



Implementation of the COSO ERM-Based Internal Control System in Marketing Management at Bank Mandiri

Dwiyan Al Rasyid^{1*}, Dim Zarita Suryanugraha², Rizal Fahmi Syaiful³, Nadya Ayu Lestari⁴, Nadia Ulfa Agustin Hilman⁵, Ana Sakinatun Nisa⁶, Asep Muhammad Adam⁷

Universitas Siliwangi, Indonesia¹

Universitas Siliwangi, Indonesia²

Universitas Siliwangi, Indonesia³

Universitas Siliwangi, Indonesia⁴

Universitas Siliwangi, Indonesia⁵

Universitas Siliwangi, Indonesia⁶

Universitas Siliwangi, Indonesia⁷

Corresponding Email: dwiyan.alrasyid@gmail.com*

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Abstract

The Internal Control System (ICS) is a crucial element in ensuring that an organization's objectives are achieved effectively and efficiently, maintaining the integrity of financial reports, protecting organizational assets, and ensuring compliance with applicable regulations. This study aims to evaluate the effectiveness of implementing ICS based on the COSO Model Enterprise Risk Management (ERM) components at Bank Mandiri KCP Cikurubuk, Tasikmalaya. The methodology used in this study is a qualitative approach with a case study, where data was collected through in-depth interviews, documentation, and observations of the ICS application in marketing procedures and policies. The results of the study indicate that the implementation of ICS at Bank Mandiri KCP Cikurubuk has been running well and is relatively effective in controlling risks and monitoring performance. In particular, the supervision of marketing policies has been in accordance with the established procedures, and there has been adequate follow-up by the Government Internal Supervisory Apparatus (APIP) to maintain the sustainability of this effectiveness. The conclusion of this study is that the ICS implemented at Bank Mandiri KCP Cikurubuk is effective and efficient in supporting the achievement of organizational goals, as well as providing a solid foundation for better internal supervision in the future.

Keywords: Internal Control System, Enterprise Risk Management, marketing management

Introduction

The Indonesian economy is currently demonstrating remarkable resilience despite increasing global uncertainties. According to data released by the Central Statistics Agency

(BPS), Indonesia's economic growth in the first quarter of 2024 reached 5.11% (year-on-year), slightly higher than the previous quarter, which was recorded at 5.04%. Looking ahead, the projected economic growth for 2024 is expected to remain strong, with estimates ranging from 4.7% to 5.5% (year-on-year). This positive economic development has a broad impact, particularly on the general public, with improvements in welfare and a higher standard of living. Undoubtedly, one of the factors supporting this economic achievement is the vital role of the banking sector in maintaining the smooth operation of the economy.

The banking sector plays an essential role in supporting monetary policies and the stability of a country's economy. Banks act as institutions that not only provide financial services but also serve as the primary pillar in maintaining public trust in the financial system and function as mediators in financial transactions. Regarding economic growth, the banking sector also plays a role in facilitating the flow of money, both on a macro and micro scale. Efficient and profitable banks significantly impact economic growth and the stability of the financial system (Nursyahriana et al., 2017). One way for banks to ensure stable operational continuity is by implementing an effective internal control system that not only helps secure operations but also ensures compliance with applicable regulations.

Internal control is a crucial aspect of a bank's operational success. Effective internal control can help prevent fraud, reduce errors, and ensure that all operations are conducted according to existing rules and policies. Furthermore, internal control functions as a mechanism for risk management, improving efficiency, and building trust with customers and other stakeholders. In this regard, a well-designed internal control system is a guarantee for a bank's long-term continuity and success. The effectiveness of internal control in banking contexts does not only focus on accurate financial reporting but also on risk management and compliance with relevant regulations. In practice, many banks use COSO-based internal control models and ERM models to design comprehensive control systems. The COSO model is an international standard used by various organizations to design and evaluate the effectiveness of their internal control systems. COSO recommends five key components: control environment, risk assessment, control activities, information and communication, and monitoring. By applying these five components, banks can identify and manage emerging risks, ensure compliance with applicable regulations, and maintain the integrity and reliability of their operational data. Meanwhile, the ERM model provides a more systematic approach to identifying, assessing, and mitigating risks that may lead to financial losses, reputation damage, or other harms.

