



Precious Metals Supply Chain Policy

June 2022

Foreword

PT. Hartadinata Abadi, Tbk. is a leading jewellery and gold bar manufacturer in Indonesia, which has been established since 1998 and became a public company in 2017. For more than 20 years, we conduct all of our businesses to the highest ethical, moral and social responsibility standards. Professionalism, innovation, environmental sustainability, honesty, and transparency are the foundation of our business. As a public listing company, we are very open with all transactions that we do. We ensure that all precious metal transactions that we carry out are in accordance with Indonesian laws of Anti-Money Laundering / Countering the Financing of Terrorism (AML/ CFT).

As our primary goal is to deliver responsible gold products to our customers, we ensure that our precious metal supply chain comes from environmentally responsible and socially responsible sources.

Scope

For the safety and transparency of the precious metals used in our production, we have established a supply chain policy that applies to all precious metals use by PT. Hartadinata Abadi, Tbk in creating the highest quality products. This supply chain policy does not apply to general procurement (eg office supplies, furniture, energy, etc.) or other transactions that are not related to precious metals. We regularly update our precious metals supply chain policy to ensure that this policy complies with applicable regulations.

All precious material used in our factories are comes from reliable, transparant, and responsible bussiness partners. We conduct a high level of monitoring, control, and evaluation of our bussiness partners, including mining companies, refiners, metal traders, and jewellers to ensure that our precious metal suppliers understand and commit to a clean business, not involved in money laundering, bribery or perform anything related to terrorism and things that violate humanity.

We monitor and reduce risks that may occur in everything we do, from sourcing our precious metals, production process, and delivery of finished products. Our employees involved in the precious metals supply chain are to comply with our precious metal supply chain policy and to implement it thoroughly.

Commitment

For this precious metal supply chain policy, our commitment includes, but not limited to:

- Maintain high moral, ethical, and social standards in our business
- Conduct our business in honesty, against fraud and corruption
- Complying with anti money laundering (AML) standard
- Complying standards for countering the financing of terrorism (CFT)
- Avoiding to have any kind of participation in any conflict or conflict areas
- Combating human rights violations, abuses, trafficking, including child labour
- Avoiding bribery and fraudulent misrepresentation of the origin of precious metals
- Ensuring the payment of taxes, fees, and royalties due to governments
- Conforming with all relevant Republic of Indonesia domestic laws
- Do not participate in direct or indirect support to state and non-state armed groups
- Eliminate any direct or indirect support of illegally acting public or private security forces
- Immediately suspend or discontinue relationship with any business partner which we identify to be violated our precious metal supply chain policy.
- Avoiding Serious abuses associated with the extraction, transport or trade of minerals
- All financial and precious metal transactions are using bank wires, through official banking channels
- Annually training our management and all relevant employees about our precious metal supply chain policy.
- Assigned experienced staff for ensuring supply chain compliance.
- Recognise that public or private security forces are used for the benefit of security and safety
- Exclusively work with the leading high security transportation and logistics companies
- Properly store and maintain all records and documentation relating to the precious metals supply chain for a minimum of 10 years

The commitment to our precious metal supply chain policy is to comply with:

- Anti money laundering (AML) & combatting the financing of terrorism (CFT) law and regulations
- LBMA responsible gold guidance
- Annex II of the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas