



Gatot Trihargo – Deputi Bidang Usaha Jasa Keuangan, Jasa Survei dan Konsultan,
Kementerian BUMN

LEVERAGING COSO ACROSS THREE LINES OF DEFENSE THE IMPLEMENTATION ON STATE-OWNED BANKS



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OJK REGULATIONS AND COSO FRAMEWORK

The objectives of Bank's internal control system is to ensure:

- ✓ **Compliance** with regulations and legislation and internal policy or regulations of the Bank.
- ✓ **Availability of financial and management information** (complete, accurate, appropriate and timely manner).
- ✓ **effectiveness and efficiency in operational activities**



OTORITAS JASA KEUANGAN
REPUBLIK INDONESIA

SALINAN

PERATURAN OTORITAS JASA KEUANGAN

NOMOR 18 /POJK.03/2016

TENTANG

PENERAPAN MANAJEMEN RISIKO BAGI BANK UMUM

- (2) Sistem pengendalian intern sebagaimana dimaksud pada ayat (1) wajib memastikan:
- a. kepatuhan terhadap peraturan dan perundang-undangan serta kebijakan atau ketentuan intern Bank;
 - b. tersedianya informasi keuangan dan manajemen yang lengkap, akurat, tepat guna, dan tepat waktu;
 - c. efektivitas dan efisiensi dalam kegiatan operasional; dan
 - d. efektivitas budaya Risiko (*risk culture*) pada organisasi Bank secara menyeluruh.



LEVERAGING COSO ACROSS THE THREE LINES OF DEFENSE*)



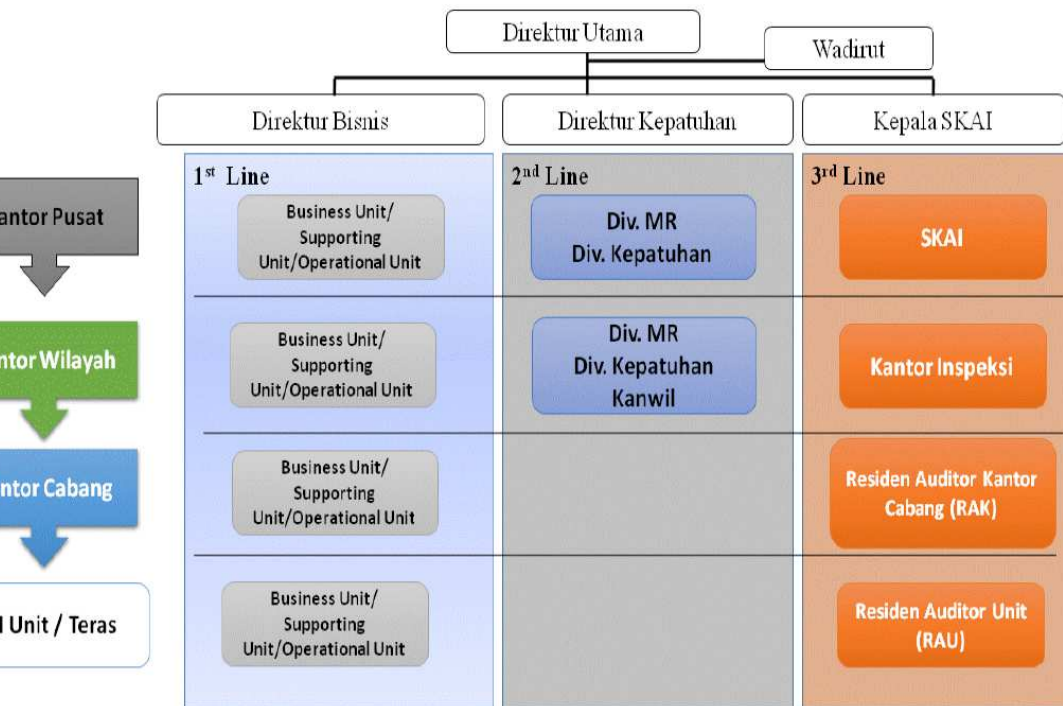
*) LEVERAGING COSO ACROSS THE THREE LINES OF DEFENSE, By The Institute of Internal Auditors, July 2015.



