

Research Article

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Analysis of the Internal Control System in the Disbursement of Small Business Loans at PT Bank Mandiri Tbk, Makassar KCP, Daya Wholesale Center

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Abstract: *This study aims to analyze the implementation of the internal control system in the disbursement of People's Business Credit (KUR) at PT Bank Mandiri Tbk's Makassar Central Wholesale Market Branch, based on the 2017 Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework. This study employs a qualitative descriptive approach. Data were collected through interviews, observations, and documentation from informants involved in the People's Business Credit disbursement process, namely the Credit Manager and Microcredit Analysts (MKA). Data analysis was conducted through the stages of data reduction, data presentation, and drawing conclusions. The research findings indicate that the internal control system for the disbursement of People's Business Credit (KUR) at PT Bank Mandiri Tbk's Makassar Central Wholesale Market Branch has been implemented in accordance with the five components of internal control based on the COSO framework (2017), namely Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring Activities. The control environment is implemented through the TIPCE work culture, a clear organizational structure, the division of duties and authorities, e-learning programs, and performance evaluations using Key Performance Indicators (KPIs). Risk assessment is conducted through document reviews, business surveys, residential surveys, credit checks via the OJK's Financial Information Service System (SLIK), and the application of the 5C principles. Control activities are carried out through the implementation of standard operating procedures (SOPs), tiered credit approval, the application of Know Your Employee (KYE), and mechanisms for handling non-performing loans. Information and communication are supported by the use of the MANPIN (Mandiri Pintar) application, daily briefings, and coordination among work units. Meanwhile, monitoring is conducted periodically through credit quality evaluations by Credit Operations (CKO), credit document oversight, and employee performance evaluations. The implementation of these five components supports the effectiveness of the internal control system.*

Keywords: Internal Control System, People's Business Credit, COSO, Credit Disbursement, Bank Mandiri.

Introduction

Banking is a vital sector of the national economy that functions as a financial intermediary by collecting funds from the public and redistributing them through credit. Credit is a major source of bank income, but it also carries significant risks, particularly default risk that may lead to non-performing loans (NPL). High NPL levels can reduce bank profitability, weaken liquidity, and threaten financial stability. Therefore, effective internal control is essential to minimize credit risk and maintain asset quality (Muzamil, 2015).

PT Bank Mandiri (Persero) Tbk, as one of Indonesia's state-owned banks, plays an important role in supporting economic growth, particularly through financing for Micro, Small, and Medium Enterprises (MSMEs). One of its major financing programs is the Kredit Usaha Rakyat (KUR), a government-supported financing program designed to provide working capital and investment loans to productive and feasible MSMEs that face limited access to formal banking services. However, KUR financing involves considerable risks because many MSME borrowers have limited assets, simple financial records, and

business conditions that are sensitive to economic changes. Therefore, effective credit analysis, monitoring, and internal control are required to ensure prudent lending practices (Mokalu et al., 2018).

As a major KUR distributor, Bank Mandiri continues to strengthen risk management and internal control to maintain credit quality. Nevertheless, the large volume of lending may increase the potential for credit problems. Previous studies have identified fluctuations in NPL at several Bank Mandiri units, indicating the need to strengthen internal control, particularly in credit analysis, borrower monitoring, and post-disbursement evaluation (Nasution & Tarmizi, 2023). The development of Bank Mandiri's NPL ratio during 2022–2025 is presented in Table 1.

Table 1. Non-Performing Loan (NPL) Ratio of PT Bank Mandiri for the 2022–2025 Period

Description	2022	2023	2024	2025
NPL Ratio	1,88%	1,02%	0,97%	0,96%

Source: PT Bank Mandiri Annual Report (Processed Data, 2026).

