annual basis, beginning at no later than the date that falls one year after the proceeds from the first issuance are received by BNI. This report is prepared to provide transparency to investors and regulators in relation to the implementation of the Framework.

Impact Reporting

BNI shall issue the environmental and/or social impacts of eligible assets financed by the issued Green Bonds. Whereas the quantitative positive impact indicators in BNI's Green Bond Report cover the following indicators:

No.	Environmental Impact	Indicator
1.	Renewable Energy	- Estimated renewable energy generation per year in MWH/GWh (electricity) and GJ/TJ (other energy) - Estimated annual Green Gas Emission reduced/prevented in tonnes of CO2 equivalent
2.	Sustainable Transportation	- Estimated annual green gas emission reduced/prevented in tonnes of CO2 equivalent - Number of green vehicles launched - Estimated kilometers of new or improved railway/special lanes for Bus, BRT, LRT corridors, and bike lanes



No.	Environmental Impact	Indicator
3.	Green Buildings	- Percentage of energy use reduced/avoided vs initial data/local building codes - Estimated annual green house gases reduced/avoided vs local initial data/local initial certification level - Certification level per property
4.	Waste to Energy and Waste Management	Estimated tonnes of waste redirected or recycled
5.	Sustainable Natural Resources and Land Use	- Estimated total hectares protected and/or certified - Estimated total trees planted in FSC/PEFC certified reforestation projects

D. Issue

On June 21, 2022, BNI issued green bonds with a total principal of Rp5 trillion. The debt securities are issued in 2 series, i.e., A Series, with a total principal value of IDR4 trillion and a term of 3 years, and B Series with a total principal value of IDR1 trillion and a term of 3 years.

The transaction consisted of:

- The First Green Bond Issue by Banks in Indonesia
- BNI's Green Bond attracted investors during the bookbuilding, where the bonds were oversubscribed by 3.1 times

Deal Summary

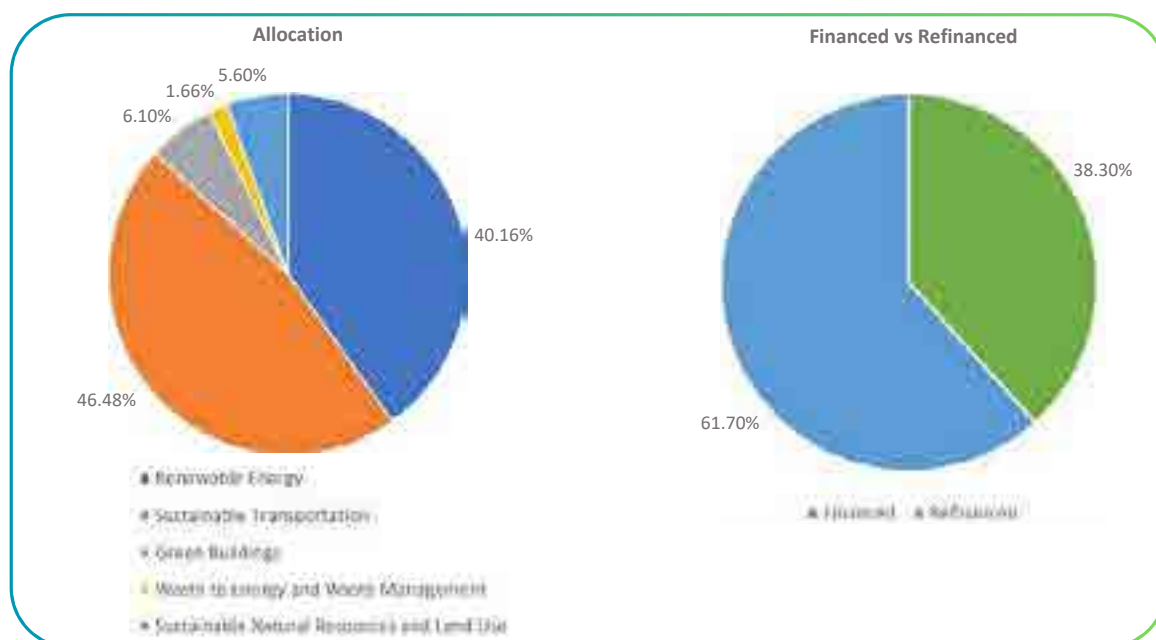
Instrument	Domestic Green Bonds that meet the Provisions of POJK 60/2017 concerning Green Bonds
Total Issue	- IDR 5,000,000,000,000 (Five Trillion Rupiah) - A Series 3 years Term 6.35% in the amount of IDR 4 Trillion - B Series 5 years Term 6.85% in the amount of IDR 1 Trillion - Average term of 3.4 years and Coupon of 6.45%
Rating	idAAA (PEFINDO)
Maturity Date	- A Series : June 21, 2025 - B Series : June 21, 2027
Settlement Date	June 21, 2022
Use of Proceeds	Business expansion, refinancing, and reprofiling funding with due consideration to the provisions of POJK 60/2017 (minimum 70% financing for Green Business Activities)
Listing	PT Bursa Efek Indonesia
Final Orderbook	IDR 15,300,000,000,000
Oversubscription rate	3.1x

