

Financial Services Authority

Insurance Brokerage Companies; Reinsurance Brokerage Companies; and Insurance Loss Appraisal Companies. at the respective addresses.

COPY

CIRCULAR OF FINANCIAL SERVICES AUTHORITY NUMBER 17/SEOJK.05/2014

ON

GOOD CORPORATE GOVERNANCE REPORT FOR INSURANCE COMPANY, SHARIAH INSURANCE COMPANY, REINSURANCE COMPANY, AND SHARIAH REINSURANCE **COMPANY**

In relation to the mandate of Article 79 paragraph (3) of Regulation of Financial Services Authority No. 2/POJK.05/2014 on Good Corporate Governance for Insurance Companies, it is necessary to regulate a form and structure of good corporate governance report for insurance company, shariah insurance company, reinsurance company, and shariah reinsurance company in the following Circular Letter of Financial Services Authority

T. **GENERAL PROVISION**

- 1. Companies are insurance company, sharia insurance company, Reinsurance Company, and sharia Reinsurance Company.
- 2. Insurance Company is general insurance company and life insurance Company.
- 3. Sharia Insurance Company is general sharia insurance company and life sharia insurance company.
- 4. Reinsurance companies is an companies which held an reinsurance business as mentioned on the insurance law.
- 5. Shariah Reinsurance companies is a companies which held a shariah reinsurance business as mentioned on the insurance law.
- 6. General Meeting of Shareholders that hereinafter referred to GMS is general meeting of shareholder as stipulated in the liabilities company for limited liability insurance company or the equivalent to that for cooperatives and mutual company.
- 7. Director is part of Insurance Company Organ that conduct management function as stipulated in the liabilities company for limited liability insurance company or equivalent to that for cooperatives and mutual company.
- 8. Board of Commissioner is part of Insurance Company Organ that conduct supervisory function as stipulated in the liabilities company for limited liability insurance company or equivalent to that for cooperatives and mutual company.
- 9. Independent Commissioner is member of Board of Commissioner that has no

affiliation to the shareholders, Director, and/or Board of Commissioner or Sharia Supervisory Board, which has no financial relation, organizational, share ownership and/or family relationship with shareholders, Director, and/or Board of Commissioner and/or Sharia Supervisory Board or other relationship which could affect the competencies to independently supervise the insurance company.

- 10. Sharia Supervisory Board is part of Insurance Company Organ that conduct supervisory function on insurance and reinsurance business conduct to be in line with sharia principles.
- 11. Good Corporate Governance for Company, hereinafter referred to Good Corporate Governance, is structure and process that used and implemented by company organ to improve target business achievement and to optimize company value for stakeholders, particularly policyholders, insured party, participant or a party that entitled to benefit accountably and based on laws and ethic value.
- 12. Financial Service Authority, is an independent body and free from interference by other parties that have the functions, duties, and authority of regulation, supervision, inspection, and investigation, as defined in the Law Number 21 of 2011.

II. THE REPORT OF IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE

- 1. Companies are obliged to set the report of implementation of good corporate governance at the end of year.
- 2. The report of implementation of good corporate governance as mentioned in number 1 which at least consist of:
 - a. Transparency on implementation of good corporate governance;
 - b. Self assessment on implementation of good corporate governance; and
 - c. Action plan.

III. TRANSPARENCY ON IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE

- 1. Transparency on implementation of good corporate governance as mentioned in Chapter II letter a, at least cover the disclosure of all implementation aspects of good corporate governance.
- 2. Implementation aspect of good corporate governance as mention in number 1 is as follows:
 - a. A disclosure of implementation of good corporate governance which at least consist of:
 - 1) Implementation of duty and responsibility of Directors, Board of Commissioner, and Sharia Supervisory Board that consist of:
 - a) Total, job title, criteria, date of appointed by GMS, work period, nationality, and domicile of Directors, Board of Commissioner, and Sharia Supervisory Board;

