

**PT Bank BTPN Syariah Tbk**  
**Anti Money Laundering, Combating the Financing of Terrorism & Proliferation of**  
**Weapons of Mass Destruction (AML CFT & WMD) Policy Statement**

PT. Bank BTPN Syariah, Tbk (Bank) is committed to supporting the Anti-Money Laundering, Combating the Financing of Terrorism & Proliferation of Weapons of Mass Destruction (AML, CFT & WMD) with all applicable laws, rules and regulations.

Bank's commitment to supporting the AML, CFT & WMD programs is included in AML CFT & WMD 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 & WMD 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, 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. 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. 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. Bank 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. 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. Bank conduct individual risk assessments for AML, CFT & WMD (Individual Risk Assessment-IRA).
  - c. Bank categorize the customers based on the AML CFT & WMD risk level which consists of High, Medium and Low Risk.
5. Customers and Transactions Monitoring
  - a. Bank conducts the continuous monitoring of customers to identify conformity between customer transactions and business activities, customer profiles and customer source of funds.
  - b. 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. Bank submits the Reports of Plan and Actual Realization of Customer updating data to the Financial Services Authority (OJK) in accordance with applicable regulations.
7. Reporting and Providing Information on the Implementation of the AML CFT & WMD Program
  - a. Reports on the implementation of the AML CFT & WMD program must be submitted to Senior Officers, Directors and Board of Commissioners.
  - b. Reports on the implementation of the AML CFT & WMD program must be submitted to OJK and The Indonesian Financial Transaction Reports and Analysis Center or INTRAC (PPATK) in accordance with applicable regulations.
  - c. Bank cooperates with law enforcement authorities in the context of eradicating Money Laundering, Combating Financing of Terrorism and Combating the Proliferation of Weapons of Mass Destruction 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

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

Bank conducts AML CFT & WMD Assessments at Branch Offices to ensure the implementation of the AML CFT & WMD 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 & WMD program.
11. AML CFT & WMD Training
  - a. Bank organizes AML CFT & WMD Training which must be attended by all employees, either face-to-face or with e-learning training method.
  - b. Bank organizes AML CFT & WMD training periodically in accordance with the provisions of the regulator

The AML CFT & WMD Policy Statement is part of the Bank's AML CFT & WMD Policy and is effective from 5 February 2024.