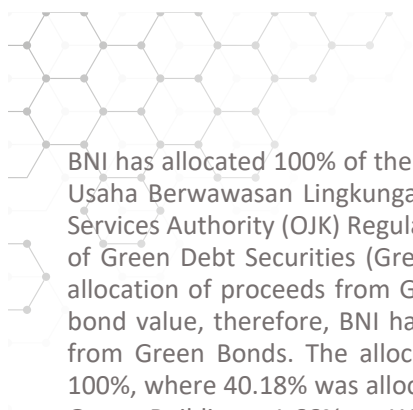


03 | Allocation of Proceeds

As of December 2024, BNI has allocated 100% of proceeds from BNI 2022 Green Bonds. The details of such allocation are presented below:

Eligible Category	Financed/Refinanced	Amount Allocated	Allocation of Proceeds
Renewable Energy	Financed	IDR 1,915 Billion	38.30%
	Refinanced	IDR 93 Billion	1.86%
Sustainable Transportation	Refinanced	IDR 2,324 Billion	46.48%
Green Buildings	Refinanced	IDR 305 Billion	6.10%
Waste to Energy and Waste Management	Refinanced	IDR 83 Billion	1.66%
Sustainable Natural Resources and Land Use	Refinanced	IDR 280 Billion	5.60%
Total		IDR 5,000 Billion	100%





BNI has allocated 100% of the proceeds from Green Bonds to 10 Green Business Activities (Kegiatan Usaha Berwawasan Lingkungan, “KUBL”) categories in accordance with the provisions of Financial Services Authority (OJK) Regulation Number 60/POJK.04/2017 concerning Issuance and Requirement of Green Debt Securities (Green Bond). The aforementioned provisions also set out the minimum allocation of proceeds from Green Bonds to financing under KUBL categories at 70% of the issued bond value, therefore, BNI has complied with the requirements concerning allocation of proceeds from Green Bonds. The allocation in accordance with the Green Bond Framework amounted to 100%, where 40.18% was allocated to Renewable Energy, 46.48% to Green Transportation, 6.08% to Green Buildings, 1.66% to Waste to Energy and Waste Management, and 5.60% to Sustainable Natural Resources and Land Use from the categories available in the Green Bond Framework.



04 | Impact Reporting



Renewable Energy

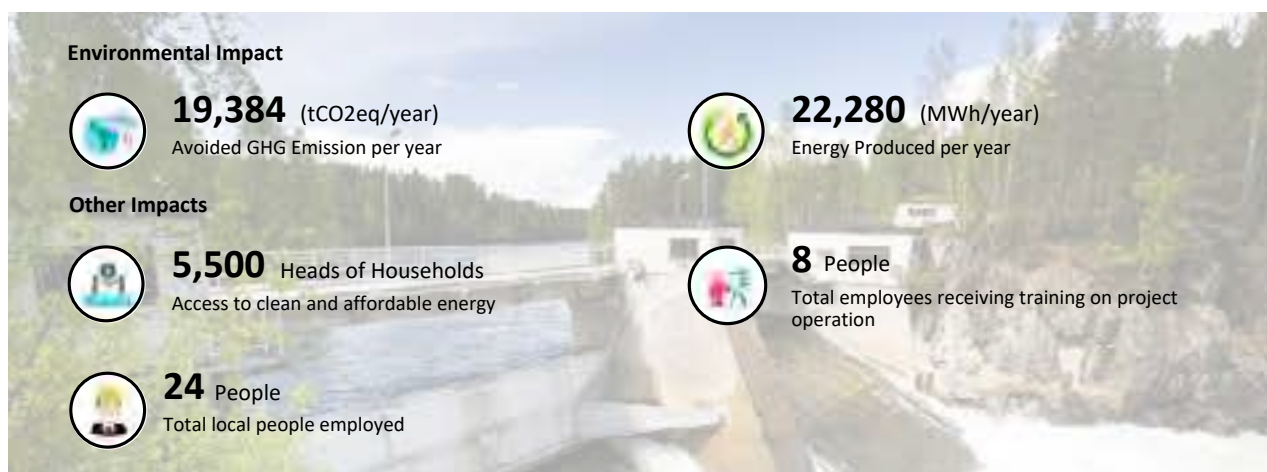
The allocation of proceeds from Green Bonds to the Renewable Energy category was made for Solar Power Plants (SPP), Mini-Hydro Power Plants (PLTMH), Wind Power Plants (PLTB) and Hydro-Power Plants (PLTA). These projects are able to provide direct contributions to the provision of access to clean and affordable energy and the improvement of proportion of renewable energy mix as well as the reduction of GHG emission.

