International Journal of Innovation, Creativity and Change. www.ijicc.net
Volume 12, Issue 12, 2020

A Bank's Liability for Banking Criminal Acts that Have Been Performed by Workers

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Banking criminal acts constitute actions against the Act, which have to do with employees, institutions, instruments, procedures and banking products, and every criminal offender must take responsibility for their actions before the applicable Act. The problem posed in this research is: What are the factors that cause bank employees to perform banking crimes?, What is the form of accountability for employees who perform banking crimes? and What is the bank's responsibility for banking crimes committed by its employees?
The research method was carried out with a normative juridical approach using secondary data. Based on the results of the study, the factors causing the perpetrators to commit banking crimes include integrity level, poor personal character, opportunities, poor corporate governance, weak supervision system and non-implementation of the principle of prudential principles which creates loopholes.

Key words: *Accountability, Criminal act, Banking Institutions, Bank employees.*

Introduction

A bank is a business entity that collects funds from the public in the form of savings and distributes them to the public in the form of credit and/or other forms in order to improve the lives of many people. This understanding is included in Article 1 paragraph (2) of the Act of the Republic of Indonesia Number 10 of 1998 concerning changes to Act Number 7 of 1992 concerning Banking. What is meant by banking is a place of business that is based on trust. When interpreted as banking Act, it is a series of regulations governing banking business entities that aim to provide legal protection for the scope of banking and if violated, get sanctioned (Zulfi Diane Zaini,2012).

Banks are financial service institutions that benefit based on the principle of trust given by the community, the benefits are derived from the difference between the funds coming in from the public and the funds issued, the principle of trust is emphasized or intended for the public to voluntarily conduct transactions at the Bank. After the bank has obtained a standing and operating license from the monetary authority of the country concerned, the bank becomes the property of the community. Therefore, its existence must not only be maintained by the owners of the bank itself, but also by the national and global community. The interest of the community to maintain the existence of a bank becomes very important, especially at this time the existence of a bank has decreased so that it has a chain or domino effect, which is transmitted to other banks which in turn may not be able to disrupt the functioning of the financial system and payment system of the country related (Chatzoglou, Prodromos D., and Eftichia Vraimaki,2009).

Banking activities are based on the belief that these are carried out by bank employees who are supported by the public. Bank employees are all bank officials and employees. In Article 49 paragraph (2) of the Banking Act it says that bank employees are bank officials who have authority and responsibility regarding matters relating to the business of the bank concerned. The roles of bank personnel or employees include collecting funds from the public, channelling funds to the public, and carrying out tasks in the context of carrying out banking services. The role of bank personnel or employees is increasingly important as it is closely related, in essence, to the safeguarding of funds entrusted by the public to the banks as this is solely in the hands of the personnel or employees of the bank (including its leaders and commissioners).

The term bank employee in the banking world is known as a banker. Bankers are bank business actors consisting of Commissioners, Directors, Shareholders and other employees who carry out banking activities (Kasmir,2012). Included in the understanding of these bank employees are Teller, Customer Service, Personal Banker, Authorize Signer, SubBranch Manager, and Branch Manager. All of these employees have duties in accordance with their respective fields. Employees who have sufficient level of closeness with customers are personal bankers, a person whose job is to promote, market, and sell products, and also to maintain customer funds and provide solutions to customers about which products are best for the needs of the customer concerned.

Basically, the personal task of the banker is to connect or be an intermediary between the bank and the customer, which aims to carry out banking activities. Although the patterns and behaviour of bank employees in carrying out their duties have been regulated, at present, there are still many irregularities committed by bank employees. Banks that are supposed to manage the business with trust, however this has been misused by bank employees who's actions can cause losses, both for customers, bank employees themselves, and the banks concerned, this can also later cause factors such as loss of trust from the community, which is when the community will stop trusting the Bank (Shidiq,I., & Wibowo, B, 2017)

In essence, bank regulation and supervision is intended to increase the confidence of everyone who has an interest in the bank, and to ensure that the bank is financially sound, managed properly and professionally, and there are no things that pose a threat to the interests of the people who save their funds in the bank (Hermansyah,2007). In other words, the general objective of bank regulation and supervision is to create a sound banking system.
Based on the description above, the problem in this study is: What are the factors that cause bank employees to commit banking crimes? ; What is the accountability of bank employees who commit banking crimes ?; and How is the bank's responsibility towards banking criminal acts carried out by its employees?

