

## RMAP Due Diligence Report

### 1. Company Information

- 1) Company Name : PT Cipta Persada Mulia
- 2) Year of Establishment : 2006
- 3) Company CID Number : CID002696
- 4) 3TG Material Processed : Tin
- 5) Company Location : Brigjen Katamso Street Km. 6, Tanjung Uncang Subdistrict, Batu Aji District, Batam City, Riau Islands Province, Indonesia, Postal Code: 29424
- 6) Reporting Periode : 01<sup>st</sup> September 2023 to 28<sup>th</sup> Februari 2026

PT Cipta Persada Mulia is an integrated tin mining company engaged in exploration, mining, smelting, and refining, located in Riau Islands Province, Indonesia. PT Cipta Persada Mulia is committed to responsible sourcing practices and to ensuring that its supply chain is free from conflict minerals and aligned with internationally recognized standards.

PT Cipta Persada Mulia holds three (3) Mining Business Licenses (Izin Usaha Pertambangan/ IUP) for Production Operations, covering mining areas located on Cibia Waters, Lingga District, Riau Islands Province, Indonesia. PT Cipta Persada Mulia also operates a smelting, refining, and processing facility located in Brigjen Katamso Street Km. 6, Tanjung Uncang Subdistrict, Batu Aji District, Batam City, Riau Islands Province, Indonesia. The smelting, refining, and processing facility produces Refined Tin Ingots.

### 2. RMAP Assessment Summary (All Sources)

- Last Assessment Date for RMAP : 05<sup>th</sup> to 06<sup>th</sup> October 2023  
Current Assessment Date : 01<sup>st</sup> September 2022 to 31<sup>st</sup> August 2023

The assesment carried out by Arche Advisors, Responsible Procurement Audit Company.

### 3. Company Supply Chain Policy (All Sources)

PT Cipta Persada Mulia recognizes its significant social responsibility toward our stakeholders and society at large. Accordingly, our supply chain policy strictly prohibits the purchase of any materials sourced from the Democratic Republic of Congo (DRC), its adjoining countries, or any other Conflict-Affected and High-Risk Areas (CAHRAs).

Through this policy, all such materials are excluded from PT Cipta Persada Mulia's supply chain, ensuring that any metal produced and sold by PT Cipta Persada Mulia can be classified as conflict-free. To verify the origin of incoming tin minerals, PT Cipta Persada Mulia undertakes the following measures:

1) **Legal Compliance**

PT Cipta Persada Mulia holds valid Mining Business Licenses (Izin Usaha Pertambangan/ IUP) for Production Operations issued by the Ministry of Energy and Mineral Resources of the Republic of Indonesia and complies with all applicable Indonesian laws and regulations.

2) **Domestic Sourcing**

In accordance with Indonesian regulations on tin mining, production, and export, PT Cipta Persada Mulia mines, procures, and consumes only tin concentrates sourced from its own concessions in Indonesia.

3) **Good Mining Practices**

All mining activities conducted by PT Cipta Persada Mulia adhere to the principles of Good Mining Practices, including:

- a. Safety of mining operations;
- b. Occupational health and safety;
- c. Environmental conservation;
- d. Good mining technical standards;
- e. Technology and engineering applications;
- f. Reclamation and post-mining rehabilitation;
- g. Community engagement and social responsibility;
- h. Transparency and reporting;
- i. Resource efficiency and waste reduction;
- j. Biodiversity protection;
- k. Emergency preparedness and response; and
- l. Continuous improvement and monitoring.

4) **Conflict-Free Materials**

PT Cipta Persada Mulia never receive or process any materials originating from Conflict-Affected or High-Risk Areas (CAHRAs) anywhere in the world.

5) **Regulatory Compliance**

PT Cipta Persada Mulia complies at all times with both national and international laws related to conflict minerals, including the United Nations Security Council Resolutions and the U.S. Dodd-Frank Act.

6) **Ethical Conduct**

PT Cipta Persada Mulia does not condone any illegal activities within the tin industry or any other industry.

