

**PT DFI RETAIL NUSANTARA TBK**

**PEDOMAN KERJA DAN KODE ETIK  
INTERNAL AUDIT**

*GUIDANCE AND CODE OF ETHICS OF  
THE INTERNAL AUDIT*

## **Latar Belakang**

Pedoman Kerja dan Kode Etik Audit Internal ("Pedoman dan Kode Etik") PT DFI Retail Nusantara Tbk ("Perseroan") guna memenuhi ketentuan Peraturan Otoritas Jasa Keuangan ("POJK") dan meningkatkan penerapan prinsip tata kelola perusahaan yang baik bagi Perseroan.

Pedoman dan Kode Etik ini berisi hal-hal sebagai berikut:

### **I. Definisi**

**Internal Audit (IA)** Fungsi independen yang bertugas melakukan evaluasi dan penilaian atas pelaksanaan pengendalian internal.

**Risalah Rapat** Dokumen tertulis yang memuat jalannya rapat, keputusan, dan hal-hal penting lainnya.

### **II. Landasan Hukum**

1. Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas.
2. POJK No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal.
3. Pedoman Umum Good Corporate Governance (GCG) Indonesia.
4. Anggaran Dasar Perseroan.

## **Background**

*The Guidelines and Code of Conduct for the Internal Audit ("Guidelines and Code of Conduct") of PT DFI Retail Nusantara Tbk ("the Company") in order to comply with the Regulations of Otoritas Jasa Keuangan ("POJK") and to enhance the implementation of good corporate governance principles for the Company.*

*The Guidance and Code of Ethics is containing the following matters:*

### **I. Definitions**

**Internal Audit (IA)** *An independent function responsible for evaluating and assessing the implementation of internal controls.*

**Meeting Minutes** *A written document containing the proceedings, decisions, and other important matters of a meeting.*

### **II. Legal Foundation**

1. *Law No. 40 of 2007 concerning Limited Liability Companies.*
2. *POJK 56/POJK.04/2015 concerning The Formation and Guidelines for Preparing the Internal Audit Unit Charter.*
3. *General Guidelines for Good Corporate Governance (GCG) of Indonesia.*
4. *The Company's Articles of Association.*

### III. Nilai-Nilai Perseroan

1. **Profesionalisme:**  
Melaksanakan tugas dengan kompetensi dan integritas tinggi.
2. **Transparansi:**  
Menyampaikan informasi secara terbuka dan akurat.
3. **Akuntabilitas:**  
Bertanggung jawab atas pelaksanaan tugas.
4. **Kemandirian:**  
Bertindak independen tanpa benturan kepentingan.
5. **Kewajaran:**  
Menjunjung keadilan dan kesetaraan.

### IV. Jam Kerja

Jam kerja Perseroan ditetapkan sebagai berikut:  
Senin – Jumat: Pukul 08.30 – 17.30 WIB

### V. Internal Audit

#### a. Deskripsi Tugas, Tanggung Jawab dan Wewenang

Internal Audit merupakan fungsi independen yang bertanggung jawab kepada Direksi dan memiliki jalur komunikasi langsung dengan Dewan Komisaris melalui Komite Audit. Tugas Internal Audit meliputi: melakukan evaluasi independen atas pelaksanaan pengendalian internal, manajemen risiko, dan tata kelola perusahaan; menyusun laporan hasil audit dan menyampaikannya kepada Direksi dan Komite Audit; serta memberikan rekomendasi perbaikan atas temuan audit. Setiap pelaksana Internal Audit wajib melaksanakan tugas dengan independen, objektif, profesional, dan penuh kehati-hatian.

### III. Values Principles

1. **Professionalism:**  
*Performing duties with high competence and integrity.*
2. **Transparency:**  
*Conveying information openly and accurately.*
3. **Accountability:**  
*Being responsible for the execution of duties.*
4. **Independence:**  
*Acting independently without conflict of interest.*
5. **Fairness:**  
*Upholding justice and equality.*

### IV. Working Hour

The Company's working hours are set as follows:  
Monday – Friday: 08:30 AM – 05:30 PM

### V. Internal Audit

#### a. Duties, Responsibilities, and Authorities

*Internal Audit is an independent function accountable to the Board of Directors and has a direct communication line with the Board of Commissioners through the Audit Committee. The duties of Internal Audit include: conducting independent evaluations of the implementation of internal controls, risk management, and corporate governance; preparing audit reports and submitting them to the Board of Directors and the Audit Committee; and providing recommendations for improvement based on audit findings. Each Internal Audit officer must perform their duties independently, objectively,*

*professionally, and with full prudence.*

**b. Rapat Internal Audit**

Rapat koordinasi Internal Audit dengan Direksi dan/atau Komite Audit dilakukan secara berkala minimal 1 (satu) kali dalam 3 (tiga) bulan atau sewaktu-waktu berdasarkan kebutuhan. Rapat internal Internal Audit dapat dilakukan secara berkala sesuai kebutuhan untuk membahas perencanaan, pelaksanaan, dan hasil audit. Hasil rapat dituangkan dalam risalah atau catatan rapat untuk didokumentasikan.

**c. Pelaporan dan Akuntabilitas**

Internal Audit wajib menyusun laporan hasil audit secara berkala dan menyampaikannya kepada Direksi serta Komite Audit. Laporan Internal Audit menjadi salah satu dasar evaluasi pengendalian internal dan manajemen risiko Perseroan. Internal Audit bertanggung jawab kepada Direksi dalam hal operasional dan kepada Dewan Komisaris melalui Komite Audit dalam hal pengawasan. Kinerja Internal Audit dievaluasi secara berkala oleh Direksi dan Komite Audit.

**b. Internal Audit Meetings**

*Internal Audit coordination meetings with the Board of Directors and/or Audit Committee are held regularly at least once every 3 (three) months or at any time as needed. Internal Internal Audit meetings may be held periodically as needed to discuss audit planning, implementation, and results. Meeting outcomes shall be recorded in minutes or meeting notes for documentation purposes.*

**c. Reporting and Accountability**

*Internal Audit must prepare audit reports periodically and submit them to the Board of Directors and the Audit Committee. Internal Audit reports serve as a basis for evaluating the Company's internal controls and risk management. Internal Audit is accountable to the Board of Directors for operational matters and to the Board of Commissioners through the Audit Committee for supervisory matters. The performance of Internal Audit is evaluated periodically by the Board of Directors and the Audit Committee.*