Literature Review

Banking institutions are one of the most important components in the national economy and are at the core of the financial system of each country. As mandated in Article 3 of Act Number 10 of 1998 concerning Amendment of Act Number 7 of 1992 concerning Banking, the main function of banking is an intermediary institution, an institution that connects people who experience excess funds (surplus of funds) with people who experience a lack of funds (*lack of funds*) (Hasibuan,2009).

Banking activities are based on the belief that these are carried out by bank employees who are supported by the public (Zulfi Diane Zaini,2018). Bank employees are all bank officials and employees. Bank employees are bank officials who have the authority and responsibility regarding matters relating to the business of the bank concerned. In the banking world, bank employees are intermediaries between banks and their customers, because those directly related to managing and carrying out customer financial transactions are bank employees (Kasmir,2012).

The roles of bank personnel or employees include collecting funds from the public, channelling funds to the public, and carrying out tasks in the context of carrying out banking services (Zulfi Diane Zaini,2017). The role of bank personnel or employees is increasingly important as it is closely related, in essence, to the safeguarding of funds entrusted by the public to the banks as this is solely in the hands of the personnel or employees of the bank (including its leaders and commissioners).

The explanation in Article 49 paragraph 2 of the Act requires that the term bank employee in the banking world is known as a banker. Bankers are bank business actors consisting of Commissioners, Directors, Shareholders and other employees who carry out banking activities and included in the understanding of these employees is Teller, Customer Service, Personal Banker, Authorize Signer, SubBranch Manager, and Branch Manager. All employees have duties in accordance with their respective fields. Employees who have a close intensity of closeness with customers are personal bankers, who are the ones in charge of promoting, marketing, and selling products, as well as maintaining and maintaining customer funds and providing solutions to customers about which products are best for the needs of the customers concerned.

Basically, the personal duty of bank employees is to connect or be an intermediary between banks and customers, which aims to carry out banking activities. Although the patterns and behaviour of bank employees in carrying out their duties have been set, but at this time, there are still many deviations made by employees bank.

Banks manage business based on trust and when this is misused by bank employees their actions can cause losses, both for the customers, the bank employees themselves, and the banks concerned. These deviations relate to criminal acts in the banking world. The words "crime" and "crime" are often related to one another, but the understanding of crime is broader than crime (Leden Marpaung,2003).The most appropriate meaning of the word "evil" is what is contained in *The Lexicon Webster Dictionary.* If interpreted freely, the notion of "crime" is an active or passive act, especially one of a frightening nature that is subject to legal sanctions as a violation of the statute (the Act) and endangers public safety or welfare. The definition of "criminal act" includes crime and violations. The word "criminal" is a translation of the Latin word, i.e. "*delictum*" (Leden Marpaung,2003). One of the crimes in the banking world is known as *fraud.*

In essence, bank regulation and supervision is intended to increase the confidence of everyone who has an interest in the bank, by ensuring that the bank is financially sound, managed properly and professionally, and there are no things that pose a threat to the interests of the people who save their funds in the bank (Hasibuan, 2009). In other words, the general objective of bank regulation and supervision is to create a sound banking system, which fulfils three aspects, namely banking that can maintain the interests of the community well, develop naturally, in the sense that it considers risk factors such as capability, systems, financials, and human resources (Zulfi Diane Zaini,2018).

Fraud is misappropriation which is defined as an act of deviation or omission intentionally carried out to trick, deceive, or manipulate banks, customers, or other parties, which occurs in the environment of the bank and/or use bank facilities so as to cause the bank, bank customer, or other parties to suffer losses, and where the perpetrator fraudulently obtains financial benefits, both directly and indirectly. Bank Indonesia Circular Letter Number 13/28 / DPNP explains that what should not only be one of the employees responsible for the error, but the leader giving the order should also share responsibility for the mistakes made by his subordinates for the authority of his orders.

Legal Entity Responsibility for Criminal Acts

Corporations are legal entities which is a form of artificial human being that has legal rights and obligations, what distinguishes them from humans is that corporations as legal subjects certainly cannot be subject to criminal penalties in the form of criminal which deprives the body of independence. Judges can impose penalties on Corporations or Administrators, or Corporations and Administrators, both alternatively and cumulatively, this refers to the Supreme Court Regulation No. 13 of 2016 concerning Procedures for Handling Criminal Cases by Corporations (Try Widyono, 2006).

Criminal Liability Theory in foreign terms is also with the theory of criminal responsibility which leads to the criminalization of the perpetrators. This theory is used in the study with the intent to determine whether or not a defendant or suspect is responsible for a criminal act that occurred.

