

STANDAR OPERASIONAL PROSEDUR (SOP)

KEBIJAKAN ANTI-PENCUCIAN UANG DAN PENCEGAHAN

PENDANAAN TERORISME (APU-PPT)

ANTI MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM (AML-CFT) POLICY

1. TUJUAN & RUANG LINGKUP (PURPOSE & SCOPE):

- **Tujuan:** Melindungi organisasi dari risiko disalahgunakan sebagai sarana pencucian uang atau pendanaan terorisme demi menjaga integritas, reputasi, dan kepatuhan hukum.

Purpose: To protect the organization from the risk of being misused as a vehicle for money laundering or terrorism financing in order to safeguard its integrity, reputation and legal compliance.

- **Ruang Lingkup:** Kebijakan ini berlaku wajib bagi seluruh elemen organisasi, termasuk Pembina, Pengurus, Pengawas, Karyawan Tetap, Karyawan Kontrak, Mitra Lokal dan Internasional, serta Relawan (Volunter).

Scope: This policy is mandatory for all elements of the organization including the Board of Patrons, Board of Management, Board of Supervisors, permanent employee, contract employee, local and international partners and volunteers.

2. PRINSIP UTAMA: *KNOW YOUR DONOR* (KYD) (KEY PRINCIPLE: *KNOW YOUR DONOR* (KYD))

Setiap dana masuk wajib melewati proses uji tuntas berdasarkan kategori nilai donasi:

All incoming funds must undergo a due diligence process based on the donation value category:

- **Donasi Rendah (< Rp 10.000.000):** Cukup mencatat nama, nomor kontak, dan metode pembayaran.

Low value donation (< Rp 10,000,000): Recording the name, contact number and payment method is sufficient.

- **Donasi Signifikan ($\geq$ Rp 10.000.000 / Kumulatif bulanan):** Wajib melakukan verifikasi identitas (KTP/Paspor untuk individu; Akta Pendirian & NPWP untuk institusi/perusahaan).

Significant donations ($\geq$ Rp 10.000.000 / monthly cumulative): Identity verification is mandatory (ID Card / Passport for individuals, Deed of Establishment & Tax ID /NPWP for institution / companies).

- **Donasi Risiko Tinggi:** Dana dari wilayah konflik, negara *tax haven*, atau *Politically Exposed Persons* (PEP)—seperti pejabat publik—wajib mendapatkan persetujuan tertulis dari Direktur Eksekutif setelah divalidasi.

High risk donations: Fund origination from conflict zones, tax havens or political exposed person (PEPs) such as public officials, require written approval from the Executive Director following validation.

3. PROSEDUR PENYARINGAN (**SANCTION SCREENING**)

Sebelum menerima dana dari donatur besar atau menyalurkan bantuan kepada penerima manfaat / mitra lapangan, Karyawan Kepatuhan / Keuangan wajib:

Before accepting funds from major donors or distributing aid to beneficiaries / field partners, compliance / finance employee is required to:

1. Memeriksa nama individu atau lembaga melalui daftar sanksi resmi:

Screen the names of individuals or institutions against official sanctions list:

- **Daftar Terduga Teroris dan Organisasi Teroris (DTTOT)** milik PPATK / POLRI.
The list of suspected terrorism and terrorist organizations (DTTOT) maintained by the PPATK (Financial Transaction Reports and Analysis Center) or the Indonesian National Police (POLRI).
- **Daftar Proliferasi Senjata Pemusnah Massal.**
The list of proliferators of weapons of mass destruction.
- **Daftar Sanksi PBB jika melibatkan jaringan internasional.**
UN Sanctions List if involving international networks.

2. Jika **ditemukan kemiripan nama, transaksi wajib ditangguhkan seketika** dan dilaporkan kepada pimpinan tertinggi untuk investigasi lanjutan.