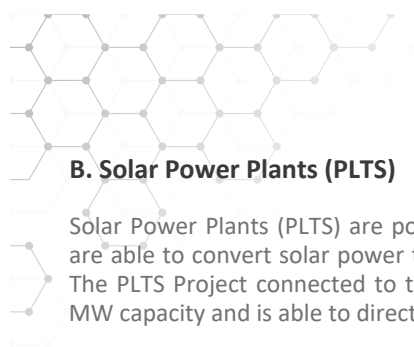
The financed projects provide indirect contributions to the following SGDs :



A. Mini-Hydro Power Plants (PLTMH)

Mini-Hydro Power Plants (MHPP) are power plants that utilize the potential energy from the watershed area of Cikaengan river, Pandeuy Village, Pandeuy District, Garut Regency. The 5.1 MW capacity PLTMH contributes to the provision of household electricity and supports the increased mix of New and Renewable Energy (NRE) in the area.





B. Solar Power Plants (PLTS)

Solar Power Plants (PLTS) are power plants that utilize potential energy from photovoltaic solar panels that are able to convert solar power to electricity, which can therefore be used to meet the needs for electricity. The PLTS Project connected to the electricity grid is located in Karangasem Regency, Bali Province, with 25 MW capacity and is able to directly produce and distribute electricity.

Environmental Impact



49,747 (tCO₂eq/year)
Avoided GHG Emission per year



57,181 (MWh/year)
Energy Produced per year

Other Impacts



115,588 Heads of Households
Access to clean and affordable energy



34 People
Total employees receiving training on project operation



120 People
Total local people employed

C. Wind Power Plants (PLTB)

Wind Power Plant (PLTB) Projects are power plants that utilize wind power and are located in Sidenreng Regency, South Sulawesi Province. The PLTB has a 70 MW capacity and will be distributed to the national electricity grid to fulfill the people's energy needs.

Environmental Impact



204,603 (tCO₂eq/year)
Avoided GHG Emission per year



215,372 (MWh/year)
Energy Produced per year

Other Impacts



150,000 Heads of Households
Access to clean and affordable energy



30 People
Total employees receiving training on project operation



30 People
Total local people employed

D. Hydro Power Plants (PLTA)

Hydro Power Plants (PLTA) Projects are power plant projects that utilize the potential energy from the river in the Asahan Regency, North Sumatra Province. The 2 x 87 MW capacity contribute to the increase in New Renewable Energy (NRE) mix in North Sumatra and support the availability of electricity supply.

Environmental Impact



1,352,932 (tCO₂eq/year)
Avoided GHG Emission per year



1,477,000 (MWh/year)
Energy Produced per year

Other Impacts



113,700 Heads of Households
Access to clean and affordable energy



107 People
Total employees receiving training on project operation



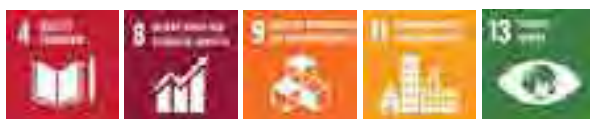
1,434 People
Total local people employed



Sustainable Transportation

The Jabodebek Light Rail Transit (LRT) project is an electric-powered single track train system project connecting Jakarta with its surrounding cities, such as Bogor, Depok, and Bekasi. The rail-based transportation project will be integrated with the existing transportation modes (Transjakarta buses, commuter lines, bus terminals, park and ride facilities, and the airport) at several stations. The Jabodebek LRT infrastructure project has a total railway length of 44.4 KM and serves a total of 21,055,870 people/year.

