RDJ ADVISORY
Tax and Advocate

TAX AND LEGAL INSIGHT
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BANKING REGULATION | CORPORATE GOVERNANCE | RISK MANAGEMENT

Beyond Compliance: Banking Strategy Meets Governance

Indonesia's New Bank Business Planning Framework under POJK 17/2026

POJK 17/2026 reframes bank business planning as more than a reporting obligation. It reinforces the link between strategy, governance, prudential oversight, and risk-based planning.

> *A business plan is no longer just a filing. It is a governance instrument.*

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Key Regulatory Developments

Advisory Note

POJK 17/2026 modernizes the framework for bank business planning and emphasizes that a business plan should be realistic, risk-based, and aligned with strategic direction.

01 Risk-Based Planning

Banks are expected to prepare realistic business plans that reflect prudential principles, governance, and risk management.

02 Board Accountability

Directors prepare, implement, and communicate the plan; Commissioners oversee its execution; Sharia Supervisory Boards provide opinions where applicable.

03 Broader Planning Scope

The framework covers strategy, governance, risk management, preformance, financial projections, funding, capital, product strategy, office network changes, and organizational infrastructure.

04 Reporting and Oversight

The regulation also addresses submission, amendments, adjustments, realization reporting, supervisory reporting, administrative sanctions, and transitional provisions.

Why This Matters

- Business planning is now more strategic.
- Governance and execution are more closely connected.
- Regulatory reporting supports forward-looking supervision.

RDJ Advisory Perspective

For boards and senior management, a business plan is no longer a routine filing. It is a governance document that links growth ambitions, capital discipline, and risk oversight.

Sources: OJK POJK No. 17 Tahun 2026; OJK Press Release SP 191/OJK/DKPU/X/2026.

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Closing Perspective

Indonesia's new framework for bank business planning reinforces a broader governance message: sustainable growth depends on disciplined strategy, realistic assumptions, and accountable execution.

Four Governance Questions

1. Are growth targets aligned with the bank's risk appetite and capital capacity?
2. Do financial projections reflect realistic market, funding, and operating assumptions?
3. Are digital initiatives, product plans, and infrastructure development supported by execution capacity?
4. Have the Board of Directors and Board of Commissioners sufficiently challenged the plan before submission and implementation?

Key Takeaway

A credible business plan does more than project growth. It demonstrates governance readiness.

In practice, stronger planning can support clearer accountability, better supervision, and more resilient institutional decision-making.

Sources: OJK POJK No. 17 Tahun 2026; OJK Press Release SP 191/OJK/DKPU/X/2026.

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