One way to reduce the occurrence of criminal acts in the banking world is by applying the Prudential Principles of banks as stipulated in Article 2, Article 8 and Article 29 paragraph (2), paragraph (3) and paragraph (4) of the Act of the Republic of Indonesia Number 10 of 1998 concerning amendments to Act Number 7 of 1992 concerning Banking. This is intended to prevent the creation of a condition that supports the occurrence of banking crime, besides that good corporate governance is also very important to suppress a condition of occurring bank crimes. Supervision also has a very important role in the management of a good bank, this supervision can be carried out by Internal Supervisors, External Supervisors and Supervision from the public so that if this oversight function can run properly it will be able to minimize the occurrence of acts of speech in the banking world. Fiduciary duty is one of the doctrines of identification that allows corporations to have a criminal liability on the basis of an act identified as a corporate act committed by an individual (Isfardiyana, Siti Hapsah,2015). In order for the individual to be identified as a corporation, the individual must act as a directing mind. Determining the directing mind can be done by looking at the facts in the case such as the position of the individual or the authority they have, so that it can be considered that their actions are indeed the actions of the company. Such authority is generally high level managers or directors. Therefore this doctrine in its application does not accommodate acts committed by employees in other positions.

Research Model

a. Problem Approach

In discussing the problems contained in writing this thesis the problem approach used is a normative juridical approach (normative legal research) and an empirical approach (empirical legal research)

b. Data Sources and Types

1) Secondary Data

Secondary data was obtained from library research material by studying documents, theoretical archives, concepts, doctrines and legal principles relating to the principle of how to quote and examine the Acts and regulations, theories from experts, legal dictionary, and scientific articles. According to Soerjono Soekanto who explained that secondary data, i.e. data obtained from library studies by reading, quoting and studying legislation, books, documents, dictionaries, articles and other legal literature relating to the issues, is to be discussed.

2) Primary Data

Primary data is data obtained directly from the community. To obtain data directly the researchers took primary data from field research objects using the interview method, and held question and answer sessions with the resource persons, to answer research problems.

c. Data Collection and Processing Procedure

1) Data Collection Procedure

Data collection procedures in this study, carried out using two methods as follows, namely:

a) Literature Study, is a series of activities carried out by the author with a view to obtaining secondary data by reading, recording and quoting from various literature, Acts, books, mass media and other written discussions that have to do with the research conducted;
b) Field Research (Field Research), is a research conducted by observation (observation) and interviews (interviews) with key informants.

2) Data Processing Procedure

After the data is collected, the data is processed through data processing with the following steps: Identification of data; Data classification and data systematisation.

D. Data Analysis

Analysis of the data obtained was carried out by means of qualitative juridical analysis, namely analysis carried out descriptively namely observing arguments from the data obtained in the study. Then the results of the analysis are followed by drawing conclusions deductively, which is a way of thinking that is based on general reality which is then specifically concluded which is then seconded to the results of the literature.

Discussion

A. Factors that Cause Bank Employees to commit Banking Crimes

Banking Criminal Acts are all types of unlawful acts related to activities in carrying out bank business, with both banks as a target and as a means through which the crime occurs. Banking Crimes is a crime, and the causes of crimes committed by criminals or perpetrators include the presence of bad opportunities and habits (Andi Hamzah,2008).

It can be analysed that there are several factors causing the perpetrators to commit crimes in banking, including integrity and poor personal characteristics of the perpetrators. If there is a gap in the banking administration system, such as poor supervisory supervision of subordinate performance and poor corporate governance and inadequate application of the principle of prudential principles, it creates a condition and opportunity for the offender to commit a crime for personal gain by making fictitious credit; Repaying Customer's credit that is not deposited into the bank account concerned, as well as marking up the Customer's credit in an amount that is of size, causing losses to the Bank concerned and other bank customers. This is in accordance with the opinion which states that one of the causes of a criminal offense is that a crime occurred due to the presence of bad opportunities and habits.

Another factor is the non-operational Standard Operational Procedures (SOP) of the Bank which becomes the standard in carrying out work in accordance with the duties and functions of each employee position in the Bank. This factor is misused by the perpetrators to enrich themselves. Perpetrators cannot do their acts alone but there are people in the office who are also involved in this crime or at least due to negligence of other employees, but the legal entity is only involved with the Defendant, this is one of the reasons why the authors are interested to conduct research with this title.