7) **Supplier Requirements**

Tin ore is procured only from Indonesian suppliers who meet predetermined requirements, including:

- a. Possession of complete permit documents, including Mining Business Licenses (Izin Usaha Pertambangan/ IUP) for General Investigation, Exploration, and Production Operation;
- b. Availability of a Feasibility Study (FS) document;
- c. Submission of an Environmental Impact Assessment (AMDAL) if the Mining Business License

- area exceeds 1,000 hectares;
- d. Submission of an Environmental Monitoring and Management Effort (UKL-UPL) document if the Mining Business License area is under 1,000 hectares; and
  - e. Fulfillment of predetermined obligations, including fixed fees (e.g., land rent) and guarantees for reclamation and post-mining activities.
- 8) **Transparency**  
Reports and documentation regarding policy implementation are maintained and made available to relevant stakeholders.
- 9) **Illegal Mining**  
PT Cipta Persada Mulia strictly prohibits the purchase, receipt, or processing of tin or any other materials sourced from illegal mining activities.
- To ensure compliance, PT Cipta Persada Mulia has taken the following measures:
- a. Source tin exclusively from licensed mining areas under its own concessions or approved suppliers with valid permits;
  - b. Verifies that all suppliers possess complete legal documentation, including Mining Business Licenses (Izin Usaha Pertambangan/ IUP), feasibility studies, and environmental approvals;
  - c. Conducts regular inspections and audits of suppliers to ensure no illegal mining practices are involved;
  - d. Implements a Know Your Supplier (KYS) process and reviews supplier compliance annually;
  - e. Applies sanctions, including suspension or termination of contracts, for any supplier found to be engaging in illegal mining activities; and
  - f. This approach ensures that all tin in PT Cipta Persada Mulia's supply chain is legally sourced, conflict-free, and compliant with both Indonesian law and international responsible sourcing standards.
- 10) **Conflict Awareness**  
PT Cipta Persada Mulia recognizes the serious risk of tin originating from conflict areas such as the Democratic Republic of Congo (DRC) and any other Conflict Affected and High-Risk Areas (CAHRAs).
- 11) **Training and Education**  
Personnel involved in tin ore procurement receive regular and periodic education and training.
- 12) **Origin Verification**  
Incoming tin ore is consistently verified against procurement information, including the use of independent third-party services to confirm the origin of tin ores.

This policy has been formally communicated to all relevant stakeholders, including suppliers, customers, and employees.

#### 4. Company Management System

PT Cipta Persada Mulia ensures that the commitments outlined in its supply chain policy are fully implemented through a formal internal due diligence procedure, which encompasses management oversight, staff training, internal control measures, and systematic record keeping

##### 1) Due Diligence Program Management

PT Cipta Persada Mulia has assigned and appointed a Due Diligence Program Manager to coordinate the activities of all relevant departments, including purchasing, quality, production, and warehouse management. The Program Manager ensures that each department fulfills its roles and responsibilities, identifies potential risks, and reports any red flags in accordance with the company's due diligence procedures.

Person In Charge (PIC) for Due Diligence Program Management:

Name : Robin  
Position : Head of Production Department  
Effective Date : 09<sup>th</sup> August 2021

Duties and responsibilities:

- a. Ensure that all tin ore raw materials received in the warehouse originate from PT Cipta Persada Mulia's mining areas or from reputable local suppliers;
- b. Coordinate with relevant departments to ensure the efficient and accurate receipt of raw tin ore in the warehouse;
- c. Supervise and control the quantity of tin ore required for the production process; and
- d. Oversee plant operations to ensure that all processes run smoothly, safely, and efficiently.

##### 2) Training

PT Cipta Persada Mulia conducts annual due diligence management system training once a year for key staff from all relevant departments required in due diligence program. Additional training sessions are provided whenever updates to the due diligence program are implemented.

##### 3) Internal Control System

- a. PT Cipta Persada Mulia has updated its due diligence management system on 12<sup>th</sup> December 2025 to align with OECD Guidelines and the Responsible Minerals Assurance Process (RMAP);
- b. PT Cipta Persada Mulia has updated supply chain policies and tin ore procurement requirements were communicated to all suppliers and partner mines in December 2025; and
- c. PT Cipta Persada Mulia has implemented monitoring procedures for the shipment and receipt of tin ore, as follows:
  - Delivery Process:
    - Each lot of tin ore from the mine site is weighed and labeled;
    - Field supervisors witness loading and unloading, signing the field operation letter; and
    - Field operation letters are co-signed by supervisors and village officials;
  - Admission Process:
    - Tin ore is received at Batam Port from Cibia Waters mining site;
    - Ore is weighed at the warehouse and a receipt is generated;

- Ore is washed, dried, and sampled for tin (Sn) content analysis in the laboratory; and
- Ore meeting Sn and other mineral requirements is assigned a lot code and recorded in the database;
- The Head of the Raw Material Warehouse tracks all incoming and outgoing tin ore; and
- The Production Manager calculates the material balance for production planning;
- Production Process:
  - Tin sand meeting Sn requirements is prepared for smelting; and
  - Supervisors record the weight of raw materials and processing results, maintaining database entries;
- Record Keeping System:
  - All records related to the due diligence program are maintained for a minimum of five years; and
  - Records are properly managed and securely stored in the company's online database.

