



# INA 2025

Indonesia Investment Authority

Pillar 1: Legal

Legal framework, objectives, and coordination with macroeconomic policies

Principle 1

1. The legal framework for the SWF should be sound and support its effective operation and the achievement of its stated objective(s).

1.1. The legal framework for the SWF should ensure legal soundness of the SWF and its transactions.

1.2. The key features of the SWF's legal basis and structure, as well as the legal relationship between the SWF and other state bodies, should be publicly disclosed.

Lembaga Pengelola Investasi or Indonesia Investment Authority (“INA”) is a sui generis legal entity established under Law Number 11 of 2020 as replaced by Law Number 6 of 2023 on Job Creation (“Law 6”) and Government Regulation Number 74 of 2020 on Indonesia Investment Authority (“PP 74”), which are publicly available and accessible. All provisions in Law Number 11 of 2020 pertaining to INA were restated in Law 6.

INA is wholly owned by the Government of the Republic of Indonesia (the “Government”) and is responsible directly to the President. As an investment institution of the Government, INA's initial capital was injected by the Government. INA is also granted certain privileges under Law 6 and PP 74, which allow it to manage its investments through, among others, the establishment of funds or direct investments with its investment partners.

Law 6 and PP 74 set out, among others, INA's organization structure, the scope of authority of each of INA's organs and the principles based on which INA does its transactions.

Link to PP 74: <https://peraturan.bpk.go.id/Details/155218/pp-no-74-tahun-2020>

Principle 2

2. The policy purpose of the SWF should be clearly defined and publicly disclosed.

Based on Law 6 and PP 74, INA's primary goal is to carry out its mandate, which is to increase and optimize the long-term investment value of its assets to contribute to the sustainable development of the Republic of Indonesia. These regulations are publicly available and accessible. Refer to GAPP 1 for attachments. Detailed implementation of INA's mandate can be found in the Annual Report (<https://www.ina.go.id/annual-report/>)

### Principle 3

3. Where the SWF's activities have significant direct domestic macroeconomic implications, those activities should be closely coordinated with the domestic fiscal and monetary authorities, so as to ensure consistency with the overall macroeconomic policies.

Given INA's short history since inception and INA's initial capital of \$5 billion relative to Indonesia's annual GDP of approximately USD 1.1 trillion, INA's activities do not yet have significant direct implications on Indonesia's domestic macro economy.

In its first year of inception, INA prioritized setting up the foundation of robust governance, risk management, and compliance while carrying out the commercial purpose enshrined in its mandate. While INA has made its maiden investment in Indonesia's second largest IPO, it has also signed commitments with partners to participate in investments. The focus on good governance during the organisation's build and design, as well as professional staffing has cemented INA's reputation of being a best-in-class, professional organisation.

Coordination with domestic fiscal authorities takes place through regular meetings with INA's Supervisory Board which members include the Minister of Finance and the Minister of State-Owned Enterprises (now under Law No. 19 of 2003 as lastly amended with Law No. 16 of 2025 on State-owned Enterprise is interpreted as the Head of Regulating Body of the State-Owned Enterprises/*Kepala Badan Pelaksana Badan Usaha Milik Negara* – “**Kepala BP BUMN**”), as ex-officio members, who ensure alignment with macro-economic policies if required. However, INA's investment decisions are made independently at the Board of Directors level, through recommendations made by the Investment Committee and are guided by INA's investment policy, aligned with its strategic asset allocation.

Entering our fifth year, we are working closely with the Ministry of Finance to assess the socioeconomic impact of our investments since establishment. This assessment would be made publicly available. We are committed to ensuring that our investment mandate contributes meaningfully to national economic development and remains aligned with broader macroeconomic policies.

### Principle 4

4. There should be clear and publicly disclosed policies, rules, procedures, or arrangements in relation to the SWF's general approach to funding, withdrawal, and spending operations.

