

BANK SMBC INDONESIA

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PT Bank SMBC Indonesia Tbk Anti-Money Laundering, Countering the Financing of Terrorism, and Counter- Proliferation Financing of Weapons of Mass Destruction (AML CFT and CPF) Statement

This document sets out the basic principles adopted by PT Bank SMBC Indonesia Tbk ("SMBC Indonesia") to prevent Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing ("ML TF and PF"). SMBC Indonesia as a subsidiary of Sumitomo Mitsui Banking Corporation (SMBC) is committed to comply with all applicable ML TF and PF laws and regulations, including but not limited to sanctions laws, if imposed on SMBC Indonesia as a Financial Institution.

I. Purpose and Requirements of Anti-Money Laundering, Countering the Financing of Terrorism, and Counter- Proliferation Financing of Weapons of Mass Destruction (AML CFT and CPF) Framework

ML TF and PF are obstacles to unhealthy economic activities. To prevent its transactions, products, and services from being used for ML TF and PF, SMBC Indonesia has prepared AML CFT and CPF Programs to identify, monitor, manage, and mitigate potential ML TF and PF risks, based on the concept of a risk-based approach. SMBC Indonesia is committed to meeting global regulatory and ethical expectations, including requirements set by international organizations such as the Financial Action Task Force (FATF).

II. AML CFT and CPF Programs

BTPN shall undertake the following actions in implementing its AML CFT and CPF programs:

1. Enterprise-wide risk assessment to determine ML TF and PF risk positions, and gain firm understanding of ML TF and PF risk controls.
2. Periodic reporting on the implementation of AML CFT and CPF to the Board of Directors and Board of Commissioners.
3. The designation of AML CFT and CPF Officer.
4. Know Your Customer (KYC) policy consists of Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), trigger and periodical KYC reviews, and customer acceptance/rejection policy.
5. Investigation of sanctions for relevant customers and transactions, updating the sanctions list and re-examining existing customers whenever there is a change in the sanctions list.
6. Taking measures against Japanese Anti-Social Forces (JASF) which threaten the order and safety of civilian lives.
7. Transaction monitoring, transaction rejection/cancellation and/or termination of business relationships including prohibition on offering and maintaining accounts/services to anonymous customers/shell banks, reporting suspicious transactions/activities, as required and permitted in the relevant jurisdiction.
8. Monitoring of cross border correspondent banking activities.
9. Record retention in accordance to local data retention and data privacy requirement for maintaining KYC information.
10. Regulatory reporting by promptly responding to any request for AML CFT and CPF information by supervisory authority in line with legal and regulatory requirements.
11. Independent monitoring and testing to ensure the level of compliance with the requirements of AML CFT and CPF programs.

12. Periodically conduct a bankwide risk assessment of AML CFT and CPF by considering the results of sectoral or national AML CFT and CPF risk assessments, conducted by the authority.
13. Ongoing training and education for all employees to promote awareness of their obligations under AML CFT and CPF laws and regulations as well as Economic Sanctions Regulations.
14. Implementation of the Know Your Employee (KYE), Know Your Vendor (KYV) and Know Your Business Partner (KYP) programs from AML CTF and CPF risk perspective.
15. Three lines of defense model as part of an operational risk management framework.

The above AML CFT and CPF programs will be reviewed periodically to ensure the implementation will be aligned with prevailing regulations.

Jakarta, 22 November 2024
PT Bank SMBC Indonesia Tbk



Dini Herdini
Compliance Director