## 5. Risk Identification

### A. Identify Conflict-Affected and High-Risk areas (CAHRAs)

PT Cipta Persada Mulia's process for selecting suppliers and subcontractors is based on a risk-based due diligence approach. This process begins with a Conflict-Affected and High-Risk Areas (CAHRAs) risk assessment, which includes evaluating the country of origin of tin ores and identifying the locations where the materials are extracted, transported, and processed. The CAHRAs risk assessment is conducted at least annually by responsible senior management, including the General Manager and the Head of Mining Engineering (Kepala Teknik Tambang/ KTT), to ensure the sustainability of production and plant operations.

CAHRAs are defined as areas associated with risks such as armed conflict, widespread violence, rebellion, political instability, weak governance, and serious human rights violations. High-risk areas may also include regions characterized by political repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence. These areas are often associated with significant human rights abuses and violations of national or international law. In its operations, PT Cipta Persada Mulia ensures that it does not purchase or use minerals originating from conflict zones, thereby preventing any conflict minerals from entering its supply chain. This approach is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition, 2016).

For more information, please refer to the website <https://www.transparency.org/en/cpi/2025>.

### B. Identification of CAHRAs Based on Country of Origin

PT Cipta Persada Mulia determines the acceptance of suppliers and processing requests based on risk ratings associated with Conflict-Affected and High-Risk Areas (CAHRAs), in accordance with recognized international references, including the Responsible Minerals Initiative (RMI) guidelines.

For more information, please refer to the website <https://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas/>.

1) **European Union (EU) CAHRAs Reference – Regulation (EU) 2017/821**

The European Union (EU) is committed to ensuring that imports of minerals and metals are sourced responsibly and in line with policies on conflict prevention and sustainable development. Regulation (EU) 2017/821 establishes mandatory supply chain due diligence obligations for EU importers of tin, tantalum, tungsten, and gold (3TG), based on the five-step framework of the OECD Due Diligence Guidance. This regulation requires companies to identify, assess, and mitigate risks in their mineral supply chains to prevent the financing of armed conflict and human rights abuses.

As part of its due diligence process, PT Cipta Persada Mulia refers to the indicative, non-exhaustive list of Conflict-Affected and High-Risk Areas (CAHRAs) developed under the EU framework. Based on this reference, PT Cipta Persada Mulia considers the following countries as CAHRAs (as per 2025 indicative list): **Afghanistan, Benin, Burkina Faso, Burundi, Cameroon, Central African Republic, Colombia, Democratic Republic of the Congo, Egypt, Eritrea, Ethiopia, India, Libya, Mali, Mozambique, Myanmar, Niger, Nigeria, Pakistan, Philippines, Russia, Somalia, South Sudan, Sudan, Ukraine, Venezuela, Yemen, and Zimbabwe.**

**PT Cipta Persada Mulia establishes that if the country of origin of sourced raw materials is included in the above list, it will be classified as a CAHRAs and subject to enhanced due diligence measures or exclusion from the supply chain, in accordance with PT Cipta Persada Mulia’s responsible sourcing policy and OECD-aligned risk management framework.**

For more information, please refer to the website <https://www.cahraslist.net/cahras>.

2) **U.S. Dodd-Frank Act – Section 1502 Reference**

Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act requires companies listed in the United States to disclose whether they use “conflict minerals” (tin, tungsten, tantalum, and gold) and to determine whether these minerals originate from the Democratic Republic of the Congo or its adjoining countries. This regulation aims to promote transparency in supply chains and to prevent the financing of armed conflict and human rights abuses associated with mineral sourcing in the region.

As part of its due diligence framework, PT Cipta Persada Mulia refers to the countries defined under Section 1502 of the Dodd-Frank Act, including the Democratic Republic of the Congo and adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia). **PT Cipta Persada Mulia establishes that if the country of origin of sourced raw materials falls within these specified countries, it will be classified as a Conflict-Affected and High-Risk Area (CAHRAs) and will be subject to enhanced due diligence measures or exclusion from the PT Cipta Persada Mulia’s supply chain, in accordance with its responsible sourcing policy.**

For more information, please refer to the website <https://www.sec.gov/comments/s7-40-10/s74010-547.pdf>.

### 3) **Global Peace Index (GPI) – Conflict Risk Indicator**

The Global Peace Index (GPI) is a widely recognized benchmark for measuring the level of peacefulness across countries worldwide. It provides a comprehensive, data-driven analysis of global peace trends, including the economic impact of violence and the factors that contribute to peaceful societies. The GPI evaluates countries based on indicators such as the level of societal safety and security, the extent of ongoing domestic and international conflict, and the degree of militarization.