In line with this, Bank Mandiri (Persero) Tbk. KCP Cikurubuk Tasikmalaya, as one of the branches of the largest banks in Indonesia, plays an essential role in supporting regional economic development while ensuring stable and efficient operational continuity. The implementation of the internal control system based on COSO and ERM models in the marketing unit at Bank Mandiri KCP Cikurubuk is of high urgency, considering the importance of risk management in marketing bank products that are directly related to customers. Bank product marketing activities, which include offering credit products, savings, and other services, require strict oversight and control to avoid potential risks that could harm the bank, both financially and reputationally. Therefore, it is crucial for Bank Mandiri KCP Cikurubuk

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to have an internal control system that not only regulates operational flows but also focuses on managing risks that may arise in each marketing activity.

The implementation of the internal control system based on the COSO and ERM models at Bank Mandiri KCP Cikurubuk Tasikmalaya is also closely linked to the application of operational risk management systems, which include several components such as RCSA (Risk Control Self-Assessment), LED (Loss Event Database), and KRI (Key Risk Indicators) applied across all branches. This internal control system is designed to ensure that each operational step of the bank aligns with the strategic objectives while mitigating various risks that may arise in daily activities. The success of implementing an internal control system based on COSO and ERM can bring substantial benefits to Bank Mandiri KCP Cikurubuk, such as improving operational efficiency, reducing the risk of financial losses, and building and maintaining customer trust. This control system also plays a role in safeguarding the bank's assets, ensuring compliance with applicable regulations, and maintaining the bank's reputation among customers and the general public.

Literature Review

Financial institutions play a crucial role in the economy of a country, especially in supporting economic growth, stability, and equitable development. In Indonesia, the role of financial institutions is vital in providing financial services that facilitate the flow of funds in the economy, both for household consumption and investment. According to Santoso (2019), financial institutions play a role in maintaining economic stability and creating efficiency in the management of financial resources. Through this important role, financial institutions, especially banks, function as intermediaries between fund owners and those who need funds, thereby achieving a more optimal allocation of resources. The Basic Banking Law, established by the Indonesian government in 1967, serves as the legal foundation governing the operation of financial institutions in Indonesia, which continues to be updated to align with economic developments and international regulations.

One key aspect of the sustainability and stability of financial institutions' operations is risk management, which involves various types of risks such as market risk, credit risk, and operational risk. Research by Dwi Sukmawati et al. (2023) states that financial institutions that cannot manage risks well will face significant losses that could undermine the institution's financial stability. Therefore, effective internal control within every financial institution is crucial. Internal control systems are a set of policies, procedures, and mechanisms designed to protect assets and ensure operational effectiveness, compliance with laws and regulations, and reliability of financial reporting (Edi Mulyanto, n.d.).

As the financial system evolves, the role of central banks within the banking system becomes increasingly important. The central bank is responsible for overseeing the stability of the national financial system and managing monetary policies that impact all sectors of the economy, including banking. As stated by Vera Yenni (2017), central banks serve as controllers of inflation, maintaining exchange rate stability, and ensuring the liquidity of the

banking system so that it can function effectively. Bank Indonesia, as the central bank, not only focuses on managing monetary policy but also on supervising commercial banks to ensure they operate in accordance with prudent principles set by banking regulations. One of the internal control systems widely adopted by large banks in Indonesia is the COSO-based internal control system and the ERM (Enterprise Risk Management) model. According to Ngurawan (2021), the ERM model is a systematic approach to identifying, assessing, and managing risks that may affect the achievement of organizational objectives. This model focuses on holistic risk management and covers all operational aspects of the organization. One of the main benefits of implementing ERM is its ability to help organizations manage risks in a more structured and integrated manner throughout their business processes (Zamzami & Arifin Faiz, 2015).

