BANK SMBC INDONESIA

Menara SMBC CBD Mega Kuningan,
Jakarta 12950, Indonesia
Tel: +6221 1500 365
www.smbci.com

PT Bank SMBC Indonesia Tbk
Pernyataan Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU PPT dan PPPSPM)

Dokumen ini menjelaskan prinsip-prinsip dasar yang diterapkan oleh PT Bank SMBC Indonesia Tbk ("SMBC Indonesia") untuk mencegah Tindak Pidana Pencucian Uang, Tindak Pidana Pendanaan Teroris dan Pendanaan Proliferasi Senjata Pemusnah Massal ("TPPU TPPT dan PPSPM"). SMBC Indonesia sebagai anak perusahaan dari Sumitomo Mitsui Banking Corporation (SMBC) berkomitmen untuk mematuhi semua peraturan perundang-undangan TPPU TPPT dan PPSPM yang berlaku, termasuk namun tidak terbatas pada undang-undang sanksi, jika dikenakan kepada SMBC Indonesia sebagai Lembaga Keuangan.

I. Tujuan dan Persyaratan Kerangka Kerja APU PPT dan PPPSPM

TPPU TPPT dan PPSPM merupakan sebuah penghambat kegiatan ekonomi yang tidak sehat. Untuk mencegah transaksi, produk, dan layanannya digunakan untuk TPPU TPPT dan PPSPM, SMBC Indonesia telah menyiapkan Program APU PPT dan PPPSPM untuk mengidentifikasi, memantau, mengelola, dan mengurangi potensi risiko TPPU TPPT dan PPSPM, berdasarkan konsep pendekatan berbasis risiko. SMBC Indonesia berkomitmen untuk memenuhi ekspektasi regulasi dan etika global, termasuk persyaratan yang ditetapkan oleh organisasi internasional seperti Financial Action Task Force (FATF).

II. Program APU PPT dan PPPSPM

Berikut adalah tindakan yang dilakukan oleh SMBC Indonesia dalam menerapkan Program APU PPT dan PPPSPM:

1. Penilaian risiko di seluruh perusahaan untuk menentukan posisi risiko TPPU TPPT dan PPSPM, dan memperoleh pemahaman yang kuat tentang pengendalian risiko.
2. Pelaporan secara berkala pelaksanaan APU PPT dan PPPSPM kepada Direksi dan Dewan Komisaris.
3. Penunjukkan Pejabat Penanggung Jawab APU PPT dan PPPSPM.
4. *Kebijakan Know Your Customer* (KYC) terdiri dari uji tuntas nasabah/ *Customer Due Diligence* (CDD), Uji Tuntas Lanjut/ *Enhance Due Diligence* (EDD), KYC review berkala atau pemicu, serta kebijakan penerimaan/penolakan nasabah.
5. Pemeriksaan sanksi untuk nasabah dan transaksi yang relevan, melakukan pengkinian daftar sanksi serta melakukan pemeriksaan ulang terhadap nasabah existing setiap waktu terdapat perubahan daftar sanksi.
6. Melakukan pemeriksaan terhadap Japanese Anti-Social Forces (JASF) yang berpotensi mengancam ketertiban dan keselamatan warga sipil.
7. Pemantauan transaksi, penolakan/pembatalan transaksi dan/atau pengakhiran hubungan usaha termasuk larangan menawarkan dan memelihara rekening/jasa kepada nasabah anonim/ *shell bank*, pelaporan transaksi/aktivitas mencurigakan, sebagaimana diwajibkan dan diizinkan di yurisdiksi terkait.
8. Pemantauan kegiatan *Cross border correspondent banking*.

9. Penyimpanan data nasabah sesuai dengan persyaratan penyimpanan data dan privasi data setempat untuk menjaga informasi KYC.
10. Pelaporan regulasi dengan segera untuk menanggapi setiap permintaan informasi APU PPT dan PPPSPM oleh otoritas pengawas sesuai dengan persyaratan hukum dan regulasi.
11. Pemantauan dan pengujian independen untuk memastikan tingkat kepatuhan terhadap persyaratan program APU PPT dan PPPSPM.
12. Secara berkala melakukan penilaian risiko APU PPT dan PPPSPM secara *bankwide* dengan mempertimbangkan hasil penilaian risiko APU PPT dan PPPSPM secara sektoral atau nasional, yang dilakukan oleh otoritas.
13. Pelatihan dan pendidikan berkelanjutan bagi seluruh karyawan untuk meningkatkan kesadaran akan kewajiban mereka berdasarkan undang-undang dan peraturan APU PPT dan PPPSPM serta Peraturan Sanksi Ekonomi..
14. *Pelaksanaan program Know Your Employee (KYE), Know Your Vendor (KYV) dan Know Your Business Partner (KYP)* dari sisi risiko APU PPT dan PPPSPM.
15. Model tiga lini pertahanan sebagai bagian dari kerangka kerja manajemen risiko operasional.