4.1. The source of SWF funding should be publicly disclosed.

4.2. The general approach to withdrawals from the SWF and spending on behalf of the government should be publicly disclosed.

PP 74 governs the general approach to funding, withdrawal and spending. Further, INA has policies governing the deployment of funds for investments and spending on operational activities to ensure good governance. The policies, which take the form of Board of Directors Regulations, are communicated throughout INA.

PP 74 stipulates that INA's capital comes from the Government, in the form of initial capital governed under Government Regulation Number 73 of 2020 on Initial Capital of Indonesia Investment Authority and subsequent capital injections regulated under Government Regulation Number 110 of 2021 and 111 of 2021.

PP 74 also governs the mechanics of using INA's profits for compulsory reserves, retained earnings and distribution or dividends to the Government.

INA discloses the amount and form of its capital in its annual report and website ([www.ina.go.id](http://www.ina.go.id)).

## Principle 5

5. The relevant statistical data pertaining to the SWF should be reported on a timely basis to the owner, or as otherwise required, for inclusion where appropriate in macroeconomic data sets.

INA prepares quarterly and annual financial reports to the Supervisory Board (which includes Minister of Finance and Kepala BP BUMN), as well as to the Ministry of Finance in its capacity as State Treasury which authorizes capital injection. The guidelines on the formulation of our financial statement are as set out in our Board of Directors Regulation.

The Supervisory Board submits its annual accountability report to the President of the Republic of Indonesia, outlining the supervisory actions taken in overseeing INA's operations and assessing their alignment with the approved plans and budget to achieve INA's mandate. Alongside this, the Board of Directors submits its annual report, consisting of the annual audited financial statement, as well as report outlining the activities and accomplishments of INA throughout the financial year, to both the President and the Supervisory Board.

Our annual report and audited financial statement are publicly disclosed on our website (<https://www.ina.go.id/annual-report/>).

Pillar 2: Institutional  
Institutional Framework and Governance Structure.  
Principle 6

6. The governance framework for the SWF should be sound and establish a clear and effective division of roles and responsibilities in order to facilitate accountability and operational independence in the management of the SWF to pursue its objectives.

Per GAPP 2, the Government has given a clear mandate to INA to support national development and achieve optimal financial returns, focusing on long-term sustainability.

The Supervisory Board has two *ex-officio* members, as the government's representations (Minister of Finance and Kepala BP BUMN) and three professional members to provide governmental and external and professional expertise and perspectives to oversee INA's performance and governance. The Supervisory Board's committees oversee areas such as Remuneration, Audit and Ethics.

The Board of Directors has full independence and accountability for the overall portfolio and its governance, including decisions on investments, strategic asset allocations and effective management of the capital injection from the Government. The Board of Directors' committees also oversee critical areas such as investment, portfolio operations, risk management, and conflict of interest, and have oversight over the respective investment risk and enterprise-wide risk faced by INA.

Law 6 and PP 74 govern the duties and authorities of the members of the Board of Directors. Furthermore, INA has developed charters for its committees and the relevant policies and procedures to support its operations. The Board of Directors Charter sets out the terms of the responsibilities and authorities according to its functions, while the Investment Committee, Risk Management Committee, Portfolio Operations Committee and Conflict of Interest Committee Charters detail each Committee's specific responsibilities as support for the Board of Directors.

The Board of Directors submits quarterly financial reports that have been reviewed by the Audit Committee and semi-annual good corporate governance self-assessment reports to the Supervisory Board.

As per GAPP 5 mentioned above, the Board of Directors submits an annual report, which includes externally audited financial statements, to the Supervisory Board. The Supervisory Board will submit this with the Supervisory Board's annual report to the President as part of INA's accountability to deliver on its mandate.

Principle 7

7. The owner should set the objectives of the SWF, appoint the members of its governing body(ies) in accordance with clearly defined procedures, and exercise oversight over the SWF's operations.

The Government sets out INA's objectives as detailed in GAPP 2.

