



**ANTI MONEY LAUNDEERING  
AND  
TERRORIST FINANCING  
DECLARATION**

# ANTI-MONEY LAUNDERING DECLARATION

1. Name of Institution: PT. JAKARTA CASH INVESTOR  
2. Address of Head Office: Wisma DJS, Jl. Benhil Raya #114B Jakarta  
3. Website: [www.ptjci.co.id](http://www.ptjci.co.id)  
4. Core Business: Gold Wholesaler, Importer, Exporter, Trader  
5. Name of Regulatory Body: Department of Economic Development
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**1. Name of the Regulatory body:**

Bank Negara Indonesia 194 (BNI 46).

**2. Is Money Laundering Considered, by laws and regulations, as a crime?**

Yes

**3. Is the Company required by any local or international law(s) to establish an AML program? If so, please identify the applicable laws and/or regulations.**

Indonesia established a Financial Intelligence Unit (FIU) called the Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK), also known as the Indonesian Financial Transaction Reports and Analysis Centre (INTRAC). The FIU was established by Law number 15 Year 2002 concerning the crime of Money Laundering. This has since been amended through Law of the Republic of Indonesia Number 8 Year 2010.

**4. Does your country's regulatory body (Central Bank) require all financial institutions to have Anti Money Laundering (AML) and Know Your Customers (KYC) procedures? If so, is your Institution in compliance with AML and KYC rules.**

Yes

**5. Has the Company adopted a Know Your Customer - KYC or Customer Identification Policy that applies to its client relationships? Yes. The AML/ CTF policy sets out the Customer Acceptance Policy, which sets out the minimum criteria to be adhered when opening new accounts or when establishing any new relationships.**

**6. Has the Company developed written AML, Combating Terrorist Financing (CTF) and Know-Your-Client (KYC) policies, which have been approved by the Management Committee of The Company?**

Company has developed written AML, CTF and KYC policies, which have been approved by the Management Committee of the Company.

**7. Has The Board been informed that these policies were approved and are in force and are consistent with INTRAC requirements?**

The Board has been informed that these policies were approved and are in force and are consistent with INTRAC requirements.

**8. Does INTRAC incorporate all FATF recommendations in its AML policy and requirements?**

INTRAC incorporates all Asia/Pacific Group on Money Laundering (APG) recommendations in its AML policy requirements.

**9. Does the Company develop AML/KYC/CTF procedures to support its policies and assist in the detection of money laundering or terrorist financing activities?**

The Company has developed comprehensive AML/KYC/CTF procedures to support its policies and to assist in the detection of money laundering or terrorist financing activities.

**10. Is the Company fully compliant with INTRAC and the APG recommendations?**

JCI is fully compliant with INTRAC and the APG recommendations.

**11. Do you have an established Audit and Compliance function to monitor and review the effectiveness of AML policies and procedures?**

JCI has an established independent Internal Audit function that reports directly to the Board Audit Committee, and additionally has a separate compliance function reporting to the Chief Risk Officer to monitor and review the effectiveness of AML/KYC/CTF policies and procedures.

**12. Do you have an established method of reporting suspicious activities / transactions to the appropriate regulators / law enforcement agency?**

JCI has an established method of reporting suspicious activities to Indonesia FIU and INTRAC via our appointed Money

Laundering Reporting Officer, consistent with the regulations and requirements of INTRAC.

**13. Do you apply the AML and CTF policies to the head office, overseas branches and majority owned subsidiaries?**

JCI applies its AML and the CTF policies to its head office and domestic branches. JCI has no overseas branches and subsidiaries.

**14. Does the Company have a compliance officer appointed to oversee anti-money laundering arrangements? If so please provide us with his / her details?**

The Company has a Chief Compliance Officer responsible for managing anti-money laundering operations. In addition to a Money

Laundering Reporting Officer responsible for reporting suspicious cases to authority.

**15. Is the Company having an automated system to monitor suspicious activity?**

Yes we do have an automated system for monitoring account activities and generate alerts and reports.

**16. Does Internal Audit review the AML process regularly?**

Internal Audit reviews the AML process regularly (at least annually as per INTRAC requirements). Issues noted and the agreed management actions to remedy issues are reported to senior management and the Board. Compliance is responsible for implementing any remedial action or improvements recommended.

**17. Is the Company able to confirm that it does not maintain relationships with 'shell banks' (defined as a bank without a physical presence and not affiliated to a regulated bank that does not maintain a physical presence)?**

JCI confirms not dealing with shell banks.

**18. How long does The Company keep records of customer and account beneficiaries' identification, transaction history? Record retention in Indonesia and at JCI is for a minimum of 10 years in any event and in specific cases the retention period is permanent.**

**19. Please list the names of your principal shareholders (in excess of 20%), senior management and their primary functions and backgrounds.**

JCI Board of members are listed in the table below.

**20. In relation to cross-border correspondent banking and other similar relationships, does your institution gather sufficient information about respondent institution to understand their business, reputation, quality of supervision and regulatory history?**

Yes, all relevant KYC information is obtained from correspondent banks.

**21. Does JCI open anonymous or numbered accounts?**

No, we do not open anonymous or numbered accounts.

**22. Does the Company require complete information of outgoing wire transfer instructions, including sender and beneficiary? names, address, account numbers, and purpose?**

Yes, JCI require complete information of outgoing wire transfer instructions.

**23. Is training provided to all staff handling customer accounts and related functions?**

Yes, AML is mandatory for all Company staff.

**24. Has your institution been subject to sanctions or punitive actions – related to anti-money laundering or terrorist financing**

– by the regulator or law enforcement in the past five years?

No

**25. Sources of further general information:**

Please refer to The Company website:

[www.ptjci.co.id](http://www.ptjci.co.id)