If a **name match** is found, **the transaction must be immediately suspended and reported to senior management for further investigation**

4. KETENTUAN TRANSAKSI KEUANGAN (**FINANCIAL TRANSACTION PROVISION**)

- **Batasan Uang Tunai:** Organisasi melarang segala bentuk penerimaan atau pengeluaran tunai di atas **Rp 5.000.000** per transaksi, kecuali untuk operasional darurat di lapangan yang tidak memiliki akses perbankan (wajib disertai nota berlapis).

Cash Limits: The organization prohibits any form of cash receipt or expenditure exceeding Rp 5,000,000 per transaction, except for emergency field operations in locations lacking banking access (such as transactions must be supported by multi copy receipts).

- **Rekening Resmi:** Seluruh arus dana wajib melalui rekening bank resmi atas nama organisasi. Dilarang keras menggunakan rekening pribadi, pengurus / karyawan untuk kegiatan organisasi.

Official Account: All fund flows must pass through official bank accounts held in the organization's name. The use of personal account belonging to administrators or employees for organization activities is strictly prohibited.

- **Prinsip Dua Alur Pemutus:** Setiap pengeluaran uang wajib melewati proses pengajuan oleh karyawan program, verifikasi oleh karyawan keuangan, dan persetujuan oleh kepala bagian/direktur.

Four Eyes Principle: Every disbursement of funds must undergo a process involving a request by program staff, verification by finance staff, and approval from department head or director.

5. MITIGASI RISIKO PENYALURAN DANA LAPORAN - **KENALI PENERIMA MANFAAT ANDA** (**RISK MITIGATION FOR FUND DISBURSEMENT – KNOWING YOUR BENEFICIARIES**)

- **Verifikasi Lapangan:** Sebelum bantuan disalurkan, tim program wajib memastikan penerima manfaat atau mitra lokal adalah entitas/individu riil yang berhak, melalui dokumentasi foto, wawancara, atau rekomendasi otoritas lokal yang sah.

Field Verification: Prior to disbursement of aid, the program team must verify that beneficiary or local partner is a genuine and eligible entity or individual through means such as photographic documentation, interviews, or recommendation from legitimate local authorities.

- **Larangan Pengalihan:** Kontrak kerja sama dengan mitra lokal wajib memuat klausul tegas bahwa dana tidak boleh dialihkan kepada pihak ketiga tanpa persetujuan tertulis dari organisasi.

Prohibition on Diversion: Cooperation agreements with local partners must include a strict clause stating that funds may not be diverted to third parties without the organization's written consent.

6. PENCATATAN DAN PELAPORAN (RECORD KEEPING AND REPORTING)

- **Retensi Dokumen:** Semua bukti transaksi, formulir KYD, draf perjanjian, dan laporan keuangan wajib disimpan secara aman (fisik maupun digital) minimal selama **5 (lima) tahun**.

Document Retention: All transaction records, KYD forms, draft agreement, and financial report must be securely stored (in physical or digital format) for a minimum of 5 (five) years.

- **Pelaporan Internal:** Staf yang menemukan indikasi transaksi keuangan tidak wajar wajib mengisi *Formulir Laporan Transaksi Mencurigakan* dan menyerahkannya kepada Pejabat Kepatuhan secara rahasia (*Whistleblowing*).

Internal Reporting: Staff members who detect indications of unusual financial transactions are required to complete a suspicious transaction report form and submit it confidentially to compliance officer; Whistleblowing.m

7. KETENTUAN KHUSUS: DANA HIBAH DARI LUAR NEGERI (SPECIAL PROVISIONS: FOREIGN GRANTS)

7.1. Uji Tuntas Tambahan (*Enhanced Due Diligence - EDD*)

Sebelum menandatangani perjanjian hibah dengan donor luar negeri (pemerintah asing, LSM internasional, korporasi, atau individu asing), organisasi wajib melakukan pemeriksaan latar belakang yang meliputi:

Before signing a grant agreement with a foreign donor (foreign government, international NGO, corporation or foreign individual), the organization is required to conduct a background check that includes:

- **Verifikasi Legalitas Donor:** Memastikan donor asing terdaftar secara sah di negara asalnya dan memiliki reputasi yang bersih dari isu pendanaan ilegal.

