

**KEPUTUSAN SINGKULER DIREKSI/
CIRCULAR DECISION OF THE BOARD OF DIRECTORS
PT KDB TIFA FINANCE Tbk
Nomor/Number : 014/DIR/HO/01/25**

Perihal/Subject : **Pengesahan Perubahan Anti Fraud Regulation /
Ratification of Amendment to Anti-Fraud Regulation**

Menimbang/ <i>With consideration</i>	:	Sehubungan dengan dinamika perubahan peraturan mengenai anti <i>fraud</i> , maka perlu dilakukan penyesuaian atas peraturan internal PT KDB Tifa Finance Tbk ("Perseroan") mengenai hal tersebut dengan Keputusan Sirkuler Direksi / <i>In connection with the dynamics of regulatory changes regarding anti-fraud, it is necessary to make adjustments to the internal regulations of PT KDB Tifa Finance Tbk ("the Company") regarding this matter by Circular Decision of the Board of Directors.</i>
Memperhatikan/ <i>With regard to</i>	:	1. POJK Nomor 12 Tahun 2024 tentang Penerapan Strategi Anti <i>Fraud</i> bagi Lembaga Jasa Keuangan / <i>Financial Services Authority Regulation Number 12 of 2024 concerning the Implementation of Anti-Fraud Strategy for Financial Services Institutions.</i> 2. Keputusan Sirkuler Direksi PT KDB Tifa Finance Tbk Nomor 122/DIR/HO/11/24 tentang Pengesahan Perubahan Anti <i>Fraud Regulation</i> tanggal 15 November 2024 / <i>Circular Decision of the Board of Directors PT KDB Tifa Finance Tbk Number 122/DIR/HO/11/24 concerning Ratification of Anti-Fraud Regulation Amendment dated November 15, 2024.</i>
Keputusan/ <i>Decisions</i>	:	1. Menetapkan dan mengesahkan Perubahan Anti <i>Fraud Regulation</i> Perseroan sebagaimana terlampir yang merupakan satu kesatuan yang tidak dapat dipisahkan dari Keputusan Sirkuler Direksi ini / <i>To stipulate and ratify Amendment to Anti-Fraud Regulation of the Company as attached which is an inseparable part of this Circular Decision of the Board of Directors.</i> 2. Dengan diberlakukannya Perubahan Anti <i>Fraud Regulation</i> ini, maka Keputusan Sirkuler Direksi Perseroan Nomor 122/DIR/HO/11/24 tanggal 15 November 2024 perihal Pengesahan Perubahan Anti-<i>Fraud Regulation</i> dicabut dan dinyatakan tidak berlaku / <i>With the enactment of this Amendment to Anti-Fraud Regulation, hence the Circular Decision of the Board of Directors Number 122/DIR/HO/11/24 dated November</i>

	15, 2024 concerning Ratification of Amendment to Anti-Fraud Regulation is revoked and declared invalid. 3. Apabila dikemudian hari terdapat perubahan dan/atau penyesuaian terhadap Keputusan ini maka akan dilakukan perbaikan sebagaimana mestinya / <i>If later there are changes and/or adjustments to this Decision then improvements will be made as appropriate.</i>
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Demikian Keputusan Sirkuler ini dibuat dan berlaku efektif sejak tanggal yang tersebut di bawah ini/
Thus this Circular Decision is made and is effective from the date stated below.

Tanggal/Date : 24 Januari / January 2025

Direksi/
The Board of Directors, 

1.



Cho Jaeseong
 Presiden Direktur/President Director

2.



Ester Gunawan
 Direktur/Director

3.



Eun Seonghyuk
 Direktur/Director

4.



Ina Dashinta Hamid
 Direktur/Director

ANTI-FRAUD REGULATION

Approved on January 24, 2025

1. PENDAHULUAN

Dalam rangka mencegah terjadinya kasus-kasus penyimpangan operasional di lingkungan PT KDB Tifa Finance Tbk (“Perseroan”), khususnya *fraud* yang dapat merugikan nasabah atau Perseroan, maka diperlukan peningkatan efektifitas pengendalian intern sebagai upaya meminimalkan risiko *fraud* dengan cara menerapkan strategi anti *fraud* yang efektif.