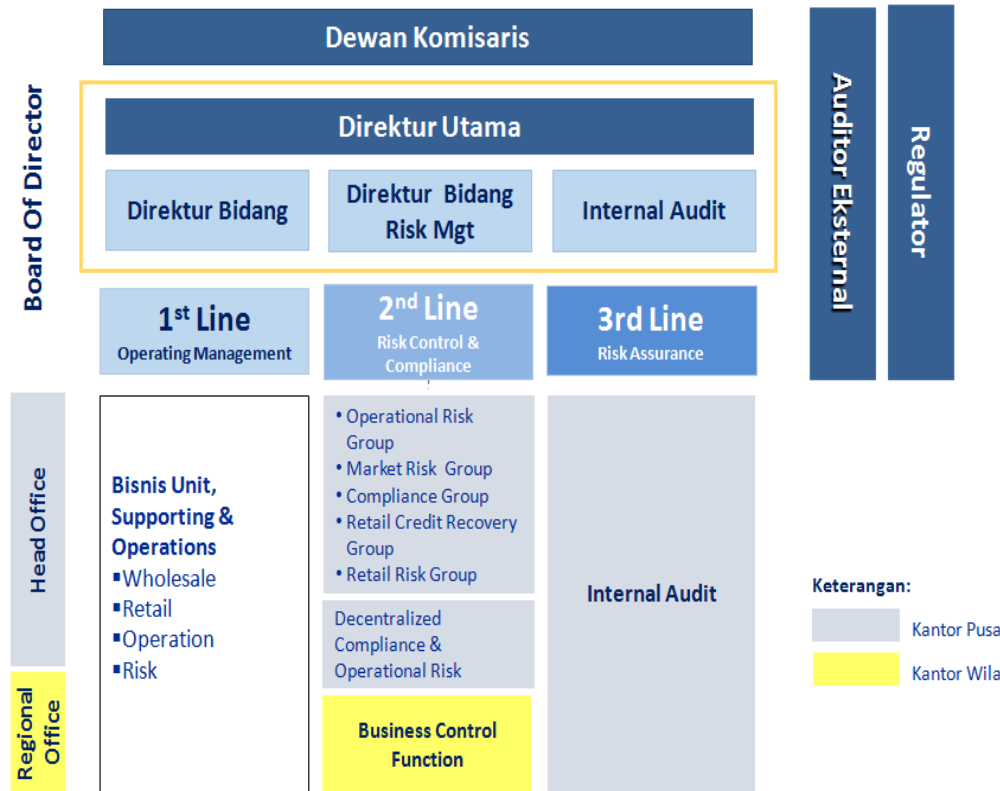
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THE THREE LINES OF DEFENSE STATE-OWNED BANKS

Three Line Of Defense BRI



Integrated Assurance Function – The Three Lines of Defense



Keterangan:

Kantor Pusat
 Kantor Wilayah



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CONTROL ENVIRONMENT AND CAPITAL MARKET REGULATIONS

CONTROL ENVIRONMENT AND TONE AT THE TOP



Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercise oversight responsibility
3. Establishes structure, authority and responsibility
4. Demonstrates commitment to competence

Risk Assessment

5. Enforces accountability
6. Specifies suitable objectives
7. Identifies and analyzes risk
8. Assesses fraud risk
9. Identifies and analyzes significant change

Control Activities

10. Selects and develops control activities
11. Selects and develops general controls over IT
12. Deploys through policies and procedures

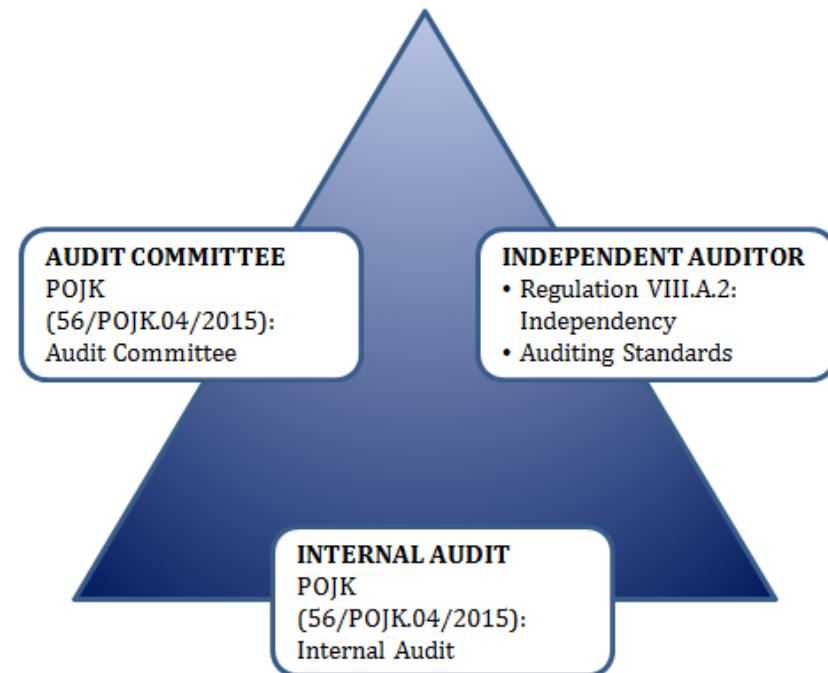
Information & Communication

13. Uses relevant information
14. Communicates internally
15. Communicates externally

Monitoring Activities

16. Conducts ongoing and/or separate evaluations
17. Evaluates and communicates deficiencies

REPORTING GOVERNANCE CAPITAL MARKET REGULATIONS



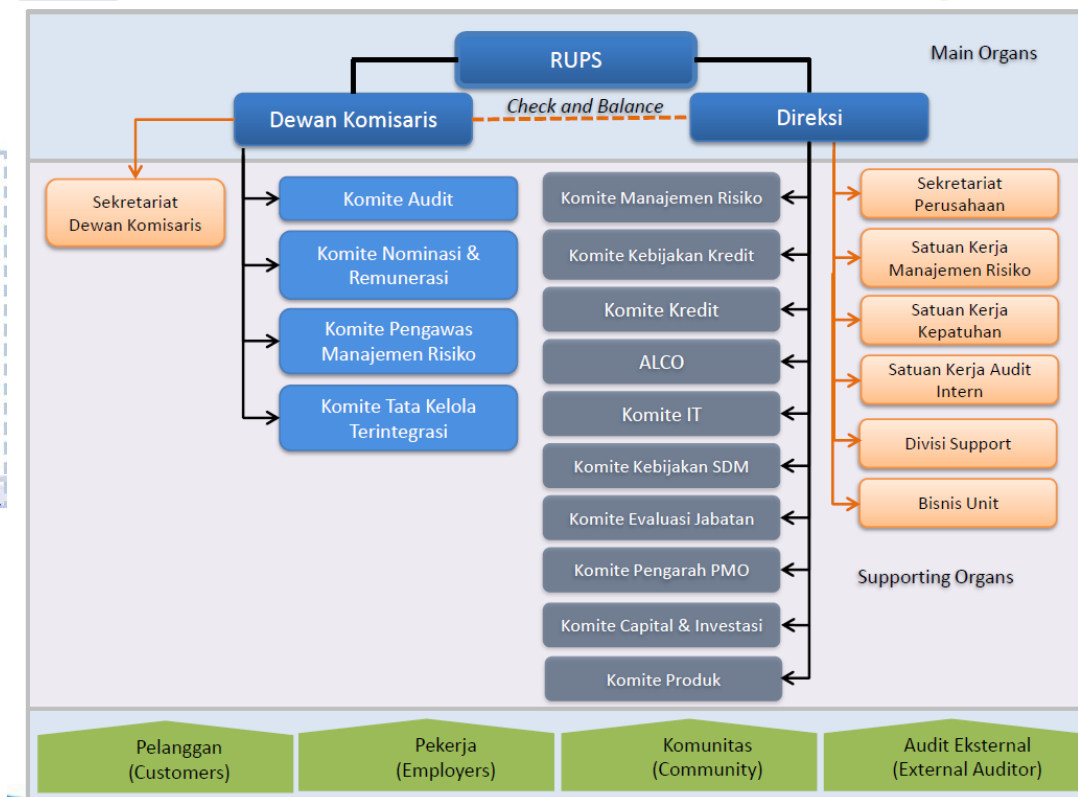
GOVERNANCE POLICY DAN STRUCTURE

Governance Policy BRI



- Visi dan Misi : Perusahaan mempunyai visi yang mencerminkan tujuan yang akan dicapai pada masa yang akan datang dan misi yang memuat cara untuk mencapai visi yang telah ditetapkan
- Nilai-nilai Perusahaan : Mencakup nilai Budaya Kerja yang diterjemahkan dalam Tindakan Budaya Kerja yang menjadi landasan cara berpikir, berperilaku dan bertindak individu dalam kelompok yang dipergunakan secara terus menerus. Nilai-Nilai Perusahaan ini tercermin dalam BRI Lima Nilai (BRILIAN) yang terdiri dari **Integritas, Profesionalisme, Keteladanan, Kepuasan Nasabah dan Penghargaan Kepada SDM**, selain itu dalam menjalankan kegiatan operasionalnya seluruh insan BRI berpedoman pada 20 (dua puluh) tindakan budaya kerja.
- Pedoman Dewan Komisaris dan Direksi : Menjabarkan struktur, tugas dan tanggung jawab, pembagian tugas, etika kerja, rapat, organisasi, dan hubungan kerja dari Dewan Komisaris dan Direksi, sebagai acuan bagi Dewan Komisaris dan Direksi dalam melaksanakan tugas untuk mencapai visi dan misi Bank.
