

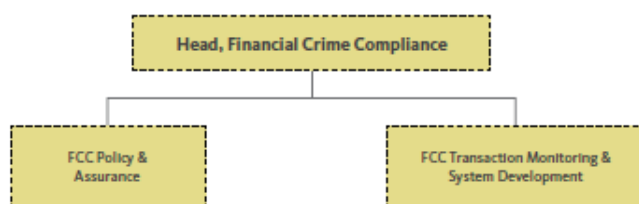
Anti Money Laundering and Terrorism Financing Prevention

PROFILE OF HEAD OF ANTI MONEY LAUNDERING AND TERRORISM FINANCING PREVENTION UNIT (APU PPT)

Andiko

Kindly refer to the Executive Officers Profiles

Organizational Structure of The Anti Money Laundering and Terrorism Financing Prevention Unit (APU PPT)



Maybank has established a Financial Crime Compliance (FCC) work unit to carry out bank-wide Anti Money Laundering & Prevention of Terrorism Funding (APU PPT) programs in accordance with the stipulations of Law Number 8 Year 2010 on Prevention and Eradication of Money Laundering Crimes, Law Number 9 Year 2013 on Prevention and Eradication of Crimes in Terrorism Funding, OJK Regulation No.12/POJK.01/2017 on Implementation of Anti Money Laundering & Prevention of Terrorism Funding Program in the Financial Services Sector, and OJK Circular No.32/SEOJK.03/2017 on Implementation of Anti Money Laundering & Prevention of Terrorism Funding Program in the Banking Sector, and other relevant regulations issued by regulators and the government.

The Bank's APU PPT programs are based on the 5 (five) pillars that consist of:

1. In order to implement the function and active role of monitoring of the Board of Directors and Board of Commissioners, the FCC Working Unit conducts the following initiatives:
 - a. Regularly hold discussions pertaining to the APU PPT Program provisions in a number of forums that include the Board of Directors meetings, the Board of Commissioners meetings, and the Risk Management Committee and Integrated Governance Committee meetings.
 - b. Propose any changes and development on the APU PPT Program Policy to the Board of Directors and/or Board of Commissioners in accordance with prevailing regulations, including policies related to APU PPT Conglomeration and prevailing Anti Bribery and Corruption policies in Maybank Indonesia.
 - c. Periodically submit the APU PPT Program implementation evaluation report to the Board of Directors and Board of Commissioners through the compliance function report, which incorporates the APU PPT risk assessment report.
 - d. Propose system development initiatives which will support the implementation of the APU PPT Program to the Board of Directors, including updating its parameters/threshold and monitoring scenarios within the AML system to ensure its suitability with the money laundering and terrorism funding motives.
 - e. Submit a draft of Suspicious Transaction Report (STR) reporting approval to the Compliance Director before being delivered to PPATK, including submitting an approval to provide response to the instruction letter from the Law Enforcement Officers and PPATK in order to implementing the APU PPT Program.
2. Continuously develop policies and procedures in accordance with the latest regulations from OJK and PPATK among others:
 - a. Issuing several of internal policies supporting the implementation of the APU PPT Program.
 - b. Conducting review and providing recommendation to other working units on their policies and procedures thereby coordinating with the implementation of APU PPT Program Policies.
 - c. Providing recommendations and advice as follow up to group discussions or queries from the branch offices/working units, both regarding the implementation of the APU PPT Program's procedure and relating to the handling of money laundering and terrorism funding cases.
3. Conduct monitoring and evaluation on implementation of the APU PPT Program's policy at the branches, working units, as well as conglomerate through the following methods:
 - a. Conducting a Bank-wide risk assessment of APU PPT, as well as the assessment of APU PPT implementation at related branches and working units at Head Office.
 - b. Continue the AML Rating program as one of the methods for monitoring the implementation of the APU PPT Program policy by the branches, including the monitoring customer acceptance procedures, transaction monitoring, customer data updating and employee training obligations.
 - c. Coordinate with internal audit, branches and working units relating to APU PPT inspections.



- d. Supervise and monitor APU PPT Program implementation activities across the conglomerate.
- e. Conduct monitoring of APU PPT Program implementation activities in the form of monthly report that is provided by foreign branch.
- f. Conduct monitoring of the APU PPT Program related to Correspondent banking activities.
- 4. Conduct enhancement of the system and data management/supporting information of APU PPT Programs, among others:
 - a. Conducted review and developed an Anti Money Laundering System and other supporting systems to perfecting the Screening, Customer Risk Assessment, Reporting, implementation of the process of Sanction and Transaction Monitoring.
 - b. Conducted enhancement of the main system to support the external (PPATK and OJK), and internal (management and compliance consolidated reports) reporting process.
 - c. Maintained the APU PPT Program database, between the PEP database, OFAC list, UN Terrorist list, List of Suspected Terrorist and Terrorist Organizations (DTTOT), Proliferation List, and other related APU PPT Program lists.
 - d. Conducted Bank reporting obligations to PPATK throughout 2019 as follows

Types of Reports	Total Reports
LTKM	705
LTKT	19,991
LTKL	277,645
Sipesat	151,079

- e. Followed-up correspondence with PPATK and other law enforcement institutions such as the Corruption Eradication Commission, National Police and the National Narcotics Agency (BNN) related to money laundering or terrorism funding.

- 5. Provide socialization or training on the APU PPT Program through the following methods:
 - a. Make coordination with Compliance Monitoring and Training (CMT) and Human Capital (HC) units in conducting face-to-face training and conference calls through the Focus Group Discussion (FGD) program with several branches and work units, and organizing regular courses of APU PPT programs held by the HC Work Unit.
 - b. E-learning Module, whereby up to 2019, 99.14% completed the e-learning training module.
 - c. Pointer awareness of APU PPT Program's general implementation through desktop or email.
 - d. Training or certification for FCC employees held internally and externally.