Ringkasan Kebijakan Penerapan Strategi Anti-Fraud

PT J.P. Morgan Sekuritas Indonesia

Sebagai bentuk komitmen Perusahaan dalam menerapkan tata Kelola yang baik (Good Corporate Governance) dan menjaga integritas operasional, maka PT J.P. Morgan Sekuritas Indonesia ('JPMSI') telah menyusun dan menerapkan Kebijakan Strategi Anti-Fraud yang merujuk pada ketentuan Peraturan Otoritas Jasa Keuangan (POJK) No. 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan. Kebijakan tersebut ditujukan sebagai pedoman untuk mencegah, mendeteksi, meningkatkan efektivitas pengendalian internal, melaporkan dan menangani tindakan fraud secara efektif dan memberikan panduan bagi Dewan Direksi dan Dewan Komisaris dalam menerapkan strategi Anti-fraud yang efektif dalam rangka memitigasi eksposur risiko fraud.

Merujuk kepada POJK No. 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan, Fraud adalah tindakan penyimpangan dan/atau pembiaran yang sengaja dilakukan untuk mengelabui, menipu, atau memanipulasi Lembaga Jasa Keuangan, Konsumen atau pihak lain, yang terjadi di lingkungan Lembaga Jasa Keuangan dan/atau menggunakan sarana Lembaga Jasa Keuangan sehingga mengakibatkan Lembaga Jasa Keuangan, Konsumen, atau pihak lain menderita kerugian dan/atau pelaku Fraud dan/atau pihak lain memperoleh keuntungan secara langsung maupun tidak langsung.

Summary of Anti-Fraud Strategy Implementation Policy at PT J.P. Morgan Sekuritas Indonesia

As part of the Company's commitment to implementing good corporate governance and maintaining operational integrity, PT J.P. Morgan Sekuritas Indonesia ('JPMSI') has developed and implemented an Anti-Fraud Strategy Policy that refers to the provisions of the Financial Services Authority Regulation (POJK) No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Service Institutions. This policy serves as a guideline to prevent, detect, enhance the effectiveness of internal controls, report, and handle fraud effectively, and provide guidance for the Board of Directors and Board of Commissioners in implementing an effective anti-fraud strategy to mitigate fraud risk exposure

Referring to POJK No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Service Institutions, fraud is defined as a deviation and/or omission intentionally carried out to deceive, cheat, or manipulate Financial Service Institutions, consumers, or other parties, occurring within the environment of Financial Service Institutions and/or using the facilities of Financial Service Institutions, resulting in the Financial Service Institutions, consumers, or other parties suffering losses and/or the perpetrators of fraud and/or other parties gaining benefits directly or indirectly.

Sementara itu jenis-jenis perbuatan Fraud meliputi korupsi, penyalahgunaan asset, kecurangan laporan keuangan dan aktivitas lainnya yang termasuk dalam ruang lingkup tindakan fraud sebagaimana dimaksud dalam POJK No. 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan

Meanwhile, the types of fraudulent acts include corruption, asset misuse, financial statement fraud, and other activities that fall within the scope of fraudulent actions as referred to in POJK No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Service Institutions.

Tata Kelola Anti-Fraud

Dalam menyusun dan menerapkan strategi anti fraud, tata kelola anti-fraud di JPMSI memperhatikan aspek-aspek sebagai berikut:

- **Pengawasan aktif Dewan Direksi dan Dewan Komisaris**

  Kewenangan dan tanggung jawab ini paling sedikit meliputi kepastian bahwa semua pegawai telah melakukan *attestation* terhadap *Code of Conduct* atau pemantauan dan evaluasi atas kejadian *fraud* serta penetapan tindak lanjut melalui rapat-rapat komite yang terkait.

- **Kebijakan dan prosedur**

  Kebijakan ini telah disusun untuk penerapan pengendalian *fraud* sesuai dengan ukuran dan kompleksitas kegiatan usaha JPMSI saat ini yang hanya memiliki 1 (satu) kantor dan hanya melayani Nasabah Kelembagaan.

- **Struktur organisasi dan pertanggungjawaban**

  Untuk mendukung efektivitas penerapan strategi anti *fraud*, Perusahaan menunjuk unit Kepatuhan/CCOR yang bertugas menentukan strategi anti Fraud. Dalam operasional sehari-hari implementasi strategi anti *fraud* akan dibantu oleh GS&I untuk melakukan investigasi. Pertanggungjawaban penerapan strategi anti Fraud unit Kepatuhan/CCOR kepada Dewan Direksi dilakukan melalui rapat Direksi dan Komisaris.

Anti-Fraud Governance

In formulating and implementing anti-fraud strategies, the anti-fraud governance at JPMSI considers the following aspects:

• Active supervision by the Board of Directors and the Board of Commissioners

This authority and responsibility at least include ensuring that all employees have attested to the Code of Conduct or monitoring and evaluating fraud incidents and determining follow-up actions through relevant committee meetings.

• Policies and procedures

These policies have been formulated for the implementation of fraud control in accordance with the size and complexity of JPMSI's current business activities, which only has one office and serves only Institutional Clients.

• Organizational structure and accountability

To support the effectiveness of anti-fraud strategy implementation, the Company appoints a Compliance/CCOR unit responsible for determining the anti-fraud strategy. In daily operations, the implementation of the anti-fraud strategy will be assisted by GS&I to conduct investigations. The accountability for the implementation of the anti-fraud strategy by the Compliance/CCOR unit to the Board of Directors is carried out through meetings of the Directors and Commissioners.

