Grant Thornton

To: P.T. Bank Rakyat Indonesia (Persero) TBK. New York Agency (BRI New York Agency)

From: Grant Thornton Advisors LLC (Internal Audit)

Subject: Regulatory Reporting Policy and Procedure Review

Date: September 3, 2026

Grant Thornton Advisors LLC (GT) has performed a preliminary assessment of the July 2026 Draft BRI New York Agency Accounting Standard Operating Procedure – Module 8, specifically the sections which deal with regulatory reporting, namely sections 10-16. A final assessment of regulatory reporting policies and procedures will be performed as part of phase 2 of the regulatory reporting consulting services project.

This memorandum contains the preliminary recommendations identified by GT in relation to sections 10-16 of the Draft Accounting Standard Operating Procedure – Module 8.

1. General recommendations cutting across all regulatory reports

- GT recommends including an overarching policy requirement which deals with the regulatory change management process, i.e., the requirement to perform periodic monitoring of changes to FRB, FFIEC, or Treasury reporting instructions in order to ensure that BRI New York Agency remains abreast of changes in reporting rules and implements changes in underlying reporting processes where required.
- GT recommends defining backup / alternate preparers and reviewers for the regulatory reports in the event that there are unexpected absences of the Accounting Officer and / or Accounting Manager / Supervisor.
- Operational resiliency can be further improved by establishing contingency procedures for system outages and other unexpected disruptions which would impact timely submission of regulatory reports.
- GT recommends documenting uniform documentation retention requirements and required documentation checklist for all regulatory reports in order to ensure that supporting artifacts are retained for an appropriate period of time.
- GT recommends including a section which deals with the protocols for error correction and report resubmission. This would include procedures for error identification, escalation requirements, amended filings, regulator notification requirements (if applicable), and requirements regarding root-cause analysis.