Selama ini, baik secara langsung maupun tidak langsung, pelaksanaan pencegahan *fraud* telah dilaksanakan oleh Perseroan, antara lain melalui penerapan manajemen risiko khususnya sistem pengendalian intern dan pelaksanaan tata kelola yang baik. Namun demikian, agar penerapannya menjadi efektif masih diperlukan upaya peningkatan agar pencegahan *fraud* tersebut benar-benar menjadi fokus perhatian dan budaya di Perseroan pada seluruh aspek organisasi, baik oleh manajemen maupun karyawan.

Strategi anti *fraud* merupakan wujud komitmen manajemen Perseroan dalam mengendalikan *fraud* yang diterapkan dalam bentuk sistem pengendalian *fraud*. Strategi ini menuntut manajemen untuk mengerahkan sumber agar sistem pengendalian *fraud* dapat diimplementasikan secara efektif dan berkesinambungan.

Melihat peningkatan kompleksitas kegiatan usaha di Perseroan serta dengan perkembangan perubahan peraturan perundang-undangan yang berlaku, maka diperlukan adanya pengkinian

1. INTRODUCTION

In order to prevent cases of operational irregularities within PT KDB Tifa Finance Tbk (“the Company”), especially fraud that can harm customers or the Company, it is necessary to increase the effectiveness of internal control as an effort to minimize the risk of fraud by implementing an effective anti-fraud strategy.

Ever since, both directly and indirectly, the implementation of fraud prevention has been implemented by the Company, among others through the implementation of risk management, especially the internal control system and the implementation of good governance. However, in order for its implementation to be effective, improvement efforts are still needed so that fraud prevention is really the focus of attention and culture in the Company in all aspects of the organization, both by management and employees.

Anti-fraud strategy is a form of commitment of the Company's management in controlling fraud applied in the form of fraud control system. This strategy requires management to deploy resources so that fraud control system can be implemented effectively and continuously.

Due to the increasing complexity of business activities in the Company as well as with the development of changes in applicable laws and regulations, it is necessary to update the



terhadap Anti *Fraud* Regulation Perseroan.

Company's Anti-Fraud Regulation.

2. TUJUAN

2. PURPOSE

2.1 Memberikan pedoman dan pengaturan atas penerapan strategi anti *fraud* yang efektif di Perseroan.

2.1 Provide guidelines and regulations of effective anti-fraud strategy at the Company.

2.2 Agar pengendalian *fraud* dapat dilakukan secara prosedural dan integral melalui upaya-upaya pencegahan, pendeteksian, investigasi dan pelaporan serta perbaikan sistem internal untuk mencegah kejadian *fraud* yang berulang.

2.2 In order to control fraud can be done procedurally and integrally through prevention, detection, investigation and reporting efforts and internal system improvement to prevent repeated fraud events.

2.3 Mencegah terjadinya kerugian dan memperburuk reputasi Perusahaan serta memperkuat sistem pengendalian *intern* untuk mencegah kejadian *fraud*.

2.3 Prevent losses and worsen the Company's reputation and strengthen internal control systems to prevent fraud events.

2.4 Meningkatkan efektifitas dan efisiensi dalam mengidentifikasi, menganalisis dan mengambil keputusan atas penanganan serta mitigasi risiko *fraud*.

2.4 Improving effectiveness and efficiency in identifying, analysing and making decisions on handling and mitigating fraud risks.

3. DASAR HUKUM

3. LEGAL BASIS

Ketentuan yang berlaku dalam mendasari penyusunan Peraturan ini adalah sebagai berikut:

The regulations that form the basis for the preparation of this Regulation are as follows:

- a. POJK Nomor 12 Tahun 2024 tentang Penerapan Strategi Anti *Fraud* bagi Lembaga Jasa Keuangan;
- b. Keputusan Sirkuler Direksi PT KDB Tifa Finance Tbk Nomor 122/DIR/HO/11/24 tentang Pengesahan Perubahan Anti *Fraud Regulation* tanggal 15 November 2024.

- a. POJK Number 12 of 2024 concerning the Implementation of Anti-Fraud Strategy for Financial Services Institutions;
- b. Circular Decision of the Board of Directors PT KDB Tifa Finance Tbk Number 122/DIR/HO/11/24 concerning Ratification of Anti-Fraud Regulation Amendment dated November 15, 2024.