The financed projects provide indirect contributions to the following SGDs :



Environmental Impact



23,741* (tCO₂eq/year)
Avoided GHG Emission per year



341,019 Gj
Energy Saving per year

Other Impacts



2,295 People
Total local people employed



39 People
Total employees receiving training on project operation

Note:
*) Calculated using the emission factor, which refers to 2006 IPCC and the calculation result from Jabodebek LRT.



Green Buildings

The allocation to Green Building category is made to Building construction projects that meet the Gold standards according to Greenship or higher, which are developed by the Green Building Council Indonesia (GBC Indonesia) or other nationally or internationally recognized standards or environmental performance certification, which consists of six categories, namely, appropriate site development, energy efficiency and conservation, water conservation, material resources & cycle, air quality and comfort, and building and environmental management.

The green building is located in Depok City, with 5 floors that function as a shopping center as well as open green-space with a total area of 14,132 m². The building has obtained the Green Mark certificate from BCA (Building and Construction Authority) with Platinum rating in 2023.

The financed projects provide indirect contributions to the following SGDs :



Environmental Impact



7,869* (tCO₂eq/year)
Avoided GHG Emission per year

Other Impacts



10 People
Total employees receiving training on project operation

Note:
*)Calculated using the research approach in Indonesia, which took into account the kWh/m²/year from the benchmarking results of retail buildings on a global scale.

Certificate

Platinum Level



Waste to Energy and Waste Management

The allocation of Green Bond Proceeds to the Waste to Energy and Waste Management category is used to finance waste processing projects, including recycling to secondary raw material and anaerobic composting to organic fertilizer. These projects contribute to sustainable management and use of natural resources, responsible waste management, and significant reduction of waste piles.

Presented below are the Waste to Energy and Waste Management projects:

- Project to process metal ash waste to be recycled into secondary raw material in the form of Zinc Oxide.
- Project to process garden waste and/or organic waste to be recycled into organic fertilizers.

The financed projects provide indirect contributions to the following SGD's :



Environmental Impact



249,976 (tCO2eq/year)
Avoided GHG Emission per year



1,543,090 (Tonne/year)
Total waste recycled

Other Impacts



180 People
Total local people employed



30 People
Total employees receiving training on project operation



Sustainable Natural Resources and Land Use

Sustainable Natural Resources and Land Use was implemented to forest concession projects with FSC-certified sustainable management plan located in Central Papua Province and West Papua Province. These projects are able to protect and maintain tree species that are able to capture and store carbon dioxide.

The financed projects provide indirect contributions to the following SGDs :



Environmental Impact



626,342 (tCO₂eq/year)
Avoided GHG Emission per year



55,899 Trees
Total trees planted in reforestation projects



314,387 (Ha)
Total hectares protected and/or certified

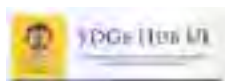
Other Impacts



408 People
Total local people employed



23 People
Total employees receiving training on project operation



LAPORAN REVIU AHLI LINGKUNGAN

Review Report by Environmental Expert

SDGs Hub Universitas Indonesia, selaku Ahli Lingkungan dipilih untuk melakukan reviu Laporan Obligasi Berwawasan Lingkungan Berkelanjutan BNI Tahun 2025 (*Green Bond Report*) dengan disertakan beberapa data pendukung terkait penerbitan Obligasi Berwawasan Lingkungan Berkelanjutan BNI tahun 2022 (*Green Bond 2022*) berikut kerangka kebijakan *Green Bond* tersebut. Ahli Lingkungan memiliki kompetensi pengalaman dan berijazah yang relevan dalam kegiatan berwawasan lingkungan dan Pembangunan berkelanjutan (Lampiran I).

Tanggung Jawab Manajemen BNI

Tanggung jawab manajemen BNI atas penyusunan dan penyajian *Green Bond Report 2025* tersebut sesuai dengan *Green Bond Framework* Bank BNI dan POJK No. 60 Tahun 2017.