Based on Table 1, PT Bank Mandiri's Non-Performing Loan (NPL) ratio consistently decreased from 1.88% in 2022 to 1.02% in 2023, 0.97% in 2024, and 0.96% in 2025. This decline indicates an improvement in credit portfolio quality and suggests that the bank's credit risk management, debtor assessment, and internal control systems have been effective in maintaining asset quality. The NPL ratio also remained well below the 5% regulatory threshold, indicating that the bank's credit condition was generally healthy and well controlled. Nevertheless, continuous monitoring and strengthening of internal controls remain necessary because economic changes and debtor conditions may increase credit risk.

These findings are consistent with Angelica et al. (2016), who found that effective internal control improves credit management through control environment, risk assessment, control activities, information and communication, and monitoring. Nasution and Tarmizi (2023) similarly reported that effective internal control is closely associated with lower levels of non-performing loans by improving credit analysis, debtor monitoring, and early detection of default risks.

Common problems in credit distribution include inadequate debtor assessment, weak segregation of duties, ineffective credit monitoring, improper collateral management, and changes in borrowers' business conditions. These factors demonstrate the importance of internal control in maintaining credit quality and minimizing potential bank losses. In accordance with the COSO framework, internal control consists of five components: control environment, risk assessment, control activities, information and communication, and monitoring (Angelica et al., 2016). These components support the implementation of prudent lending practices, regulatory compliance, and early identification and mitigation of credit risks.

This issue is particularly relevant to PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya, where credit activities, including KUR financing, support businesses in trade, services, and mining sectors. High demand for financing provides opportunities to strengthen the bank's intermediation function but also increases credit risk. Therefore, this study aims to examine the implementation of internal control in KUR distribution at PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya, assess its conformity with the COSO framework, and provide recommendations to strengthen credit risk management and internal control.

Implementation Method

Research Design

This study employs a comparative descriptive design with a qualitative approach. It aims to describe and compare the implementation of the internal control system in the distribution of Kredit Usaha Rakyat (KUR) at PT Bank Mandiri (Persero) Tbk KCP Makassar Pusat Grosir Daya with the five components of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework.

A qualitative approach was selected because the study focuses on gaining an in-depth understanding of internal control practices rather than numerical or statistical analysis. Data were collected through interviews with authorized personnel directly involved in the credit distribution process and through relevant documents and institutional records. The research design is presented in a schematic form to illustrate the research stages, relationships among the research elements, and the methods applied.

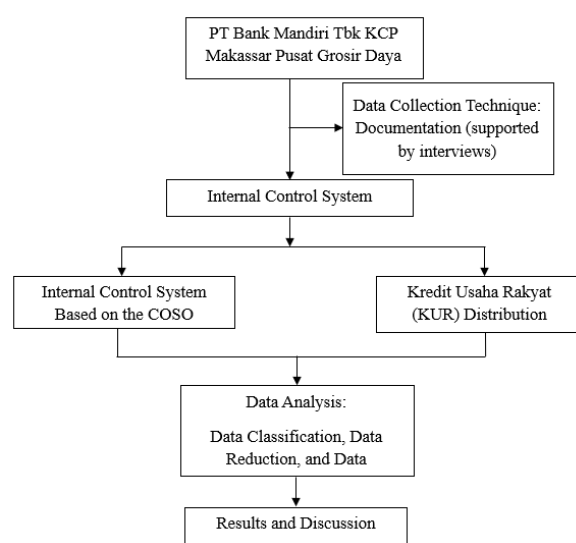


Figure 1. Research Design Scheme

Research Focus and Description

This study focuses on analyzing the implementation of the internal control system in credit distribution at PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya. The analysis covers the main stages of the credit process, including credit planning, creditworthiness analysis, credit approval, disbursement, monitoring, and collection. Each stage is assessed to determine its effectiveness in ensuring compliance with bank procedures, applying prudential principles, and minimizing credit risk.

Research Subjects

The research subjects consist of documents related to the internal control system and personnel directly involved in the credit distribution process. The main informants are the Credit Manager, who supervises and approves credit decisions, and the Micro Credit Analyst (MKA), who verifies documents, reviews borrowers through the Financial Services Information System (SLIK), and conducts creditworthiness analysis based on the 5C principles.