Program APU PPT dan PPPSPM di atas akan ditinjau secara berkala untuk memastikan penerapannya sesuai dengan ketentuan yang berlaku.

Jakarta, 03 Februari 2026
PT Bank SMBC Indonesia Tbk

Dini Herdini
Direktur Kepatuhan

BANK SMBC INDONESIA

Menara SMBC CBD Mega Kuningan,
Jakarta 12950, Indonesia
Tel: +6221 1500 365
www.smbci.com

PT Bank SMBC Indonesia Tbk
Statement on Anti-Money Laundering Countering the Financing of Terrorism, and Counter-Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM)

This document explains the basic principles applied by PT Bank SMBC Indonesia Tbk ("SMBC Indonesia") to prevent Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing ("TPPU TPPT and PPSPM"). SMBC Indonesia as a subsidiary of Sumitomo Mitsui Banking Corporation (SMBC) is committed to comply with all applicable TPPU TPPT and PPSPM laws and regulations, including but not limited to sanctions laws, if imposed on SMBC Indonesia as a Financial Institution.

I. Objectives and Requirements of the Anti-Money Laundering Terrorism Financing and Counter-Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) Framework

Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing (TPPU, TPPT and PPSPM) are obstacles to unhealthy economic activities. To prevent its transactions, products, and services from being used for Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing (TPPU, TPPT and PPSPM), SMBC Indonesia has prepared the AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) Programs to identify, monitor, manage, and mitigate potential Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing (TPPU, TPPT and PPSPM) risks, based on the concept of a risk-based approach. SMBC Indonesia is committed to meeting global regulatory and ethical expectations, including requirements set by international organizations such as the Financial Action Task Force (FATF).

II. Anti-Money Laundering Counter Terrorism Financing and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT dan PPPSPM)

Following are the actions taken by SMBC Indonesia in implementing the AML CTF and Counter-Proliferation of Weapons of Mass Destruction Financing Program Programs:

1. Company-wide risk assessment to determine Money Laundering, Terrorist Financing and Weapons of Mass Destruction Proliferation Financing (TPPU, TPPT and PPSPM) risk positions, and gain a solid understanding of risk controls.
2. Periodic reporting on the implementation of Anti-Money Laundering Counter Terrorism Financing and Countering the Financing of the Proliferation of Weapons of Mass Destruction to the Board of Directors and Board of Commissioners.
3. Appointment of Officers Responsible for AML CTF and PPPSPM.
4. Know Your Customer (KYC) policy consists of Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), periodic or trigger KYC reviews, and customer acceptance/rejection policies.
5. Investigation of sanctions for relevant customers and transactions, updating the sanctions list and re-examining existing customers whenever there is a change in the sanctions list.
6. Conducting screening process of the Japanese Anti-Social Forces (JASF) which have the potential to threaten public order and safety.
7. Transaction monitoring, transaction rejection/cancellation and/or termination of business relationships including prohibition on offering and maintaining accounts/services to anonymous

customers/shell banks, reporting suspicious transactions/activities, as required and permitted in the relevant jurisdiction.

8. Monitoring of cross border correspondent banking activities.
9. Customer data storage complies with local data storage and data privacy requirements to safeguard KYC information.
10. Prompt regulatory reporting to respond to any AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) information requests by supervisory authorities in accordance with legal and regulatory requirements.
11. Independent monitoring and testing to ensure the level of compliance with the requirements of the AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) programs.
12. Periodically conduct AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) risk assessments on a bank-wide basis by considering the results of AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) risk assessments on a sectoral or national basis, conducted by the authorities.
13. Sustainable training and education for all employees to increase awareness of their obligations under AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) laws and regulations as well as Economic Sanctions Regulations.
14. Implementation of the Know Your Employee (KYE), Know Your Vendor (KYV) and Know Your Business Partner (KYP) programs from the AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) risk perspective.
15. Three lines of defense model as part of an operational risk management framework.

The AML CTF and Counter- Proliferation of Weapons of Mass Destruction Financing (APU PPT and PPPSPM) programs above will be reviewed periodically to ensure their implementation is in accordance with applicable provisions.

Jakarta, 03 February 2026
PT Bank SMBC Indonesia Tbk

Dini Herdini
Compliance Director