Tanggung Jawab Ahli Lingkungan

Tanggung jawab Ahli Lingkungan adalah untuk melakukan reviu *Green Bond Report* dan beberapa dokumen pendukung lainnya sesuai ketentuan POJK No. 60 Tahun 2017. Reviu yang kami lakukan mencakup kesesuaian implementasi pemilihan proyek Kegiatan Usaha Berwawasan Lingkungan ("KUBL") sebagaimana tertera di dalam *Green Bond Framework* dan pada POJK 60 Tahun 2017. Meski telah terbit POJK No. 18 tahun 2023 pengganti POJK 60 Tahun 2017 tetapi Emiten yang telah melakukan penerbitan Efek Bersifat Utang Berwawasan Lingkungan sebelum POJK 18 Tahun 2023 ini berlaku, tetap mengikuti ketentuan sebagaimana diatur dalam POJK No. 60/POJK.04/2017 tentang Penerbitan dan Persyaratan Efek Bersifat Utang Berwawasan Lingkungan (*Green Bond*). Penyaluran dana hasil penerbitan *Green Bond 2022* ke proyek KUBL terpilih, sesuai *Green Bond Framework*. BNI telah melakukan penyaluran 100% atas dana penerbitan *Green Bond 2022* berdasarkan POJK No. 60/2017. Ahli Lingkungan melakukan reviu terhadap dampak lingkungan yang tertuang dalam *Green Bond Report 2025* dan menyesuaikan dengan data yang tersedia.

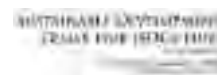
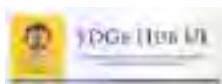
SDGs Hub Universitas Indonesia, as the Environmental Expert chosen to review the 2025 BNI Sustainable Environmentally Friendly Bonds Report (Green Bond Report) which includes several supporting data related to the issuance of BNI's 2022 Sustainable Environmentally Friendly Bonds (Green Bond 2022) and the Green Bond policy framework. Environmental Experts have relevant experience and certificate competencies in environmentally friendly and sustainable development activities (Appendix I).

Management Responsibilities

BNI management's responsibility for the preparation and presentation of the 2025 Green Bond Report is in accordance with BNI's Green Bond Framework and Financial Services Authority Regulation (POJK) No. 60 of 2017.

Responsibilities of Environmental Experts

The Environmental Expert's responsibility is to review the Green Bond Report and several other supporting documents following the provisions of POJK No. 60 of 2017. The review we conducted assessed the suitability of implementing the Environmentally Friendly Business Activities ("KUBL") projects as outlined in the Green Bond Framework and POJK 60 of 2017. Even though POJK No. 18 of 2023 replaces POJK 60 of 2017, Issuers who have issued Environmentally Friendly Debt Securities before POJK 18 of 2023 comes into force still follow the provisions as regulated in POJK No. 60/POJK.04/2017 concerning Issuance and Requirements for Environmentally Friendly Debt Securities (Green Bond). Distribution of funds from the issuance of Green Bond 2022 to selected KUBL projects, in accordance with the Green Bond Framework. BNI has distributed 100% of the funds from the issuance of Green Bond 2022 based on POJK No. 60/2017. Environmental experts reviewed the environmental impacts contained in the Green Bond Report 2025 and adjusted them to the available data.



Hasil Reviu

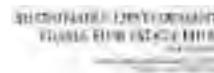
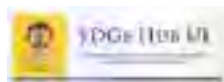
Hasil reviu atas *Green Bond Report* 2025 terhadap penyaluran alokasi kegiatan yang didanai oleh hasil penerbitan *Green Bond* 2022 adalah sebagai berikut:

- 1) Pemilihan proyek pada sektor KUBL dalam penyaluran dana hasil penerbitan *Green Bond* 2022 telah sesuai dengan *Green Bond Framework*, meskipun penamaan untuk satu KUBL produk yang dapat mengurangi penggunaan sumber daya dan menghasilkan lebih sedikit polusi digunakan penamaan sesuai proyek yaitu pengelolaan sampah menjadi Energi dan manajemen sampah.
- 2) Tidak ada perubahan realisasi alokasi dana hasil penerbitan *Green Bond* 2022 untuk membiayai lima sektor KUBL yang telah disetujui. Lima KUBL tersebut adalah energi terbarukan, transportasi ramah lingkungan, pengelolaan sumber daya alam dan penggunaan lahan yang berkelanjutan, produk yang dapat mengurangi penggunaan sumber daya dan menghasilkan lebih sedikit polusi (pengelolaan sampah menjadi energi dan manajemen sampah), dan Gedung Ramah Lingkungan (halaman 7 dalam Laporan Tahunan).
- 3) Dana *Green Bond* ini dialokasikan 100% untuk kegiatan yang termasuk di dalam KUBL (POJK No. 60/2017). Adapun, sampai tahun ketiga penyaluran yang sesuai dengan *BNI Green Bond Framework* adalah sebesar 100%, dengan rincian yaitu energi Terbarukan sebesar 38,30% untuk proyek baru dibiayai dan 1,86% proyek dibiayai kembali, Transportasi Ramah Lingkungan sebesar 46,48%, Gedung Berwawasan Lingkungan sebesar 6,10%, Pengolahan Sampah menjadi Energi dan Manajemen Limbah (produk yang dapat mengurangi penggunaan sumber daya dan menghasilkan lebih sedikit polusi (*eco-efficient*) sebesar 1,66% dan Penggunaan Sumber Daya Alam dan Penggunaan Tanah yang Berkelanjutan sebesar 5,60%.