- **Pengendalian dan Pemantauan**

  Dalam melakukan pengendalian dan pemantauan, JPMSI melakukan langkah untuk meningkatkan efektivitas penerapan strategi anti *fraud* diantaranya melalui pengkajian ulang anggota Direksi dan Komisaris atas penerapan strategi anti fraud maupun kaji ulang operasional oleh Satuan Kepatuhan atas penerapan strategi anti *fraud*, pengendalian di bidang Sumber Daya Manusia (SDM) melalui kebijakan cuti dan aktivitas sosial atau kebersamaan, pemisahan fungsi pelaksanaan aktivitas JPMSI seperti front office dan back office untuk jasa layanana perantara pedagang efek, program *Business Continuity* yang memadai, sistem akuntasi yang memadai untuk menjamin penggunaan data yang akurat dan konsisten dalam pencatatan dan pelaporan keuangan.

Strategi Anti-Fraud

Penerapan strategi Anti-*fraud* di JPMSI dilakukan secara terkoordinasi oleh Satuan kerja Kepatuhan/*Compliance Conduct & Operational Risk (‘*Kepatuhan/*CCOR’)* dan *Global Security & Investigations* (‘GS&I’) dimana isu-isu terkait risiko *fraud* akan dibawa ke forum Rapat Dewan Direksi yang diketuai oleh Presiden Direktur serta Rapat Dewan Komisaris. Selain itu, penerapan strategi anti *fraud* dilakukan dengan cara menumbuhkan kesadaran atas risiko serta kepedulian dan budaya anti *fraud* pada seluruh jajaran organisasi JPMSI dan attestation tahunan *Code of Conduct.* Dalam penerapan strategi anti-fraud, JPMSI menerapkan pilar-pilar strategi anti-fraud sebagaimana diatur di dalam POJK No. 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan, yaitu:

• Control and Monitoring

In conducting control and monitoring, JPMSI takes steps to enhance the effectiveness of the anti-fraud strategy implementation, including through the Board of Directors and Commissioners members review on implementation on strategy anti-fraud, as well as operational reviews by the Compliance Unit on the implementation of the anti-fraud strategy. This also includes control in the field of Human Resources (HR) through leave policies or team-building activities, separation of functions in JPMSI activities such as front office and back office for brokerage services, adequate Business Continuity programs, and a sufficient accounting system to ensure the use of accurate and consistent data in financial recording and reporting.

Anti-Fraud Strategy

The implementation of the anti-fraud strategy at JPMSI is coordinated by the Compliance Conduct & Operational Risk unit ('Compliance/CCOR') and Global Security & Investigations ('GS&I'), where issues related to fraud risk are brought to the Board of Directors meeting chaired by the President Director, as well as the Board of Commissioners meeting. Additionally, the implementation of the anti-fraud strategy is carried out by fostering risk awareness, as well as promoting anti-fraud awareness and culture throughout the JPMSI organization, along with the annual attestation of the Code of Conduct. In implementing the anti-fraud strategy, JPMSI applies the pillars of the anti-fraud strategy as regulated in POJK No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Service Institutions, which are:

a. Pencegahan

Pilar pencegahan memuat langkah untuk mengurangi potensi risiko terjadinya *fraud*, mencakup kesadaran anti *fraud*, identifikasi kerawanan, dan kebijakan mengenal pegawai, penyaringan pemasok dan Nasabah serta langkah lain yang diperlukan oleh Perusahaan untuk pencegahan *fraud*.

a. Prevention

The prevention pillar includes steps to reduce the potential risk of fraud, encompassing anti-fraud awareness, vulnerability identification, and employee due diligence policies, supplier and customer screening and other measures necessary for fraud prevention by the Company.

b. Deteksi

Pilar ini memuat langkah untuk mengidentifikasi dan menemukan *fraud* dalam kegiatan usaha JPMSI seperti kebijakan dan mekanisme penanganan pengaduan *whistleblowing*, pemeriksaan dadakan dan sistem Pengawasan.

b. Detection

This pillar includes steps to identify and uncover fraud in JPMSI's business activities, such as whistleblowing complaint handling policies and mechanisms, surprise inspections, and monitoring systems.

c. Investigasi, Pelaporan dan Sanksi

Pilar investigasi, pelaporan, dan sanksi mencakup langkah untuk penyelidikan atau investigasi, sistem pelaporan, dan pengenaan sanksi terhadap kejadian *fraud* dalam kegiatan usaha JPMSI, serta langkah lain yang diperlukan untuk investigasi, pelaporan, dan pengenaan sanksi.

c. Investigation, Reporting, and Sanctions

The investigation, reporting, and sanctions pillar includes steps for conducting investigations, reporting systems, and imposing sanctions on fraud incidents in JPMSI's business activities, as well as other necessary measures for investigation, reporting, and sanctioning.

d. Pemantauan, Evaluasi dan Tindak-Lanjut

Pilar pemantauan, evaluasi, dan tindak lanjut mencakup langkah untuk melakukan pemantauan, evaluasi, dan menindaklanjuti *fraud*, serta langkah lain yang diperlukan untuk pemantauan, evaluasi, dan tindak lanjut.

d. Monitoring, Evaluation, and Follow-Up

The monitoring, evaluation, and follow-up pillar includes steps for monitoring, evaluating, and following up on fraud, as well as other necessary measures for monitoring, evaluation, and follow-up.