








**MERDEKA
BATTERY**
MATERIALS

PT MERDEKA BATTERY MATERIALS Tbk

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

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01 December 2023	01 December 2023	01 December 2023	01 December 2023	01 December 2023

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**ANTI MONEY
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Revision to

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DOCUMENT CHANGE STATUS

Revision Number	Division/Department	Reason of Change	Revision By	Revision Date



ANTI MONEY LAUNDERING

1. GENERAL

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

Suppose, in the course of implementation, non-conformities are found that are not covered in this document and are considered essential for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to this policy.

And suppose there is a difference in interpretation between this policy's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and in the event of a request for discretion on implementing this policy, it must obtain prior approval from the President Director.

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 Employee at PT Merdeka Battery Materials 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.

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5. POLICY

5.1 Definition

1. The Company is PT Merdeka Battery Materials Tbk or its subsidiaries.
2. Employee are people who work at PT Merdeka Battery Materials Tbk or its subsidiaries.
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 categorized as money laundering may be subject to penalties and sanctions per the applicable laws and regulations.

5.3 Anti-Money Laundering

1. The Company opposes money laundering practices so that all Employee 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 that he knows or reasonably suspects results from 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 Employee in accordance with the account in the Employee's name.
 - b. Updating Employee's data to avoid Employee's relationship in terrorism involvement.