Research Instruments

The study uses documentation and interview guidelines as the main research instruments. Documentation includes organizational structures, standard operating procedures (SOPs), credit application and approval forms, credit realization reports, collectibility data, and other relevant credit records.

Interviews with the Credit Manager and MKA are conducted to obtain information regarding credit analysis, approval, disbursement, monitoring, collection, risk control, and operational constraints.

Data Collection Techniques

Data are collected through documentation and interviews. Documentation is used to obtain relevant official records and supporting evidence, while interviews are conducted with the Credit Manager and MKA to gain an in-depth understanding of the implementation of internal controls in KUR distribution (Kamaruddin et al., 2023).

Data Analysis Techniques

The study applies descriptive qualitative data analysis through three main stages:

1. Data Reduction – selecting, simplifying, and categorizing relevant information based on the five COSO components: control environment, risk assessment, control activities, information and communication, and monitoring.
2. Data Display – presenting the reduced data through narrative descriptions, tables, or diagrams to identify patterns and relationships among internal control components.
3. Conclusion Drawing and Verification – developing conclusions based on identified findings and verifying them by comparing interview results with supporting documents to ensure the consistency and validity of the findings.

Results And Discussion

Data Analysis

Control Environment

Table 2. Control Environment

Aspect	Findings	Compliance	Remarks
Integrity and Ethical Values	Bank Mandiri implements the TIPCE work culture (<i>Trust, Integrity, Professionalism, Customer Focus, and Excellence</i>) as a behavioral guideline for all employees.	Compliant	Ethical values are presented
Organizational Structure	The credit distribution process has a clear organizational structure and division of authority through a hierarchical approval system.	Compliant	The organizational structure
Competency Development	Employees participate in <i>e-learning</i> programs and training to improve their competencies.	Compliant	The <i>e-learning</i> platform is presented in Appendix 5.
Performance Evaluation and Accountability	Employee performance is evaluated through KPIs, with rewards provided to outstanding employees.	Compliant	Employee awards are presented in Appendix 7.

Source: Processed Data, 2026

Based on the Control Environment component at PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya is consistent with the COSO (2017) framework. This is reflected in the implementation of the TIPCE work culture (Trust, Integrity, Professionalism, Customer Focus, and Excellence), a clear organizational structure, employee competency development through e-learning, and performance evaluation using Key Performance Indicators (KPIs).

The findings indicate that TIPCE serves as a guideline for employees in performing their duties, particularly in KUR distribution. Clear segregation of duties and hierarchical credit approval help minimize the risk of abuse of authority. Regular training also ensures that employees' credit analysis competencies remain aligned with applicable regulations and company policies.

Management commitment, clear responsibilities, performance evaluation, competency development, and employee recognition support the effective implementation of the control environment. Overall, the control environment strengthens employee compliance, reduces potential fraud, improves service quality, and supports accountability in KUR credit decisions.

Risk Assessment

Table 3. Risk Assessment Analysis

Aspect	Findings	Compliance	Remarks
Risk Identification	The bank examines documents, conducts business surveys, and verifies the borrower's residence before credit approval.	Compliant	Interview results with informants
Credit History Analysis	Prospective borrowers are assessed through the Financial Services Information System (SLIK) of the Financial Services Authority (OJK).	Compliant	Interview results with informants
Creditworthiness Analysis	Creditworthiness is assessed using the 5C principles (<i>Character, Capacity, Capital, Collateral, and Condition of Economy</i>).	Compliant	Interview results with informants
Risk Mitigation	Collateral requirements are determined according to the credit ceiling and Bank Mandiri's policies.	Compliant	Credit ceilings are presented in Appendix 3

Source: *Processed Data, 2026*

Based on the Risk Assessment component is consistent with the COSO (2017) framework. This is demonstrated through document verification, business and residence surveys, SLIK OJK checks, the application of the 5C principles, and collateral requirements based on the credit ceiling.