4. JENIS PERBUATAN *FRAUD*

4. TYPES OF FRAUD ACTIONS

Jenis perbuatan yang tergolong *fraud* terdiri atas:

The types of action that are classified as fraud consist of:

- a. Penggelapan;

- a. Embezzlement;

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| b. Penipuan; | b. Fraud; |
| c. Pemalsuan; | c. Forgery; |
| d. Pencurian; | d. Theft; |
| e. Penyalahgunaan Kewenangan; | e. Abuse of Authority; |
| f. Korupsi meliputi: | f. Corruption, includes: |
| i. benturan kepentingan yang merugikan Perseroan dan/atau konsumen; | i. conflict of interest that is detrimental to the Company and/or consumers; |
| ii. penyuapan; | ii. bribery; |
| iii. penerimaan tidak sah; dan/atau | iii. unauthorized acceptance; and/or |
| iv. pemerasan. | iv. extortion. |
| g. Penyalahgunaan aset meliputi: | g. Misuse of assets, include: |
| i. penyalahgunaan uang tunai; | i. misuse of cash; |
| ii. penyalahgunaan persediaan; dan/atau | ii. misuse of inventory; and/or |
| iii. penyalahgunaan asset lainnya. | iii. misuse of other assets. |
| h. Kecurangan laporan keuangan meliputi: | h. Financial statement fraud, include: |
| i. melebihkan kekayaan bersih dan/atau pendapatan bersih; atau | a. overstating net worth and/or net income; or |
| ii. mengurangi kekayaan bersih dan/atau pendapatan bersih. | b. reducing net worth and/or net income. |
| i. Pembocoran informasi rahasia; dan/atau | i. Leakage of confidential information; and/or |
| j. Tindakan lain yang dapat dipersamakan dengan <i>fraud</i> sesuai dengan ketentuan peraturan perundang-undangan. | j. Other actions that can be equated with fraud in accordance with the provisions of laws and regulations. |

5. PENERAPAN STRATEGI ANTI *FRAUD*

5. IMPLEMENTATION OF ANTI-FRAUD STRATEGY

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| 5.1 Perseroan wajib menyusun dan menerapkan strategi anti <i>fraud</i> . | 5.1 The Company shall prepare and implement the anti-fraud strategy. |
| 5.2 Direksi dan Dewan Komisaris wajib memastikan penerapan strategi anti <i>fraud</i> di Perseroan berjalan secara efektif. | 5.2 The Board of Directors and Board of Commissioners shall ensure that the implementation of anti-fraud strategy in the Company runs effectively. |
| 5.3 Perseroan memastikan organisasi yang dikendalikan menerapkan strategi anti <i>fraud</i> . | 5.3 The Company shall ensure that the controlled organization implements the anti-fraud strategy. |
| 5.4 Dalam menyusun dan menerapkan strategi anti <i>fraud</i> , Perseroan menetapkan program kerja untuk mencapai sasaran tersebut. | 5.4 In preparing and implementing the anti-fraud strategy, the Company shall establish work programs to achieve the objectives. |

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| <p>5.5 Dalam menyusun dan menerapkan strategi anti <i>fraud</i> yang efektif, Perseroan wajib memperhatikan paling sedikit:</p> <ul style="list-style-type: none"> a. kondisi lingkungan internal dan eksternal; b. kompleksitas kegiatan usaha; c. jenis <i>fraud</i>; d. risiko terkait <i>fraud</i>; dan e. kecukupan sumber daya yang dibutuhkan. | <p>5.5 In preparing and implementing an effective anti-fraud strategy, the Company shall pay attention to at least:</p> <ul style="list-style-type: none"> a. internal and external environmental conditions; b. the complexity of business activities; c. types of fraud; d. risks related to fraud; and e. the adequacy of resources required. |
| <p>5.6 Penerapan strategi anti <i>fraud</i> mencakup pencegahan dan penanganan agar kegiatan usaha Perseroan tidak dimanfaatkan dalam aktivitas yang terkait dengan tindak pidana.</p> | <p>5.6 The implementation of anti-fraud strategy includes prevention and handling so that the Company's business activities are not utilized in activities related to criminal offenses.</p> |
| <p>5.7 Penyusunan dan penerapan strategi anti <i>fraud</i> terdiri atas 4 (empat) pilar, meliputi:</p> <ul style="list-style-type: none"> a. pencegahan; b. deteksi; c. investigasi, pelaporan, dan sanksi; dan d. pemantauan, evaluasi, dan tindak lanjut. | <p>5.7 In The preparation and implementation of the anti-fraud strategy consists of 4 (four) pillars, including:</p> <ul style="list-style-type: none"> a. prevention; b. detection; c. investigation, reporting, and sanctions; and d. monitoring, evaluation, and follow-up. |
| <p>6. KEWAJIBAN PERSEROAN</p> | <p>6. OBLIGATION OF COMPANY</p> |
| <p>6.1 Perseroan wajib menyampaikan kepada Otoritas Jasa Keuangan:</p> <ul style="list-style-type: none"> a. Strategi anti <i>fraud</i>; b. Perubahan terhadap strategi anti <i>fraud</i>; c. Laporan atau koreksi laporan penerapan strategi anti <i>fraud</i>; d. Laporan kejadian <i>fraud</i> berdampak signifikan, secara daring melalui sistem pelaporan Otoritas Jasa Keuangan. | <p>6.1 The Company shall submit to the Financial Services Authority:</p> <ul style="list-style-type: none"> a. Anti-fraud strategy; b. Changes to the anti-fraud strategy; c. Report or correction of report on the implementation of anti-fraud strategy; d. Report on the occurrence of fraud with significant impact, through online reporting system of the Financial Services Authority. |
| <p>6.2 Penyampaian laporan sebagaimana dimaksud angka 6.1 di atas dilakukan secara lengkap, akurat, kini, dan utuh.</p> | <p>6.2 The submission of the report as referred to in number 6.1 above shall be complete, accurate, current, and intact.</p> |
| <p>6.3 Pertanggungjawaban Perseroan atas</p> | <p>6.3 The Company's liability for losses to</p> |

