

SATUAN KERJA AUDIT INTERNAL

Sistem pengendalian internal diterapkan oleh Perseroan melalui pembentukan Satuan Kerja Audit Internal. Dalam struktur organisasi Perseroan, Satuan kerja Audit Internal secara langsung berada di bawah Presiden Direktur. Sesuai dengan *Internal Audit Charter*, Satuan Kerja Audit Internal berwenang dan bertanggung jawab untuk melaksanakan pengawasan internal di Perseroan.

Dasar Hukum Pembentukan

Pada tahun 2019, terdapat perubahan Kepala Audit Internal sebagaimana Surat Keputusan Direksi dan Dewan Komisaris Nomor SK-003/BOC-BOD/BAF.VII/2019 tertanggal 15 Juli 2019 tentang Perubahan Kepala Audit Internal yang telah menunjuk Kepala Audit Internal yang baru yaitu Erdyan Lazuardy efektif per tanggal 1 Agustus 2019. Perubahan tersebut telah disampaikan kepada OJK dan IDX melalui surat No. BAF/085/CP/VIII/2019 tertanggal 5 Agustus 2019.

Piagam Audit Internal

Dalam melaksanakan tugasnya, Satuan Kerja Audit Internal telah dilengkapi *Internal Audit Charter* seperti yang tercantum dalam keputusan Direksi Nomor 02/AMAUD/VII/2017 tertanggal 19 Juli 2017. Pada tahun 2019, Perseroan melakukan penyesuaian *Internal Audit Charter* dengan keputusan Direksi Nomor 04/AM-AUD/VII/2019 tertanggal 2 Juli 2019 dengan melakukan penambahan dalam beberapa hal.

Secara keseluruhan, adapun pokok-pokok yang tercantum dalam *Internal Audit Charter* mencakup sebagai berikut:

1. Latar belakang
2. Visi dan Misi
3. Struktur Organisasi dan Kedudukan Divisi Audit Internal
4. Tugas dan tanggung jawab Divisi Audit Internal
5. Wewenang Divisi Audit Internal
6. Kode Etik Auditor Internal
7. Persyaratan Auditor Internal
8. Pertanggung-jawaban Divisi Audit Internal
9. Larangan Auditor Internal
10. Penutup

Struktur dan Kedudukan Audit Internal

1. Divisi Audit Internal dalam Perusahaan berada di bawah Presiden Direktur;
2. Divisi Audit Internal dipimpin oleh Kepala Divisi Audit Internal;
3. Kepala Divisi Audit Internal diangkat dan diberhentikan oleh Presiden Direktur atas persetujuan Dewan Komisaris;
4. Kepala Divisi Audit Internal melaporkan segala kegiatannya dan bertanggung jawab atas laporan tersebut kepada Presiden Direktur;

Tugas dan Tanggung Jawab serta Wewenang

Tugas dan tanggung jawab Audit Internal antara lain:

1. Menyusun dan melaksanakan rencana audit internal tahunan;

INTERNAL AUDIT UNIT

Internal control system is implemented by the Company through establishment of Internal Audit Unit. In the Company's organization structure, the Internal Audit Unit is under the President Director. According to the Internal Audit Charter, the Internal Audit Unit holds the authority and responsibility to perform internal monitoring in the Company.

Legal Basis of Establishment

In 2019, there was a change in Head of Internal Audit Unit under the Board of Directors and Board of Commissioners Decree Number SK-003/BOC-BOD/BAF.VII/2019 dated July 15, 2019 concerning Change to Head of Internal Audit Unit appointing the new Head of Internal Audit, Erdyan Lazuardy effectively as per August 1, 2019. The change has been submitted to OJK and IDX through letter No. BAF/085/CP/VIII/2019 dated August 5, 2019.