INA has a two-tier board structure that comprises the Supervisory Board and the Board of Directors. The Supervisory Board supervises and advises the Board of Directors. The Board of Directors manages day-to-day management and operational activities of INA and formulate as well as implement policies (the “**Board of Directors**”).

Law 6 and PP 74 set out the required criteria for selecting the Board of Directors and the Supervisory Board members.

The selection of professional members adheres to the criteria set out in PP 74 and further detailed in Supervisory Board Regulations, such as having diverse professional backgrounds and expertise in their respective fields. To ensure transparency and accountability, PP 74 mandates that a selection panel is created to select eligible candidates (“**Selection Panel**”) through a process that is open to public. The Selection Panel would then recommend 2 candidates for each 1 position to the President. The President appoints the professional members, in consultation with the parliament, based on recommendation of the Selection Panel.

Decision making by the Supervisory Board is carried out by deliberation to reach consensus, and none of the members of the Supervisory Board including ex-officio members have veto rights.

The Supervisory Board has a duty to conduct supervision of the management of INA (which is conducted by the Board of Directors).

The Supervisory Board is not involved in making investment decisions. Based on Law 6 (Article 166 (15)) and PP 74 (Article 12 (2)), the authority and responsibility of the Supervisory Board are limited to the:

- Review, evaluate and approve annual work plan and budget along the proposed KPIs submitted by the Board of Directors;
- Submit the accountability report of the Supervisory Board and the Board of Directors;
- Appointment and dismissal of the Board of Directors and Advisory Board;
- Remunerations of the Supervisory Board and the Board of Directors;
- Propose an increase and decrease in INA's capital to the President;
- Approve INA's annual financial statement;

Temporarily suspend members of the Board of Directors; and

- Appoint interim replacement and approval of INA's auditor.

The Supervisory Board also has the Ethics Committee, Remuneration Committee and Audit Committee, as part of the oversight functions. Each of those committees has periodical meetings with the Board of Directors

to provide updates and inputs based on its supervision.

Based on Law 6 (Article 167 (7)) and PP 74 (Article 30 (2)), the Board of Directors carries out the operations.

In carrying out its duties, the Board of Directors is authorized to:

- formulate and determine INA's policies;
- implement policies and operational management of INA;
- formulate and propose remuneration of the Supervisory Board and Board of Directors to the Supervisory Board;
- formulate and propose work plans and annual budgets along with key performance indicators to the Supervisory Board;
- formulate organizational structure and employee management, including the appointment, termination, remuneration system, award system, pension program and old-age tuition, and other remunerations to INA's employees; and
- represent INA in and out of court.

The Board of Directors establishes an Investment Committee, whose task is to provide unanimous recommendations on any investment-related decisions to be approved by the Board of Directors. The Investment Committee will meet at least once a week.

The Board of Directors has quarterly meetings with all members of the Supervisory Board, while monthly meetings are held with the professional members of the Supervisory Board on INA's key activities.

In conclusion, as per the duties and authorities of the Supervisory Board and the Board of Directors mentioned above, the Board of Directors acts as the management, while the Supervisory Board acts as the supervisor who oversees INA's operations and assesses their alignment with the approved plans and budget.

## Principle 8

8. The governing body(ies) should act in the best interests of the SWF, and have a clear mandate and adequate authority and competency to carry out its functions.

Per GAPP 2, INA has a clear mandate and objective. With help from external advisors, the Supervisory Board selects members of the Board of Directors from a pool of professional candidates, using the help of external independent advisors, based on their track record and competencies, with a strong reputation in the market for integrity.

The authorities and guidelines on the roles and responsibilities of each of the members of the Board of Directors are set out in the Board of Directors Charter. Please refer to GAPP 7.

As mentioned above in GAPP 6, the Board of Directors also has the following committees:

- Investment Committee,
- Risk Management Committee,
- Portfolio Operations Committee, and
- Conflict of Interest Committee.