COSO-based internal control, adopted by many global financial institutions, including those in Indonesia, is a framework designed to provide a foundation for efficient and effective risk management. According to Anggriany & Hasnawati (2023), there are five main components in the internal control system, which include: the control environment, risk assessment, control activities, information and communication, and monitoring. These five components are interconnected and must be implemented comprehensively within the organization to ensure the effectiveness of internal controls. The application of COSO in banking not only helps identify risks but also provides guidance to enhance the reliability of financial information and ensure that all operational activities align with set goals. A good internal control system improves transparency and reduces the potential for deviations or abuse of authority that may harm the bank and its customers. As explained by Elfani et al. (n.d.), strong and effective internal control is key to protecting assets, ensuring the accuracy of financial reporting, and maintaining compliance with regulations.

Bank Mandiri KCP Cikurubuk, as one of Indonesia's leading banks, plays a significant role in implementing an internal control system based on COSO and ERM to maintain operational stability and manage existing risks. The importance of the internal control system in supporting the operational success of a bank, as outlined by Ilmiah & Akuntansi (2021), is to ensure that every decision made in the bank's operations is based on proper risk management. The COSO and ERM-based internal control system enables the bank to monitor and evaluate risks periodically, as well as take corrective actions if any discrepancies in business processes are found. Thus, internal control is an essential factor in maintaining the bank's operational continuity and ensuring that the established goals are achieved efficiently and effectively.

Furthermore, implementing good internal control also provides a foundation for better risk management. This is highly relevant for Bank Mandiri KCP Cikurubuk, which serves many customers and handles large-scale transactions. The success of the internal control system implemented at the bank not only helps build customer trust but also minimizes risks that could adversely affect the bank's stability. By following the guidelines in COSO and ERM, Bank Mandiri KCP Cikurubuk can ensure that all aspects of their operations run transparently, accurately, and efficiently.

Internal control is a fundamental element in the management of organizations, both in the public and private sectors. In the context of financial institutions, internal control functions

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to ensure smooth operations, protect assets, and ensure compliance with applicable policies. According to Margaretha (2013), internal control consists of a series of procedures designed by management to ensure the achievement of organizational goals related to operations, reporting, and compliance. This enables the organization to manage risks in a systematic and integrated manner. COSO's internal control consists of five main components that support each other, namely: Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring. The first component, Control Environment, provides the foundation for the success of internal controls by fostering awareness of the importance of control within an organization. In this context, an organizational culture that prioritizes transparency and integrity is vital. Organizations with cultures that emphasize transparency and honesty will have more effective controls (Hanifah et al., 2023).

Next, the Risk Assessment component serves to identify and analyze risks that may hinder the achievement of organizational goals. This process is crucial in banking because risks such as bad debts, fraud, or non-compliance with regulations can affect the reputation and financial stability of the institution (Accounting Study, School of Economics Kesatuan Bogor, 2018). The application of this component at Bank Mandiri KCP Cikurubuk, for example, is expected to mitigate such risks through appropriate strategies. The third component, Control Activities, involves policies and procedures established to address the risks identified. It includes controls over transactions, operational oversight, and more efficient and effective resource management. The application of systematic control activities will help banks maintain a balance between financial interests and risk management (Rahmi, 2017).

The fourth component, Information and Communication, is a system that facilitates effective communication among all parties involved in the organization. In banking, it is essential to ensure that information related to financial reports, risks, and compliance is well understood by both internal and external parties, including stakeholders and regulators (Penulis et al., 2020). Lastly, Monitoring is the process that ensures all internal control elements are functioning effectively. This process involves periodic evaluations and monitoring of the existing control systems to ensure that the controls remain relevant in light of changes in the business environment and organizational strategy (Ridzal et al., 2022). Effective monitoring can detect deviations early and allow the organization to make quick corrections, thus preventing more significant losses.