Review Results

The results of the review of the 2025 Green Bond Report regarding the distribution of activity allocations funded by the proceeds of the 2022 Green Bond issuance are as follows:

- 1) *The selection of projects in the KUBL sector for the distribution of funds from the 2022 Green Bond issuance follows the Green Bond Framework, although the naming of one KUBL product that can reduce resource use and produce less pollution is used according to the project, namely waste management into Energy and management rubbish.*
- 2) *There is no change in the realization of the allocation of funds from the issuance of Green Bond 2022 to finance the five approved KUBL sectors. The five sectors are renewable energy, environmentally friendly transportation, natural resource management, and sustainable land use, products that can reduce resource use and produce less pollution (waste to energy and waste management), and environmentally friendly buildings (page 7 in the Annual Report)*
- 3) *This green bond fund is allocated 100% for activities included in KUBL (POJK No. 60/2017). Meanwhile, until the third year of distribution in accordance with the BNI Green Bond Framework is 100%, with details, namely Renewable energy of 38.30% for newly financed projects and 1.86% for refinanced projects, Environmentally Friendly Transportation of 46.48%, Environmentally Conscious Buildings of 6.10%, Waste Processing into Energy and Waste Management (products that can reduce resource use and produce less pollution (*eco-efficient*) of 1.66% and Sustainable Use of Natural Resources and Land Use of 5.60%.*

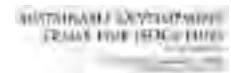


4) Pelaporan dampak dari 5 KUBL yaitu:

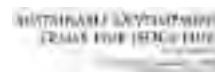
1. Energi Terbarukan: (1) Pembangkit Listrik Tenaga Mini Hidro (PLTMH) dengan kapasitas 5,1 MW di DAS Cikaengan Desa Pandeuy Kecamatan Pandeuy Kabupaten Garut, energi yang dihasilkan 22.280 MWh pertahun, memberikan dampak lingkungan dapat menghindari emisi GRK 19.384 tCO₂eq/tahun, jumlah pekerja lokal sebanyak 24 orang dan yang menerima pelatihan 8 orang, dan dapat diakses 5.500 Kepala Keluarga; (2) Energi Listrik Tenaga Surya (PLTS) dengan total kapasitas 25 MW di Karangasem Provinsi Bali dan dampak lingkungan dapat menghindari emisi GRK sebesar 49.747 tCO₂eq/tahun, energi yang dihasilkan 57.181 MWh pertahun, 115.588 Kepala Keluarga dapat mengakses energi bersih dan terjangkau, penduduk lokal yang diperkerjakan sebanyak 120 orang dengan 34 orang jumlah pekerja yang menerima pelatihan berkaitan dengan pengoperasian proyek; 3) Pembangkit Listrik Tenaga Banyu (PLTB) di Kabupaten Sidenreng Rappang Provinsi Sulawesi Selatan, dengan kapasitas 70 MW menghasilkan energi sebesar 215.372 MWh pertahun, emisi GRK yang terhindari sebesar 204.603 tCO₂eq/tahun, jumlah kepala keluarga yang dapat akses energi bersih dan terjangkau sebanyak 150.000 orang, jumlah karyawan dari masyarakat lokal yang dapat diperkerjakan sebanyak 30 orang dengan seluruh pekerja lokal mendapat pelatihan terkait pengoperasian proyek; Pembangkit Listrik Tenaga Air (PLTA) di Kabupaten Asahan Provinsi Sumatera Utara, dengan kapasitas 2 x 87 MW, menghasilkan energi sebesar 1.477.000 MWh pertahun, emisi GRK yang terhindarkan sebesar 1.352.932 tCO₂eq/tahun, jumlah kepala keluarga yang dapat mengakses energi bersih dan terjangkau sebanyak 113.700, jumlah masyarakat lokal yang diperkerjakan sebanyak 1.434 orang dan 107 orang menerima pelatihan berkaitan dengan pengoperasian. Secara keseluruhan Kegiatan Usaha Berwawasan Lingkungan Energi Terbarukan yang dilakukan mendukung capaian SDGs Indonesia nomor 4, 6, 7, 8, 9, 11, 12, dan SDGs 13, tetapi yang terdapat dilaporkan hanya untuk mencapai SDGs No 4, 7, 8, 12, 13. (Untuk detail Pelaporan Dampak Halaman 8-10).