The GPI in 2025 shows that global peacefulness continues to decline, with the average level of peace deteriorating for the sixth consecutive year. Peace has reached its lowest level on record, with rising internal and international conflicts, increased militarisation, and geopolitical fragmentation contributing to this trend. The report notes that there are more active state-based conflicts than at any time since World War II, and a growing number of countries are involved in conflicts beyond their borders. Despite this overall decline, some regions and countries continue to rank as relatively peaceful, while others are among the least peaceful worldwide

PT Cipta Persada Mulia utilizes the GPI as part of its external reference framework to assess conflict-related risks in its supply chain. PT Cipta Persada Mulia establishes that countries or regions with a **GPI score above 2.35 (categorized from “Low Peace” to “Very Low Peace”)** are considered **high risk and are therefore subject to enhanced due diligence measures or exclusion from the supply chain.**



For more information, please refer to the website <https://www.visionofhumanity.org/resources/?type=research>.

### 4) **Corruption Perceptions Index (CPI) – Governance Risk Indicator**

Good governance is characterized by the absence of corruption, which includes the abuse of entrusted power for private gain. Corruption can be categorized as grand, petty, or political, depending on the scale of resources misappropriated and the sector affected (Source: Transparency International). Transparency International is a global network leading efforts against corruption, with more than 100 established national chapters. These chapters operate independently and are self-financed, working with governments, civil society, businesses, and media to promote transparency in elections, public administration, procurement, and commercial activities. Transparency International also conducts advocacy campaigns to encourage governments to implement anti-corruption reforms.

PT Cipta Persada Mulia incorporates the Corruption Perceptions Index (CPI) as part of its external risk assessment framework to evaluate governance-related risks in its supply chain. **PT Cipta Persada Mulia considers countries or regions with a CPI score below the global average to be higher risk. Materials sourced from such countries are subject to enhanced due diligence, including additional verification of supplier legal compliance, permits, and operational integrity. If governance risks cannot be sufficiently mitigated, PT Cipta Persada Mulia may**

exclude materials from these areas to ensure alignment with responsible sourcing standards and RMI due diligence requirements.

For more information, please refer to the website <https://www.transparency.org/en/cpi/2025>.

5) **United Nation Human Rights Council**

The United Nations Human Rights Council (UNHRC) is an intergovernmental body within the United Nations system responsible for promoting and protecting human rights globally, as well as addressing situations involving human rights violations and making recommendations. The Council addresses a wide range of thematic human rights issues and country-specific situations throughout the year. The UNHRC consists of 47 Member States elected by the United Nations General Assembly and was established to replace the former United Nations Commission on Human Rights.

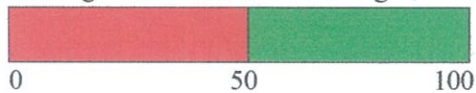
PT Cipta Persada Mulia uses information from the United Nations Human Rights Council (UNHRC) as part of its external reference framework for assessing country-level human rights risks within its supply chain. **In line with this approach, PT Cipta Persada Mulia considers countries or regions that receive fewer than 95 votes in UN General Assembly elections for UNHRC membership representing less than half of the total UN Member States as higher risk areas. Materials sourced from these regions are subject to enhanced due diligence, including verification of supplier compliance with human rights, labor standards, and relevant legal requirements.** This framework ensures that PT Cipta Persada Mulia's supply chain practices align with internationally recognized human rights standards and RMI due diligence guidelines.

For more information, please refer to the website <https://www.ohchr.org/en/hr-bodies/hrc/about-council>.

6) **ACLED Conflict Index 2025**

The ACLED Conflict Index is a global assessment published annually by the Armed Conflict Location & Event Data Project (ACLED), an independent non-profit organization. The Index evaluates conflict levels in every country and territory in the world based on four key indicators: deadliness (number of fatalities from political violence), danger to civilians (events specifically targeting civilian populations), geographic diffusion (spatial spread of conflict across the country), and fragmentation (number of active armed groups involved). The Index ranks the top 50 countries and territories experiencing the most extreme, high, or turbulent levels of conflict globally. Countries not appearing in the top 50 are considered to have a relatively low level of armed conflict.

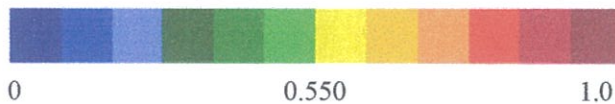
According to PT Cipta Persada Mulia, a country that appears in the ACLED Conflict Index Top 50 ranking is considered to be at high risk.



For more information, please refer to the website <https://acleddata.com/conflict-index-2026-watchlist>.

