

**ANTI-CORRUPTION AND  
ANTI-MONEY LAUNDERING POLICY  
PT GLOBAL DIGITAL NIAGA Tbk**

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**2022**

**ANTI-CORRUPTION AND  
ANTI-MONEY LAUNDERING POLICY  
PT GLOBAL DIGITAL NIAGA, Tbk.  
(The “Company”)**

The Company is committed to supporting the Indonesian Government in its efforts to establish an effective Anti-Corruption, Anti-Money Laundering, and Prevention of Terrorism Funding regime by establishing internal Company anti-corruption, anti-money laundering, and prevent terrorism funding regulations, procedures, and policies, and implementing the same consistently and firmly.

The crime of “money laundering” is an effort to hide or mask the criminal origins of an asset in various ways, in order to avoid the tracking of such crime that results in the asset by the authorities, and to allow themselves free use of such an asset for legitimate and illegitimate activities. This crime is regulated in Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering, as well as its executing regulations, as can be amended from time to time.

“Terrorism funding” is any action to supply, collect, provide, or loan funds, which shall be directly or indirectly meant, or is known to be meant, to be used in terrorism, a terrorist organization, or terrorist activities, as meant in Law Number 9 of 2013 concerning the Prevention and Eradication of the Crime of Terrorism Funding, as well as its executing regulations, as can be amended from time to time.

The Company is committed to complying with applicable laws and regulations concerning Anti-Money Laundering and Prevention of Terrorism Funding in performing its business operations. The Company has established this Anti-money Laundering and the Prevention of Terrorism Funding Policy as a means to prevent and eradicate the crimes of money laundering and terrorism funding. The implementation of these Policies in the Company and Group includes the following:

1. Sufficient knowledge of the consumer and target market;
2. Implementing sufficient analysis of each of our entities and their consumers, target markets, and generated products;
3. Active monitoring from the management, internal control, and human resource department, training that can be applied from the moment of pre-employment screening; as well as monitoring and recognizing employee profiles, and
4. Sustainable training in order to generate awareness of (each employee and staff member’s) responsibility in the prevention and eradication of money laundering and terrorism funding.

All individuals, whether employees, members of the Board of Director, or the Board of Commissioners of the Company and Group, are prohibited from accepting, obtaining, paying, facilitating, or promising a bribe in any form, whether directly or indirectly, to anyone, and for whatever reason.

If within the environs of the Company and Group, it is detected and/or suspected that any employee, members of the Board of Directors, or the Board of Commissioners, is involved in any activity that facilitates bribery, corruption, money laundering, and/or terrorism funding, they will be imposed with strict sanctions, and then shall be legally processed, and then imposed with civil and criminal sanctions if they are proven to have committed such actions.