4) Reporting the impact of 5 KUBLs, namely:

1. Renewable Energy: (1) Mini Hydro Power Plant (PLTMH) with a capacity of 5.1 MW in the Cikaengan Watershed, Pandeuy Village, Pandeuy District, Garut Regency, the energy produced is 22,280 MWh per year, has an environmental impact of avoiding GHG emissions of 19,384 tCO₂eq/year, the number of local workers is 24 people and 8 people receive training, and can be accessed by 5,500 Heads of Families; (2) Solar Power Plant (PLTS) with a total capacity of 25 MW in Karangasem, Bali Province and the environmental impact can avoid GHG emissions of 49.747 tCO₂eq/year, the energy produced is 57,181 MWh per year, 115,588 Heads of Families can access clean and affordable energy, the number of local residents employed is 120 people with 34 workers receiving training related to project operations; 3) The Hydroelectric Power Plant (PLTB) in Sidenreng Rappang Regency, South Sulawesi Province, with a capacity of 70 MW with a capacity of 70 MW produces energy of 215,372 MWh per year, avoided GHG emissions of 204.603 tCO₂eq/year, the number of heads of families who can access clean and affordable energy is 150,000 people, the number of employees from the local community who can be employed is 30 people with all local workers receiving training related to project operations; Hydroelectric Power Plant (PLTA) in Asahan Regency, North Sumatra Province, with a capacity of 2 x 87 MW, produces energy of 1,477,000 MWh per year, avoided GHG emissions of 1.352.932 tCO₂eq/year, the number of heads of families who can access clean and affordable energy is 113,700, the number of local people employed is 1,434 people and 107 people receive training related to operations. Overall, the Renewable Energy Environmentally Conscious Business Activities carried out support the achievement of Indonesia's SDGs numbers 4, 6, 7, 8, 9, 11, 12, and SDGs 13, but those included in the report are only to achieve SDGs No. 4, 7, 8, 12, 13. (For details on Impact Reporting, see Pages 8-10).



2. Estimasi dampak lingkungan dari proyek Transportasi Ramah Lingkungan Light Rail Transit (LRT) yaitu 23.741 (tCO₂eq/tahun) emisi GRK yang terhindarkan pertahun dengan penghematan energi sebesar 341.019 GJ (2024) yang memperkerjakan 2.295 orang karyawan dan sebanyak 39 orang pekerja yang menerima pelatihan berkaitan dengan pengoperasian. Secara keseluruhan untuk KUBL Transportasi Ramah Lingkungan dapat mendukung capaian SDGs Nomor 3, 4, 8, 9, 11, 12, 13 dan SDGs No. 17, sedangkan yang tertulis di laporan Dampak hanya 4, 8, 9, 11, dan 13 (Halaman 11 Pelaporan Dampak).
3. Estimasi dampak lingkungan dari KUBL Gedung Berwawasan Lingkungan yang berlokasi Kota Depok yaitu terhindarnya 7.869 tCO₂eq emisi gas rumah kaca pertahunnya dengan memperoleh sertifikat *Green Mark* dari *Building and Construction Authority* (BCA) dengan pencapaian Platinum. KUBL Gedung Berwawasan Lingkungan dapat mendukung capaian SDGs Nomor 3, 6, 7, 8, 9, 11, 12, 13, 15, dan SDGs No 17, sedangkan yang tertulis di pelaporan dampak hanya SDGs No. 4, 7, 11, 12, dan SDGs 13 (secara detail dapat dilihat pada Halaman 12 Pelaporan Dampak).
4. Estimasi dampak lingkungan dari KUBL Pengolahan Sampah menjadi Energi dan Manajemen Limbah (produk yang dapat mengurangi penggunaan sumber daya dan menghasilkan lebih sedikit polusi (eco-efficient)) yaitu total limbah yang di daur ulang sebanyak 1.543.090 ton/tahun, dengan estimasi emisi GRK yang terhindarkan adalah 249.976 tCO₂eq/tahun, dengan jumlah masyarakat lokal yang diperkerjakan sebanyak 180 orang, dan 30 orang yang menerima pelatihan berkaitan dengan pengoperasian. KUBL ini mendukung capaian SDGs nomor 3, 4, 6, 7, 9, 11, 12, dan SDGs 13, sedangkan yang tertulis di Pelaporan Dampak Halaman 13 hanya untuk SDGs nomor 4, 6, 8, 12, dan SDGs No. 13).
2. *The estimated environmental impact of the Light Rail Transit (LRT) Green Transportation project is 23,741 (tCO₂eq/year) avoided GHG emissions per year with energy savings of 341,019 GJ (2024), which employs 2,295 employees and 39 workers who receive training related to operations. Overall, the Green Transportation KUBL can support the achievement of SDGs Numbers 3, 4, 8, 9, 11, 12, 13, and SDGs No. 17, while only 4, 8, 9, 11, and 13 are written in the Impact report (Page 11 Impact Reporting).*
3. *The estimated environmental impact of the KUBL Environmentally Conscious Building, located in Depok City, is the avoidance of 7,869 tCO₂eq of greenhouse gas emissions per year by obtaining a Green Mark certificate from the Building and Construction Authority (BCA) with a Platinum achievement. KUBL Environmentally Conscious Building can support the achievement of SDGs Numbers 3, 6, 7, 8, 9, 11, 12, 13, 15, and SDGs No. 17, while those written in the impact report are only SDGs No. 4, 7, 11, 12, and SDGs 13 (details can be seen on Page 12 of Impact Reporting).*
4. *Estimated environmental impact of KUBL Waste to Energy Processing and Waste Management (products that can reduce resource usage and produce less pollution (eco-efficient)), namely total recycled waste of 1,543,090 tons/year, with an estimated avoided GHG emissions of 249,976 tCO₂eq/year, with the number of local people employed as many as 180 people, and 30 people who received training related to operations. This KUBL supports the achievement of SDGs numbers 3, 4, 6, 7, 9, 11, 12, and SDGs 13, while what is written in the Impact Reporting Page 13 is only for SDGs numbers 4, 6, 8, 12, and SDGs No. 13).*