Their charters provide clear authorities and guidelines on the roles and responsibilities of each committee.

## Principle 9

9. The operational management of the SWF should implement the SWF's strategies in an independent manner and in accordance with clearly defined responsibilities.

While the Government provides clear mandates to INA and is represented by the Minister and Kepala BP BUMN in the Supervisory Board, the Government does not direct nor interfere in INA's investment decisions.

INA assesses and executes its investment strategy independently and is responsible for the overall portfolio performance. INA also reports regularly to the Supervisory Board and the Government.

Decision making by the Board of Directors is carried out by deliberation to reach consensus, and none of the members of the Board of Directors have veto rights.

INA investment decisions process is set out in the Board of Directors Regulation on Investment, which covers (among others) deal preview, the business and commercial perspective, as well as preliminary discussion on risk and mitigation for INA to invest in, due diligence process, and partner selection to be deliberated in the Investment Committee meetings. The Investment Committee would then recommend an investment to be approved by the Board of Directors. The Board of Directors could approve or reject an investment recommendation from the Investment Committee. Throughout the process, Risk, ESG, Compliance and Legal divisions are involved to assess the investment based on their respective scope of responsibility, and such divisions along with the Investment division would have to sign off on the final investment memo.

INA's investment activities—covering direct equity, funds, and hybrid capital solutions—are governed by internal policies and procedures to reinforce good governance practices and ensure consistency, transparency, and accountability across all investment types.

Please refer to Paragraph 7, 8, and 9 under GAPP 7.

## Principle 10

10. The accountability framework for the SWF's operations should be clearly defined in the relevant legislation, charter, other constitutive documents, or management agreement.

Law 6 and PP 74 specify the appointment, roles, and responsibilities of the Board of Directors and the Supervisory Board. These regulations are publicly available and accessible. Refer to GAPP 1 for attachments.

INA further details the framework for operations and accountability for such operations in the Supervisory Board's policies and the Board of Directors' policies, these policies are issued as Board of Supervisors Regulation and Board of Directors Regulations, respectively. PP 74 mandates the Board of Directors to formulate policies in the following matters:

- asset management;
- risk management implementation;
- compliance;
- human resources;
- finance;
- legal;
- information system;
- audit;
- procurement of goods and services;
- business plan; and
- remuneration for the Supervisory Board and the Board of Directors.

INA currently has 45 policies and 6 charters to govern its operations.

The Supervisory Board reviews and approves the Annual Work Plan and Budget along with Key Performance Indicators proposed by the Board of Directors. This is regulated under Law 6 and PP 74 and further stipulated under INA's internal policies. The process and the items to be covered in the Annual Work Plan and Budget is as set out in the Board of Directors Regulation. Any deviation from what has been stipulated in the Annual Work Plan and Budget for the respective year must be approved by the Supervisory Board.

## Principle 11

11. An annual report and accompanying financial statements on the SWF's operations and performance should be prepared in a timely fashion and in accordance with recognized international or national accounting standards in a consistent manner.

INA prepares quarterly and annual audited financial statements in accordance with International Financial Accounting Standards (“IFRS”) issued by the International Accounting Standards Board (“IASB”). At the latest, the annual financial statement must be audited by an external independent public accounting firm on 31 March. All contingent liabilities and off-balance sheet items, if any, are included in the audited financial statements.

INA also prepares an annual report which consists of achievements, management analysis, macro and industry overviews, investments, financial highlights, funding, governance, risk management and sustainability reporting. The publication of INA’s annual report is on our website ([www.ina.go.id](http://www.ina.go.id)) by 30 May, at the latest.

## Principle 12

12. The SWF’s operations and financial statements should be audited annually in accordance with recognized international or national auditing standards in a consistent manner.

INA prepares the financial statements with accounting standards in accordance with IFRS issued by IASB and audited annually by an independent external public accounting firm as required under PP 74.

The auditor is internationally recognised and taken from the “Big Four” accounting firms by revenue.