Perpetrators of violations of the bank procedure system in each case have in common the number of actors. Every violator of the bank procedure system cooperates with another in accordance with their respective duties and authorities. This is because the bank's employees have limited duties and authority, so that it's difficult to be committing crimes if only done by one person.

Bank employees that take actions to disburse funds to the bank that are not in accordance with the prevailing bank procedure system, that is, the disbursement of the funds is disbursed without the knowledge or permission of the customer or the bank (Kasmir, 2010) but through the help of a computer system where the money is taken online and transferred to a holding account that has been prepared in advance by the perpetrators.

The causes of crimes committed by bank employees are often through the approval process from superiors, whether the approval is given based on negligence or intentional factors. The approval process from the employer is required by bank employees whose positions are lower, because this is based on the existence of a supervisory system and SOP established by each bank. Approval from superiors as a form of supervision from superiors to subordinates, is in place so that all mistakes or losses can be prevented as early as possible. Therefore, every action carried out by subordinates requires the approval of superiors.

The role of superiors in every activity by bank employees is very important, especially by bank employees who commit crimes. The approval from the superior can be interpreted in that the actions of his subordinates have been properly checked according to the applicable procedures, so that the next process or the agreed action can be carried out by the bank employee concerned. The role of superiors in bank crimes and/or violations of the bank procedure system does not only include giving approval to subordinates, but can also play a role as a person who gives orders to subordinates to commit crimes.

B. Criminal Liability of Bank Personnel Who Perform Banking Crimes

In the case of Banking Crimes, it is generally carried out by Credit Analysts who commit banking crimes which should be done alone without the involvement or negligence of other parties and there should be other parties who are responsible for the occurrence of banking crime.

As for the liability of Bank employees who commit banking crimes: Based on Article 49 paragraph (1) letter a of the Act of the Republic of Indonesia Number 10 of 1998 concerning amendments to Act Number 7 of 1992 concerning Banking states that, Members of the board of commissioners, Bank directors or employees who intentionally: make or cause the existence of false records in bookkeeping or in the process of reporting or in documents or reports of business activities, transaction reports or bank accounts, are threatened with imprisonment for at least 5 (five) years and no more than 15 (fifteen) years and a minimum fine Rp.10.000.000.000,00 (ten billion rupiah) and at most Rp.200.000.000.000,00 (two hundred billion rupiah).Therefore, it should not only be the Credit Analyst who is responsible for the banking crime, but also the Bank and affiliated parties, such as, among others, the superior or branch head of the bank concerned.

C. The Bank's Responsibility for Banking Criminal Acts Conducted by Employees

To answer the third problem in this study, theories and doctrines are used, including the strict liabillity doctrine which is a doctrine of corporate criminal responsibility adopted from doctrines in civil Act. The doctrine is often applied to the civil Act, this is in accordance with the doctrine of strict liability, which is a doctrine that excludes the element of error or the element of mens rea in criminal liability. The doctrine of strict liability deviates the main principle in criminal Act, namely the principle of error or the principle of mens rea. Deviations from the principle of error or the principle of mens rea in this doctrine are due to the doctrine of strict liability (criminal liability). Whereas for mens rea is seen as irrelevant to be questioned whether in reality there is or not. In the event that a Bank employee violates the precautionary principle, even though the person concerned knows that the act is wrong, of course the reason "by order of the superior" is not a justification. This is a juridical consequence that must be borne by Bank Employees, but of course this can be taken into consideration for decision makers, especially Judges in deciding and imposing sanctions on Bank Employees.

Other legal aspects that can be analyzed in the application of the Bank's precautionary principle are the meaning of "not implementing the steps needed to ensure the Bank's compliance with the provisions in this Act and other statutory provisions applicable to the Bank" as stipulated in Article 49 paragraph (2) b of the Banking Act.

In practice, the violation of the principle of prudence that is often done is not doing the steps or procedures for granting credit as outlined in the guidelines for granting credit or Standard Operating Procedures made by banks as a guide for Banks in carrying out their activities. The Bank's Standard Operating Procedures can be said to be part of the provisions of banking legislation, so violations or deviations from the Standard Operating Procedures are considered as a form of violation of the precautionary principle. Banking Act Regulates that Standard Operating Procedures or guidelines that are made and applied internally in the banking sector are part of the provisions of the legislation and other applicable provisions, so that violations of the Standard Operating Procedures constitute a violation of the principle of prudence. This opinion is based on Article 8 paragraph (2) and Article 15 of the Banking Act.

