

RESPONSIBLE SOURCING GOLD AND SILVER SUPPLY CHAIN POLICY

1. Objective

Realizing potential risk that might happened related to mineral mining, trading and processing, export & import activities from conflicted area and/ or high risk which could bring negative impact significantly, we admit that ANTAM Logam Mulia, have responsible to honor human right, do not contribute to conflict, thus we have commitment to use, promote and stated within contract and/ or any agreement with suppliers and encourage them to take part in responsible gold and silver supply chain from conflicted and high risk area. We commit to keep away from any action which could contribute to conflict financing and subject to relevant UN Resolution, or if applied, to related domestic regulations.

An internal management system has been established through the implementation team to fulfill and ensure the effectiveness of implementation as a company registered in the LBMA Good Delivery List (GDL) and regulates the management, roles and responsibilities, internal audit and scheduling of third party external audits that registered and approved by LBMA with standard criteria of ISO19011:2011 & ISAE 3000 on supply chain due diligence, quality management assurance, training schedules, internal and external/counterparts communication in handling customer complaints. In the implementation has been assigned compliance officer to ensure system applied effectively and report directly to senior management. We, ANTAM Logam Mulia conduct regular training for related employee and other parties and continuously encourage to taking part in LBMA Responsible Gold and Silver Guidance implementation, including reporting suspicious transaction to management.

We also conduct due diligence and “know your customer” process to ensure that gold and silver supply chain transactions are monitored thoroughly and records are maintain efficiently and effectively in order to comply LBMA Responsible Gold and Silver Guidance. Following are our attitudes regarding high risk criteria

2. Serious violation regarding to mineral extraction, transportation or trading activities.

We don't tolerate or take benefit from any parties who contribute, support or facilitate:

- i. All form of torture, cruel behavior, inhumanly or down grading
- ii. All form of forced labor under threat
- iii. All kind of child labor
- iv. Heavy human right violation and other violence, for instance widely sexual abuse
- v. War crime or serious violation on international human law, human crime or genocide.

Regarding risk management to serious violation, we will suspend or terminate any involvement with suppliers that identified be source or related with any parties which conduct serious violation as stated above.

3. Direct or indirect support to non-private armed group

We don't tolerate any direct or indirect support to non-private armed group or its affiliate that

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involve in extraction, transportation, trading, processing or exporting activities of gold and silver or gold-bearing metal, which are:

- i. Illegally control mine location or transportation route, where mineral is traded and other actor in gold supply chain
 - ii. Collect illegal levies or extort money or mineral at points heading to mine location, along transportation route or points where mineral are traded, and/ or
 - iii. Collect illegal levies or extort intermediaries, exporting company or international trading
- Regarding risk management against direct or indirect support to non-private armed group, we suspend or terminate any involvement with suppliers that identified be source or related with any parties that support directly or indirectly to non-private armed group as stated above.

4. Public and private security forces

ANTAM Logam Mulia

- To agree not to give direct or indirect support to public or private security forces which illegally control mine location, transportation route and other actor in gold and silver supply chain that illegally collect levies or extort money or other mineral at points where minerals are traded, or extort levies illegally or extortion to intermediaries, exporting company or international trading
- To admit that public or private security officer in mine location and surrounding area and/ or along transportation route merely play role for law enforcement, including protecting human right, giving protection for miner, equipment and facility and protect mine location and transportation route from any interference on extraction or other legal trade.
- To require public or private security officer on counter parties which involve in gold and silver supply chain to comply with security principals and human rights. We also support selection process to ensure that individual or security forces that known responsible for human violations is/ are not employed.
- To give support to central or local government, international organization and society organization to contribute giving best solution on increasing transparency, proportionality and accountability related to public security officer payment in providing security services.
- To give support to local government, international organization and society organization to avoid or minimize influence from minorities group, for instance artisanal mining to fight against public or private security forces.

Regarding to risk management against public or private security forces, we arrange, adopt and implement risk management plan to main suppliers which identified giving direct or indirect support to public or private security forces to avoid or minimize the risk. We suspend or terminate any involvement with main suppliers if failed to conduct mitigation plan within six months. We also apply same attitude toward other main suppliers that identified have high risk activities.

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5. Bribery and deception of mineral origin

We implement an Anti-Bribery Management System (SMAP) based on ISO/IEC 37001:2016 and carry out certification as a form of commitment in implementing the program to strengthen the implementation of *Good Corporate Governance* (GCG) through a confidential complaint mechanism (Confidential Grievance Mechanism). We don't offer, promise, give or bribe, and will reject bribery to hiding or disguise mineral originalities, tax abuses, cost and royalties paid to government for extract, trade, process, transport and export the minerals.

6. Money Laundering

We support efforts and take steps to contribute on effective money laundering elimination that identified from, or related to extraction, trading, processing or exporting mineral that come from illegal tax, mineral extortion at points heading to mine location, along transportation route or points where mineral are traded by main suppliers. We also do not tolerate any transaction related to terrorism financing.

7. Tax payment, cost and royalties to government

We guarantee that all tax, cost and royalties related to extraction, trading, and exporting mineral from conflicted or high risk area are paid to government in accordance with company position in gold supply chain, and we commit to deliver payment based on principals under Extractive Industry Transparency Initiative (EITI) or other related local regulations.

Regarding to risk management against bribery and deception of mineral origin, money laundering, tax, cost and royalties payment to government, we commit to involve supplier, central or local government institution, international organization, community and influenced third parties, properly, to increase and monitor performance in order to avoid or minimize negative impact risk through measurable steps within proper timeline. We suspend and terminate cooperation with main supplier if they failed on conducting mitigation.

8. World Heritage Sites

We also ensure that there are no minerals including by-products either owned or from suppliers which sourced from designated areas such as protected forest areas, nature conservation and world heritage sites is a landmark or area which is selected by The United Nations Educational, Scientific and Cultural Organisation (UNESCO) as having a cultural, historical, scientific or other form of significance, and is legally protected by international treaties. The sites are judged important to the collective interests of humanity.

9. Environment, Social, & Governance (ESG)

We implement an Environment Management System ISO 14001:2015 (EMS) to ensure the business process be managed to reduce environmental impact risk. We also concern that the sourcing should have good management system regarding air, water, land pollution and incident management plans, as well as water stewardship, especially in water scarce and stressed areas.

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We actively contribute to the community around the area of operation through the sustainable Corporate Social Responsibility (CSR) programs and following Indonesia President Decree (PP Nomor 21 tahun 2019) regarding national action plan for reduce and stop mercury use, we ensure to ban the uses a mercury involved in the mine production, handling and processing of gold in order to limit negative impacts on environment and health and safety issues and to find alternative solution to mercury and engage with upstream producers to encourage them to comply with the International Cyanide Management Code which is a initiative for the gold and silver mining industries, and the producers and transporters of the cyanide used in gold and silver mining.

We always manage and service our people with compliance to the labor regulation regulations as minimum standard, as well as implement Occupational Health Safety System Management ISO 45001:2018 to ensure that all our people have appropriate support for health and safety in the working environment. We also encourage to ensure that all mineral supplier & counterpart do their best practice in comply with Labor National Policy, management of labor issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers.

To make sure all the process governed properly we implement Quality System Management ISO 9001:2015 and for all employee's have commitment to perform Code of Conduct. We respectfully any feedback comment from our stakeholder if seen our people do non ethical business, it can be report to our grievance communication channel by email whistleblowing@antam.com or WA chat 0813191862288.

Definition : "mineral" term in this document refer to mineral that contains of gold and silver.

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