Internal Audit Charter

In carrying out the duty, the Internal Audit Unit has been equipped with Internal Audit Charter as mentioned in BOD Decree Number 02/AM-AUD/VII/2017 dated July 19, 2017. In 2019, the Company revised the Internal Audit Charter under BOD Decree Number 04/AM-AUD/VII/2019 dated July 2, 2019 by adding some provisions.

Overall, principal contents of the Internal Audit Charter are including:

1. Background
2. Vision and Mission
3. Organization Structure and Position of Internal Audit Division
4. Duty and responsibility of Internal Audit Division
5. Authority of Internal Audit Division
6. Code of Ethics of Internal Auditor
7. Internal Auditor Requirements
8. Accountability of Internal Audit Division
9. Prohibitions to Internal Auditor
10. Closing

Internal Audit Structure and Position

1. Internal Audit Division is under President Director of the Company;
2. Internal Audit Division is led by Head of Internal Audit Division;
3. Head of Internal Audit Division is appointed and dismissed by President Director with approval from Board of Commissioners;
4. Head of Internal Audit Division reports every activity and solely responsible upon the report to the President Director;

Duty and Responsibility and Authority

Duty and responsibility of Internal Audit are as follows:

1. Prepare and implement annual internal audit plan;

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| <ol style="list-style-type: none"> 2. Menguji dan mengevaluasi pelaksanaan pengendalian internal dan sistem manajemen risiko sesuai dengan kebijakan perusahaan; 3. Melakukan pemeriksaan dan penilaian atas efisiensi dan efektivitas di bidang keuangan, akuntansi, operasional, sumber daya manusia, pemasaran, teknologi informasi dan kegiatan lainnya; 4. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkat manajemen; 5. Membuat laporan hasil audit dan menyampaikan laporan tersebut kepada Presiden Direktur dan Dewan Komisaris; 6. Memantau, menganalisis, dan melaporkan pelaksanaan tindak lanjut perbaikan yang telah disarankan; 7. Bekerja sama dengan Komite Audit; 8. Menyusun program untuk mengevaluasi mutu kegiatan audit internal yang dilakukannya; 9. Melaksanakan tugas khusus dalam lingkup pengendalian internal yang ditugaskan oleh Presiden Direktur. | <ol style="list-style-type: none"> 2. Examine and evaluate implementation of internal control and risk management system according to corporate policy; 3. Examine and audit efficiency and effectiveness in Finance, Accounting, Operations, Human Resources, Marketing, Information Technology and other activities; 4. Provide improvement suggestion and objective information about the audited activity at all management level; 5. Prepare audit report and submit the report to the President Director and Board of Commissioners; 6. Oversee, analyze and report implementation of improvement follow-up as suggested; 7. Cooperate with Audit Committee; 8. Prepare the program to evaluate quality of the implemented internal audit activity; 9. Perform special assignment under the internal control scope assigned by the President Director. |
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Adapun wewenang Audit Internal adalah sebagai berikut:

1. Mengakses seluruh dokumen, pencatatan dan informasi atas obyek audit untuk mendapatkan data yang berkaitan dengan penugasannya;
2. Memberikan usulan kepada Presiden Direktur untuk menyusun, mengubah dan melaksanakan kebijakan pengawasan internal termasuk antara lain menentukan prosedur dan lingkup pelaksanaan pekerjaan audit;
3. Melakukan verifikasi dan uji kehandalan terhadap informasi yang diperoleh dalam kaitan dengan penilaian efektifitas sistem yang diauditnya;
4. Melakukan komunikasi secara langsung dengan Direksi, Dewan Komisaris, dan/atau Komite Audit serta anggota Direksi, Dewan Komisaris, dan/atau Komite Audit;
5. Mengadakan rapat secara berkala dan insidental dengan Direksi, Dewan Komisaris, dan atau Komite Audit;
6. Melakukan koordinasi kegiatannya dengan kegiatan Auditor Eksternal;
7. Melakukan koordinasi dengan divisi lain dalam melakukan kegiatan audit di Perusahaan

Kualifikasi atau Sertifikasi Profesi

Kepala Satuan Kerja Audit Internal memiliki beberapa sertifikasi, antara lain: Sertifikat Comprehensive Course of Financial Company Business-APPI, Sertifikasi Risk Management (Level executive), Sertifikat mengikuti training Anti Fraud Awareness.