- b) Duty and responsibility of Directors, Board of Commissioner, and Sharia Supervisory Board;
- c) Double title of Directors, Board of Commissioner, and Sharia Supervisory Board;
- d) Training of Directors, Board of Commissioner, and Sharia Supervisory Board;
- e) Implementation the activity and recommendation Board of Commissioner, and Sharia Supervisory Board;
- f) The frequency of meeting, meeting of Board of Commissioner, and meeting of Sharia Supervisory Board which has been held, at least consist of:
 - a) Total meetings which has been held in one year;
 - b) Total meeting that attended physically and/or bye teleconference, video conference or others electronic media; and
 - c) Attendance of each member in every meeting.
- 2) Implementation of role of working unit and committee that conduct internal management function which consist of:
 - a) Implementation of working unit role that conduct internal management function;
 - b) Implementation of committee role that conduct internal management function that consist of:
 - 1. Completeness and implementation of committee role which formed by Directors, consist of:
 - i. Committee structure, membership, and expertise
 - ii. Committee role and responsibility
 - iii. Frequency of Committee meetings
 - iv. Committee work programs and its realization.
 - 2. Completeness and implementation of committee role which formed by Board of Commissioner, consist of:
 - i. Committee structure, membership, expertise, and the independence of committee
 - ii. Role and responsibility of Committee
 - iii. Frequency of Committee meetings
 - iv. Committee work programs and its realization.
 - 3) Implementation compliance functions, internal auditor, and external auditor. Information that needs to be disclosed is a performance of implementation of management function, internal auditor, and external auditor:
- a) Compliance function:

Implementation of compliance with laws and regulations, consist of:

1) A member of Directors that supervises compliance function and working

unit or employee that responsible to related member of Directors;

- 2) The obligation to fulfill the minimum of equity;
 - 3) The level of financial soundness, which is solvability level, liquidity ratio, and sufficiency investment ratio;
 - 4) Implementation of know-your-customer principles and submission of cash financial transactions and suspicious transactions to Financial Transactions and Reports Analysis Centre; and
 - 5) Working unit ownership or handling and settlement function of consumer complaints.
- b) Internal auditor function:

The effectiveness and scope of implementation of internal auditor role in assessing the aspect and substance of activity, which are:

- 1) The scope of auditor work
- 2) structure or position of Working unit of internal auditor
- 3) Independency of internal auditor
- 4) Working unit role description
- 5) Total employee of working unit of internal auditor
- 6) The report of implementation of internal auditor role.
- c) External auditor function.

The effectiveness and scope of implementation of external auditor role is providing accounting notes and other data that is necessary for external auditor thus the external auditor is permitted to give his opinion about fairness, obedience, and suitability referred to financial report and the standard of audit.

- 4) Implementation of risk management includes the intern management. Information which needs to be disclosed is:
 - a) An active supervision of Director and Board of Commissioner.
 - b) The sufficiency of policy, procedure, and stipulating of risk limit.
 - c) The sufficiency of identification process, measurement, monitoring, and risk management.
 - d) Information system of risk management.
- e) A comprehensive management system.
- 5) Implementation of remuneration policy and other facilities for member of Directors, Board of Commissioner and Sharia Supervisory Board.
- a) A disclosure of remuneration policy and other facilities member of Directors,
 Board of Commissioner and Sharia Supervisory Board, which at least consist of:
 - 1) Remuneration in formed in natura, includes salary and other fixed income, which is benefit, compensation based on shares, tantiem, and other remunerations