5. Estimasi Dampak Lingkungan dari KUBL Penggunaan Sumber Daya Alam dan Penggunaan Tanah yang Berkelanjutan dengan menanam pohon sebanyak 55.899 pohon, dengan estimasi emisi GRK yang terhindarkan adalah 626.342 tCO₂eq/tahun, luas area yang dilindungi dan bersertifikasi FSC (Forest Stewardship Council), dengan jumlah masyarakat lokal yang diperkerjakan sebanyak 408 orang dan 23 orang yang menerima pelatihan. Agar dapat diketahui lebih pasti dampak yang ditimbulkan, untuk berikutnya dapat digunakan area yang terdampak dan dampak relasionalnya. KUBL ini mendukung capaian SDGs nomor 4, 8, 13, 15 (telah sesuai dengan Laporan Dampak Halaman 14).

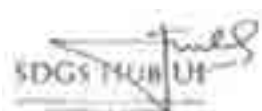
Indikator pada KUBL yang telah ditetapkan sebelumnya oleh BNI telah sesuai. Perhitungan emisi karbon sebagai dampak kegiatan akan lebih sempurna dengan menggunakan Faktor Emisi GRK Sistem Ketenagalistrikan dari Keputusan Menteri Energi dan Sumber Daya Mineral Nomor 127.K/TL.03/MEM.S/2019, sedangkan untuk penghitungan dampak KUBL lainnya telah sesuai dengan best practices.

5. *Environmental Impact Estimation of KUBL Sustainable Use of Natural Resources and Land Use by planting 55,899 trees, with an estimated avoided GHG emissions of 626,342 tCO₂eq/year, protected and FSC (Forest Stewardship Council) certified, with the number of local people employed as many as 408 people, and 23 people who received training. To better understand the impacts caused, the affected areas and their associated impacts can be used as a basis for the next step. This KUBL supports the achievement of SDGs numbers 4, 8, 13, 15 (in accordance with the Impact Report Page 14).*

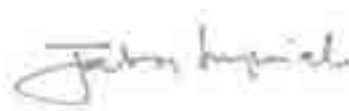
The indicators in KUBL that have been previously set by BNI are appropriate. Calculation of carbon emissions as an impact of activities will be more perfect by using the GHG Emission Factor for the Electricity System from the Decree of the Minister of Energy and Mineral Resources Number 127.K/TL.03/MEM.S/2019, while the calculation of other KUBL impacts is in accordance with best practices.

Jakarta, 17 Juni 2025

Jakarta, June 17th, 2025



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