The external auditor conducts the audit in accordance with auditing standards established by the Indonesian Institute of Certified Public Accountants (IICPA or “SPAP”/Standar Profesional Akuntan Publik) and State Financial Audit Standards (“SPKN”/Standar Pemeriksaan Keuangan Negara) established by the State Audit Board of the Republic of Indonesia (“BPK”/Badan Pemeriksa Keuangan Republik Indonesia).

In addition, our external auditor also issues a report for compliance to law and regulation and internal control under local auditing standard section 62 – Compliance Auditing Considerations in Audits of Governmental Entities and Recipients of Governmental Financial Assistance (which is similar to International Auditing Standard Section 801).

INA’s audited financial statement is distributed to the Supervisory Board, Audit Committee and the President of Republic Indonesia, together with its annual report and annual responsibility report from the Supervisory Board. The audited financial statement is publicly available on our website: <https://www.ina.go.id/financial-statement/>

## Principle 13

13. Professional and ethical standards should be clearly defined and made known to the members of the SWF’s governing body(ies), management, and staff.

INA has several policies to define ethical norms and professional standards, including a code of ethics and professional conduct for the Board of Directors and employees, whistle-blowing system, risk management and conflicts of interest. These policies have been communicated to all Board of Supervisors and Board of Directors members and employees to ensure a full understanding of and compliance with the policies. In addition, an Integrity Pact and a semi-annual Declaration of Personal Investments are implemented and renewed consistently to reinforce accountability and ethical conduct across the organization.

INA has standard qualification requirements and minimum professional standards for each level that align with roles and responsibilities and is stipulated in our human resources policy and organizational structure.

#### Principle 14

14. Dealing with third parties for the purpose of the SWF's operational management should be based on economic and financial grounds, and follow clear rules and procedures.

INA follows clear guidelines in selecting partners for all its investments. These are stipulated in a specific Partner Selection Policy. When interacting with investors, INA is also guided by its Investor Relations Policy (which includes guidance relating to marketing, capital sourcing, fundraising). Both policies were drafted by benchmarking international standards, and include background and anti-money laundering checks.

INA also follows best practices in its interactions with vendors and other third parties, ensuring transparency with well-articulated procedures. The approach is covered by the Procurement Policy.

#### Principle 15

15. SWF operations and activities in host countries should be conducted in compliance with all applicable regulatory and disclosure requirements of the countries in which they operate.

INA operates mainly in the Republic of Indonesia.

INA has legal and compliance divisions responsible for providing required legal support in carrying out its business activities and managing regulatory compliance, among others Anti Bribery and Corruption and Anti-Money Laundering policies. We have set up Personal Data Protection policy under our Board of Directors Regulation. The investment and strategic operations divisions work closely with them to ensure that all transactions carried out by INA are in accordance with laws and regulations to control any legal risks that INA might encounter.

#### Principle 16

16. The governance framework and objectives, as well as the manner in which the SWF's management is operationally independent from the owner, should be publicly disclosed.

INA commits to a solid governance framework guided by PP 74 and further stipulated in its Supervisory Board and Board of Directors Regulations. Further implementation of the Supervisory Board and Board of Directors Regulations will be stipulated, respectively, in Supervisory Board and Board of Directors Decisions.

INA's investment framework can be found on INA's website and annual report <https://www.ina.go.id/annual-report/>

#### Principle 17

17. Relevant financial information regarding the SWF should be publicly disclosed to demonstrate its economic and financial orientation, so as to contribute to stability in international financial markets and enhance trust in recipient countries.

Any relevant information is disclosed in annual reports, such as achievements, management analysis, macro and industry overviews, investments, financial highlights, funding, governance, risk management and sustainability. The annual report and any updates on investments are published on our website ([www.ina.go.id](http://www.ina.go.id)) as required by law and regulation.

#### Pillar 3: Investment

Investment and Risk Management Framework.

