

PT Bank JTrust Indonesia Tbk's Commitment to Implementation of Anti-Money Laundering (AML) Program & The Prevention of Terrorism Financing (CFT)

PT Bank JTrust Indonesia Tbk. committed to support the Anti-Money Laundering and Counter-Terrorism Financing regime by referring to the applicable Provisions, Rules and Regulations, such as;

1. Laws of the Republic of Indonesia No. 8 Year 2010 dated October 22, 2010 concerning the Prevention and Eradication of Money Laundering.
2. Laws of the Republic of Indonesia No. 9 Of 2013 dated March 13, 2013 concerning the Prevention and Eradication of Terrorism Financing Crimes.
3. Financial Services Authority (POJK) Regulation No. 12/POJK.01/2017 Implementation of Anti-Money Laundering And Prevention of Terrorism Program in the Financial Services Sector.
4. Financial Services Authority (POJK) Regulation No.23/POJK.01/2019 concerning Amendments to the Financial Services Authority Regulation No. 12/POJK.01/2017 concerning the Implementation of Anti-Money Laundering and Counter-Terrorism Financing Programs in the Financial Services Sector.
5. Circular Letter of the Financial Services Authority No. 32/SEOJK.03/2017 concerning the Implementation of Anti-Money Laundering and Counter-Terrorism Financing Programs in the Banking Sector Provisions and/or Regulations issued by the Center for Transaction Reporting and Analysis Finance.
6. Regulation of the Head of the Center for Financial Transaction Reporting and Analysis (PPATK) which regulates the implementation of Anti-Money Laundering and Prevention of Terrorism Financing in the Unitary State of the Republic of Indonesia.

In the effort to increase effectiveness in the implementation of Anti-Money Laundering and Counter-Terrorism Financing programs, as well as active participation in order to prevent, detect and report to parties Authority to be related to all actions / transactions that are reasonably suspected or known to be related to money laundering and terrorism financing, as well as preventing the Bank from being targeted for activities money laundering and terrorism financing, PT Bank JTrust Indonesia Tbk refers to the Policy on the Implementation of Anti-Money Laundering and Prevention of Terrorism Financing, which includes:

I. Active Supervision From Directors and Commissioners

a. Active Supervision from the Board of Directors among others includes:

1. Ensure that you have AML and CFT Program Policies and Procedures in line with applicable laws and regulations.
2. Ensure that written policies and procedures regarding AML and CFT programs are in line with changes and development of products, services, and technologies, and are in accordance with the development of Money Laundering method or terrorism financing.
3. Ensure that the implementation of the AML and CFT programs has been implemented in accordance with the established written policies and procedures.
4. Ensure the availability of Special Task Forces or Functions that carry out the policies and procedures of the AML and CFT programs independently.
5. Ensure that Officials and / or Employees in special work units (UKK), namely *AML & CFT Departments* located in the Compliance Directorate have adequate capabilities

- and have the authority to access all Customer data and other information, and responsible for ensuring that
6. the AML-CFT implementation program at Bank JTrust Indonesia has run effectively.
 7. Ensure the appointment of Special Work Unit Officers in the implementation of the AML and CFT Program at the Branch Office (*Branch AML Officer*).
 8. Ensure that all Officials/Employees at Bank JTrust Indonesia have an understanding and ability in the application of AML and CFT through face-to-face socialization/training and *Electronic Learning*.

b. Active Supervision of the Board of Commissioners, among others, includes:

1. Approve the policies and procedures for implementing the AML and CFT programs proposed by the Board of Directors;
2. Supervise the implementation of the Board of Directors' responsibilities to the implementation of the AML and CFT programs; and
3. Ensure that there are discussions related to Money Laundering and/or Terrorism Financing in meetings of the Board of Directors and Board of Commissioners.

II. Policies and Procedures

The policies and procedures that have been owned by JTrust Bank currently include ;

1. Identification and verification of the Customer, as well as identification and verification of the Beneficial Owner.
2. Risk Management of Money Laundering and/or Financing of Terrorism is sustainable (*Risk Based Approach*) related to customers, countries, products and services as well as delivery channels.
3. Monitoring customer profiles and transactions
4. Transaction delay, transaction termination, closure of business relationship and rejection of transactions related to TPPU & TPPT.
5. Transfer Dana dan *Cross Border Correspondent Banking*
6. Reporting to the Board of Directors and the Board of Commissioners regarding the implementation of policies and procedures for implementing the AML and CFT programs
7. Reporting to Regulators

III. Internal Control

To ensure the effectiveness of the implementation of the AML and CFT Program implementation has been carried out in accordance with applicable regulations, it is necessary to monitor by independent parties periodically, namely periodic checks by internal audits and examinations conducted by external auditors, as well as supervision of the implementation of AML and CFT implementation from the Board of Commissioners and Directors.

IV. Management Information System

To support the monitoring of customer profiles and transactions effectively and comprehensively. PT Bank JTrust Indonesia, Tbk already has an Information System Application that can monitor, identify, analyze and provide reports based on transaction characteristics and risk levels Customer.

As well as always reviewing and updating the parameters and methods of analysis based on the applicable provisions and laws, and recommendations from the national AML CFT working body as well as internationally.

V. Human Resources and Training

In supporting the implementation of AML and CFT with integrity and competence for all employees. PT Bank JTrust Indonesia, Tbk carries out training programs periodically and continuously. The least training topics include:

1. Implementation of the applicable provisions, laws and regulations related to the AML and CFT programs;
2. Techniques, methods, and typologies of money laundering or terrorism financing including *trends* and developments in the risk profile of banking products; and
3. Policies and procedures for implementing the AML and CFT Programs as well as the role and responsibility of employees in combating money laundering or terrorism financing, including the consequences if employees *tipping off*.
4. Training with a communicative and easy-to-understand method, as well as measuring the understanding of trainees by providing evaluations before and after the training is carried out.

VI. Implementation of Risk Culture and AML & CFT Compliance

All personnel of PT Bank JTrust Indonesia, Tbk always synergize in strengthening the AML and CFT implementation program, among others through;

1. Continuous improvement of aspects of the implementation of AML & CFT programs based on assessments in the *Financial Integrity Rating On Money Laundering / Terrorism Financing*,
2. Internalization of risk culture and compliance culture to AML & CFT programs, based on *National Risk Assessment and Sectoral Risk Assessment On Money Laundering/Terrorism Financing*.