- 2) Other facilities in formed natura or in natura means other income, includes allowance for housing, transportation, health insurance, and other facilities
- b) A disclosure of package or remuneration policy for 1 (one) year, which at least consist of:
- 1) Package or remuneration policy and other facilities for member of Directors, Board of Commissioner and Sharia Supervisory Board as stipulated by GMS
- 2) Type of remuneration and other facilities for member of Directors, Board of Commissioner and Sharia Supervisory Board which at least cover total of Directors, Board of Commissioner and Sharia Supervisory Board, and the whole amount of remuneration policy and other facilities as mentioned in letter a); and
- 3) Total of member of Directors, Board of Commissioner and Sharia Supervisory Board that receive the one-year remuneration package grouped according to the level of income.
 - 6) Strategic Corporate Plan, consist of:
 - a) Corporate plan which cover the formulation of objective and target which reached by the companies in the next 5 (five) years; and
 - b) Business plan that reflect the business activities plan in the next 1 (one) year and 3 (three) years.
- 7) Transparency of Company financial condition and non-financial that has not been disclosed in other reports.
- 8) The company function which transferred to other parties (outsourcing).
 - 9) Implementation of GMS authority, consist of:
 - a) implementation of annual GMS and extra ordinary GMS with decision that determined by each GMS.
 - b) Process of the announcement and GMS calling.
 - c) other things which still wait for GMS approval.
 - 10) Implementation of Independent Commissioner role related to protection for the interest of policyholders, insured party, participant or a party that entitled to benefit, either related to service or claim settlement, includes the report of dispute which is in settlement process on mediation, arbitration, or judiciary institutions. This regulation is only valid for Insurance Company and Sharia Insurance Company.
- 11) Cooperative relation between Insurance Company and Sharia Insurance Company with Insurance Agent Company that conduct to market the insurance product which is name of agent, total agent, ownership of agency certificate, and agency agreement. This regulation is only valid for Insurance Company and Sharia Insurance Company.
 - b. A disclosure of shares ownership of member of Directors and Board of

Commissioner that reach 5% (five percent) or more than paid-up capital, which consist of type and total shares on:

- 1) Related company;
- 2) Other Insurance and insurance related company;
- 3) Financial services companies, except other Insurance and insurance related company; and
- 4) Other companies that domiciled inside or outside the country, includes shares that obtained from the stock exchange.
- c. Financial relation and family relationship between member of Directors with other member of Directors, member of Board of Commissioner, member of Sharia Supervisory Board, and/or share holders where member of Directors stated
- d. Financial relation and family relationship between member of Board of Commissioner with other member of Board of Commissioner, member of Directors, member of Sharia Supervisory Board, and/or shareholders where member of Directors stated
 - e. The highest and the lowest salary ratio
 - Salary means a right of every member of Directors, member of Board of Commissioner, employee, and non-permanent employee, (includes honorary and outsources) that approved and stipulated in form currency as payment from the company or employers based on contract of work, agreement, or laws, includes allowances for employee and their family upon their work and/or services;
 - 2) The ratio of the highest and the lowest salary, in comparison scale as follows:
 - a) The ratio of the highest and the lowest salary;
 - b) The ratio of the highest and the lowest salary for member of Directors;
 - c) The ratio of the highest and the lowest salary for member of Board of Commissioner;
 - d) Salary Ratio of the highest of Directors member and the highest of employee
 - The compared salary in salary ratio means payment that received for member of Directors, Board of Commissioner, and employee on the end of reporting.
 - Employee means company permanent employee until staff.
 - f. Implementation of investment governance, consist of:
 - 1) Investment policy and strategic
- 2) Investment management, which is the implementation of analysis for investment risk; and
 - g. Transferring of investment to other parties, if there is
 - 1) Total of internal fraud;
 - Internal fraud means the deflection that conducted by the member of

Directors, member of Board of Commissioner (involving honorarium and outsourcer that can disadvantage and endanger the business activities and the financial soundness;

