



Correspondent Bank – Anti-Money Laundering Questionnaire

Section 1 - Bank Information details

Name of institution:	PT. BANK COMMONWEALTH
Registered address:	PT. Bank Commonwealth World Trade Centre 6 (<i>formally Wisma Metropolitan II</i>), 15th Floor. Jl.Jend Sudirman Kav.29-31 Jakarta 12920 - Indonesia
Swift Address / Website	BICNIDJA / www.commbank.co.id
Registered Banking License Number	262/KMK.017/1997

Section 2 - Parent Bank details

Legal Name of Institution	Commonwealth Bank of Australia (CBA)
Registered Address	Ground Floor, Tower 1, 201 Sussex Street Sydney NSW 1155 Australia.

Section 3 - Ownership

Ownership refers to an individual, a corporate or government shareholders, holding > 20% of shares issued.	CBA : 99.00 % Local partner : 1.00 % *) As of June 2015.
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Section 4 - Anti-Money Laundering Compliance Program

- Does your institution have an AML Compliance Program?
☒ Yes ☐ No
- Has your institution appointed a senior officer responsible for its Anti-Money Laundering program?
☒ Yes ☐ No If Yes provide further information below

Name Position/Title	Head of AML & Sanctions
Email address	Compliance-AMLCTF@commbank.co.id
Telephone number	62 21 255 49 500
Fax number	62 21 529 625 95
Mailing address	PT. Bank Commonwealth World Trade Centre 6 (<i>formally Wisma Metropolitan II</i>), 15th Floor. Jl.Jend Sudirman Kav.29-31 Jakarta 12920 - Indonesia

**Section 5 - General AML policies, practices and procedures**

1. If you are not the Parent Bank, is your institution subject to your Parent's AML Policy and controls?

☒ Yes ☐ No

Note: Since PTBC is a subsidiary of Commonwealth Bank of Australia, we have to align with AML Group Policy.

2. Does your AML compliance program require the approval of your Board or a senior committee thereof?

☒ Yes ☐ No

3. Does your institution have written policies that have been approved by senior management documenting the processes that have been put in place to prevent, detect and report suspicious transactions?

☒ Yes ☐ No

4. In addition to inspections by the government supervisors/regulators, does your institution have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

☒ Yes ☐ No

5. Does your institution have policies covering relationships with politically exposed persons (PEP) consistent with world-wide financial services best practices?

☒ Yes ☐ No

6. Does your institution have appropriate record retention procedures pursuant to applicable law?

☒ Yes ☐ No

7. Does your institution's AML policies and practices apply to all your branches?

☒ Yes ☐ No

8. Does your institution require full details for outgoing wire transactions, i.e. sender and beneficiary names, address and account number?

☒ Yes ☐ No

Section 6 - Corresponding banking

1. Does your institution have any accounts or relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).

☐ Yes ☒ No

2. Does your institution have a policy prohibiting correspondent accounts/relationships with shell banks?

☒ Yes ☐ No

3. Does your institution have policies to reasonably ensure that you will not conduct transactions with or on behalf of shell banks through any of your accounts or products?

☒ Yes ☐ No

**Section 7 - Risk assessment**

1. Does your institution have a risk focused assessment of your customer base and their transactions?
☒ Yes ☐ No
2. Does your institution determine the appropriate level of enhanced and ongoing due diligence necessary for those categories of customers and transactions that you have reason to believe pose a heightened risk of money laundering and terrorist financing activities at or through your institution?
☒ Yes ☐ No
3. Does your institution take steps to understand the normal and expected transactions of your customers based on your risk assessment of your customers?
☒ Yes ☐ No

Section 8 - Customer Due Diligence and Enhance Due Diligence

1. Has your institution implemented systems for the identification of all your customers at account opening, including verification of customer information from independent and reliable sources (eg. name, street address, date of birth, number and type of valid official identification)?
☒ Yes ☐ No
2. Does your institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?
☒ Yes ☐ No
3. Does your institution provide anonymous accounts, or numbered accounts for which you do not collect the full details of the beneficial owner?
☐ Yes ☒ No
4. Does your institution accept wire transfers or any other means of funds transfer on behalf of non-customers without obtaining proof of identification?
☐ Yes ☒ No
5. Does the FI have a process to review and, where appropriate, update customer information relating to high risk customer information?
☒ Yes ☐ No
6. Does your institution have a requirement to collect information regarding your customer's business activities/source of funds?
☒ Yes ☐ No

**Section 9 - Reportable transactions and prevention and detection of transactions with illegally obtained funds**

1. Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?
☒ Yes ☐ No
2. Does your institution have procedures to identify transactions structured to avoid large cash reporting requirements?
☒ Yes ☐ No
3. Does your institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?
☒ Yes ☐ No
4. Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?
☒ Yes ☐ No

Section 10 - Transaction monitoring

1. Does your institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments?
☒ Yes ☐ No
2. Does your institution filter payments against relevant sanctions lists?
☒ Yes ☐ No

Section 11 – AML/CTF training

1. Does your institution provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your products and services and internal policies to prevent money laundering?
☒ Yes ☐ No
2. Does your institution retain records of its training sessions including attendance records and relevant training materials used?
☒ Yes ☐ No
3. Does your institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?
☒ Yes ☐ No
4. Does your institution employ agents to carry out some AML functions of your institution?
☐ Yes ☒ No

**Section 12 – AML/CTF regulation**

1. Does your country adhere to the anti-money laundering recommendations and special terrorist financing recommendations developed by the Financial Action Task Force (FATF)?

☒ Yes ☐ No

2. Please provide details of your key Regulatory / Supervision Body and the names of the laws / regulations you adhere to.

- Act No.8 Year 2010 - Preventing and Combating Money Laundering.
- Act No.3 Year 2011 – Fund Transfer.
- Act No.9 Year 2013 – Preventing and combating Terrorism Financing.
- PBI No.14/27/2012 - Anti Money Laundering (AML) and Counter Terrorism Financing (CTF).
- Bank Indonesia Circular Letter No.No. 15/21 / DPNP dated June 14, 2013 - The Implementation of Anti-Money Laundering and Combating the Financing of Terrorism for Commercial Banks;
- Regulation of Head of the Financial Transaction Reports and Analysis of the Republic of Indonesia Number Per.02/1.02/ INTRAC/02/15 dated February 3, 2015 - The Categories of Service Providers that Potentially Conduct Money Laundering.
- Regulation of Head of the Financial Transaction Reports and Analysis of the Republic of Indonesia Number Per.09/1.02.2 / INTRAC/09/12 dated September 4, 2012 - The Procedure for Submission of Suspicious Transaction Reports and Cash Transaction Reports for Financial Services;
- Regulation of Head of Financial Transaction Reports and Analysis of the Republic of Indonesia Number Per.11/1:02 / INTRAC / 09/12 dated September 4, 2012, - Cash Transactions Exempted from Reporting Obligations;

Including but not limited to other related laws and regulations.

Position/Title : Compliance Director

Name : Angeline Nangoi

Signature :

Date : 14 July 2015