- Kode Etik : Merupakan pedoman yang menjelaskan etika usaha dan tata perilaku insan Bank untuk melaksanakan praktik-praktik pengelolaan perusahaan yang baik. Kode Etik BRI tertuang dalam SKB Dewan Komisaris dan Direksi tentang Kode Etik BRI
- Perjanjian Kerja Bersama : mengatur syarat-syarat kerja yang merupakan hasil perundingan dan kesepakatan antara Bank dengan serikat pekerja Bank.

Governance Structure BRI





FIRST LINE OF DEFENSE

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FIRST LINE OF DEFENSE
Management Controls
Internal Control Measures

Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercise oversight responsibility
3. Establishes structure, authority and responsibility
4. Demonstrates commitment to competence

Risk Assessment

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6. Specifies suitable objectives
7. Identifies and analyzes risk
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Control Activities

10. Selects and develops control activities
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12. Deploys through policies and procedures

Information & Communication

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Monitoring Activities

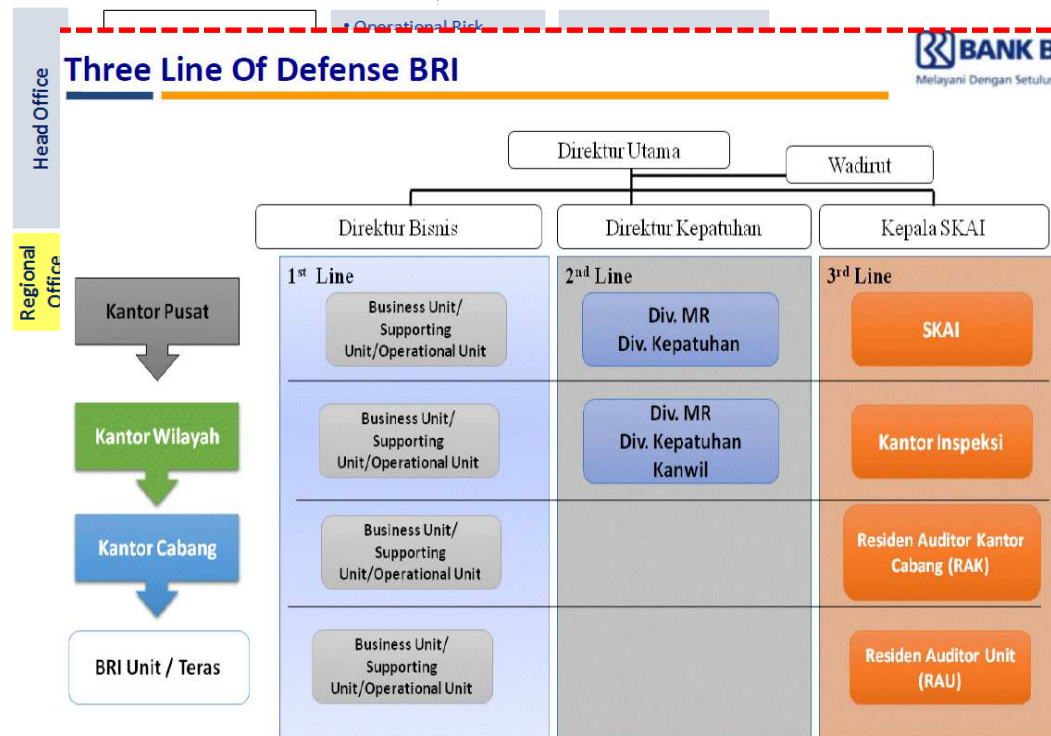
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17. Evaluates and communicates deficiencies