kerugian konsumen atau pihak lain yang timbul akibat kesalahan dan/atau kelalaian Direksi, Dewan Komisaris, pegawai, dan/atau pihak ketiga yang bekerja untuk kepentingan Perseroan dilaksanakan sesuai dengan ketentuan peraturan perundang-undangan.

consumers or other parties arising from errors and/or omissions of the Board of Directors, Board of Commissioners, employees, and/or third parties who work for the interests of the Company shall be carried out in accordance with the provisions of laws and regulations.

- 6.4 Untuk menjaga dan meningkatkan pemahaman dan kepedulian terhadap penerapan strategi anti *fraud*, Perseroan melakukan:
- edukasi dan pengembangan kompetensi kepada pihak internal; dan
 - edukasi dan/atau sosialisasi kepada pihak eksternal, atas seluruh ketentuan mengenai anti *fraud* yang berlaku di Perseroan paling sedikit 1 (satu) kali dalam 1 (satu) tahun.

- 6.4 To maintain and improve understanding and awareness of the implementation of the anti-fraud strategy, the Company conducts:
- education and competency development to internal parties; and
 - education and/or socialization to external parties, on all anti-fraud provisions applicable in the Company at least 1 (one) time in 1 (one) year.

7. UNIT KERJA PENGENDALI *FRAUD*

7. FRAUD CONTROL WORK UNIT

- 7.1 Perseroan wajib memiliki unit kerja atau fungsi yang bertugas menangani penerapan strategi anti *fraud* dalam organisasi Perseroan.
- 7.2 Unit Kerja Pengendali *Fraud* adalah unit kerja yang melaksanakan fungsi pengendalian, pengawasan, dan penanganan atas kejadian *fraud* Perseroan.
- 7.3 Unit Kerja Pengendali *Fraud* sebagaimana dimaksud pada ayat (1):
- bertanggung jawab kepada anggota Direksi; dan
 - memiliki hubungan komunikasi dan pelaporan secara langsung kepada Dewan Komisaris.
- 7.4 Ketua Unit Kerja Pengendali *Fraud* atau Presiden Direktur yang membawahi Unit Kerja Pengendali *Fraud* harus memiliki:
- sertifikat keahlian di bidang anti *fraud*;

- 7.1 The Company is required to have a work unit or function in charge of handling the implementation of anti-fraud strategies in the Company's organization.
- 7.2 Fraud Control Work Unit is a work unit that carries out the function of controlling, supervising and handling the Company's fraud events.
- 7.3 Fraud Control Work Unit as referred to in paragraph (1):
- is responsible to the members of the Board of Directors; and
 - has direct communication and reporting relationship to the Board of Commissioners.
- 7.4 The Head of the Fraud Control Unit or the President Director in charge of the Fraud Control Unit must have:
- certificate of expertise in the field of