Article 8 paragraph (2) regulates that: "Commercial Banks are required to have and apply credit and financing guidelines based on sharia principles, in accordance with the provisions stipulated by Bank Indonesia". Furthermore, in the elucidation of Article 8 paragraph (2) the principles of the provisions stipulated by Bank Indonesia are mentioned.

It is understandable why the Banking Act classifies violations of the bank's prudential principles as violations that are subject to criminal sanctions or commonly referred to as Banking Criminal Acts because in Article 49 paragraph (2) b the Banking Act stipulates that the same sanctions for the Board of Commissioners, Directors or Bank employees who intentionally do not carry out the necessary steps to ensure bank compliance with the provisions in the Act and other statutory provisions applicable to banks, are threatened with imprisonment for at least 3 (three) years and a maximum of 8 (eight) years, and a fine of at least Rp. 5.000.000.000,00 (five billion rupiah) and at most Rp.100.000.000.000,00 (one hundred billion rupiah). In practice, cases of Banking Criminal Acts based on Article 49 paragraph (2) are relatively common, such as granting credit that is not in accordance with the guidelines or Standard Operating Procedures for granting credit, or credit is granted without fulfilling the required documents based on the credit granting guidelines . Although the Banking Act and the Sharia Banking Act explicitly classify violations of the precautionary principle as Banking Crimes.

Violations of the Bank's Standard Operating Procedures into Violations of Criminal Act in the Field of Banking, cannot be done by just one person because each Bank Employee has limited duties and responsibilities as determined by each bank. Therefore, a violation of the bank procedure system with the intention to support banking criminal acts requires the role of other bank employees.

Criminal liability to a bank for a crime committed by one of its bank employees should be interpreted that the bank is liable for criminal errors or violations of its bank employees. The existence of legal subjects can be held criminally liable, then this condition can be applied and supported by legislation that is violated by the bank as a corporation. That an employer is deemed responsible for what is done by his employees as long as it is done within the scope of work, in the case of the object of this study it is very clear that the perpetrators of banking criminal acts are Bank employees who are appointed and dismissed based on Decree made by the Directors. Therefore, it can be analogous that the mandate giver or the employer in this case is the Board of Directors so that the corporation or board of directors, superiors or leaders as wel as the perpetrators of the banking crime can also be held liable for criminal acts of banking crimes committed (Krismen, Yudi,2014).

Corporate criminal liability rests on the assumption that all legal and illegal actions carried out by high level managers or Directors are identified as corporate actions. Therefore, this doctrine is used to justify the imposition of criminal liability to corporations, despite the fact that corporations are not something that can do themselves and may not have mens rea because they do not have hearts (Krismen, Yudi,2014).

Based on the description above which rests on the applicable legal rules based on both the Banking Act and the Limited Liability Company Act and the theory of corporate liability, the officials who are legal subjects at the Bank must share responsibility as the supervisor of the offender who is the sole Defendant in Banking Criminal Acts.

Conclusion and Suggestion

In general, factors causing the occurrence of banking crimes include Integrity; bad personal character of the perpetrator; opportunity; poor corporate governance; Standard Operating Procedures that are not implemented, a weak supervision system, non-implementation of the principle of prudence and risk management of a weak bank, there are gaps in the banking administration system that can create conditions as well as opportunities for actors to commit banking crimes.

Based on the description above, it can be concluded that the Bank as a Corporation at the time of the occurrence of the banking crime should be held accountable for criminal liability for the banking crime because it has been negligent by not implementing good corporate governance and not applying the principle of prudence to the maximum in carrying out the activities of the business of the Bank, thereby creating gaps, circumstances and conditions that could result in banking crimes.

Furthermore, the Banks Business Actors engaged in Banking in order to be able to implement good corporate governance need to install a strong supervision system and apply the principle of prudential principles and risk management to be able to minimize the occurrence of banking crime. Then, Bank Employees are to always maintain the integrity and trust they receive, and to make the Banking Criminal Acts an example so that similar incidents do not occur again bearing in mind that their impact can reduce public confidence in the banking business. And to the Financial Services Authority of the Republic of Indonesia, to provide strict warnings and sanctions against banks whose employees commit banking crimes, because they have been negligent in carrying out their business activities, then carry out investigations where the perpetrating bank employees work and also imposed on the affiliated parties the Banking Crime Act and the Panel of Judges to examine and decide on a case properly and fairly so that no parties feel victimized and there are other parties protected.

Acknowledgments

The authors would like to thank the Universitas Bandar Lampung for the support for this study.

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