Integrated Assurance Function – The Three Lines of Defense

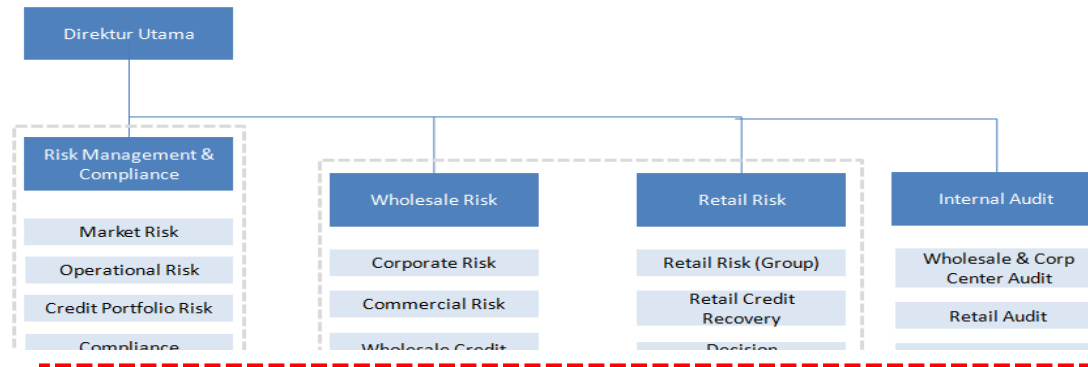


Three Line Of Defense BRI



BANK ORGANIZATIONAL STRUCTURE FOR RISK AND CONTROL FUNCTION

Struktur Organisasi Bank Mandiri untuk Risk and Control Function



SECOND LINE OF DEFENSE

SECOND LINE OF DEFENSE

Financial Control
Security
Risk Management
Quality
Inspection
Compliance



Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercise oversight responsibility
3. Establishes structure, roles, and responsibilities
4. Demonstrates competence

Risk Assessment

5. Enforces accountability
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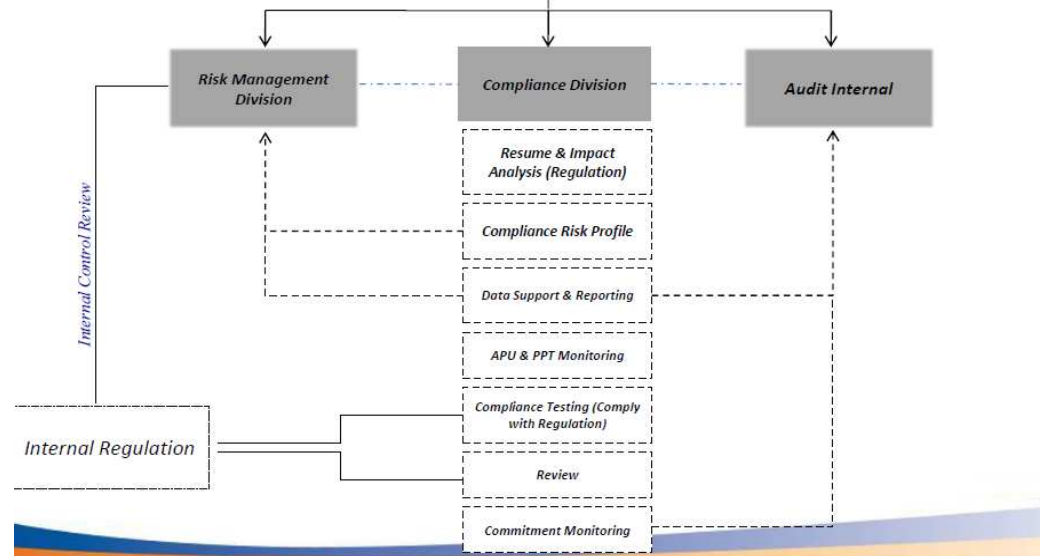
Monitoring Activities

