

RMI-RMAP Public Due Diligence Report

1. COMPANY INFORMATION

PT ATD MAKMUR MANDIRI (ATD) was established in 2010 with the vision to be the leading tin producer in Indonesia. Over the past few years, PT ATD Makmur Mandiri has been producing high-grade tin metal through continuous improvement in tin smelting and refining technology. In 2015, PT ATD MAKMUR MANDIRI was successfully audited and considered compliant to the Responsible Mineral Assurance Process standard. ATD Smelter ID number is CID002503 and located at Jln. Komplek Industri Jelitik Sungailiat, Bangka Belitung Island, Indonesia. This RMI-Public Due Diligence covered PT ATD MAKMUR MANDIRI production activity in 2024

2. RMAP Assessment Summary

PT ATD MAKMUR MANDIRI has undergone a Responsible Mineral Assurance Process (RMAP) assessment on March 31th, 2022 until April 1st, 2022 and was once again found to be comply with all the standards and protocols. The assessment is valid for Three year. The assessment was conducted by a Responsible Sourcing Audit Firm, in accordance with EICC/CFS/CFSP protocol (now the RMI-RMAP). The summary report is public and can be found on RMI website: <https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/tungsten-smelters-list/conformant-tin-smelters/>

3. Company Supply Chain Policy

PT ATD MAKMUR MANDIRI has developed a supply chain policy to avoid the use of conflict minerals, which indirectly or directly related to armed groups or involved with human right abuses and conflict-affected regions. The supply chain policy based on the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance. PT ATD MAKMUR MANDIRI is committed to addressing any Annex II risk if identified. The Policy was reviewed and approved by top management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (customers, suppliers, employees etc.) and it can be seen on company website at www.atdmmj.com

4. Company Management System

Management Structure

PT ATD MAKMUR MANDIRI follows through on its commitment in the supply chain policy and has established an internal procedure for due diligence as follows:

- The company's Top Management and all management team, as part of the Quality Management System, is responsible to oversee the due diligence program and risk management implementation

- The company has assigned a senior manager to coordinate the work of the relevant departments to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified
- The company conducts due diligence management system training once a year for key staff from all relevant departments required. If there is any updates of the program, the company conducts additional training as necessary

Internal Systems of Control

PT ATD MAKMUR MANDIRI has established & updated its due diligence management system to be aligned with the OECD Guidance and RMAP in March, 2022. The company communicated the update supply chain policy and sourcing requirements to all suppliers in July, 2022. The company has incorporated due diligence requirements into legally binding agreements with suppliers.

PT ATD MAKMUR MANDIRI has established GRIEVANCE MECHANISM Procedure for internal and external use. The Grievance Mechanism allows stakeholders to raise questions or concerns or provide positive feedback and have them addressed in a prompt and respectful manner.

Your report will be treated confidentially, and only necessary parties who are relevant to the investigation will be involved.

Phone:
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Record Keeping System

PT ATD MAKMUR MANDIRI requires that all records relating to the due diligence program are maintained at least for five (5) years and that they be properly used and safely stored.

5. Risk Identification

As part of the requirements from Responsible mineral Assurance Program (RMAP) and in line with the OECD Due Diligence Guidance, PT ATD MAKMUR MANDIRI stated that the tin ores processed at the PT ATD MAKMUR MANDIRI smelter are coming from INDONESIAN MINING COMPANY only such as:

- PT SUMBER ALAM TIMAH JAYA NO IUP: 188.4/286/ESDM/DPMPTSP/2018 at Belinyu, Bangka Regency, Bangka Belitung Province, INDONESIA
- CV BANGKA TIMAH MAKMUR NO IUP: 188.4/285/ESDM/DPMPTSP/2018 at Merawang, Bangka Regency, Bangka Belitung Province, INDONESIA

- CV AGUNG SANGUN JAYA NO IUP : 12102100463480003 at Air Gegas, South Bangka Regency, Bangka Belitung Province, INDONESIA

