**Business Deputy Manager**

**Direct Selling Officer (Branch Office)**

**Credit Committtee**

**Credit Administration Officer**

**Marketing Department of Employee Loan (Branch Office)**

**DEBTOR COMPANY**

**Head of Branch Office**

**Head of Employee Loan Section (Branch Office)**

**President Director**

**Director of Business and Operation**

**RURAL BANK**

* Business Deputy Manager & Direct Selling Officer of the debtor company deliver false information during *On The Spot* (OTS) interview
* Do not verify the completeness, authenticity, and reliability of the required supporting documents

Withdraw the disbursement fund from the fictitious employee saving accounts and share a portion with Deputy Business Manager of the Debtor Company

Using fictitious employee payroll to fulfill the credit requirement

Do not examine the compliace with the credit procedure and prudential banking principle

Approve the application and disbursement of the Employee Loan

Perform quantitative analysis and propose the Employee Loan to the credit committee

* Do not verify the completeness, authenticity, and reliability of the required supporting documents
* Proceed the Employee Loan Application with no underlying quantitative and qualitative credit analysis

Do not verify the compliance with the credit policy

Act as a Branch Manager

Sign the Memorandum of Understanding of Employee Loan

Sign the Memorandum of Understanding of Employee Loan

Falsify the credit application form of the Employee Loan candidates, then submit all of the credit requirement documents on behalf of the Employee Loan candidates

Find candidates outside the company to be submitted for Employee Loans Application

No formal application letter

***The execution of Memorandum of Understanding is not carried out at the same time and place***

**Source:**

***https://putusan3.mahkamahagung.go.id/direktori/putusan/zaec94c76cd3ffca863f323334313138.html***

**NON-PERFORMING LOAN**

Apply for Employee Loan

Receive a portion of the fictitious Employee Loan disbursement

Propose the Employee Loan Application

Do not examine the credit advice dan the completeness of the required supporting documents

Approve the credit analysis

Propose the Employee Loan Application

Approve the credit analysis

Approve the credit analysis

Approve the credit analysis

Prepare Credit Analysis