### 7) UNDP Human Development Index (HDI) 2025

The Human Development Index (HDI) is a composite statistic published annually by the United Nations Development Programme (UNDP) that measures a country's average achievement in three key dimensions of human development: a long and healthy life (measured by life expectancy at birth), knowledge (measured by mean years of schooling and expected years of schooling), and a decent standard of living (measured by Gross National Income per capita). The HDI was created to emphasize that people and their capabilities should be the ultimate criteria for assessing the development of a country, not economic growth alone. Countries with high HDI scores tend to have stable governance, strong institutions, rule of law, and respect for human rights, which are direct indicators of reduced conflict and political risk. The HDI scale ranges from 0 to 1.0, with scores above 0.700 classified as High Human Development, indicating a stable and well-governed society. PT Cipta Persada Mulia stated that if a country has an HDI score below 0.550 (Low Human Development category), then it is declared as high risk.



For more information, please refer to the website <https://hdr.undp.org/data-center/human-development-index>.

### Conclusions:

Based on our latest assessment, PT Cipta Persada Mulia confirms that all countries and regions from which we source materials are currently not listed in the EU CAHRAs or under the U.S. Dodd-Frank Act Section 1502. PT Cipta Persada Mulia risk management framework defines that if two or more of the three key risk criteria (conflict, governance, and human rights) are identified as high risk, the relevant country or region will be classified as a CAHRAs.

In such cases, **PT Cipta Persada Mulia will not source materials from those areas to maintain responsible sourcing and supply chain integrity. The CAHRAs assessment is reviewed and updated at least annually by designated senior management, including the General Manager and Head of Mining Engineering (Kepala Teknik Tambang/ KTT) to ensure ongoing compliance with international standards and the sustainability of production and plant operations.**

Person In Charge (PIC):

Name : Robin

Position : Head of Production Department

### C. Identification of CAHRA Using External Resources

PT Cipta Persada Mulia holds three (3) Mining Business Licenses (Izin Usaha Pertambangan/ IUP) covering a total area of 11,550 hectares in Cibia Waters, meanwhile PT Prima Nusa Artha Unggul area of 4,241 hectares in Karimun Waters. PT Cipta Persada Mulia's business operations are fully integrated, from mining to processing and refining. The relationship between PT Cipta Persada Mulia and PT Prima Nusa Artha Unggul is formalized through a toll smelt agreement, and PT Cipta Persada Mulia sources exclusively from its own mining areas. In addition to the national CAHRAs identification methodology,

PT Cipta Persada Mulia has developed enhanced supplier selection and qualification procedures to address additional risks associated with responsible sourcing. These procedures involve comprehensive review and documentation for all potential new suppliers.

When collaborating with suppliers, PT Cipta Persada Mulia prioritizes compliance with the laws and regulations of the Republic of Indonesia. PT Cipta Persada Mulia ensures that all suppliers possess valid permits and legal documents, including:

- 1) Company legal registration and permits.
- 2) Legal status of directors and shareholders.
- 3) Deed of incorporation.
- 4) Business license (Nomor Induk Berusaha/ NIB).
- 5) Taxpayer Identification Number (NPWP).
- 6) Mining business license (Izin Usaha Pertambangan/ IUP) for production operations.
- 7) Clear and Clean certification.

PT Cipta Persada Mulia requires original information and supporting documents for every transaction involving the procurement of tin ores. Suppliers who fail to meet the established criteria and requirements are subject to sanctions. All suppliers are required to certify that every material delivered to PT Cipta Persada Mulia is sourced in accordance with PT Cipta Persada Mulia's supply chain policy, and all documentation follows CAHRAs related procedures. PT Cipta Persada Mulia conducts screening of all suppliers against international sanctions lists and lists of prohibited persons using the SAP Global Trade Services (GTS) compliance system. This includes official lists from the EU and other countries, which are updated regularly. This process provides additional assurance that PT Cipta Persada Mulia's business partners are not affiliated with terrorist organizations, narcotics traffickers, or other illegal groups.

#### D. Risk Assessment

PT Cipta Persada Mulia has not identified any potential risks related to Conflict-Affected and High-Risk Areas (CAHRAs), as all sourced raw materials originate from countries and areas that are classified as non-conflict. However, PT Cipta Persada Mulia maintains a proactive approach to risk management. Should potential CAHRAs-related risks be identified in the future, PT Cipta Persada Mulia will immediately assess, document, and address them in accordance with the guidelines and recommendations of the Responsible Minerals Initiative (RMI). This ensures ongoing compliance with responsible sourcing practices and continuous improvement of the PT Cipta Persada Mulia's supply chain due diligence program.