Setiap anggota Satuan Kerja Audit Internal atau secara kolektif harus memiliki kemampuan dan pengetahuan antara lain sebagai berikut:

1. Kemampuan dalam menerapkan standar dan etika internal audit, prosedur dan teknik yang diperlukan dalam melaksanakan audit;
2. Pemahaman prinsip-prinsip manajemen yang dibutuhkan untuk mengenali dan menilai materialitas penyimpangan etika bisnis dan etika kerja;
3. Pemahaman mengenai ekonomi, keuangan dan sistem Informasi;
4. Pemahaman mengenai kebijakan operasional dan proses bisnis perusahaan.

Authority of the Internal Audit is as follows:

1. Access all documents, records and information upon the audit object to acquired data related to the assignments;
2. Provide recommendation to the President Director to prepare, revise and implement the internal monitoring policy namely stipulating the audit procedure and scope of work;
3. Perform verification and reliability test on the acquired information related to the assessment on the audited system effectiveness;
4. Perform direct communication with the Board of Directors, Board of Commissioners, and/or Audit Committee and members of Board of Directors, Board of Commissioners and/or Audit Committee;
5. Hold regular and incidental meetings with the Board of Directors, Board of Commissioners and or Audit Committee;
6. Coordinate the activities with External Auditor's activities;
7. Coordinate with other divisions in performing audit activity in the Company.

Professional Qualification or Certification

Head of Internal Audit Unit holds certifications, among others: Comprehensive Course of Financial Company Business-APPI, Risk Management Certification (Level executive), Certificate of participation in Anti Fraud Awareness training.

Every personnel of the Internal Audit Unit or collectively shall have capability and knowledge, including as follows:

1. Capability in implementing internal audit standards and ethics, procedure and technique that are required in performing audit;
2. Understanding on the management principles required to recognize and evaluate materiality of business and work ethics violation;
3. Understanding on economics, finance and information system;
4. Understanding on operational policy and business process of the Company.

Dalam rangka meningkatkan kompetensi secara berkesinambungan, auditor internal diwajibkan untuk memperoleh sertifikasi dasar audit yang sudah disepakati dengan Learning & Development Division, beserta tambahan beberapa sertifikat mengikuti training eksternal.

Kode Etik Audit Internal

Dalam menjalankan tugasnya, Auditor Internal Perseroan memiliki kode etik yang mengikat dalam berperilaku di lingkungan Perseroan, antara lain:

1. Integritas
Dalam pelaksanaan tugasnya, internal auditor menunjung tinggi kejujuran, *diligence*, dan penuh tanggung jawab.
2. Objektivitas
Auditor internal menunjukkan tingkat objektivitas profesional tertinggi dalam mengumpulkan, mengevaluasi, dan mengkomunikasikan informasi tentang kegiatan atau proses yang sedang diperiksa. Auditor internal membuat penilaian yang seimbang atas segala hal relevan dan tidak terpengaruh secara tidak semestinya oleh kepentingan pribadi atau pihak lain dalam memberikan pertimbangan.
3. Kerahasiaan
Auditor internal menghormati nilai dan kepemilikan informasi yang mereka terima dan tidak mengungkapkan informasi tanpa izin, kecuali terdapat ketentuan perundang-undangan atau kewajiban profesional untuk melakukannya.
4. Kompetensi
Auditor internal menerapkan pengetahuan, keterampilan, dan pengalaman yang diperlukan dalam pelaksanaan audit internal.