The effectiveness of internal control is crucial in ensuring that organizational goals are achieved properly. As COSO (2009) stated, effective internal control helps organizations manage risks, protect assets, and enhance stakeholder trust. This is especially relevant in the context of banking, where good internal control can improve operational efficiency, reduce the risk of losses, and strengthen the institution's reputation (Deni et al., 2019). In the banking system, internal control is not only essential for preventing financial risks but also for maintaining the integrity of financial reporting and ensuring that banks comply with existing regulations. Bank Mandiri KCP Cikurubuk, as a crucial branch within Bank Mandiri's network, needs a strong internal control system to maintain operational stability and mitigate existing risks. By adopting the principles of internal control based on COSO, Bank Mandiri KCP

Cikurubuk can ensure that every operational activity and strategic decision aligns with established goals.

Through the implementation of an internal control system in accordance with COSO standards and ERM-based risk assessment, Bank Mandiri can better monitor and control existing risks. The application of the ERM model allows the bank to proactively identify and manage emerging risks and take appropriate corrective actions to ensure operations align with its long-term goals (Amelia et al., n.d.). On the other hand, marketing is an essential element in supporting the operational success of banking. Marketing serves as a tool to introduce bank products to consumers and enhance relationships with customers. Effective marketing can help the bank expand its market share and achieve long-term profitability. Therefore, it is crucial for Bank Mandiri KCP Cikurubuk to integrate marketing aspects with internal control to ensure that the marketing strategies implemented are not only effective but also comply with existing policies and regulations.

Research Method

This study uses a qualitative research method with a descriptive approach, aiming to provide an in-depth understanding and depiction of the phenomenon under investigation. The study focuses on the processes and meanings behind the phenomenon being studied, with data analyzed descriptively through narratives and verbal statements from the research subjects. This research not only aims to describe but also to understand the perceptions and experiences of the participants in the context of internal control at Bank Mandiri KCP Cikurubuk Tasikmalaya.

Data collection was carried out using various techniques to obtain relevant and in-depth information. First, this study used documentation methods to gather data in the form of official documents available at the bank, such as annual reports, standard operating procedures (SOPs), internal policies, and relevant audit reports. These documents provide detailed information regarding the internal control system and policies implemented at the bank, and are used to enrich the researcher's understanding of existing practices.

Next, to obtain more contextual data, the researcher conducted a field study using observation techniques. Through direct observation of the operational processes taking place at the bank, the researcher could observe the implementation of internal control policies in daily practice, as well as the dynamics that occur on the ground. This observation provided a deeper understanding of how policies are applied in the direct interactions between employees, customers, and the existing systems. Additionally, interviews were conducted with several key individuals involved in the implementation of internal control at Bank Mandiri KCP Cikurubuk Tasikmalaya. These interviews aimed to gather more in-depth information about how internal control is implemented, the challenges faced, and their perceptions of the effectiveness of these policies. The individuals interviewed included branch leaders, financial staff, and employees directly involved in daily operations at the bank.

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The next stage is the analysis of the data obtained. After the data was collected, the researcher conducted a descriptive analysis to depict the phenomenon occurring at Bank Mandiri KCP Cikurubuk Tasikmalaya. The data obtained from interviews, observations, and documentation were simplified and selected based on their relevance to the focus of the research. The data was then presented in a structured narrative form, with the aim of providing a clear picture of how internal control is implemented and whether the policies are effective.

Results

The internal control system at Bank Mandiri KCP Cikurubuk Tasikmalaya operates effectively, based on the application of principles from COSO (Committee of Sponsoring Organizations of the Treadway Commission) applied across various components of internal control. According to the data obtained, each component of the internal control system has been well implemented, in line with established standards. The internal environment at Bank Mandiri KCP Cikurubuk Tasikmalaya reflects a philosophy applied through clear SOPs and a management style that is relatively relaxed, yet still emphasizes responsibility in every task and function of the employees. The management at this bank always strives to ensure that every activity carried out aligns with the established vision and mission. Furthermore, providing the best service to customers is a priority, with a friendly, polite, and courteous attitude consistently maintained.