#### E. CAHRAs Assessment

Based on the Conflict-Affected and High-Risk Areas (CAHRAs) assessment procedure, the sourcing areas of PT Cipta Persada Mulia's resources are all classified as **low-risk**, as determined through multiple internationally recognized reference sources:

- 1) **EU CAHRAs List – Regulation (EU) 2017/821:** None of the PT Cipta Persada Mulia sourcing origins are from countries listed in the EU CAHRAs list.
- 2) **U.S. Dodd-Frank Act – Section 1502 Reference:** None of the PT Cipta Persada Mulia's sourcing origins are from countries listed under the U.S. Dodd-Frank Act Section 1502.
- 3) **Global Peace Index (GPI):** The sourcing areas are exclusively within PT Cipta Persada Mulia's mining operations in Indonesia. The Republic of Indonesia has a Global Peace Index (GPI) score of

approximately 1.8–1.9 in 2025, which is categorized as a relatively high level of peace. Therefore, Indonesia is considered a low-risk area in terms of conflict-related risks.

- 4) **Corruption Perceptions Index (CPI):** According to the latest Corruption Perceptions Index (CPI), The Republic of Indonesia’s score remains below the global average, indicating relatively elevated governance risks. Therefore, Indonesia is classified as a higher-risk area in terms of governance and is subject to enhanced due diligence measures.
- 5) **United Nations Human Rights Council (UNHRC):** The Republic of Indonesia has previously held a seat in the United Nations Human Rights Council (UNHRC), reflecting a level of international recognition in human rights engagement. Based on available international references and the absence of widespread or systematic human rights violations relevant to PT Cipta Persada Mulia’s operations, The Republic of Indonesia is considered a relatively low-risk area in terms of human rights. This assessment is subject to periodic review as part of PT Cipta Persada Mulia’s ongoing due diligence process.
- 6) **ACLED Conflict Index 2025:** The Republic of Indonesia does not appear in the Top 50 most conflict-affected countries and territories in the world. This means Indonesia is not categorized as a high-conflict country, so we declared Indonesia is a Low Risk.
- 7) **UNDP Human Development Index (HDI) 2025:** The Republic of Indonesia has an HDI score of 0.728 (High Human Development category, ranked 113<sup>th</sup> out of 193 countries) based on the UNDP Human Development Report 2025, which is above our threshold of 0.550, so we declared Indonesia is a Low Risk Area.
- 8) **Frequency of CAHRAs Assessment:** PT Cipta Persada Mulia conducts CAHRAs assessments whenever updated or new information on sourcing areas becomes available and/or at least once per year, to ensure ongoing compliance with responsible sourcing standards.

Based on the most recent assessment of external sources, **PT Cipta Persada Mulia confirms that the countries and regions from which it sources materials are not included in the EU CAHRAs list or identified under the U.S. Dodd-Frank Act Section 1502.** In evaluating country-level risks across the three key criteria (conflict, governance, and human rights), the Corruption Perceptions Index (CPI) indicates that the Republic of Indonesia presents relatively elevated governance risks. However, PT Cipta Persada Mulia applies a risk-based approach whereby a country or region is classified as a Conflict-Affected or High-Risk Area (CAHRAs) only if at least two of the three criteria are assessed as high-risk. As only one criterion (governance) is identified as higher risk, while conflict and human rights indicators remain within acceptable levels, the Republic of Indonesia is currently considered a low-risk sourcing area. This assessment is subject to periodic review in line with the PT Cipta Persada Mulia’s ongoing due diligence process. Furthermore, the mining sites located in the Riau Islands Province are not identified as CAHRAs based on current assessments using internationally recognized references. In this case, the Republic of Indonesia maintains a regulatory framework governing mining activities, including licensing, environmental management, and operational compliance, which supports legal and responsible mining practices.

This assessment is subject to periodic review in line with the PT Cipta Persada Mulia’s due diligence procedures and evolving external risk indicators.

#### F. Know Your Supplier (KYS) Program

PT Cipta Persada Mulia prioritizes compliance with the laws and regulations of the Republic of Indonesia when collaborating with suppliers. To ensure responsible sourcing, the Company verifies that all suppliers possess valid permits and legal documentation, which include:

- 1) Company legal registration and permits.
- 2) Legal status of directors and shareholders.
- 3) Deed of incorporation.
- 4) Business license (Nomor Induk Berusaha/ NIB).
- 5) Taxpayer Identification Number (NPWP).
- 6) Mining business license (Izin Usaha Pertambangan/ IUP) for production operations.
- 7) Clear and Clean certification.
- 8) Compliance with Company regulations and RMI Due Diligence.
- 9) Commitment to transparency and adherence to applicable the Republic of Indonesia regulations.
- 10) Valid contract for a minimum of one year.
- 11) Transactions conducted via non-cash or bank transfer.