- 2) A disclosure of internal fraud shall at least consist of:
- a) Total of internal fraud which had been settled; and
 - b) Total of internal fraud which is in the settlement process in corporate internal;
 - c) Total of internal fraud which had not been settled yet; and
 - d) Total of internal fraud which followed up by a legal process.
- h. A disclosure of other important things, shall at least consist of:
- 1) The resignation or the dismissal of external auditor
- 2) Material transaction with related parties that is:
 - a) Purchasing, selling, stock or asset exchanging with 10% (ten percent) or more of company equity that conducted with related parties for one time or in a series of process;
 - b) Property leasing, management and service agreement includes mutual company for sharing of resource that conducted with related parties; and
 - c) Reinsurance agreement and settlement of intercompany balances that conducted with related parties;
- 3) Insurance claims that submitted by and/or inter company with 10% (ten percent) or more company equity
 - 4) Conflict of interest which is on going and/or might happen; and
 - 5) Other company material information that related to Good Corporate Governance
 - i. Legal Issues
 - 1) Legal issue means civil and criminal issues faced by the company during the period of reporting years and due process of law
 - 2) A disclosure of legal issues shall at least consist of:
 - a) Total of legal issues which had received decision that binding legal force
 - b) Total of legal issues, which is in settlement process in the court and in the institution of alternative dispute resolution for civil issues.

IV. SELF ASSESSMENT ON THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE

- 1. Company is obliged to conduct self-assessment on implementation of good corporate governance periodically at least one time per-year.
- 2. Self-assessment on the implementation of good corporate governance as mentioned in number 1 is conducted based on the guidelines of good corporate governance and self-assessment checklist which arranged by committee that formed by

- governments to arrange the good corporate governance policy.
- 3. The report of self-assessment on the implementation of good corporate governance is non-separable part for the implementation of good corporate governance report as mentioned in chapter II number 2.

V. ACTION PLAN

- 1. Company is obliged to set an action plan to increase or improve the implementation of good corporate governance as follow up of self-assessment. Action plan includes the necessary corrective action and time of settlement and constraints or obstacle of settlement, if there is any shortage on the implementation of good corporate governance.
- 2. Action plan as mentioned in number 1 is a non-separable part from the implementation of good corporate governance report.

VI. FORM AND PROCEDURE OF THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE REPORT

Form and procedure of the implementation of good corporate governance report as stipulated in the attachment that is a non-separable part from FSA Circular Letter.

VII. SUBMISSION TIME OF THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE REPORT

- 1. Company is obliged to submit the implementation of good corporate governance report to Financial Services Authority on or before February 28 of the following year.
- 2. If a term of February 28 is days off, submission dateline is the following workdays after February 28 as mention above.

VIII. PROCEDURE OF SUBMITING THE IMPLEMENTATION OF GOOD CORPORATE GOVERNANCE REPORT

- Company is obliged to submit the implementation of good corporate governance report which had been assigned by the Director, Board of Commissioner, and Sharia Supervisory Board to Chief Executive of Non-Bank Financial Industry Supervisory as follows.
 - a. The submission cover letter of the implementation of good corporate governance report which assigned by Directors and shall be submitted in hardcopy
 - b. Contents of the implementation of good corporate governance report shall be submitted in form of electronic (softcopy); and
 - c. checklist of self-assessment which its format prepared by the committee formed by government which in charge of developing the good corporate governance policy is submitted in softcopy with spreadsheet format

2. Insurance Company and Reinsurance Company shall submit the report to the following address:

Chief Executive of Non-Bank Financial Industry Supervisor

Financial Services Authority

Director of Insurance Supervisory and Health Social Security Agency (BPJS Kesehatan)

Sumitro Djojohadikusumo Building 14th floor

Jl. Lapangan Banteng Timur Nomor 2-4

Jakarta 10710.

