

SUPPLIER SUSTAINABILITY CODE OF CONDUCT



PT Aneka Tambang (Persero) Tbk.

I. Purpose

As part of PT ANTAM Tbk's commitment to sustainability across all business lines, this Supplier Sustainability Code of Conduct is designed to ensure that all ANTAM suppliers operate in accordance with the company's sustainability principles. This code of conduct supports compliance with national regulations, including the Ministry of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023, applicable internal Management Policies, and sector-specific mining regulations.

Through this code of conduct, ANTAM aims to create long-term value for stakeholders by integrating Environmental, Social, and Governance (ESG) principles into the supply chain. Suppliers are expected to conduct their operations responsibly and adhere to the sustainability standards established by the company.

II. Scope

The scope of the ANTAM Supplier Sustainability Code of Conduct applies to all entities, organizations, or individuals that provide goods or services to ANTAM that meet specified criteria. This code of conduct encompasses various aspects of sustainability that suppliers must adhere to, ensuring that the entire ANTAM supply chain operates in accordance with established sustainability principles.

III. Business Ethics

ANTAM is committed to upholding high standards of ethics and integrity in conducting its business and requires its employees to work honestly while avoiding corruption and bribery. ANTAM requires its suppliers to share the same commitment to ethics and integrity, as outlined below:

1. Comply with all laws and regulations related to business ethics and integrity applicable in Indonesia.
2. Avoid engaging in bribery, corruption, facilitation payments, and any prohibited business practices.
3. Adhere to anti-corruption and anti-money laundering laws and regulations, as well as ANTAM's Anti-Corruption and Anti-Bribery Policy.
4. Avoid actions that may lead to conflicts of interest.
5. Maintain the confidentiality of all non-public information regarding ANTAM, including any information obtained by the supplier in the course of performing their duties.
6. Comply with applicable laws and regulations regarding privacy and personal data protection.

IV. Environment

1. Environmental Management

ANTAM is committed to protecting the environment and strives to prevent and mitigate any environmental impacts that may result from its operations. ANTAM requires its suppliers to adopt best practices in environmental management. Our suppliers must:

- a. Comply with all applicable environmental laws and regulations in Indonesia and implement an effective environmental management system.
- b. Establish mechanisms to identify and assess opportunities to reduce or eliminate the environmental impacts of their activities, including the goods they supply and the services they provide.

- c. Preserve biodiversity, manage energy, including water resources, efficiently use natural resources, control emissions and pollution, and implement waste management systems.

V. Human Rights and Working Conditions

1. Employment and Human Rights

As a member of the United Nations Global Compact, ANTAM is committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. ANTAM requires all suppliers to:

- a. Comply with all applicable labour laws and regulations in Indonesia.
- b. Ensure equitable working conditions, including fair wages, reasonable working hours, rest periods, and paid leave.
- c. Prohibit all forms of forced labour and the use of child labour in their operations.
- d. Uphold workers' rights to freedom of expression, peaceful assembly, and association.
- e. Enforce anti-discrimination policies, ensuring equal treatment of employees regardless of religion, race, or gender identity.
- f. Treat all employees with dignity and respect, avoiding the use of violence and prohibiting physical or verbal harassment, including sexual harassment or any other forms of abuse.
- g. Respect internationally recognized human rights as outlined in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and other applicable international human rights principles, as well as Indonesian human rights laws and regulations.
- h. Establish an effective grievance mechanism for suppliers' employees, business partners, and communities whose rights may be affected by supplier activities.
- i. Take remedial action for any human rights impacts that may result from, or be contributed to by, supplier activities.

2. Occupational Health and Safety (OHS)

ANTAM prioritizes the occupational health and safety (OHS) of employees, suppliers, contractors, and business partners as a core operational value. To ensure this commitment, all parties are required to:

- a. Comply with all applicable OHS regulations in Indonesia.
- b. Apply an effective OHS management system.
- c. Apply the Mining Safety Management System (SMKP).
- d. Implement the Contractor Safety Management System (CSMS)
- e. Provide a secure and healthy workplace, including appropriate personal protective equipment (PPE) at no cost.
- f. Strive to eliminate fatalities, injuries, and work-related health issues.
- g. Regularly review and enhance safety programs and practices to improve OHS performance.
- h. Establish channels for employees to communicate and raise grievances related to occupational health and safety (OHS).

3. Community Engagement

ANTAM believes that community engagement is essential to ensure the success of its operations and maintain the social license to operate. ANTAM is committed to conducting community engagement and contributing to the welfare improvement of communities in the areas where it operates. We expect our suppliers to share this same commitment. ANTAM requires its suppliers to uphold similar commitments as follows:

- a. Establish harmonious relationships with local communities around ANTAM's operational areas.
- b. Avoid the use of violence and prevent conflicts with local communities in all operational areas of ANTAM.
- c. Respect the culture, beliefs, and values of indigenous and local communities throughout ANTAM's operational areas.
- d. Engage in dialogue and consultations with local communities and indigenous peoples across ANTAM's operational areas.
- e. Maintain effective communication with communities to resolve disagreements, issues, and challenges, ensuring fair and mutually beneficial outcomes.
- f. Regularly evaluate the potential and actual impacts of their activities on surrounding communities, integrate measures to mitigate the potential impacts, and address actual impacts in their work plans.

VI. Complaint Mechanism

Suppliers can file complaints regarding unethical actions by ANTAM employees or other related parties that may hinder their compliance with this Supplier Sustainability Code of Conducts through the available complaint system on the following website (<https://www.antam.com/en>), the Whistleblower System (WBS), MIND ID, or through the reporting page provided.

Additionally, any disputes related to the supplier's compliance with this Code of Conduct will be resolved in accordance with the dispute resolution clause in the contract between the supplier and ANTAM.

VII. Monitoring, Assessment, Audit and Review

Each supplier is expected to self-monitor their compliance with ANTAM's Supplier Sustainability Code of Conduct.

ANTAM will periodically evaluate the implementation of this code of conduct, including through audits by independent third parties. This Supplier Sustainability Code of Conduct will be reviewed and updated regularly as needed to ensure its relevance and effectiveness in supporting the company's sustainability objectives.

VIII. Reference

This Supplier Sustainability Code of Ethics is developed in accordance with the following guidelines:

1. United Nations Guiding Principles - Business and Human Rights.
2. ILO Declaration - Fundamental Principles and Rights at Work.
3. Indonesia Financial Services Authority (OJK) Regulation No. 21/POJK.04/2015 - Implementation of Governance Guidelines.
4. Indonesia Financial Services Authority (OJK) Regulation No. 51/POJK.03/2017 - Implementation of Sustainable Finance for Financial Service Institutions, Issuers, and Public Companies.
5. ISO 14001:2015 – Environmental Management Systems.
6. ISO 45001:2018 – Occupational Health and Safety Management Systems (OHS).
7. Mining Safety Management System (SMKP) – Ministry of Energy and Mineral Resources (ESDM).
8. Collective Labor Agreement (PKB) between PT ANTAM Tbk. and the Workers' Union.
9. Management Policy - PT ANTAM Tbk. Supply Chain Management Guidelines No. 876.K/92/DAT/2024.