PT Cipta Persada Mulia implements the following measures to ensure compliance with its supply chain policy and RMI due diligence (Supplier Due Diligence Procedures) requirements:

- 1) Original information and supporting documents are required and verified for every transaction to ensure traceability and authenticity.
- 2) All transactions are conducted through bank transfer or other cashless payment methods to enhance transparency and accountability.
- 3) PT Cipta Persada Mulia's supply chain policy and RMI due diligence requirements are communicated to all suppliers and mining partners.
- 4) Suppliers are required to comply with all applicable laws and regulations, including the payment of royalties and taxes, adherence to labor regulations, and compliance with ethical standards, including human rights and anti-bribery principles.
- 5) Suppliers must complete the PT Cipta Persada Mulia's due diligence questionnaire and submit a written commitment letter confirming adherence to company policies, including RMAP requirements.
- 6) Suppliers are required to enter into a formal contract with PT Cipta Persada Mulia for a minimum period of one (1) year. Non-compliance with the established requirements may result in corrective actions, including suspension or termination of business relationships.

Approved Supplier: The KYS assessment is reviewed annually or whenever there are additional suppliers or changes in tin sand sourcing areas. Sanctions are applied to suppliers who fail to meet the established criteria or requirements.

#### G. Red Flag Management

PT Cipta Persada Mulia recognizes that potential red flags may arise within the business process. PT Cipta Persada Mulia has established Standard Operating Procedures (SOPs) and business procedures covering the full supply chain, from supplier selection and tin ore processing to ingot production and sales. Red flags are defined as indicators of unusual activity or risk that require further investigation. PT Cipta Persada Mulia has implemented a structured Red Flag Assessment, which includes:

- 1) Identification of potential red flags.

- 2) Evaluation of associated risks and potential consequences.
- 3) Implementation of controls and corrective actions based on the assessment.
- 4) The Red Flag procedure is reviewed at least annually and whenever indications of potential risks arise, particularly in the Riau Islands, Indonesia. General Manager and the Head of Mining Engineering (Kepala Teknik Tambang/ KTT) are responsible for conducting these reviews, ensuring that all identified risks are effectively mitigated and the supply chain remains compliant with company policies and RMI guidelines.

## 6. Risk Management

Only for high-risk procurements.

## 7. Labor Policy

PT Cipta Persada Mulia is committed to complying with the applicable labor laws and regulations of the Republic of Indonesia, including:

- 1) Law Number 13 of 2003 on Manpower, as amended by Law Number 11 of 2020 on Job Creation and its implementing regulations.
- 2) Government Regulation Number 35 of 2021 concerning Fixed-Term Employment Agreements, Outsourcing, Working Hours, and Termination.
- 3) Minister of Manpower Regulation Number 16 of 2011 and other relevant labor regulations.

Key Labor Commitments:

- 1) The Company strictly prohibits child labor. Employee age is verified through official identification documents such as the National Identity Card (KTP) and/or birth certificate, in accordance with applicable laws.
- 2) PT Cipta Persada Mulia does not employ any form of forced labor, including debt bondage or coercive employment practices.
- 3) The Company ensures that all employees are treated fairly, ethically, and without discrimination, in accordance with Indonesian labor laws and internationally recognized human rights standards.

Protection of Labor Force

- 1) Working hours, overtime, and shift schedules are established and monitored in accordance with Government Regulation Number 35 of 2021 and other applicable regulations.
- 2) Employees are enrolled in the national social security programs administered by BPJS Kesehatan (health insurance) and BPJS Ketenagakerjaan (employment and pension benefits), in compliance with Indonesian law.
- 3) PT Cipta Persada Mulia provides appropriate Personal Protective Equipment (PPE) and implements occupational health and safety measures in line with applicable regulations and industry standards.
- 4) Employees are entitled to paid leave, including annual leave and other statutory leave, in accordance with Indonesian labor regulations. Leave scheduling is managed to ensure operational continuity while respecting employee rights, including for employees residing both within and outside the Batam City area.
- 5) PT Cipta Persada Mulia implements specific protections for female employees, including provisions related to maternity leave, menstrual leave, and workplace safety, in accordance with applicable regulations.
- 6) Salaries and wages are paid in a timely manner and in accordance with employment agreements,

applicable minimum wage regulations, and statutory requirements.

**Company Regulations:**

- 1) Ensure compliance with applicable legal requirements.
- 2) Define the rights and obligations of employees and management.
- 3) Promote harmonious industrial relations.
- 4) Foster a safe, fair, and ethical working environment.