#### Principle 18

18. The SWF's investment policy should be clear and consistent with its defined objectives, risk tolerance, and investment strategy, as set by the owner or the governing body(ies), and be based on sound portfolio management principles.

18.1. The investment policy should guide the SWF's financial risk exposures and the possible use of leverage.

18.2. The investment policy should address the extent to which internal and/or external investment managers are used, the range of their activities and authority, and the process by which they are selected and their performance monitored.

18.3. A description of the investment policy of the SWF should be publicly disclosed.

INA's Investment policy is design aligned with INA's mandate, strategic direction, risk appetite statements, and strategic asset allocation. The investment policy is consulted with the Supervisory Board prior to approval by the Board of Directors and reviewed regularly to ensure its consistency and relevancy. All investment portfolios are monitored through Portfolio Operations Committee. The risk tolerance measured by relevant risk metrics, for example Debt to Equity Ratio as determined and monitored by Risk Management Committee. Any escalations and recommendations will be reported to the Board of Directors accordingly.

Aligned with INA's strategic asset allocation considerations, INA has begun investing as Strategic Limited Partner (LP) into funds managed by external investment managers and establishing partnership frameworks with the managers to secure strategic benefits including but not limited to co-investment potential into relevant Indonesian projects (where applicable). External investment manager selection and investment into funds are conducted based on the alignment of the fund's investment scope and strategy to INA's mandate and priorities. The investment manager's reputation and track record in adherence to policies and standards described in GAPP 14. This process is governed in PP 74.

INA investment process follows the guidelines clearly written in the Investment Policy, which includes:

- Investment Procedure
- Partner Selection
- Investor Relations and Fund Raising
- Investment Committee Charter
- Portfolio Value Creation and Monitoring
- Asset Transfer
- Portfolio Operations Committee Charter
- Limited Secondary Shares Investment

INA's Investment Policy also follows internationally benchmarked best practices and is designed to govern a robust investment process, ensuring INA's investment decisions are made according to sound economic and financial considerations.

#### Principle 19

19. The SWF's investment decisions should aim to maximize risk-adjusted financial returns in a manner consistent with its investment policy, and based on economic and financial grounds.

19.1. If investment decisions are subject to other than economic and financial considerations, these should be clearly set out in the investment policy and be publicly disclosed.

19.2. The management of an SWF's assets should be consistent with what is generally accepted as sound asset management principles.

INA carries a dual mandate of supporting Indonesia's national development and achieving optimal financial returns. This mandate underpins INA's investment and financing strategies.

INA's investment strategies focus on identifying potential value creation for Indonesia with a long-term outlook on its investment.

The Board of Directors decides on the investment decisions based on unanimous recommendations from the Investment Committee.

All INA's assets are monitored by dedicated team and regularly discussed in respective governance bodies/committee (e.g. Portfolio Operations Committee, Risk Management Committee). Monitoring metrics and thresholds are defined for the assets as part of risk monitoring in order to ensure any necessary escalation and actions are done in timely manner to relevant committees and Board of Directors.

In the annual report, INA provides reviews of its portfolio investment.

## Principle 20

20. The SWF should not seek or take advantage of privileged information or inappropriate influence by the broader government in competing with private entities.

INA maintains the highest level of ethical standards and accountability in its operations. This is governed by an Integrity Pact which include conflict of interest declaration that signed by the Board of Directors and all employees and renewed annually.

The Integrity Pact ensures commitments to prevent any collusion or nepotism and ensure no conflict of interest.

INA does not have, nor does it seek, access to privileged information. INA operates under a robust legal framework and international governance standards to prevent inappropriate access to, and the use of, confidential information.

## Principle 21

21. SWFs view shareholder ownership rights as a fundamental element of their equity investments' value. If an SWF chooses to exercise its ownership rights, it should do so in a manner that is consistent with its investment policy and protects the financial value of its investments. The SWF should publicly disclose its general approach to voting securities of listed entities, including the key factors guiding its exercise of ownership rights.

