

PT Bank BTPN Syariah Tbk
Anti Money Laundering and Combating the Financing of Terrorism (AML & CFT)
Policy Statement

PT. Bank BTPN Syariah, Tbk (Bank) is committed to supporting the Anti-Money Laundering and Combating the Financing of Terrorism with all applicable laws, rules and regulations.

The Bank's commitment to supporting the AML and CFT programs is included in AML & CFT Policies and Procedures as follows:

1. Active Supervision by the Board of Directors and Board of Commissioners (BOD & BOC)
BODs & BOCs are actively supervising in order to ensure that the implementation of the AML & CFT programs at the Bank are carried out in accordance with applicable regulations.
2. Customer & Beneficial Owner (BO) identification
 - a. For Customer Due Diligence (CDD) process, the Bank use a risk-based approach to identify the occurrence of money laundering and/or terrorism financing in the process of accepting and identifying customers and/or BO.
 - b. The Bank is required to obtain informations and documents for opening an account in accordance with applicable regulations.
 - c. The Enhanced Due Diligence (EDD) process is used by the Bank to develop a relationship with Customers/BOs who are categorized as high risk customers, including PEP (Politically Exposed Person).
3. Termination of Business Relations or Rejection of Transactions
 - a. The Bank refuses to open an account for Prospective Customers and/or carry out transactions with Prospective Customers, Existing Customers, Beneficial Owners and Walk in Customers (WIC) who do not meet the provision criteria or whose information is doubtful and is contained in the List of Suspected Terrorists and Terrorist Organizations (DTTOT) List of Funding of Proliferation of Weapons of Mass Destruction (WMD) and/or other similar lists issued by the Regulator.
 - b. The Banks will close the business relationships with customers whose sources of funds are suspected/known to originate from criminal acts, and are listed on the list of suspected terrorists, terrorist organizations and lists of funding of proliferation of weapons of mass destruction.
4. Money Laundering and Financing of Terrorism Risk Management
 - a. The Bank conducts identification and risk assessment of money laundering and/or Combating the Financing of Terrorism based on National Risk Assessment (NRA) and Sectoral Risk Assessment (SRA) related to the development of new products and business practices, new distribution, and use of new technology or technology development for new products or existing products.
 - b. The Bank categorize the customers based on the AML & CFT risk level which consists of High, Medium and Low Risk.
5. Customers and Transactions Monitoring
 - a. The Bank conducts the continuous monitoring of customers to identify conformity between customer transactions and business activities, customer profiles and customer source of funds.
 - b. The Bank evaluates the monitoring results of customers and customer transactions to ensure that they meet the criteria for a Suspicious Transaction Report.

6. Customer Updating Data
 - a. Customer updating data is carried out when there are changes to the required information and documents.
 - b. The Bank submits the Reports of Plan and Actual Realization of Customer updating data to the Financial Services Authority (OJK).

7. Reporting and Providing Information on the Implementation of the AML & CFT Program
 - a. Reports on the implementation of the AML & CFT program must be submitted to Senior Officers, Directors and Board of Commissioners.
 - b. Reports on the implementation of the AML & CFT program must be submitted to OJK and The Indonesian Financial Transaction Reports and Analysis Center or INTRAC PPATK in accordance with applicable regulations.
 - c. The Bank cooperates with law enforcement authorities in the context of eradicating Money Laundering and Combating Financing of Terrorism by submitting the required information/documents.

8. Document Administration

Bank is required to keep documents related to Customer or WIC data for a period of at least 5 (five) years since the end of the business relationship/transaction with the Customer/WIC.

9. Management Information System

The Bank has systems used to carry out the screening process for prospective customers against the watchlist, and also to monitor customer transactions and submit Cash Transaction Reports and Suspicious Transaction Reports.

10. Internal Control

The Bank conducts AML & CFT Assessments at Branch Offices to ensure the implementation of the AML & CFT program is in accordance with applicable regulations. Periodic inspections are also carried out by the Internal Audit Unit on the implementation of the AML & CFT program.

11. AML & CFT Training

The Bank organizes AML & CFT Training which must be attended by all employees, either face-to-face or with e-learning training method.

The AML & CFT Policy Statement is part of the Bank's AML & CFT Policy and is effective from 15 November 2022.