PT Cipta Persada Mulia Regulations are communicated to all employees and are periodically reviewed and updated to reflect changes in applicable laws and operational practices.

**8. Grievance Handling Process/ Whistleblowing System**

PT Cipta Persada Mulia recognizes that effective implementation of supply chain policies requires active participation from all internal and external stakeholders. To support this, the Company has established a Grievance Handling Process and Whistleblowing System to manage complaints, unlawful behavior, or unethical acts.

**Key Features of the Whistleblowing System:**

- 1) The system allows employees, members of the Board of Commissioners, Directors, and external stakeholders to report suspected violations through a confidential and independent mechanism. Anonymous reporting is permitted where allowed by applicable regulations.
- 2) The Whistleblowing System serves as an alternative channel when formal reporting lines (e.g., supervisors or internal departments) are not effective or appropriate.
- 3) The Company ensures the confidentiality of the whistleblower's identity and prohibits any form of retaliation. Whistleblowers are entitled to receive updates on the status of their reports, where applicable.

PT Cipta Persada Mulia investigates reports related to actions that may harm PT Cipta Persada Mulia or violate applicable laws, regulations, or ethical standards (scope of reportable violations) including but not limited to:

- 1) Violations of applicable laws and regulations.
- 2) Misuse of position for personal or third-party benefit.
- 3) Fraud, deception, or falsification of records.
- 4) Conflicts of interest.
- 5) Gratification, bribery, corruption, or theft.
- 6) Other unethical conduct that may impact the integrity of the PT Cipta Persada Mulia's operations or supply chain.

Whistleblowers can submit reports through the following:

- Website : <https://ciptapersadamulia.co.id/>  
Email : [info@ciptapersadamulia.co.id](mailto:info@ciptapersadamulia.co.id)  
Telephone : +62 778 409 3912 (Batam)  
+62 212 957 4542 (Jakarta)

PT Cipta Persada Mulia has established a structured process for handling whistleblowing reports to ensure timely, fair, and transparent investigations, as outlined below:

- 1) The whistleblower submits the report using the designated reporting channels provided by PT Cipta Persada Mulia.
- 2) The Whistleblowing Team verifies the completeness and relevance of the report.
- 3) The Whistleblowing Team analyzes the report within seven (7) working days.
- 4) If necessary, an Investigation Team, appointed by the Whistleblowing Team, conducts a detailed investigation within seven (7) working days.
- 5) The results of the investigation are submitted to the Director for review and discussion.
- 6) If the process exceeds fourteen (14) working days, the Whistleblowing Team informs the whistleblower of the delay and provides an update on the status.
- 7) If a violation is confirmed, appropriate sanctions are applied. If the report is unsubstantiated, an official report is communicated to the whistleblower.
- 8) For cases requiring escalation, the Whistleblowing Team notifies senior management and submits a formal report.

This system ensures transparency, accountability, and protection of stakeholders while promoting compliance with company policies, Indonesian law, and RMI guidelines.

#### 9. Training Process

PT Cipta Persada Mulia conducts regular training programs to ensure all employees involved in mining, processing, and refining activities are competent, compliant with regulations, and aware of health, safety, and operational standards.

#### Training Sessions Conducted:

Date	Training Topic	Description
October 11 <sup>th</sup> , 2023	Production	Warehouse Sampling Tin ore Training.
May 07 <sup>th</sup> , 2024	Office and Administrative Management	Office and Administrative Management Training.
August 12 <sup>th</sup> , 2024	Lab Training	Lab Technicians Training.
December 7 <sup>th</sup> , 2024	Refining and Crystallizer Process	Refresher training on the refining process, including crystallizer operations, process optimization, and quality control.
March 11 <sup>th</sup> , 2025	Health and Safety Management	Refresher training on workplace health and safety procedures for mining operations.
May 7 <sup>th</sup> , 2025	Office and Administrative Management	Refresher training focused on office operations, administrative procedures, and internal controls.
May 12 <sup>th</sup> , 2025	Mining Safety Management System (“Sistem Manajemen Keselamatan Pertambangan”)	Refresher training on mining safety management, including hazard identification, risk control, and compliance with regulations.

Date	Training Topic	Description
June 07 <sup>th</sup> , 2025	Refining and Crystallizer Process	Refresher training on the refining process, including crystallizer operations, process optimization, and quality control.
November 21 <sup>st</sup> , 2025	Document Management System	Refresh training document management system.

All training sessions are documented and reviewed regularly to ensure employees are equipped to comply with legal requirements, company policies, and RMI due diligence standards.

Batam, 03<sup>rd</sup> March 2026  
PT Cipta Persada Mulia



**Darwis Leonardo Fensury**  
Director