

**DECLARATION OF ANTI-MONEY LAUNDERING AND COUNTER-FINANCING
TERRORISM PROGRAM
PT BANK CIMB NIAGA TBK**

In accordance with the regulation of the Law on the Prevention and Eradication of the Crime of Money Laundering no. 8 of 2010, Law on the Prevention and Eradication of the Financing of Terrorism No. 9 of 2013, POJK No. 12/POJK.01/2017 concerning the Implementation of the Anti-Money Laundering & Prevention of Terrorism Financing Program in the Financial Services Sector which has been changed to POJK No.23.POJK.01/2019, SEOJK No. 32/SEOJK.03/2017 concerning Implementation of Anti-Money Laundering & Prevention of Terrorism Financing Programs in the Banking Sector and SEOJK No. 47/SEOJK.04/2017 concerning the Implementation of the Anti-Money Laundering Program and the Prevention of the Financing of Terrorism in the Capital Markets Sector, as well as the PPATK regulations. The management of PT Bank CIMB Niaga Tbk (Bank) is fully committed to continuously implementing the Anti-Money Laundering and Prevention of Terrorism Financing programs as regulated in Law no. 8 of 2010 and other provisions. The implementation of the APU & PPT program that is determined and actively supervised by the Board of Directors and Board of Commissioners of Bank is as follows:

1. Supervision of the Board of Directors on the implementation of the AML and CFT Program

Management and mitigation of the risk of Money Laundering and Terrorism Financing is one of the concerns of the Board of Directors so that it is stated in the determination of the Bank's AML and CFT policies and requires that all existing policies and procedures at the Bank are in accordance with the implementation of the AML and CFT Program. The Board of Directors obtains the latest information regarding the implementation of the compliance function and the implementation of the AML and CFT program on a regular basis and also reports this periodically to the Audit Committee, the Risk Oversight Committee and the Operational Risk Committee.

2. Supervision of the Board of Commissioners on the implementation of the AML and CFT Program

In order to carry out the supervision, management and mitigation of the risk of Money Laundering and Terrorism Financing, the Board of Commissioners participate in giving approval to the AML and CFT policies as well as evaluating the implementation of the AML and CFT program on an ongoing basis. Reports on the implementation of the compliance function and the implementation of the AML and CFT program are submitted periodically to the Board of Directors, the Audit Committee, the Risk Oversight Committee and the Operational Risk Committee.

3. Risk-based AML & CFT policies and procedures of, in accordance with the complexity of the Bank's business, involving the followings relevant provisions:

- a. Customer Due Diligence (CDD) in the context of Customer Identification and Customer Data Update, including the classification method for determining customer risk against potential money laundering and terrorism financing, identification of

- Beneficial Owners and screening of customer data against the Anti Money Laundering Watch-list (AML Screening) database.
- b. Measurement of AML and CFT risk is carried out using indicators/parameters of the Risk Based Approach (RBA), which includes the Customer Risk Rating and Bank AML Risk Rating.
 - c. AML and CFT Risk Control and Management carried out through the implementation of the Customer Due Diligence (CDD) or Enhanced Due Diligence (EDD) process to determine the customer profile and analysis of the suitability of transactions with the Customer/WIC profile as well as dissemination of policies and procedures, training to all Bank employees, evaluation of the implementation of AML and CFT in Branch Offices through Risk Control Self-Assessment (RCSA).
 - d. Continuous monitoring and analysis to identify conformity between customer transactions and customer profiles, including closure of business relationships and rejection of transactions in the context of implementing AML and CFT.
 - e. Identification and evaluation of the risk of potential money laundering and terrorism financing through the Bank's products, services and e-channel deliveries.
 - f. Identification and Reporting of Suspicious Financial Transactions (LTKM), Cash Financial Transactions (LTKT), Financial Transactions for Transfers of Funds From and To Overseas (LTKL) and the Integrated Service User System (SIPESAT) to PPATK.
 - g. Procedure for screening new employees and monitoring of employee's financial transaction as part on implementing the Know Your Employee (KYE).
 - h. The administration of CDD document and other documents related to AML & CFT.
 - i. Follow-up on results of evaluation and the reporting on AML & CFT risk exposures to senior management, committee and regulator.
 - j. Internal Control, include:
 - 1) Preparing the process and control as guidelines for business units to ensure compliance and understanding of the AML & CFT program. The controls are described in AML & CFT policies and procedures (SOPs) .
 - 2) Testing and quality assurance process to ensure that Branch Office and Business Unit have implemented AML & CFT in line with prevailing Policies and Procedures.
 - 3) Evaluation on risk indicators based on appropriate risk considerations and methodology as well as the documentation.

4. Internal Control to Evaluate the Adequacy and Effectiveness of the AML & CFT Program

To ensure that the implementation of the AML and CFT program is in accordance with predetermined policies, a self-assessment procedure is applied at branch offices and business units which are then validated by the AML unit. In addition, the continuous process of validation and inspection of the implementation of the AML and CFT program is carried out by the AML Unit & Internal Audit Unit.

