Material Aspects					OMISSION			
and General Disclosures	GRI Standard		Disclosure	Page	Requirement Omitted	Reason	Explanation	
Waste	GRI 3: Material Topics 2021	3-3	Management of material topics	238				
	GRI 306: Waste 2020	306-1	Waste generation and significant waste- related impacts	238				
		306-2	Management of significant waste- related impacts	238				
		306-3	Waste generated	238, 288				
		306-4	Waste directed from disposal	238, 288				
		306-5	Waste directed to disposal	238, 288				
Employment	GRI 3: Material Topics 2021	3-3	Management of material topics	224				
	GRI 401: Employment 2016	401-1	New employee hires and employee turnover	229, 293 - 296				
		401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	223				
		401-3	Parental leave	224				
Training and Education	GRI 3: Material Topics 2021	3-3	Management of material topics	169, 206, 227				
	GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	213, 298				
		404-2	Programs for upgrading employee skills and transition assistance programs	115, 132, 165-166, 170, 201, 204, 206, 227, 297- 298, 301				
		404-3	Percentage of employees receiving regular performance and career development reviews	224, 301				

Feedback Form



Material Aspects					OMISSION		
and General Disclosures	GRI Standard	Disclosure		Page	Requirement Reason Ex Omitted		Explanation
Diversity and Equal Opportunity	GRI 3: Material Topics 2021	3-3	Management of material topics	214, 216, 222			
	GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	289, 291 - 292			
		405-2	Ratio of basic salary and remuneration of women to men	222, 292 - 293			
Non Discrimination	GRI 3: Material Topics 2021	3-3	Management of material topics	216			
	GRI 406: Non Discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	217			
Local Community	GRI 3: Material Topics 2021	3-3	Management of material topics	274			
	GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	264, 274, 299			
		413-2	Operations with significant actual and potential negative impacts on local communities	264, 274			
Marketing and Labeling	GRI 3: Material Topics 2021	3-3	Management of material topics	169			
	GRI 417: Marketing and Labeling 2016	417-1	Requirements for product and service information and labeling	169			
		417-2	Incidents of non- compliance concerning product and service information and labeling	-			
		417-3	Incidents of non-compliance concerning marketing communications	-			

Financial Services Authority Performance Data GRI Content Index References

complaints concerning

breaches of customer privacy and losses of

customer data

			Page			
GRI Standard		Disclosure		Requirement Omitted	Reason	Explanation
GRI 3: Material Topics 2021	3-3	Management of material topics	191			
GRI 418:	418-1	Substantiated	191,			

297-298

SASB Content Index for

Commercial Banks

Material Aspects and General

Disclosures **Customer Privacy**

Appendices

Sustainability

Customer

Privacy 2016



Financial Services Authority References (SEOJK G.4)

Circular Letter No. 16/SEOJK.04/2021	Disclosure	Page
Sustainability Strategy		
A.1	Explanation of the Sustainability Strategy	16, 20, 111
Overview of Sustainab	ility Performance	
B.1	Overview of Economic Performance	8, 280-286, 299
B.2	Overview of Environmental Performance	10,12
B.3	Overview of Social Performance	12, 300
Company Profile		
C.1	Vision, Mission, and Sustainability Values	27
C.2	Company Address	26
C.3	Company Scale	26, 29-30, 280-281, 289-290
C.4	Products, Services, and Business Activities Conducted	26, 282-285
C.5	Memberships in Associations	36
C.6	Significant Organizational Changes	37
Board of Directors' Sta	atements	
D.1	Board of Directors' Statements	16, 20
Sustainability Governa	nce	
E.1	Responsibility for the Implementation of Sustainable Finance	67
E.2	Competency Development Related to Sustainable Finance	52
E.3	Risk Assessment of Sustainable Finance Implementation	61
E.4	Stakeholder Engagement	116
E.5	Issues Related to the Implementation of Sustainable Finance	67
Sustainability Performa	ance	
F.1	Activities to Build a Sustainability Culture	28, 114
Economic Performance	e	
F.2	Comparison of Targets and Performance in Production, Portfolio, Financing Targets, Investments, Revenue, and Profit/Loss	280-285, 288, 297- 299
F.3	Comparison of Targets and Performance in Portfolios, Financing Targets, or Investments in Financial Instruments or Projects in Alignment	282-285, 299
Environmental Perform	nance General	
F.4	Environmental Costs	239, 288
Material Aspects		
F.5	Use of Environmentally Friendly Materials	110, 237, 288
Energy Aspects		
F.6	Amount and Intensity of Energy Used	235, 286
F.7	Efforts and Achievements in Energy Efficiency and Renewable Energy Usage	235, 286, 288

GRI Content Index

Circular Letter No. 16/SEOJK.04/2021	Disclosure	Page
Water Aspects		
F.8	Water Usage	239, 287
Emission Aspects		
F.11	Amount and Intensity of Emissions Produced by Type	234, 286 287
F.12	Efforts and Achievements in Reducing Emissions	233 - 234, 288
Waste and Effluent As _l	pects	
F.13	Amount of Waste and Effluent Produced by Type	11, 238- 239, 288
F.14	Waste and Effluent Management Mechanisms	238-239, 288
F 15	Spills That Occurred (if any)	239, 288
Environmental Compla	ints Aspects	
F.16	Number and Nature of Environmental Complaints Received and Resolved	239
Social Performance		
F.17	Commitment of Financial Services Institutions (FSIs), Issuers, or Public Companies to Provide Equal Access to Products and/or Services for Consumers	164
Employment Aspects		
F.18	Equality of Employment Opportunities	11, 214
F.19	Child Labor and Forced Labor	217
F.20	Regional Minimum Wage	223
F.21	Decent and Safe Working Environment	230
F,22	Employee Training and Development	210, 297-298
Community Aspects		
F.23	Impact of Operations on Surrounding Communities	244, 264 274, 299
F.24	Community Complaints	264, 298
F.25	Social and Environmental Responsibility (CSR) Activities	263, 288 299
F.26	Innovation and Development of Sustainable Finance Products/Services	282-283 285, 299
F.27	Products/Services Evaluated for Customer Safety	171, 282 283, 285 298
F.28	Impact of Products/Services	244, 299
F.29	Number of Products Recalled	171, 298
F.30	Customer Satisfaction Survey on Sustainable Finance Products and/or Services	299
Others		
G.1	Written Verification from Independent Parties, If Any	38
G.2	Feedback Form	315
G.3	Responses to Feedback on the Previous Year's Report	315
G.4	List of Disclosures According to POJK 51/2017	37, 311