- 3. Insurance Company and Reinsurance Company that have sharia unit shall submit the report to the following address:
 - a. Chief Executive of Non-Bank Financial Industry Supervisory

Financial Services Authority

u.p Director of Insurance Supervisory and Health Social Security Agency (BPJS Kesehatan)

Sumitro Djojohadikusumo Building, 14th floor

Jl. Lapangan Banteng Timur Nomor 2-4

Jakarta 10710

b. Chief Executive of Non-Bank Financial Industry Supervisory Financial Services Authority

u.p Director of Sharia IKNB

Sumitro Djojohadikusumo Building, 13th floor

Jl. Lapangan Banteng Timur Nomor 2-4

Jakarta 10710

4. Sharia Insurance Company and Sharia Reinsurance Company shall submit the report to the following address:

Chief Executive of Non-Bank Financial Industry Supervisory

Financial Services Authority

u.p Director of Sharia IKNB

Sumitro Djojohadikusumo Building, 13th floor

Jl. Lapangan Banteng Timur Nomor 2-4

Jakarta 10710

5. In term of there is any changes of Financial Services Authority address to submit report as mentioned in number 2, number 3, and number 4, Financial Services Authority will convey the notification regarding the changes address by mail or announcement.

IX. CLOSING PROVISIONS

FSA Circular Letter comes into Force on the date its stipulated. For public purpose, this circular letter shall be issued in the state Gazette of the Republic of Indonesia..

Stipulated in Jakarta on 9 December 2014 Chief Executive of Insurance, Pension Fund, Financing Agency and Other Financial Service Agency of the Financial Services Authority, Signed by FIRDAUS DJAELANI

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APPENDIX

CIRCULAR LETTER OF FINANCIAL SERVICES AUTHORITY

NUMBER 18/SEOJK.05/2014

ON

GOOD CORPORATE GOVERNANCE IMPLEMENTATION REPORT FOR INSURANCE BROKERAGE COMPANIES, REINSURANCE BROKERAGE COMPANIES AND INSURANCE LOSS APPRAISAL COMPANIES

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 - A. Good Corporate Governance implementation disclosure.
 - 1) Implementation of duties and responsibilities of Board of Directors and Board of Commissioners.
 - a) number, position name, criteria, appointment date by GMS, terms of office, citizenship and domicile of members of Board of Directors and Board of Commissioners

(1) Board of Directors

			Criteria						
No	Name	Position	Last formal education and profession title	Work experience in insurance sector	Fit and proper test	Appointment date by GMS	Terms of office	Citizenship	Domicile
1.									
2.									
Etc.									

Provide details for the above table

In the event there is a change in membership of the Board of Directors in the reporting year, the previous membership structure of the Board of Directors shall be included in the following table:

No	Name	Position	Appointment date by GMS	Discharge date by GMS	1
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(2) Board of Commissioners

			Criteria						
No	Name	Position	Last formal	Work experience in	Fit and	Appointment date	Terms of	Citizenship	Domicile
110		1 05111011	education and	_	proper test	by GMS	office	Citizensinp	Domene
			profession title	msurance sector	proper test				
1.									
2.									
Etc.									

Provide details for the above table

In the event there is a change in membership of the Board of Commissioners in the reporting year, the previous membership structure of the Board of Commissioners shall be included in the following table:

No	Name	Position	Appointment date by GMS	Discharge date by GMS

b) duties and responsibilities of Board of Directors and Board of Commissioners.

c) dual position of Board of Directors and Board of Commissioners.

(1) Board of Directors

No	Name	Position in Company	Position in Other Company	Name of the Other Company	Business Sector
1			1.		
1.			2.		

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		Etc.	
2.		1.	
		2.	
		Etc.	
Etc.			

(2) Board of Commissioners

No	Name	Position in Company	Position in Other Company	Name of the Other Company	Business Sector
			1.		
1.			2.		
			Etc.		
2.			1.		
			2.		
			Etc.		
Etc.					

d) training of Board of Directors and Board of Commissioners training in relation to improvements in human resources in achieving the vision and mission of the company.

(1) Board of Directors

No	Name	Position	Workshop/training/seminar	Organizer	Date	Venue
1.						
2.						
Etc.						

(2) Board of Commissioners

No	Name	Position	Workshop/training/seminar	Organizer	Date	Venue
1.						
2.						