5. Management Information System in the Implementation of AML & CFT

For the purposes of monitoring customer profiles and transactions, Bank has an application system that can identify and determine customer risk levels, analyze, monitor and provide reports on the characteristics of transactions made by customers, including identification of suspicious financial transactions. This application is able to carry out

comprehensive monitoring of all customer transactions at the Bank, including credit card products, wealth management and custody. This application is equipped with parameters and thresholds, which are continuously evaluated in accordance with the evolution in the modus operandi of money laundering and terrorism financing. This application also has a function for the implementation of the screening process for the watch-list and reporting of LTKM, LTKT, LTKL & Sipesat. The Bank also continuously makes improvements to the applications used to add various functions in order to increase the effectiveness and efficiency of the system.

6. Training (Certification) of AML & CFT for Employees

Training on AML & CFT are mandatory for all employees on a regular basis. The training method is carried out both in class training and through e-learning.

7. Establishment of a special organization, the Anti Money Laundering (AML) Unit, to implement the AML & CFT program

In carrying out its function, the AML unit reports and is directly responsible to the Compliance Director. The staffs of AML unit possess adequate banking knowledge and experience on the evaluation and mitigation of risks related to the implementation of the AML & CFT program. All of the staffs have participated in training and certification programs on compliance. In addition, considering the large scale of the Bank, each Business Unit and Branch Office has RCU/DCORO and the AML Local Team that also ensures the implementation of AML and CFT in the area concerned and is responsible for accessing and monitoring customer transactions. RCU is an independent party under the Business Unit that performs risk mitigation and performs Control Effectiveness Testing (CET) on operational, compliance and AML & CFT risks. Meanwhile, DCORO and the AML Local Team are the officials and Business officers concerned who have been appointed to fulfill the responsibility for implementing the AML and CFT program in the area concerned.

8. Screening of the Watch-List

The Bank screens every account opening and customer business relationship against the watch-list issued by the competent authorities as well as the watch-list commonly used in international best practice (among others The Office of Foreign Assets Control (OFAC) List, United Nation (UN) List, List Suspected Terrorists and Terrorist Organizations (DTTOT) and the Proliferation List, the list of Politically Exposed Persons (PEP) and adverse news. The Bank has subscribed to the watch-list database from Thomson Reuters-Worldcheck. The Bank also re-screens all existing customers every time there is an update/addition of a watch-list.

9. AML & CFT Risk Assessment

The Bank has developed a risk-based approach to measure AML and CFT risks at the customer level (customer risk rating) and bank-wide (Bank AML risk rating):

- a. **Customer AML Risk Rating (CRR)**, which is a measurement of the AML & CFT risk inherent in each customer using indicators that include customer identity/profile, geographic/country and business factors, products/services/channels used by customers and the type of business entity, which classified into Low, Medium, and High.

- b. **Bank AML Risk Rating (BARR)**, is the result of an assessment of the AML and CFT risk measurement at the Bank which is determined based on the inherent risk as well as the level of risk control and AML and CFT control at the Bank.

10. Compliance Test and Advisory related to AML & CFT

The AML Unit reviews policies, procedures, products/activities/channels to ensure compliance with applicable laws and regulations related to AML and CFT. In addition, the AML Unit provides opinions to the business and other working units regarding various questions and issues related to the implementation of AML & CFT.

11. Reporting and Fulfilling Data Request to Regulator/Law Enforcement

Reports to regulators for the implementation of AML and CFT are carried out by the AML unit, including the provision of data to law enforcement officers.

12. Implementation of AML and CFT Program in Financial Conglomerate

Bank as the Main Entity in the Financial Conglomerate ensures that the implementation of the AML and CFT Program in all subsidiaries is in line with the implementation of the AML and CFT Program at the Bank (Main Entity).

13. In implementing the AML & CFT programs, the Bank has set up 3 (three) lines of defense, as follows :

a) First Line of Defense

The first line of defense is carried out by the Business Unit/Branch Office that operates the Bank's daily business activities as the front-liners. In every Business Unit/Branch Office, there is someone who is responsible for the AML & CFT programs, designated as the Local AML. He or she is also given access to the information system used in the management of AML & CFT.

b) Second Line of Defense

The second line of defense is an oversight function that ensures the first line of defense has carried out its functions properly.. The AML & CFT Unit that acts as the second line of defense, prepares the strategy and steps to be taken, and the system that will be used to strengthen the implementation of the AML & CFT programs.

c) Third Line of Defense

The third line of defense is an oversight function on implementation of the AML & CFT programs by the first and second lines of defense. The internal auditors, external auditors and the Board of Commissioners carry out this function to ensure that the first two lines of defense are working effectively.

Other than the started above Bank has committed to take part in FATCA & CRS program and successfully registered as member of FATCA in IRS with member ID GIIN 03K4KB.99999.SL.360.

For futher information about the Bank's AML & CFT program, please deliver your inquiry to aml.ho@cimbniaga.co.id