The implementation is supported by the prudential banking principle, whereby the bank verifies not only administrative documents but also the actual business conditions of prospective borrowers. SLIK OJK data further enables the bank to objectively assess borrowers' credit histories and reduce the risk of lending to problematic borrowers.

In practice, the assessment begins with document verification, followed by business and residence surveys and a 5C analysis (Character, Capacity, Capital, Collateral, and Condition of Economy). The results are used to determine credit eligibility and the appropriate credit limit.

Overall, effective risk assessment helps reduce the potential for non-performing loans, improve credit portfolio quality, and strengthen the reliability of credit decisions.

Control Activities

Table 4. Control Activities Analysis

Aspect	Findings	Compliance	Remarks
Credit Distribution SOP	The bank has an SOP and flowchart for the KUR distribution process.	Compliant	The flowchart is presented in Figure 2.
Authorization and Segregation of Duties	Each credit decision requires hierarchical approval according to the respective authority.	Compliant	The organizational structure is presented in Figures 2 and 3.
Fraud Control	The bank implements Know Your Employee (KYE) and provides customers with education on installment payments.	Compliant	Interview results with informants.
Non-Performing Loan Management	The bank applies warning letters, restructuring, subrogation claims, and collateral auctions in accordance with established procedures.	Compliant	The warning letter is presented in Appendix 9.

Source: *Processed Data, 2026*

Based on the Control Activities component is consistent with the COSO (2017) framework. This is reflected in the KUR distribution SOP, hierarchical approval mechanisms, segregation of duties, implementation of Know Your Employee (KYE), customer education, and procedures for handling non-performing loans.

The implementation is supported by well-documented operational policies and supervision at each stage of credit distribution. Clear employee responsibilities and the use of a credit distribution flowchart help ensure that each process follows established procedures and receives the required approval.

In practice, credit distribution involves document submission, credit analysis, field surveys, collateral assessment, authorized approval, and disbursement. KYE is applied to strengthen employee oversight, while customers are educated to make installment payments directly through their loan accounts to minimize misuse of funds.

For problem loans, the bank applies warning letters, restructuring, subrogation claims, and collateral auctions when necessary. Overall, these control activities improve procedural compliance, reduce fraud risk, and help maintain credit quality.

Information and Communication**Table 5.** Analysis of Information and Communication

Aspect	Findings	Compliance	Remarks
Information System	The bank uses the MANPIN system to manage data and support credit analysis.	Compliant	The MANPIN system is presented in Appendix 11.
Information Quality	Credit information is supported by complete application forms and supporting documents.	Compliant	Credit application requirements and documents are presented in Appendix 8.
Internal Communication	Daily briefings are conducted to communicate operational information and company policies.	Compliant	Briefing activities are presented in Appendix 6.

Source: *Processed Data, 2026*

Based on Table, the Information and Communication component is consistent with the COSO (2017) framework. This is reflected in the use of the MANPIN information system, daily briefings, inter-unit communication, and reporting mechanisms for issues arising during credit distribution.

The implementation is supported by integrated information technology and open communication among employees. MANPIN enables systematic storage and access to prospective borrower data by authorized units, while daily briefings provide updates on work targets, policy changes, and operational issues.

In practice, credit analysis is conducted through MANPIN, from entering prospective borrower data to submitting analysis results to authorized officers. Any incomplete documentation is immediately coordinated with the unit head to ensure timely follow-up and prevent service delays.

Overall, effective information and communication improve service speed, decision-making accuracy, and administrative control. Accurate information and effective communication also strengthen coordination among units, enabling KUR distribution to operate efficiently and in accordance with company policies.