Struktur, Kedudukan dan Pertanggung jawaban Audit Internal

Secara struktural, Satuan Kerja Audit Internal bertanggung jawab langsung kepada Presiden Direktur. Dalam pelaksanaannya, Auditor Internal audit dilarang merangkap tugas dan jabatan terkait pelaksanaan kegiatan operasional baik di Perseroan maupun anak perusahaan. Komposisi keanggotaan Satuan Kerja Audit Internal Perusahaan terdiri dari 1 (satu) Kepala Divisi, 2 Kepala Department dan 30 staff/supervisor/deputy department head internal audit.

Profil Kepala Satuan Kerja Audit Internal

Erdyan Lazuardy, Warga Negara Indonesia, 45 tahun. Meraih gelar Sarjana Ekonomi dari Universitas Mercu Buana, bidang Akuntansi pada tahun 1998 dan gelar Magister dibidang Hukum Bisnis dari Universitas Pancasila Jakarta pada tahun 2011.

Beliau bergabung dengan Perseroan pada tahun 2019 sebagai Division Head Satuan Kerja Audit Internal hingga saat ini. Sebelumnya pernah bekerja sebagai Branch Administration Head PT Columbindo Perdana (1999), Deputy Branch Manager PT Columbindo Perdana (1999 – 2000), Assistant Manager IT Department PT Columbindo Perdana (2000 - 2002), Operation Support Head PT Adira Quantum Multifinance (2002 - 2012), Head of Internal Audit PT Adira Quantum Multifinance (2012 - 2014), Head of Operation PT Adira Quantum Multifinance (2014 - 2015), Director PT Adira Quantum Multifinance (2016-2017),

In order to develop the competency in on going basis, the internal auditor is required to obtain basic audit certification as agreed with Learning & Development Division, altogether with additional certificates for participating in external trainings.

Ethical Code of Internal Audit

In carrying out its duties, the Company's Internal Auditors have a binding code of conduct in the conduct of the Company, including:

1. Integrity
In carrying out the duties, internal auditors uphold high honesty, diligence, and full responsibility.
2. Objectivity
Internal auditors demonstrate the highest level of professional objectivity in collecting, evaluating, and communicating information about the activity or process being examined. Internal auditors make a balanced assessment of all relevant aspects and are not affected by personal interests or other parties in giving their consideration.
3. Confidentiality
Internal auditors respect value and ownership of the information they receive and do not disclose information without permission, unless there are statutory provisions or professional obligations to do so.
4. Competency
Internal auditors has applied the required knowledge, skills and experience needed in carrying out internal audits.

Internal Audit Structure, Position and Accountability

Structurally, the Internal Audit Unit is directly responsible to President Director. In its implementation, the Internal Auditor is prohibited to serve in concurrent position and duties related to implementation of operational activity both in the Company and subsidiaries. Composition of Internal Audit Unit membership in the Company consists of 1 (one) Division Head, 2 Department Head and 30 staffs/ supervisor/deputy department head internal audit.

Head of Internal Audit Profile

Erdyan Lazuardy, Indonesian Citizen, 45 years. Earned Bachelor's degree of Economics from Universitas Mercu Buana majoring Accounting in 1998 and Master's degree of Business Law from Universitas Pancasila in 2011.

He joined with the Company in 2019 as Division Head in the Internal Audit unit until now. He was previously worked as Branch Administration Head PT Columbindo Perdana (1999), Deputy Branch Manager PT Columbindo Perdana (1999 – 2000), Assistant Manager IT Department PT Columbindo Perdana (2000 - 2002), Operation Support Head PT Adira Quantum Multifinance (2002 - 2012), Head of Internal Audit PT Adira Quantum Multifinance (2012 - 2014), Head of Operation PT Adira Quantum Multifinance (2014 - 2015), Director PT Adira Quantum Multifinance (2016-2017), Head of New Business

Head of New Business Development PT Adira Dinamika Multi Finance Tbk (2015 – 2016) dan jabatan terakhir sebagai Head of Credit Development PT Adira Dinamika Multi Finance Tbk (2017 – 2019).

