

PT Bank BTPN Tbk Anti-Money Laundering and Combating the Financing of Terrorism Program

This document sets out the basic principles adopted by PT Bank BTPN Tbk (“BTPN”) to prevent Money Laundering and the Financing of Terrorism (“ML/FT”). BTPN as subsidiary of Sumitomo Mitsui Banking Corporation (SMBC) is committed to complying all applicable ML/TF laws and regulations, including but not limited to, sanctions laws, where it imposed to BTPN as financial institutions.

I. Purpose and Requirements of Anti-Money Laundering/Combating the Financing of Terrorism (“AML/CFT”) Framework

Money Laundering and the Financing of Terrorism hinder sound economic activities. In order to prevent its transactions, products and services from being used for Money Laundering or the Financing of Terrorism, BTPN has prepared an AML/CFT Program to identify, monitor, manage and mitigate the potential ML/FT risks, based on the concept of a risk-based approach. BTPN is committed to satisfying global regulatory and ethical expectations, including the requirements set out by international organizations such as the Financial Action Task Force (FATF).

II. AML/CFT Program

BTPN shall undertake the following actions in implementing its AML/CFT Program:

- (i) Enterprise wide-risk assessment to determine ML/FT risk position and gain firm understanding of ML/FT risk control.
- (ii) Know Your Customer (KYC) policy consists of customer due diligence, enhanced due diligence, customer onboarding, trigger and periodical review, and customer acceptance/rejection policy.
- (iii) Sanctions screening for customers and its relevant transactions.

- (iv) Taking measures against Japanese Anti-Social Force (JASF) which threaten the order and safety of civilian lives.
- (v) Transaction monitoring and suspicious transaction/activity reporting as required and permitted in the relevant jurisdiction.
- (vi) Regulatory reporting by promptly responding to any requests for AML/CFT information by a supervising authority in line with legal and regulatory requirements.
- (vii) Record retention in accordance to local data retention and data privacy requirements for maintaining KYC information.
- (viii) Ongoing training and education to all employees to promote awareness of their obligations under AML/CFT laws and regulations and the Economic Sanctions Regulations.
- (ix) Independent monitoring and testing to assure the level of compliance with the requirements of AML/CFT program.
- (x) Three lines of defense model as part of the operational risk management framework.

The above AML / CFT Program will be reviewed periodically to ensure the implementation will be aligned with prevailing regulations.

PT BANK BTPN TBK



Dini Herdini

Compliance Director