

Commitment of PT Bank JTrust Indonesia Tbk to Implementation of Anti-Money Laundering (AML), Countering Terrorism Financing (CTF), and Countering the Proliferation Financing (CPF) of Weapons of Mass Destruction Program

PT Bank JTrust Indonesia Tbk. is committed to supporting the Regime of Anti-Money Laundering, Countering Terrorism Financing (CTF), and Countering the Proliferation Financing (CPF) of Weapons of Mass Destruction Program by referring to the applicable provisions, regulations and laws, namely;

1. Law of the Republic of Indonesia No. 8 of 2010 dated 22 October 2010 concerning Prevention and Eradication of Money Laundering Crimes;
2. Law of the Republic of Indonesia No. 9 of 2013 dated 13 March 2013 concerning Prevention and Eradication of Terrorism Financing Crimes;
3. Financial Services Authority Regulation (POJK) No. 8 of 2023 concerning Implementation of Anti-Money Laundering (AML), Countering Terrorism Financing (CTF), and Countering the Proliferation Financing (CPF) of Weapons of Mass Destruction Program in the Financial Services Sector.
4. Financial Services Authority Circular Letter No. 32/SEOJK.03/2017 concerning Implementation of Anti-Money Laundering (AML), Countering Terrorism Financing (CTF), and Countering the Proliferation Financing (CPF) of Weapons of Mass Destruction Program in the Banking Sector Provisions.
5. Regulation Head of the **Indonesian Financial Transaction Reports and Analysis Center** which regulates the Implementation of Anti-Money Laundering (AML), Countering Terrorism Financing (CTF), and Countering the Proliferation Financing of Weapons of Mass Destruction (CPF) Program in the Republic of Indonesia.

In order to increase the effectiveness of the AML CFT & CPF program implementation at BANK JTRUST INDONESIA, it is necessary to support the active participation in order to prevent, detect and report to the authorities related to all actions/transactions that should be suspected or known to be related to money laundering, financing of terrorism and financing of weapons of mass destruction as well as preventing the Bank from being targeted for money laundering (ML), financing of terrorism (TF) and Proliferation financing (PF) of weapons of mass destruction, PT Bank JTrust Indonesia Tbk refers to the Policy on Implementation of Anti-Money Laundering (AML), Countering Terrorism Financing (CTF), and Countering the Proliferation Financing (CPF) of Weapons of Mass Destruction, which includes:

- I. Active Supervision of Directors and Commissioners
 - a. Active Supervision from the Board of Directors includes among others:
 1. Ensuring that the AML CTF and CPF Program Policies and Procedures are in line with the applicable provisions, regulations and laws
 2. Ensure that written policies and procedures regarding the AML CTF and CPF are in line with changes and developments in products, services and technology, as well as in accordance with developments in the mode of ML TF and PF.
 3. Ensuring that the implementation of the AML CTF and CPF programs has been carried out in accordance with the established written policies and procedures.

4. Ensure the availability of a Special Task Force or function that independently implements the policies and procedures for the AML CTF and CPF Program.
 5. Ensuring that Officials and/or Employees in the Special Work Unit (UKK), namely the AML CTF and CPF Department who are in the Compliance Directorate have adequate capabilities and have the authority to access all customer data and other information, and are responsible for ensuring the AML CTF and CPF implementation programs at Bank JTrust Indonesia have been running effectively,
 6. Ensure the appointment of Special Work Unit Officers in implementing the AML CTF and CPF Programs at Branch Offices (Branch AML Officer).
 7. Ensure that all Officers/Employees at Bank JTrust Indonesia have understanding and ability in implementing AML CTF and CPF which are carried out through face-to-face socialization/training and Electronic Learning.
- b. Active Supervision by the Board of Commissioners, including among others:
1. Give approval for the policies and procedures for implementing the AML CTF and CPF programs proposed by the Board of Directors;
 2. Supervise the implementation of the Board of Directors' responsibilities regarding the implementation of the AML CTF and CPF programs; And
 3. Ensuring that there is discussion regarding efforts to prevent Money Laundering, Financing of Terrorism and/or Funding of Weapons of Mass Destruction in meetings of the Board of Directors and the Board of Commissioners
- II. Policies and Procedures
1. Identification and verification of customers, as well as identification and verification of beneficial owners.
 2. Risk Management Money Laundering, Financing of Terrorism and/or Funding of Weapons of Mass Destruction on an ongoing basis (Risk Based Approach) related to Customers, countries, products and services as well as distribution networks (delivery channels).
 3. Monitoring of customer profiles and transactions
 4. Postponement of transactions, termination of transactions, closure of business relationships and rejection of transactions related to Money Laundering, Financing of Terrorism and/or Funding of Weapons of Mass Destruction.
 5. Fund Transfers and Cross Border Correspondent Banking.
 6. Application of the Know Your Employee principle
 7. Reporting to the Board of Directors and Board of Commissioners regarding the implementation of policies and procedures for implementing the AML CTF and CPF programs
 8. Reporting to Regulators
- III. Internal control
- To ensure the effectiveness of the implementation of the AML CTF and CPF programs Implementation has been carried out in accordance with applicable regulations, periodic monitoring by independent parties is required, namely periodic inspections by Internal Audit and inspections conducted by External Auditors, as well as supervision over the implementation of AML CTF and CPF programs from the Board of Commissioners and Directors.

IV. Management information System

To support monitoring of customer profiles and customer transaction profiles that have been running effectively, PT Bank JTrust Indonesia, Tbk has an Information System Application that can monitor, identify, analyze and provide reports with the characteristics of transactions based on risks carried out by customers by referring to the applicable rules, regulations and laws.

In supporting the implementation of AML CTF and CPF programs with integrity and competence for employees. PT Bank JTrust Indonesia, Tbk conducts regular and continuous employee training programs. Training topics at least include:

1. Implementation of the applicable provisions, regulations and laws related to the AML CTF and CPF programs;
2. Techniques, methods and typologies of money laundering, financing of terrorism and proliferation Financing, including trends and developments in the risk profile of banking products;
3. Policies and procedures for implementing the AML CTF and CPF Programs as well as the roles and responsibilities of employees in eradicating money laundering or terrorism financing, including the consequences if employees tip off.
4. Training with a communicative and easier to understand method, by providing material that presents cases related to AML CTF and CPF which often occur in banking transaction activities, as well as measuring the understanding of trainees by providing AML CTF and CPF questions before and after the training is conducted

V. Implementation of AML CTF and CPF Risk and Compliance Culture

All employees of PT Bank JTrust Indonesia, Tbk always synergize in strengthening the AML CTF and CPF implementation programs, including through;

1. Improving aspects of the implementation of the AML CTF and CPF programs based on assessments in the Financial Integrity Rating on Money Laundering, Terrorism Financing and Proliferation Financing
2. Internalization of a risk culture and a culture of compliance with the AML CTF and CPF, based on the National Risk Assessment, Sectoral Risk Assessment and Internal Risk Assessment on Money Laundering, Terrorism Financing and Proliferation Financing of Weapons of Mass Destruction