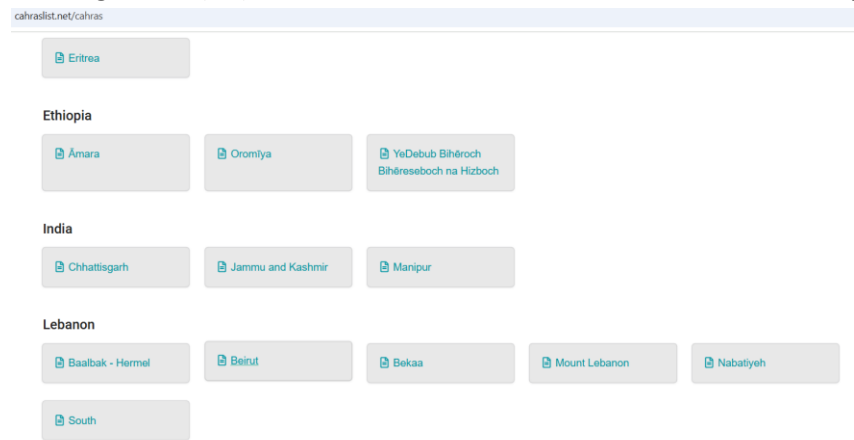
In accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflicts-Affected and High-Risk Areas, PT ATD MAKMUR MANDIRI strongly refuse any materials, which indirectly or directly related to armed groups or involved with human right abuses and conflict-affected regions, including:

- Serious abuse (i.e. torture, cruel, inhuman degrading treatment; forced for compulsory labor; child labor; human right violations and abuses such widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide).
- Direct or indirect support to non –state armed groups.
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of materials.
- Money laundering.
- Non-payment of taxes, fees and royalties to governments.

Conflict-Affected and High-Risk Areas (CAHRA) Identification Procedure

As part of the Responsible Mineral Assurance Program (RMAP) requirements and in line with the OECD Due Diligence Guidance, PT ATD MAKMUR MANDIRI has implemented a Conflict-Affected and High-Risk Areas (CAHRA) Identification Procedure consist of two steps:

1. **Identification of CAHRA using country of origin including region and country of transit**
PT ATD MAKMUR MANDIRI applies two internationally recognized resources to identify suspected CAHRA countries (recommended by RMAP): EU CAHRA LIST & Dodd Frank Act.
 - **EU CAHRA LIST**
The current indicative, non-exhaustive list of conflict-affected and high-risk areas under Regulation (EU) 2017/821 can be visualised on the List of CAHRAs page



Source : <https://www.cahraslist.net/cahras>

PT ATD MAKMUR MANDIRI determines if a country or region has listed in, then it is declared as **CAHRA**

- **The Dodd-Frank Act**
specifically Section 1502, aims to curb the trade of conflict minerals, particularly 3TG (tin, tantalum, tungsten, and gold), which can finance armed groups in the Democratic Republic of Congo and surrounding countries (Central African Republic, South Sudan, Zambia, Angola, the Republic of Congo, Tanzania, Burundi, Rwanda and Uganda)
PT ATD MAKMUR MANDIRI determines if a country or region has listed in, then it is declared as **CAHRA**

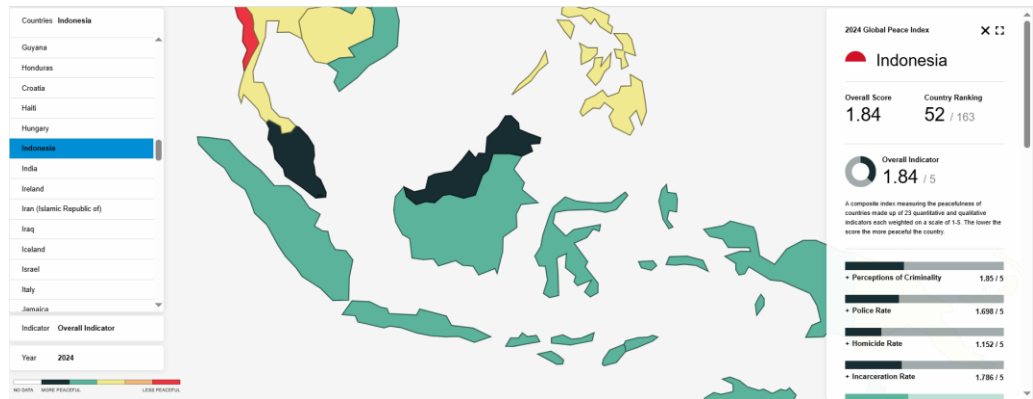
Source : <https://www.responsiblemineralsinitiative.org/about/faq/general-questions/what-is-the-connection-between-rmi-and-us-dodd-frank-act/>

2. Identification of HIGH RISK using resources

PT ATD MAKMUR MANDIRI applies three internationally criteria recognized resources to identify suspected CAHRA countries (recommended by RMAP): Global Peace Index, Corruption Perception Index, and Human Development Index.

