

Key Guidelines for the Implementation of Anti-Fraud Strategies

In accordance with the Financial Services Authority Regulation (POJK) No. 39/POJK.03/2019 dated December 19, 2019 concerning the Implementation of Anti-Fraud Strategies for Commercial Banks, BCA Syariah has established the Anti-Fraud Strategy Implementation Guidelines, which adhere to the aforementioned regulation. These guidelines were ratified in the Board of Directors Decree No. 011/SK/DIR/2020 dated March 30, 2020, concerning the Anti-Fraud Strategy Implementation Guidelines for PT. Bank BCA Syariah. The guidelines reflect BCA Syariah management's commitment to preventing fraud by effectively and continuously implementing anti-fraud strategies.

This Anti-Fraud Strategy directs BCA Syariah in determining the steps to:

- a. Prevent
- b. Detect
- c. Investigate, report, and impose sanctions
- d. Monitor, evaluate, and follow up on fraud incidents.

In accordance with the aforementioned Financial Services Authority Regulation (POJK), BCA Syariah defines fraud as any act of deviation or deliberate omission intended to deceive, defraud, or manipulate the Bank, its customers, or other parties, occurring within the Bank's environment and/or utilizing the Bank's facilities, resulting in financial loss to the Bank, its customers, or other parties, and/or financial gain to the perpetrator either directly or indirectly.

Types of actions categorized as fraud include:

- a. Cheating;

Key Guidelines for the Implementation of Anti-Fraud Strategies

- b. Deception;
- c. Asset misappropriation;
- d. Information leakage;
- e. Banking crimes (tipibank); and
- f. Other actions that can be equated with fraud in accordance with statutory regulations.

In the formulation and implementation of an effective Anti-Fraud Strategy, BCA Syariah has considered the following aspects:

- a. internal and external environmental conditions;
- b. the complexity of business activities;
- c. the types, potential, and risks of fraud; and
- d. the adequacy of necessary resources.

To enhance the effectiveness of the anti-fraud strategy implementation, BCA Syariah has established a specialized unit or function dedicated to managing the anti-fraud strategy. This unit has clear authority and responsibilities, reports directly to the President Director, and maintains direct communication and reporting lines with the Board of Commissioners.

Objectives of Implementing the Anti-Fraud Strategy

The Guidelines for Implementing the Anti-Fraud Strategy are designed to ensure that all levels within BCA Syariah organization can:

- Understand and execute the Guidelines for Implementing the Anti-Fraud Strategy, recognizing it as part of their responsibility in managing the Bank.

Key Guidelines for the Implementation of Anti-Fraud Strategies

- Comprehend their respective functions, roles, and responsibilities to create anti-fraud awareness, ultimately leading to an anti-fraud culture.

Implementation of the Anti-Fraud Strategy

The Anti-Fraud Strategy, developed comprehensively and integrally, is implemented as a fraud control system utilizing tools derived from 4 (four) interrelated pillars, namely:

1. Prevention

This includes measures aimed at reducing the potential risk of fraud, encompassing at a minimum: anti-fraud awareness, vulnerability identification, and know-your-employee policies.

2. Detection

This includes measures to identify and uncover fraud in the Bank's business activities, encompassing at a minimum: whistleblowing policies and mechanisms, surprise audits, and surveillance systems.

3. Investigation, Reporting, and Sanctions

This includes measures encompassing at a minimum: investigations or inquiries, reporting systems, and the imposition of sanctions.

4. Monitoring, Evaluation, and Follow-Up

This includes measures encompassing at a minimum: monitoring, evaluation, and follow-up actions.

Key Guidelines for the Implementation of Anti-Fraud Strategies

Reporting to the Financial Services Authority (OJK)

In compliance with monitoring the implementation of the anti-fraud strategy, BCA Syariah is obligated to submit the following to the Financial Services Authority (OJK):

- The anti-fraud strategy no later than three (3) months after the latest OJK regulation takes effect;
- Any changes to the anti-fraud strategy within seven (7) business days of their implementation;
- Semiannual reports on the implementation of the anti-fraud strategy as of the end of June and December, submitted no later than the 15th of the following month after the end of each reporting period; and
- Reports on significant fraud incidents no later than three (3) business days after BCA Syariah becomes aware of their occurrence.
- Additionally, corrections to data and/or information errors in the reports on the implementation of the anti-fraud strategy and significant fraud reports previously submitted to OJK, based on findings by BCA Syariah and/or OJK, must be promptly addressed.