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OJK Regulations:
Risk management and compliance

Compliance Framework

Regulator, External Auditor & Law Enforcer





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THIRD LINE OF DEFENSE AND INTERNAL AUDIT

THIRD LINE OF DEFENSE

Internal Audit

Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercise oversight responsibility
3. Establishes structure, authority and responsibility
4. Demonstrates commitment to competence

Risk Assessment

5. Enforces accountability
6. Specifies suitable objectives
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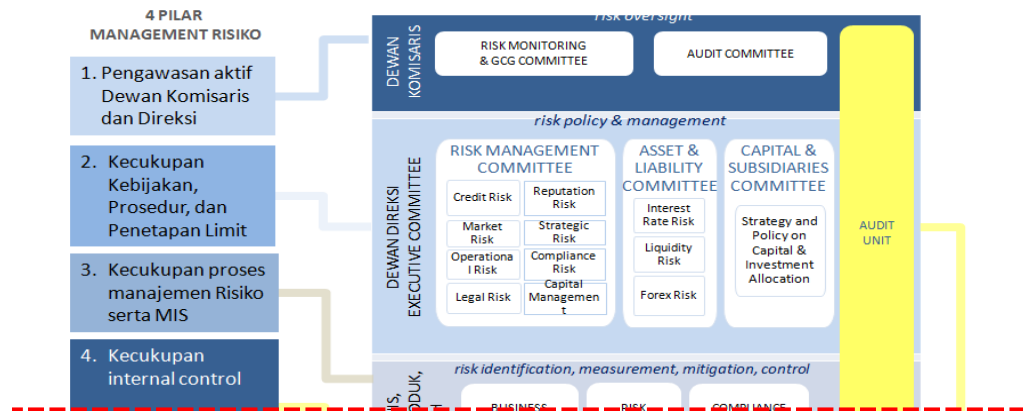


Implementation of Assurance functions in Bank Mandiri

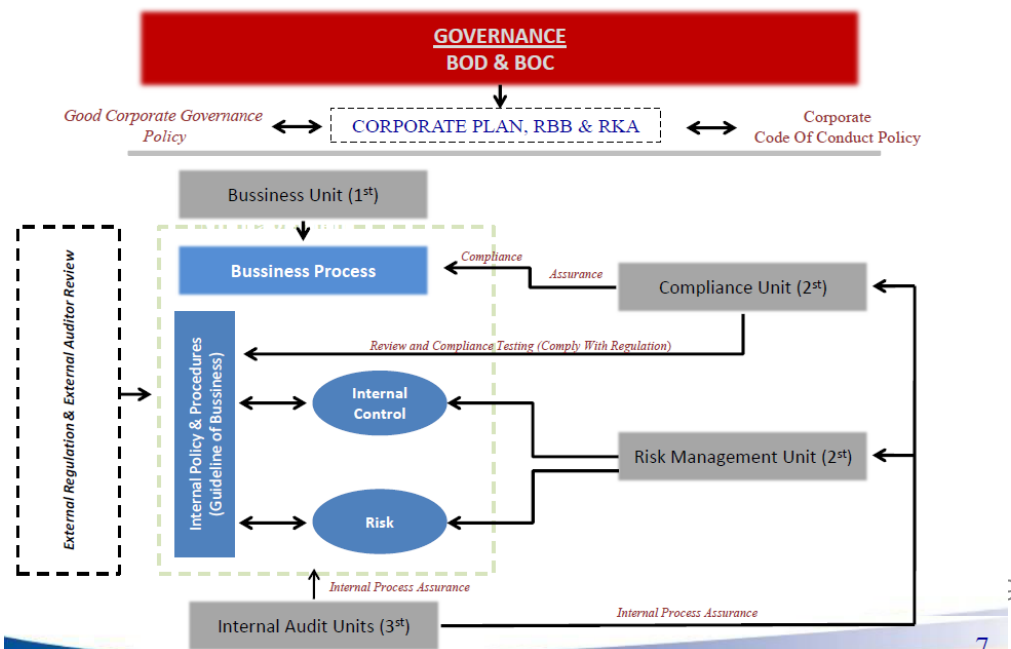


Integrated Assurance Function

Integrasi dilakukan mulai dari tingkat high level hingga tingkat operasional



Governance, Risk And Compliance Mechanism BRI





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Thank You