Commitment to integrity, ethical values, and competence is also applied across all levels of the organization. All employees at Bank Mandiri KCP Cikurubuk Tasikmalaya are highly regarded in terms of integrity and code of ethics. This is reflected in the socialization efforts carried out by internal audit to minimize fraud, as well as the attendance system that utilizes technology to ensure employee punctuality and presence. In terms of supervision, Bank Mandiri KCP Cikurubuk Tasikmalaya has an internal audit that conducts regular inspections every two months, along with an annual audit from Bank Mandiri headquarters. This ensures that the internal control process is continuously monitored and its adequacy assessed. Additionally, there is a clear organizational structure with detailed task distribution and the use of manuals to define authority and responsibility at every level. All employees at the bank undergo training relevant to their field, whether new or existing, and receive rewards or promotions based on their work achievements.

The goal-setting process at Bank Mandiri KCP Cikurubuk Tasikmalaya is also effective. The most important strategic goal is to maintain customer satisfaction by providing the best service. To achieve this, the bank utilizes technology such as the Livin app in the micro-financing process, which facilitates and accelerates the process. The BI-Checking process is also applied to ensure the eligibility of prospective customers before financing is provided. Bank Mandiri KCP Cikurubuk Tasikmalaya also routinely evaluates the performance of customers and identifies potential events, both internal and external. The bank conducts evaluations when there is a decline in the number of financing customers or other issues, responding through restructuring of problematic financing. In terms of risk assessment, Bank Mandiri KCP Cikurubuk Tasikmalaya identifies and manages risks using the 5C principles in

customer analysis. The technology system used to store customer data also serves as an effort to reduce the risk of losing important data or accidents that could lead to financial losses.

Table 1 Effectiveness of COSO Principles at Bank Mandiri KCP Cikurubuk Tasikmalaya

No.	ERM COSO Internal Control System Components	Internal Control System Criteria of Bank Mandiri KCP Cikurubuk Tasikmalaya	Description
1.	Internal Environment	Philosophy applied based on Bank Mandiri KCP Cikurubuk's SOP	Yes
		Relaxed management style, yet emphasizing responsibility	Yes
		Management activities aligned with the vision and mission of Bank Mandiri KCP Cikurubuk Tasikmalaya	Yes
		Providing the best service to customers with friendliness, politeness, and respect	Yes
		Commitment to integrity, ethical values, and competence	Upholding integrity, code of ethics, and competence for all employees
		Internal audit socialization to minimize fraud occurrences	Yes
		Attendance system using EDC (Electronic Data Capture) machine	Yes
2.	Objective Setting	Maintaining customer satisfaction by providing the best service	Yes
		Conducting BI-Checking process in providing financing	Yes
3.	Event Identification	Periodic performance evaluation and restructuring financing for problematic customers	Yes
4.	Risk Assessment & Risk Response	Analyzing potential customers based on the 5C principles	Yes
		Using information technology to store customer data	Yes
		Marketing at Bank Mandiri KCP Cikurubuk Tasikmalaya can accept risks within the bank's tolerance limits	Yes

Based on the results obtained, Bank Mandiri KCP Cikurubuk Tasikmalaya has implemented an effective internal control system. All internal control components applied are in accordance with the COSO principles and applicable policies, ensuring that the organization's goals can be achieved efficiently and effectively.

Table 2: Internal Control System for Marketing at Bank Mandiri KCP Cikurubuk Tasikmalaya

No	ERM COSO Internal Control System Components	Bank Mandiri KCP Cikurubuk Tasikmalaya Internal Control Criteria	Remarks
1	Control Activities	Separation of duties and functions among employees	Yes
		Transaction authorization is carried out by the financing committee with the right authority	Yes
		Financing procedures and policies comply with regulations	Yes
		Proper security system for documents and assets	Yes
2	Information & Communication	Information systems are relevant, accurate, and timely	Yes
		Effective communication between managers and employees	Yes
3	Monitoring	Continuous monitoring of bank operational implementation	Yes
		Disciplinary monitoring of micro-financing customers	Yes

The control activities at Bank Mandiri KCP Cikurubuk Tasikmalaya have been running smoothly. The clear separation of duties among employees and the transaction authorization carried out by the competent financing committee ensures that the financing process adheres to established procedures. Document and asset security is also well-regulated, with dedicated storage spaces to preserve the integrity of documents. The information system owned by the bank is relevant, accurate, and timely, and can be accessed by relevant parties, such as the internal audit team. Effective communication between managers and employees is well-maintained, with the use of internal emails and the Bank Mandiri portal facilitating the exchange of information related to applicable policies and procedures.

