



## **ANTI MONEY LAUNDERING POLICY**

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**PT CITA MINERAL INVESTINDO Tbk**

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## **ANTI MONEY LAUNDERING POLICY**

PT Cita Mineral Investindo Tbk ("the Company") is committed and compliant with applicable statutory provisions and supports the Government of Indonesia's program. To ensure that the Company's activities and business are protected from actions that can harm the Company, the Company has established the Anti-Money Laundering Policy.

The purpose of implementing this Anti Money Laundering policy is to prevent material and immaterial losses, applying local anti-money laundering program that seeks to prevent situations in which the Company participates or assists any third party in Money Laundering.

### **Scope**

This policy covers all actions taken by Board of Commissioners, Board of Directors and all employees of the Company without any exception.

### **Policy**

All employees, Board of Commissioners, and Board of Directors must ensure that the Company's activities and business are protected from Money Laundering actions as defined in the Law of the Republic of Indonesia No. 8 of 2010 concerning Prevention and Eradication of Money Laundering, which is related to the activities of:

1. Placing, transferring, shifting, spending, paying, granting, entrusting, bringing abroad, changing the form, exchanging with currency or securities or other acts over Assets that are known or suspected to be the result of a criminal offense.
2. Concealing or disguising the origin, source, location, designation, transfer of rights, or actual ownership of Assets that are known or suspected to be the result of a criminal offense.

3. Receiving or taking control the placement, transfer, payment, grant, donation, safekeeping, exchange, or use of Assets that are known or suspected to be the result of a criminal offense.

Money Laundering is a process in which the results of crime are transformed into apparently legitimate money or other assets (including raw materials), to disguise the true illegal origin of such criminal proceeds. Money Laundering is a criminal offense subject to imprisonment or fine or both. Usually associated with drug trafficking or organized crime. Violations against Money Laundering include organized crime, bribery, embezzlement, corruption, extortion, drug trafficking, human trafficking, tax fraud and other fraud, and others.

To protect the Company (Shareholders, Board of Commissioners and Board of Directors, all employees) from Money Laundering, the followings need to be considered:

- 1) Conducting transactions intended for personal advantage from the activities of the Company is prohibited;
- 2) Representing the Company if has interests that conflict with the interests of the Company is prohibited;

The Company supports efforts and takes measures to contribute to the effective elimination of money laundering identified from, or related to, bauxite/alumina extraction, trading, processing, transportation or export activities originating from illegal taxes or bauxite/alumina extortion at points to mine sites, along transportation routes or at points where bauxite/alumina is traded by major suppliers.

The Company has 4 (four) pillars of Anti Money Laundering strategy, as follows:

- 1) Prevention:
  - a. Active supervision by the Internal Audit Unit in the context of implementing Corporate Governance;

- b. Awareness campaign on Anti Money Laundering through a number of internal and external media;
- c. Ongoing socialization through training to all employees, induction of new employees to remind and ensure that employees have sufficient knowledge about Anti Money Laundering;
- d. Know Your Employee Principle.
- e. Be aware of Transactions that:
  - are inconsistent, unnecessarily complicated or risk free;
  - involves payments to or from third parties or involving agents/intermediaries, who may risk being accidentally involved in money laundering or other criminal activities such as tax evasion, fraud schemes or bribery;
  - involves countries that do not have a clear relationship with business;
  - contains provisions outside the expected market conditions;
  - involves a bank account other than the ordinary business account of a partner or non-partner party;
  - involving partners who are known or suspected of serious criminal activity.

2) Detection:

- a. The Company has a whistleblowing system policy as a channel for reporting and delivering aspirations that is safe and confidentiality is guaranteed, so that employees can actively participate in maintaining and expressing ethical issues and bad behavior, including but not limited to money laundering incidents;
- b. The Company has an Internal Audit Unit that is tasked with monitoring the implementation of ethics.

3) Investigation, Reporting and Sanctions:

- a. The Company has an Internal Audit Unit whose duties include investigating allegations of money laundering;

- b. The Internal Audit Unit Committee regularly submits reports to the President Director;
- c. The Internal Audit Unit provides recommendations for actions on violations that have been proven to be performed, which are submitted to related parties.

4) Monitoring, Evaluation and Follow-up:

- a. The Company has a reporting system that records all incidents and the follow-ups;
- b. The entire information/data is documented, as a periodic evaluation material for future improvement.

**Penalty**

Offenders who are proven to have committed Money Laundering actions will be subject to penalty in accordance with Company Regulations (PP) and applicable legal provisions. This policy will be reviewed periodically according to the needs and developments both from within and outside the Company.

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# APPROVAL SHEET

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Approved on behalf of Board of Directors and Board of Commissioners

PT Cita Mineral Investindo Tbk

in Jakarta, 2 August 2020

## Board of Commissioners



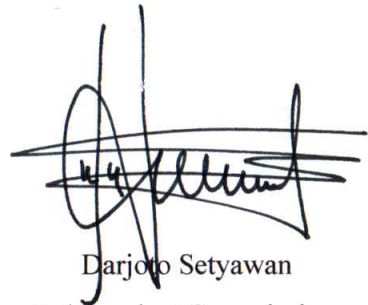
Lim Gunawan Hariyanto  
President Commissioner



James Gregory Baxter  
Commissioner



A. Ibrahim Saleh  
Independent Commissioner



Darjoto Setyawan  
Independent Commissioner

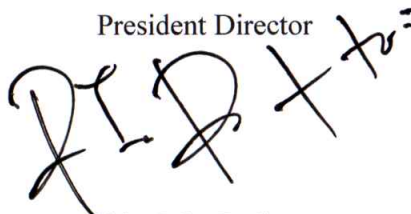
## Board of Directors



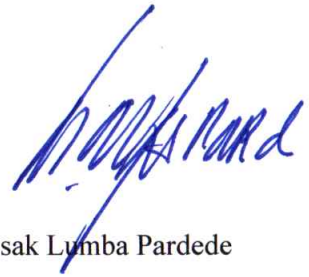
Harry Kesuma Tanoto  
President Director



Ferry Kadi  
Director



Robby Irfan Rafianto  
Director



Yusak Lumba Pardede  
Director