

RMI-RMAP Public Due Diligence Report

1. Company Information

PT TIMAH Tbk was established in 1976 as a Tin metals company. In 2012, PT TIMAH Tbk was successfully audited and found to be compliant to the EICC-CFS-CFSP standard. PT TIMAH Tbk has been compliant ever since. The company has a 2 processing facility in Mentok and Kundur. Mentok Smelter CID number is CID001482 and located at Raya Timah Street, Number 1, Mentok, Bangka Belitung Island, Indonesia. This facility processes tin products. The Due Diligence report period is valid from January 1, 2023 to December 31, 2023.

2. RMAP (formerly CFSP) Assessment Summary

PT TIMAH Tbk has undergone a RMAP assessment on October 19th, 2021 and was once again found to be compliant with all the standards and protocols. The last assessment periode is from July 1, 2018 to September 25, 2021. The company that conducted last assessment is UL Responsible Sourcing. The assessment is valid for Three year and the report was published on April 26th, 2023. The assessment was conducted by a Responsible Sourcing Audit Firm, in accordance with the EICC/CFS/CFSP protocol (now the RMI-RMAP). The summary report is public and can be found on the RMI website:

<https://www.responsiblemineralsinitiative.org/facilities-lists/active-conformant-facilities-list/active-conformant-facilities-list-search/>

3. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, PT TIMAH Tbk has developed a supply chain policy. This policy is fully aligned with the third edition of the OECD Due Diligence Guidance for

Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (CAHRA-OECD Guidance). The policy covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is firmly committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which is committed to support its implementation. The policy has been widely disseminated to customers and vendors alike as part of the quality management system (QMS). It appears clearly on all purchase and sales orders. This policy is also located on the PT TIMAH Tbk website: <https://www.timah.com/blog/our-business/product-legality-and-compliance.html>

4. Company Management System

Management Structure

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

- The company's Board Directors & 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

The company has established/updated its due diligence management system to be aligned with the OECD Guidance and RMAP in January, 2023. The company communicated the updated supply chain policy and sourcing requirements to all

identified upstream suppliers in January, 2023. The company has incorporated due diligence requirements into legally binding agreements with suppliers using PT TIMAH Tbk purchase and sales orders.

Record Keeping System

PT TIMAH Tbk requires that all records relating to the due diligence program are maintained and properly stored for at least Five (5) years.

5. Risk Identification

The company has a robust process to identify risks in the supply chain. PT TIMAH Tbk does not use source from any Conflict Affected-High Risk Areas (CAHRA). All primary tin ore, are solely sourced from our mining concessions. All due diligence is fully consistent with the RMI-RMAP standards and assessment procedures. Given the process for primary materials noted, the company fulfills the Know Your Supplier process in that all of the producers are RMI/RMAP compliant.

Grievance Mechanism

PT Timah Tbk uses Whistleblowing system as Grievance Mechanism. Whistleblowing MIND ID or OpenMIND is an independent reporting facility for anyone to report any violations by individuals within the widespread MIND ID environment. OpenMIND ensures the confidentiality of reports and the identity of reporters. OpenMIND exists to make sure individuals in the MIND ID Group are consistently upholding integrity, professionalism, synergy, and sustainability. This mechanism is also located on the PT TIMAH Tbk website:

<https://timah.com/blog/gcg/openmind.html>



These categories of violations can be reported:

- Criminal actions
- Fraud
- Corruption, Collusion, and Nepotism
- Extortion
- Sexual harassment
- Violations to confidentiality/Code of Ethics
- Racism

Report date: October 31, 2024