



ANTI-MONEY LAUNDERING & COUNTERING FINANCING OF TERRORISM POLICY STATEMENT

PT. Bank OF India Indonesia Tbk (“ BOII”) is a publicly listed company in Indonesia Stock Exchange, regulated by Bank Indonesia and Indonesia Financial Service Authority (OJK).

In keeping with the fight against money laundering and terrorist financing, BOII adheres to the high standard and implement Anti Money Laundering & Countering Financing of Terrorism Laws and Regulations throughout the Bank networks and business units which cover the following :

- Comply with Indonesia’s Law on Money Laundering (Law of The Republic Indonesia No.8 Year 2010 concerning The Prevention and Eradication of Money Laundering), AML & CFT guidelines established by Indonesia Financial Service Authority, as well as Indonesia Financial Intelligence Unit (Indonesian Financial Transaction Reports and Analysis/INTRAC) and observing international best practice in accordance with the recommendation of Financial Action Task Force (FATF).
- Appoint Anti Money Laundering Officer whose responsible to the Board of Management for establishing and maintaining the Bank’s Anti Money Laundering compliance program.
- The Bank does not conduct business with “Shell Banks”, maintain anonymous accounts, or pay-through accounts.
- Fully cooperate with law enforcement and regulatory agencies to the extent permitted by laws.

The Bank has developed and maintained its Anti Money Laundering program comprising of written AML-CFT policy and procedures, employing online compliance system to support AML & CFT implementation, as well as internal and independent controls, which has been reported regularly and approved by its Management Board. All business units and employees must adhere to these standards to protect BOII and its reputation from being misused for money laundering and/or terrorist financing or other illegal purposes.

KYC PROGRAM

In order to mitigate money laundering activities, the Bank has implemented Customer Due Diligence procedures consist of the requirement to obtain all opening account documents, perform customer identification and documents verification, as well as updating customers data accordingly and apply Enhance Due Diligence (EDD) process for high risk customers.

RISK ASSESSMENT & TRANSACTION MONITORING

A risk based approach that identify, monitors and manages customer transactions is applied based on characteristics of the products, customers, geographic area and product delivery methods.

All customers and their transactions are screened against UN lists, OFAC Sanctions Lists, Local Terrorist lists and Local Political Exposed Persons (PEPs) list. Once a suspicious activity is detected it will be reported directly to Indonesian Financial Transaction Reports and Analysis Centre (INTRAC)

AML & CFT TRAINING

In order to promote awareness of different possible patterns and techniques of money laundering and terrorism financing, the Bank provides comprehensive AML & CFT training for all of its employees held annually.

Special training programs dedicated to designated employees such as front liners, back office operations, marketing, and internal auditors which include customer identification, screening process, account activity monitoring, and transaction reporting as well as typologies to recognize money laundering activities.