Etc.								
e) im	e) implementation of activities and recommendations of the Board of Commissioners.							

- f) frequency of meetings of Board of Directors and Board of Commissioners in 1 (one) year.
 - (1) Meeting of Board of Directors

			Total meeting of Board of Directors (meetings)		
No	Name	Position	Attendance		
			Physical	Physical Teleconference/ Videoconference/ Other Electronic Media	
1.					
2.					
Etc.					

(2) Meeting of Board of Commissioners

Total meeting of				Total meeting of Board of Commissioners (meeting	of Board of Commissioners (meetings)	
No	Name	Position	Attendance			
			Physical Teleconference/ Videoconference/ Other Electronic Media		% Attendance	
1.						
2.						
Etc.						

(3) Meeting between Board of Commissioners and Board of Directors

			Total meeting of Board of Commissioners and Board of Commissioners (meetings)	
No	Name	Position	Attendance	% Attendance
			Physical Teleconference/ Videoconference/ Other Electronic	

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		Media	
1.			
2.			
Etc.			

(4) Meeting between Board of Commissioners and External Auditor

			Total meeting of Board of Commissioners and External Auditor (meetings)		
No	Name	Position	Attendance		
			Physical Teleconference/ Videoconference/ Other Electronic Media		% Attendance
1.					
2.					
Etc.					

2) Implementation of external auditor function

The function of external auditor:

The task implementation effectiveness of external auditor and the company's compliance with the provisions, include the provision of all accounting records and data required by the external auditor to enable the external auditor to provide opinion on the fairness, compliance and conformity of the company's financial statements with the applicable audit standards. For example relevant provisions of the obligation to fulfill the minimum own capital, the amount of unpaid premium which should not exceed the own capital, and the implementation of the principle concerning your customer for insurance brokers.

Public accountant office shall perform audit on financial statements of the Company for the past 6 years:

Year	Public accountant office	Accountant name (individual)	

Th	is provision shall only apply to insurance brokerage and reinsurance brokerage companies.				
3)	Risk management implementation, including internal control system.				
	a) active supervision of Board of Directors and Board of Commissioners.				
	for example: review on accuracy sufficiency of underwriting and human resources policies.				
	b) sufficiency of policy, procedure and risk limit setting.				
	c) sufficiency of risk identification, measurement, monitoring and control process.				
	d) risk management information system.				
	e) comprehensive internal control system.				
4)	Implementation of remuneration policy and other facilities for members of Board of Directors and Board of Commissioners for 1				

4) Implementation of remuneration policy and other facilities for members of Board of Directors and Board of Commissioners for 1 (one) year.

	Total received in 1 year		
Type of remuneration and other facilities	Board of Directors	Board of Commissioners	
	(million Rp)	(million Rp)	
1. Remuneration (including salary and other fixed income, including benefits,			
stock-based compensation, gratification and other form of remunerations in the			
form of non-in kind)			
2. Other facilities in the form of in kind (housing, transportation, health insurance			
and others)			
Total			

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3)	Transparency of financial and non-financial conditions of the Company which are not yet disclosed in other reports.
	for example: disclosure of the rating of the company as conducted by rating agencies, transparency of products presented in
	brochures, leaflets and other promotional media and in the company's website, transparency of the procedures for complaints and
	dispute resolution to policyholders, and shares buy back.

6) Outsourced Company functions

No	Outsourced function to other party	Other party as partner	Business license of the other party	Contract terms	Reason for selecting the other party

7) GMS authority implementation

a) implementation of annual GMS and extraordinary GMS and resolutions from each GMS.

b) GMS announcement and invitation processes.

c) other matters which still waiting for GMS approval.
for example: transactions and appointments of Board of Directors and Board of Commissioners

B. Disclosure of share ownership by members of Board of Directors and Board of Commissioners which is equal or more than 5% (five percent) of paid-up capital, including the type and number of share certificates.