Pendidikan dan/atau Pelatihan Anggota Satuan Kerja Audit Internal

Untuk meningkatkan kompetensi dan pemahaman dalam menunjang pelaksanaan tugas dan tanggung jawabnya, anggota Satuan Kerja Audit Internal telah mengikuti pelatihan.

Pelaksanaan Kegiatan Satuan Kerja Audit Internal

Secara keseluruhan, implementasi kegiatan Satuan Kerja Audit Internal Perseroan pada tahun 2019 meliputi pelaksanaan audit terhadap cabang dan unit bisnis sesuai dengan rencana audit tahunan; melaksanakan fungsi pengawasan terhadap komitmen yang telah disepakati secara periodic; melakukan kegiatan *Branch Self-Assessment* (BSA) yang dilakukan 2 kali setiap cabang; dan penguatan fungsi anti-fraud dengan tujuan meminimalkan terjadinya fraud dan fungsi *quality assurance* untuk memastikan terjaganya kualitas Kinerja kantor cabang.

Di tahun 2019, Satuan Kerja Audit Internal juga telah melakukan update dan penyempurnaan terkait *Standard Operating Procedure* (SOP) yang berisi mengenai aktivitas yang telah diatur, dan *worksheet audit program* yang menggunakan konsep Audit Program berbasis *Committee of Sponsoring Organizations of the Treadway Commission* (COSO 5) dan telah dilakukan uji coba menambahkan subscoring dengan mengisi checklist di setiap fungsi yang ada di kantor cabang.

Satuan Kerja Audit Internal juga secara independen dan objektif telah menjalankan kegiatan audit di kantor cabang Perseroan dan di kantor pusat Perseroan, yang meliputi audit kepatuhan terhadap kebijakan pemerintah (OJK), audit spesial terhadap fungsi kritical di kantor pusat, audit *surveillance* serta memastikan *Standard Operating Procedure* (SOP) sudah dilakukan serta evaluasi efektivitas sistem pengendalian internal perusahaan. Proses audit internal yang berlangsung sepanjang 2019 ini telah berjalan secara efektif.

Satuan Kerja Audit Internal berperan aktif dalam pelaksanaan setiap rapat rutin dengan Komite Audit untuk membahas program kerja Audit Internal, dan hal-hal terkait temuan-temuan penting yang memerlukan perhatian manajemen sesuai dengan fungsi pengawasan Komite Audit. Satuan Kerja Audit Internal juga aktif melakukan sharing terkait pengendalian internal di Perseroan, serta kegiatan audit meeting bersama kepala cabang yang dilaksanakan di kantor pusat.

Satuan Kerja Audit Internal secara periodik melakukan kajian secara internal maupun independen atas *quality assurance* unit audit internal demi memastikan bahwa proses audit yang dilaksanakan oleh Perseroan telah sesuai dengan standar yang berlaku dan juga untuk mendeteksi potensi pengembangan proses audit secara berkesinambungan. Guna meningkatkan efisiensi dan efektivitas kerja serta mengoptimalkan penggunaan sumber daya audit, Perseroan juga telah menerapkan sistem informasi audit berbasis IT sistem sejak tahun 2017 yaitu *Audit*

Development PT Adira Dinamika Multi Finance Tbk (2015 – 2016) with the latest position as Head of Credit Development PT Adira Dinamika Multi Finance Tbk (2017 – 2019).

Education and/or Training for Internal Audit Unit

To develop competency and understanding in supporting the duty and responsibility, the Internal Audit Unit has participated in trainings.

Internal Audit Unit Activity Implementation

Overall, implementation of the Company's Internal Audit Unit in 2019 included the audits implementation of branches and business units in accordance with the annual audit plan; performing the monitoring function over the commitments that have been agreed periodically; conduct Branch Self- Assessment (BSA) activities which are carried out twice per branch; and strengthening the anti-fraud function with the aim of minimizing fraud and quality assurance functions to ensure the quality of branch office performance.