INA follows a careful approach in structuring its investments as each transaction is unique, which requires a bespoke approach. INA follows best practices and guidance from international advisors when considering investment structures, including having appropriate investor rights and protection.

As mentioned in GAPP 18, the Strategic Operations Division monitors all investment portfolios and determines the value creation model for each equity investment—taking into account factors such as investment type, ownership structure, and asset class. Based on this value creation model, INA exercises its ownership rights in each investment to ensure that its financial return objectives are achieved and that the interests of its stakeholders are effectively protected.

## Principle 22

22. The SWF should have a framework that identifies, assesses, and manages the risks of its operations.

22.1. The risk management framework should include reliable information and timely reporting systems, which should enable the adequate monitoring and management of relevant risks within acceptable parameters and levels, control and incentive mechanisms, codes of conduct, business continuity planning, and an independent audit function.

22.2. The general approach to the SWF's risk management framework should be publicly disclosed.

INA has Risk Management Framework ("RMF") that govern the risk management process i.e. risk identification, risk assessment, risk mitigation, risk monitoring and risk reporting throughout the investment process and at enterprise-wide level.

RMF also governs INA's Risk Appetite Statements, of which are articulated and set based on INA's mandate and strategic objectives. Risk metrics and thresholds are defined in order to ensure any necessary escalation and actions are done in timely manner as part of effective risk management.

INA has Risk Management Committee (RMC) as one of INA's governance bodies which provides oversight risk function for enterprise-wide risks, including risk dashboard, enterprise risk profile, issue management, any escalation of breach in threshold and emerging risks are discussed in RMC.

INA's risk governance is adopting the "three lines of defence" model. The first line of defence consists of the investment team, treasury, and other divisions of which managing the risk in their business and operational activities. The second line of defence includes Risk Management, Compliance and Legal, which provide oversight, guidance, and monitoring to ensure that risks are effectively identified, assessed, and controlled within defined parameters. and the third line of defence is Internal Audit, which operates independently in providing the assurance of the internal control, and develops an annual audit plan approved by the Board of Directors and the Audit Committee. Internal Audit focuses on high-risk areas and investment process to assess compliance, internal control adequacy, and post-transaction performance, while maintaining full independence and objectivity in fulfilling its assurance role.

The three lines of defence model sets out the roles and responsibilities' parameters across INA to identify, mitigate, monitor and report all its risk-taking activities. The three lines of defence also ensure adequate guidelines and policies to guarantee INA's operations stay within the boundaries of its risk appetite.

As part of risk management framework and as a core-competence to be instilled throughout INA, INA enables its people to understand risk management requirements and expectation through communication and regular training program to build a risk aware culture, while also building and expanding its technology infrastructure to support effective risk management.

The risk management framework is publicly disclosed and included in our annual report.

### Principle 23

23. The assets and investment performance (absolute and relative to benchmarks, if any) of the SWF should be measured and reported to the owner according to clearly defined principles or standards.

INA conducts an internal performance evaluation and calculates the valuation of its investments by an independent consultant/valuer every quarter. The valuation is signed off by the Finance and Risk divisions and reported to the Board of Directors. The result will be reflected in the financial statements in accordance with IFRS, INA's accounting and valuation policies.

The investment team, strategic operations and treasury team jointly monitor and report the performance of portfolio companies to the Board of Directors and Supervisory Board. Where applicable, the report includes tracking against targets and value creations identified as part of the investment decisions.

## Principle 24

24. A process of regular review of the implementation of the GAPP should be engaged in by or on behalf of the SWF.

This is the second self-assessment of compliance with the Santiago Principles. Each division has reviewed and validated the self-assessment for the GAPPs relevant to their respective division, which has subsequently been reviewed and approved by the Board of Directors. The self-assessment process continues to be conducted on a triennial basis, ensuring ongoing alignment of INA's governance, accountability, and operational practices with the Santiago Principles.