Monitoring**Table 6.** Monitoring Analysis

Aspect	Findings	Compliance	Remarks
Periodic Evaluation	The bank conducts monthly, quarterly, and semiannual evaluations through authorized units.	Compliant	Interview results with informants.
Post-Disbursement Monitoring	The CKO unit monitors credit quality after disbursement.	Compliant	Interview results with informants.

Aspect	Findings	Compliance	Remarks
Administrative Supervision	Credit documents are systematically reviewed and stored as part of the monitoring process.	Compliant	Document storage is presented in Appendix 10.
Performance Evaluation	Monitoring is conducted through KPIs and e-learning programs to improve employee competencies.	Compliant	Interview results with informants.

Source: *Processed Data, 2026*

Based on Table 6, the Monitoring component is consistent with COSO (2017). Periodic evaluations, post-disbursement credit monitoring, document reviews, KPI-based performance evaluation, and e-learning support continuous monitoring. These practices enable early detection of credit problems, timely corrective action, and maintenance of credit quality.

Discussion

Control Environment

The Control Environment at PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya is consistent with COSO (2017), as indicated by the TIPCE culture, clear organizational structure, segregation of duties, employee training, and KPI-based performance evaluation. Documentation and interviews confirm that these practices support integrity, accountability, and employee competency in KUR distribution. The findings are consistent with Armalia et al. (2025), but differ from Melisa et al. (2021), who identified unclear duties and overlapping functions. Overall, a clear structure and defined responsibilities strengthen internal control.

Risk Assessment

The Risk Assessment component complies with COSO (2017) through document verification, business and residence surveys, SLIK OJK checks, 5C analysis, and collateral assessment. These procedures support prudent credit decisions and reduce the risk of problem loans. The findings are consistent with Armalia et al. (2025) and Nasution and Tarmizi (2023). However, unlike the latter study, the research site applies continuous post-disbursement monitoring through Credit Operation (CKO), strengthening risk control throughout the credit cycle.

Control Activities

The Control Activities component is consistent with COSO (2017) through KUR SOPs, credit flowcharts, hierarchical authorization, segregation of duties, KYE, customer education, and problem-loan procedures. These controls ensure that credit decisions follow established procedures and reduce fraud and credit risks. The findings support Armalia et al. (2025) and Tarmizi and Nasution (2022), who reported that SOPs and authorization mechanisms strengthen banking controls.

Information and Communication

The Information and Communication component complies with COSO (2017) through the MANPIN system, complete credit documentation, daily briefings, and inter-unit communication. MANPIN supports systematic credit data management, while regular communication facilitates information sharing

and decision-making. These findings are consistent with Armalia et al. (2025), confirming that effective information and communication support efficient KUR distribution and internal control.

Monitoring

The Monitoring component is consistent with COSO (2017) through periodic evaluations, post-disbursement monitoring, document reviews, KPI evaluation, and e-learning. Continuous monitoring supports early detection of problems and timely corrective action. The findings are consistent with Armalia et al. (2025) but differ from Nasution and Tarmizi (2023), which identified weaknesses in borrower monitoring. At the research site, continuous monitoring contributes to maintaining credit quality and strengthening internal control.

Conclusion

Based on the findings, the internal control system for Kredit Usaha Rakyat (KUR) distribution at PT Bank Mandiri Tbk KCP Makassar Pusat Grosir Daya is consistent with the five COSO (2017) components: control environment, risk assessment, control activities, information and communication, and monitoring. The control environment is supported by the TIPCE culture, clear segregation of duties, employee competency development, and KPI-based performance evaluation. Risk assessment involves document verification, business and residence surveys, SLIK OJK checks, and 5C analysis. Control activities include SOPs, hierarchical authorization, segregation of duties, KYE, and problem-loan procedures. Information and communication are supported by the MANPIN system, daily briefings, and inter-unit coordination, while monitoring is conducted through periodic evaluations and post-disbursement credit monitoring. Overall, the five COSO components are systematically implemented and support procedural compliance, risk management, decision-making accuracy, and credit quality in KUR distribution.

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