In 2019, the Internal Audit Work Unit has also updated and improved the Standard Operational Procedure (SOP) which contains activities that have been regulated, and program audit worksheets that applied the Audit Program based on the Committee of Sponsoring Organizations of the Treadway Commission (COSO 5) concept) and a trial has been added by including sub-scoring by completing a checklist of each function at the branch office.

The Internal Audit Work Unit has independently and objectively performed audit activities at the Company's branch offices and at the head office, which including compliance audits to the government (OJK) policies, special audits of critical functions at the head office, audit surveillance and ensuring Standard Operating Procedures (SOP) has been carried out as well as an evaluation of the effectiveness of the company's internal control system. The internal audit process done throughout 2019 has been effective.

The Internal Audit Work Unit holds an active role in conducting every regular meeting with the Audit Committee to discuss Internal Audit work program, and matters related to important findings that require management's attention in accordance with the Audit Committee's oversight function. The Internal Audit Work Unit is also active in sharing related to internal control in the Company, as well as audit meeting activities with the head of the branch which is held at the head office.

The Internal Audit Work Unit periodically conducts an internal and independent review of the internal audit unit's quality assurance in order to ensure that the audit process carried out by the Company is in accordance with applicable standards and also to detect the potential for developing an ongoing audit process. In order to improve work efficiency and effectiveness and optimize the use of audit resources, the Company has also implemented an IT-based audit information system since 2017, such as the Audit Command Language (ACL), which was

Command Language (ACL) yang dibangun berdasarkan metodologi standar audit dalam pengelolaan proses kerja audit. Sistem ini membantu Perseroan untuk mendeteksi fraud yang terjadi di kantor cabang ataupun di kantor pusat Perseroan.

Selain itu, Satuan Kerja Internal Audit juga terus memperdalam siklus audit internal dengan mempertajam rencana perbaikan hasil temuan audit dan memperkuat proses pengawasan pelaksanaan rencana perbaikan tersebut, memperbaiki kertas kerja audit dan pelaksanaan penilaian pengendalian internal secara mandiri oleh kepala cabang untuk meningkatkan kesadaran terhadap pengendalian internal di masing-masing kantor cabang.

Adapun fokus dan rencana audit ke depan adalah memperbaharui worksheet audit program dengan menambahkan sub-scoring dengan tujuan memastikan hasil audit bisa membantu fungsi kerja yang perlu diperbaiki di kantor cabang, meningkatkan fungsi konsultasi yang akan dilakukan oleh tim *Quality Assurance*, dengan harapan bisa menjaga kualitas proses operasional kantor cabang, dan terus melakukan sosialisasi terhadap Anti Fraud melalui berbagai media Perseroan, dan dilakukan penguatan untuk menjalankan lima (5) Komitmen Anti Fraud, serta dilakukan *Fraud Self Assessment* secara periodik diseluruh kantor cabang dan unit bisnis Perseroan.

developed based on the standard audit methodology in managing audit work processes. This system helps the Company to detect fraud that occurs at branch offices or at the head office.

In addition, the Internal Audit Work Unit also continues to sharpened the internal audit cycle by sharpening the plan to improve audit findings and strengthening the process of supervising the improvement plan, improving the audit working paper and implementing an internal control assessment independently by the branch head to increase internal control awareness at each branch office.

Focus and audit plan ahead is to update the program audit worksheet by adding sub-scoring with the aim of ensuring the audit results can help work functions that need to be improved at the branch office, improving the consultation function to be carried out by the Quality Assurance team, with the hope of maintaining the quality of the process branch office operations, and continuing to socialize the Anti-Fraud through various media companies, and carried out strengthening to carry out five (5) Anti-Fraud Commitments, as well as periodic Fraud Self Assessments in all branch offices and business units of the Company.