

PT BANK NEO COMMERCE TBK
ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM (AML & CFT)
POLICY STATEMENT

- A. PT Bank Neo Commerce Tbk (BNC) is committed to fully comply with the AML & CFT laws and regulations in Indonesia.

BNC has set a comprehensive AML & CFT internal regulation (Policy and Procedure) and implemented, which has been approved by BNC Board of Director. BNC Policy and Procedure comply with Indonesian Law based on:

1. Indonesia Law Number 8 Year 2010 concerning The Prevention and Eradication of The Crime of Money Laundering.
2. Indonesia Law Number 9 Year 2013 concerning The Prevention and Eradication of the Terrorism Fund.

- B. As an organization committed to the prevention of Money Laundering and suppression of terrorist financing, BNC actively maintain the Policy and Procedure to ensure every activity is inline through the regulation and law. This policy statement is a brief description of general principles to which BNC will adhere to, as follows:

1. Comply with applicable AML & CFT laws and regulations as established by Indonesian Central Bank (Bank Indonesia/BI), Indonesia Financial Services Authority (Otoritas Jasa Keuangan/OJK), Indonesian Financial Transaction Reports and Analysis Center (Pusat Pelaporan dan Analisis Transaksi Keuangan/PPATK).
2. Develop written AML & CFT policy & procedure, and apply it to all business units. Furthermore, conduct periodic reviews of all AML & CFT policies and procedures.
3. BNC does not conduct business with shell Bank.
4. BNC does not allow direct use of the correspondent account by third parties to transact business on their behalf (payable-through accounts) and does not offer services of opening anonymous accounts.
5. Obtain all account opening documentation requirements as per law.
6. Implement the Know Your Customer (KYC) principle before initiate business relationship with Bank (Enhanced due diligence for high-risk customers or Customer due diligence for customer identification, verification, and monitoring)
7. Screening customer data during onboarding and regularly according list from various sources e.g., List of Suspected Terrorists and Terrorist Organizations (DTTOT), Funding List for the Proliferation of Weapons of Mass Destruction (DPPSP).
8. Monitoring and Analysis of customer transactions.



9. BNC committed to participate on Exchange of Information (Common Reporting Standard).
10. Report all identified suspicious activities to the extent that it can do so under all applicable laws and other report as regulated in the applicable laws and regulations.
11. Periodically update customer database.
12. Retaining all the customer related documents for certain period specified as per local laws in each jurisdiction.
13. Provide regular training on AML & CFT policies and new AML & CFT laws and regulations to employees.
14. Compliance with BNC's AML & CFT policies monitored through a combination of internal audit, external audit, and regulatory reviews of compliance with relevant legislation and/or regulations.
15. Anti-Tipping Off principle, prohibit disclose any information.

BNC is a publicly listed company in the Indonesia Stock Exchange and is regulated by Indonesian Central Bank (Bank Indonesia/BI), Indonesia Financial Services Authority (Otoritas Jasa Keuangan/OJK). As responsible financial institution, BNC recognizes its obligation to cooperate with the regulators and another law enforcement agency as appropriate.

PT Bank Neo Commerce Tbk

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Compliance Director

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