Name | Position | Share ownership by members of Board of Directors and Board of Commissioners which is equal or more than 5% (five

				percen	t) of paid-up	capital			
	A		В		C		D		Note:
	Total share	Ownership	Total share	Ownership	Total share	Ownership	Total share	Ownership	Indonesia/O
	nominal	percentage	nominal	percentage	nominal	percentage	nominal	percentage	verseas

Note:

- A. respective Company;
- B. other insurance company;
- C. financial service company other than insurance company; and
- D. other domestic or foreign company, including shares from stock exchanges.
- C. Financial and family relationships between members of the Board of Directors, members of the Board of Commissioners, and/or shareholders of the Company where members of the Board of Directors have position.

	Financial relations with										
Name	Other member of Board of Directors			Other member of Board of Commissioners			Shareholder				
	Yes	No	Description*	Yes	No	Description*	Yes	No	Description*		
1.											
2.											
Etc.											

		Familial relations with										
Name	Name Other member of Board of Directors			Other 1	Other member of Board of Commissioners			Shareholder				
	Yes	No	Description*	Yes	No	Description**	Yes	No	Description*			
1.												
2.												

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Etc.					

Note:

- *) Financial relations: debt/loan, business partnership etc.
- **) Familial relations: husband/wife/child/parents/sibling/in-law, etc.
- D. Financial and family relationships between members of the Board of Commissioners, members of the Board of Directors, and/or shareholders of the Company where members of the Board of Commissioners have position.

	Financial relations with										
Name	Other member of Board of Commissioners			Ot	Other member of Board of Directors			Shareholder			
	Yes	No	Description*	Yes	No	Description*	Yes	No	Description*		
1.											
2.											
Etc.											

		Familial relations with										
Name	Other member of Board of Commissioners			Other member of Board of Directors			Shareholder					
	Yes	No	Description*	Yes	No	Description**	Yes	No	Description*			
1.												
2.												
Etc.												

Note:

- *) Financial relations: debt/loan, business partnership etc.
- **) Familial relations: husband/wife/child/parents/sibling/in-law, etc.
- E. Total internal frauds.

	Total cases performed by				
Internal frauds in 1 year	Member of Board of Directors and Board of Commissioners	Permanent employee	Non-permanent employee		

	T-1	T	T-1	T	T-1	T
Total frauds						
Already resolved						
In internal resolution process						
No resolution effort yet						
Already legally followed-up						

F. Disclosure of other important matters	F.	Disclosure	of other	important	matters
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1)	resignation	or discharge	of external	auditor
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2)	material	transaction	with	related	party.
-,	material	danoaction	VVICII	related	party.

3) current and/or potential conflict of interests.

Example of current and/or potential conflict of interests includes Company asset purchase by a member of Board of Directors, a member of Board of Commissioners and/or corporate employee.

No	Name and position of party with conflict	Name and position of	Transaction	Transaction value (million	Information *)	
	of interests	decision maker	type	Rupiah)		
1.						
2.						
Etc.						

Note:

4)	Other material information on related party and Good Corporate Governance, including owner intervention, internal dispute, or
	issues due to remuneration policy in the Company.

\sim	т 1	
UI.	Legar	issue.

^{*)} It is not in accordance with the prevailing system and procedure.

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Legal issue	Total cases	
	Civil	Criminal
Already received a legally binding decision:		
a. Civil		
b. Criminal		
In the process of settlement in courts and in alternative dispute resolution institution for civil case:		
a. Civil		
b. Criminal		
Total		

III. ACTION PLAN

No	Corrective action	Resolution Target	Resolution obstacle	Information
1.				
2.				
Etc.				

Approves,

Board of Directors

Board of Commissioners

Enacted in Jakarta on 9 December 2014

Chief Executive of Insurance, Pension Fund, Financing Agency and Other Financial Service Agency of the Financial Services Authority,

signed

FIRDAUS DJAELANI