<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/>

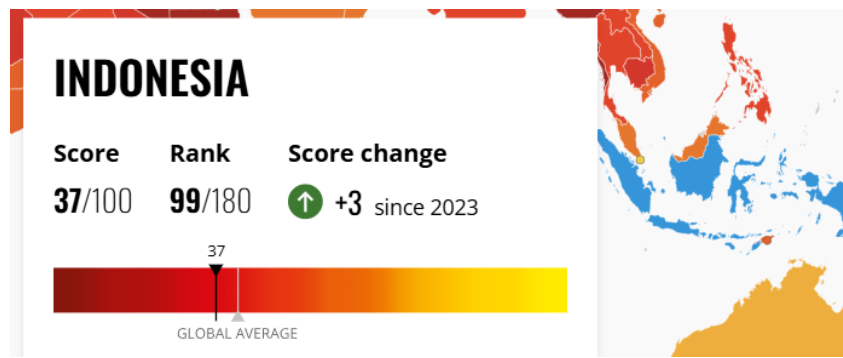
- **Global Peace Index (Identification based on conflict issues)**
GPI is the world’s leading measure of global peacefulness. Its report present the most comprehensive data-driven analysis to date on trends in peace, its economic value, and how to develop peaceful societies. It captures the three absence of violence or the fear of violence across three domains: Safety and Security, Ongoing Conflict, and militarization.



Source: <https://www.visionofhumanity.org/maps/#/>

PT ATD MAKMUR MANDIRI determines if a country or region has a “Low” to “Less Peaceful” intensity level or have index value ≥ 2 , then it is declared as **HIGH RISK AREA**

- **Corruption Perception Index (Identification based on governance issues)**



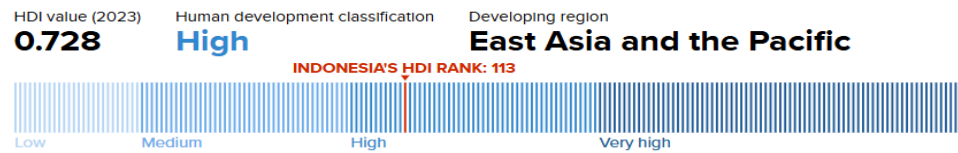
Source: <https://www.transparency.org/en/cpi/2024/>

The Corruption Perceptions Index (CPI) is the most widely used global corruption ranking in the world. It measures how corrupt each country's public sector is perceived to be, according to experts and businesspeople. Each country's score is a combination of at least 3 data sources drawn from 13 different corruption surveys and assessments. These data sources are collected by a variety of reputable institutions, including the World Bank and the World Economic Forum. A country's **score** is the perceived level of public sector corruption on a scale of 0-100, where 0 means highly corrupt and 100 means very clean. A country's **rank** is its position relative to the other countries in the index. Ranks can change merely if the number of countries included in the index changes.

PT ATD MAKMUR MANDIRI determines if a country or region has score under 41, then it is declared as **HIGH RISK AREA**

- **United Nations Development Program — International Human Development Indicators (identification based on human rights issues)**

The Human Development Index (HDI) is a summary measure of average achievement in key dimensions of human development: a long and healthy life, being knowledgeable and have a decent standard of living. The HDI is the geometric mean of normalized indices for each of the three dimensions. The health dimension is assessed by life expectancy at birth, the education dimension is measured by mean of years of schooling for adults aged 25 years and more and expected years of schooling for children of school entering age. The standard of living dimension is measured by gross national income per capita. The HDI uses the logarithm of income, to reflect the diminishing importance of income with increasing GNI. The scores for the three HDI dimension indices are then aggregated into a composite index using geometric mean.



Source: <https://hdr.undp.org/data-center/specific-country-data#/countries/IDN>

PT ATD MAKMUR MANDIRI determines if a country or region has a “low” level HDI Or has rank ≥ 120 then it is declared as **HIGH RISK AREA**.

PT ATD MAKMUR MANDIRI stated that if 2 out of 3 criteria was found to be “High Risk Area”, then the area will be considered as CAHRA and PT ATD MAKMUR MANDIRI will not source its material from that CAHRA

Risk Assessment

Since PT ATD MAKMUR MANDIRI supplies tin ore only from Indonesian mining companies which has valid mining lincense and has mining area in Bangka Belitung Province, INDONESIA so there is no potential risk associated with CAHRA. However, if in the future it is found that PT ATD MAKMUR MANDIRI supplies tin ore from other suppliers and potential risks are found, PT ATD MAKMUR MANDIRI will identify and follow up in accordance with the rules and suggestions from the RMI Organization.