Verification of Donor Legality: Ensuring that foreign donors are legally registered in their home countries and have a reputation free from issues regarding illegal funding.

- **Analisis Sumber Dana:** Memastikan dana hibah bukan berasal dari aktivitas ilegal, pencucian uang, atau wilayah yurisdiksi berisiko tinggi yang masuk dalam daftar hitam *Financial Action Task Force* (FATF).

Source of Fund Analysis: Ensuring that grant funds do not originate from illegal activities, money laundering or high-risk jurisdictions include on the Financial Action Task Force (FATF) blacklist).

- **Penyaringan Afiliasi:** Memastikan jajaran direksi, pendiri, dan pemilik manfaat akhir dari lembaga donor tidak terafiliasi dengan organisasi radikal atau terlarang.

Affiliation Screening: Ensuring that the boards of directors, founders and ultimate beneficial owners of donor institutions are not affiliated with radical or banned organizations.

7.2. Kepatuhan Regulasi Nasional – Indonesia (*Compliance with National Regulations – Indonesia*)

Setiap penerimaan dana hibah dari luar negeri wajib mematuhi koridor hukum Indonesia yang berlaku:

Any receipt of grant funds from abroad must comply with the applicable Indonesia legal framework:

- **Perizinan & Registrasi:** Memastikan organisasi telah memiliki izin pemanfaatan bantuan asing atau berkoordinasi dengan Kementerian Dalam Negeri / Kementerian Luar Negeri sesuai dengan regulasi ormas yang berlaku.

Licensing & Registration: Ensure the organization holds a permit for the utilization of foreign aid or coordinates with the Ministry of Home Affairs / Ministry of Foreign Affairs in accordance with applicable regulations regarding mass organizations.

- **Pelaporan Transaksi:** Setiap transaksi masuk dari luar negeri melalui sistem perbankan wajib menyertakan dokumen pendukung (*underlying dokumen*) seperti Perjanjian Hibah kepada bank penerima guna memenuhi kewajiban pelaporan ke Bank Indonesia (BI) dan PPATK.

Transaction Reporting: Every incoming transaction from abroad processed through the banking system must be accompanied by supporting documentation (underlying documents) – such as a grant agreement, submitted to the receiving bank in order to comply with reporting obligations to Bank Indonesia (BI) and the PPATK.

7.3. Pembatasan Penggunaan Dana Asing (*Restrictions on the Use of Foreign Funds*)

- **Larangan Aktivitas Politik:** Dana hibah luar negeri dilarang keras digunakan untuk mendanai kegiatan politik praktis, kampanye pemilihan umum, atau aktivitas yang dapat mengganggu stabilitas keamanan nasional.

Prohibition of Political Activities: Foreign grants are strictly prohibited from being used to fund practical political activities, general election campaigns or activities that could undermine national security stability.

- **Kesesuaian Tujuan Penggunaan:** Penggunaan dana asing harus dipisahkan secara administratif (rekening khusus atau pelacakan proyek terpisah) untuk memastikan 100% dana dialokasikan sesuai tujuan kemanusiaan/sosial yang disepakati.

Alignment of Usage with Objectives: The use of foreign funds must be administratively segregated (e.g, via dedicated accounts or separate project tracking) to ensure that 100% of the funds are allocated in accordance with the agreed upon humanitarian or social objectives.

7.4. Mekanisme Pengembalian Dana (*Refund Mechanism*)

Organisasi berhak menolak atau mengembalikan dana hibah secara sepihak jika di kemudian hari ditemukan bahwa:

The organization reserves the right to unilaterally reject or return grant funds if it is subsequently discovered that:

- Dokumen legalitas donor asing terbukti palsu atau dimanipulasi.
The foreign donor's legal documentation is proven to be forged or manipulated.
- Lembaga donor atau pengurus utamanya masuk ke dalam daftar sanksi internasional (UN/OFAC) atau DTTOT Indonesia.

The donor institution or its key officials appear on international sanctions list (UN/OFAC) or Indonesia's DTTOT (List of Suspected Terrorist and Terrorist Organizations).