Monitoring of the bank's operational implementation is carried out continuously. Additionally, disciplinary monitoring of micro-financing customers is also applied, ensuring that it always complies with the applicable regulations. Managers provide daily briefings to employees before operational activities, ensuring that everything runs smoothly and according to the standards. Therefore, the internal control system for marketing procedures and policies at Bank Mandiri KCP Cikurubuk Tasikmalaya has been effectively implemented and adheres to the applicable COSO principles.

Conclusion

Based on the research findings and discussions conducted regarding the analysis of the internal control system on marketing procedures and policies based on the COSO (Committee of Sponsoring Organizations of the Treadway Commission) ERM (Enterprise Risk Management) model, which has been implemented at Bank Mandiri KCP Cikurubuk Tasikmalaya, it can be concluded that the internal control system at this bank has been

implemented very well and effectively. All components applied by the bank, ranging from internal environment, objective setting, event identification, risk assessment, to control activities, communication, and monitoring, have adhered to the principles promoted by COSO.

Bank Mandiri KCP Cikurubuk Tasikmalaya has successfully run its operations by complying with the established procedures and policies. The internal environment at this bank shows clear responsibility in each task and function of the employees. They also apply a good culture, such as 3S (Smile, Greeting, and Courtesy), which creates a conducive work atmosphere. Additionally, the clear organizational structure and EDC (Electronic Data Capture)-based attendance system further enhance the effectiveness of the internal control system implemented at this bank.

The goal-setting conducted by this bank covers various aspects, including strategic, operational, reporting, and compliance goals, which collectively support the achievement of the organization's overall objectives. With this clear goal-setting, the bank ensures that every step taken in its operations is always directed and aligned with the established vision and mission. In terms of event identification, the bank also regularly evaluates internal performance and restructures problematic financing to avoid potential risks that could harm the bank. This identification process shows that the bank is capable of responding quickly to any changes or issues that occur both inside and outside the organization.

Regarding risk assessment, the bank has implemented the 5C (character, capacity, capital, collateral, condition) principle in analyzing potential financing customers, showing caution in selecting customers to be financed. By utilizing technology to store customer data digitally, the bank also minimizes the risk of losing important data that may occur in physical documents. Internal control activities at the bank have also been well implemented, with clear separation of duties among employees and a well-managed document and asset security system. The use of the latest technology in micro-financing applications shows that the bank not only keeps up with the times but also utilizes technological advancements to improve efficiency and accuracy in its operations.

In terms of information and communication, the bank provides relevant and accurate data and ensures that communication between managers and employees is effective. With the existence of an internal portal that informs the latest policies and mandatory internal email access for all employees daily, communication becomes more structured and well-organized. Regarding monitoring, Bank Mandiri KCP Cikurubuk Tasikmalaya enforces discipline in customer visits and maintains good relationships with micro-financing customers. Monitoring is carried out continuously by the management, both in daily operational monitoring and in overseeing the effectiveness of activities carried out by employees. All of this demonstrates that the bank has strong control over all aspects of its operations, including customer financing management.

From all the components that have been applied, it can be concluded that the internal control system implemented at Bank Mandiri KCP Cikurubuk Tasikmalaya has been effective. The internal control system guidelines and standards applied are in accordance with the framework set by COSO, which has been recognized as an international standard in banking

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and other organizations. The internal control, which covers all aspects of the organization by integrating existing control concepts, has proven to help the bank achieve its operational goals efficiently and effectively while maintaining integrity and compliance with applicable regulations. Therefore, the internal control system at Bank Mandiri KCP Cikurubuk Tasikmalaya can be considered a good example of the implementation of internal control in accordance with international standards.

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