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| <ul style="list-style-type: none"> b. pengalaman di bidang anti <i>fraud</i>; dan/atau c. pengalaman yang memadai di bidang kegiatan usaha Perseroan. <p>7.5 Tugas dan tanggung jawab Unit Kerja Pengendali <i>Fraud</i> antara lain:</p> <ul style="list-style-type: none"> a. menyusun kebijakan dan prosedur pengendalian yang khusus ditujukan untuk pengendalian <i>fraud</i>; b. memastikan setiap kebijakan pengendalian melalui kaji ulang baik oleh manajemen (<i>top level review</i>) maupun kaji ulang operasional (<i>functional review</i>) oleh audit internal atas pelaksanaan strategi; c. memastikan adanya pengendalian lain seperti pengendalian aset fisik dan dokumentasi; d. melakukan koordinasi dan pemantauan terhadap pelaksanaan program pengendalian <i>fraud</i> dan strategi anti <i>fraud</i> oleh setiap unit, Departemen, Kantor Cabang atau Kantor Perwakilan; e. memantau, menganalisis dan merekomendasikan rencana edukasi bagi pegawai yang terlibat sesuai dengan kebutuhan pelatihan tentang pedoman pelaksanaan pengendalian <i>fraud</i> dan strategi anti <i>fraud</i> paling sedikit 1 (satu) kali dalam 1 (satu) tahun; f. memastikan adanya standarisasi investigasi Perseroan dengan memperhatikan kerahasiaan, independensi dan kompetensi yang dibutuhkan. Proses ini dapat dilakukan atas permintaan manajemen, pengaduan laporan nasabah, hasil pemeriksaan Audit Internal, dan <i>whistleblowing</i>; g. menyusun mekanisme laporan atas setiap kejadian <i>fraud</i> kepada manajemen | <ul style="list-style-type: none"> anti-fraud; b. experience in the field of anti-fraud; and/or c. adequate experience in the field of the Company's business activities. <p>7.5 Duties and responsibilities of Fraud Control Work Unit, among others:</p> <ul style="list-style-type: none"> a. arrange control policies and procedures specifically aimed at fraud control; b. ensure any control policy through review by either management (top level review) or operational review (functional review) by internal audit of the implementation of the strategy; c. ensure other controls such as physical asset control and documentation; d. coordinate and monitor the implementation of the fraud control program and anti-fraud strategy by each unit, Department, Branch Office or Representative Office; e. monitor, analyze and recommend educational plans for employees involved in accordance with training needs on guidelines for the implementation of fraud control and anti-fraud strategies at least 1 (one) time in 1 (one) year; f. Ensure the standardization of the Company's investigation in accordance with the confidentiality, independency and competence required. This process can be carried out based on management request, customer complaint report, internal audit results and whistleblowing; g. establish a report mechanism for any fraud incidents to the management of the |
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Perseroan maupun kepada Otoritas Jasa Keuangan (OJK); h. melakukan kegiatan pemantauan, evaluasi, dan tindak lanjut pada setiap kejadian <i>fraud</i>; i. bertanggung jawab pada penyampaian laporan-laporan strategi anti <i>fraud</i> sesuai ketentuan OJK.	Company as well as to the Financial Services Authority (OJK); h. conduct monitoring, evaluation, and follow-up activities on each fraud event; i. responsible for delivering anti-fraud strategy reports in accordance with OJK provisions.
7.6 Pembentukan dan/atau penunjukan Unit Kerja Pengendali <i>Fraud</i> Perseroan akan diatur lebih lanjut berdasarkan Keputusan Sirkuler Direksi.	7.6 The establishment and/or appointment of the Company's Fraud Control Work Unit will be further regulated based on a Circular Decree of the Board of Directors.
8. KETENTUAN PERALIHAN Ketentuan teknis lebih lanjut mengenai anti <i>fraud</i> akan diatur berdasarkan Anti <i>Fraud Procedure</i> Perseroan.	8. TRANSITIONAL PROVISIONS Further technical provisions regarding anti-fraud will be regulated based on Anti-Fraud Procedure of the Company.
9. PENUTUP Anti <i>Fraud Regulation</i> ini akan direview secara berkala sesuai dengan perkembangan Perseroan dan perubahan peraturan perundang-undangan yang berlaku.	9. CLOSING This Anti-Fraud Regulation will be reviewed periodically in accordance with the Company's development and changes to the applicable laws and regulations.