



## PT MERDEKA COPPER GOLD, Tbk.


### POLICY ANTI-MONEY LAUNDERING POL-IR-07-00

PREPARED	CHECKED	APPROVED	
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	<b>ANTI-MONEY LAUNDERING</b>	<b>Created date</b>	<b>01 August 2022</b>
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**1. GENERAL**

Policy regarding Anti-Money Laundering is developed, implemented, and managed for the benefit of PT Merdeka Copper Gold, Tbk. and its subsidiaries, in managing the Company's finances without any money laundering practices.

**2. PURPOSE**

The purpose of this policy is to guide the implementation of good corporate governance and have prepared procedures to ensure that the Company's finances are used solely for the intended purpose and are not diverted for unlawful use such as terrorist financing or money laundering for any criminal activity.

**3. SCOPE**

This policy applies to all Employees at PT Merdeka Copper Gold, Tbk. and its subsidiaries.

**4. RESPONSIBILITY**

**4.1 Top Management**

The Top Management must approve and sign all quality management system documents including Company Policies, Procedures, Work Instructions, Forms and other documents.

**4.2 Management Representative**

The HR department must cooperate with other departments to prepare and revise all documents including Company Policies, Procedures, Work Instructions, Forms and other documents.


**4.3 Head of Department or Department Manager**

The Department Head or Department Manager must review the relevant documented information, ensure that subordinate staff are aware of any changes or updates or updates to the document.

**5. POLICY**

**5.1 Definition**

1. The Company is PT Merdeka Copper Gold, Tbk. or its subsidiaries.
2. Employees are people who work at PT Merdeka Copper Gold, Tbk. or its subsidiaries.

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3. Money laundering is an unlawful act in the form of embezzlement or disguise/hiding the origin of money/funds or assets through various financial transactions so that the money/wealth appears to have come from legitimate activities.

### 5.2 General Standards

1. The Company is committed to avoiding all money laundering practices in all of the Company's financial transactions.
2. Every employee is prohibited from carrying out money laundering practices and any acts that are categorized as money laundering may be subject to penalties and sanctions in accordance with the applicable laws and regulations.

### 5.3 Anti-Money Laundering

1. The Company opposes money laundering practices, so that all Employees are prohibited from engaging in the following behaviors:
  - a. Placing, transferring, transferring, spending, paying, granting, entrusting, bringing abroad, changing form, exchanging with currency or securities or other actions on assets which he knows or reasonably suspects is the result of a criminal act as referred to in the applicable laws and regulations;
  - b. Concealing or disguising the origin, source, location, designation, transfer of rights, or actual ownership of assets which are known or reasonably suspected to be the result of criminal acts as referred to in the applicable laws and regulations; and/or
  - c. Receive or control the placement, transfer, payment, grant, donation, safekeeping, exchange, or use of assets which he knows or reasonably suspects is the result of a criminal act as referred to in the applicable laws and regulations.
2. To avoid money laundering practices, the Company carries out the following:
  - a. Make payment of salaries to Employees in accordance with the account in the name of the Employee.
  - b. Updating Employee's data to avoid Employee's relationship in terrorism involvement.