

Independent Reasonable Assurance Report on PT. Emas Murni Abadi's Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year)

To the Board of Directors of PT. Emas Murni Abadi, Jl Cirangrang Dalam No. 8, Desa/Kelurahan Cirangrang, Kecamatan Babakan Ciparay, Bandung, Indonesia,

The Scope of the Assurance Engagement

We have performed an independent reasonable assurance engagement on PT. Emas Murni Abadi's attached Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) for the reporting period 01/01/2025 to 31/12/2025.

The Subject Matter of the Assurance Engagement

The subject matter includes the description of the Refiner's precious metals responsible sourcing policies, procedures, governance, management systems, and key performance information contained in the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) and whether this has been prepared in accordance with the reporting criteria.

Reporting Criteria against which assurance is performed:

The reporting criteria ("the Criteria") comprises the LBMA's Responsible Sourcing Guidance including [the Responsible Gold Guidance version 9](#), and the Disclosure Guidance version 3 ("LBMA Guidance") applied through the Refiner's detailed Precious Metals Supply Chain Policy, available on the company website <https://hartadinataabadi.co.id/good-corporate-government/others/id=8015>.

Our Opinion

Reasonable Assurance Opinion

In our opinion, the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) for the period from 01/01/2025 to 31/12/2025 is prepared, in all material respects, in accordance with the Criteria.

Basis for our opinion

We conducted our engagement in accordance with *International Standard on Assurance Engagements (ISAE) 3000 (Revised)*, *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* issued by the International Auditing and Assurance Standards Board (IAASB) and the [LBMA Third Party Assurance Guidance version 2](#). Our responsibilities under this standard are further described in the “Our responsibilities” section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our reasonable assurance opinion.

Independence and Quality Statement

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).

Our firm applies International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Refiner’s Responsibilities

The Directors are responsible for the preparation and presentation of the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) in accordance with the Criteria and free from material misstatements, whether due to fraud or error.

This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived and maintaining adequate records and assurance trails.

The Directors are also responsible for determining the appropriateness of the Criteria in view of the intended users of the Report and for ensuring that the Criteria remain publicly available to the Assurance Report users.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain reasonable assurance about whether the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) is free from material misstatement, whether due to fraud or error.
- forming an independent opinion, based on the procedures we have performed and the evidence we have obtained; and

- reporting our opinion to the Directors.

Summary of the work we performed as the basis for our opinion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) that is sufficient and appropriate to provide a basis for our opinion. The nature, timing, and extent of the procedures selected depended on our judgment, including an assessment of the risks of material misstatement of the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year), whether due to fraud or error.

We identified and assessed the risks of material misstatement through understanding the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) and the engagement circumstances. We also obtained an understanding of the internal control relevant to the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) to design procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal controls.

Our procedures include:

- **Suitability of Criteria:** reviewing the Refiner's Gold Supply Chain Due Diligence Procedure and standard operating procedure documentation to determine conformance with the LBMA Guidance.
- **Business Understanding:** interviewing key management and senior executives to evaluate the Refiner's governance and internal control environment against the Criteria.
- **Process Understanding:**
 - critically evaluating the Refiner's supply chain risk identification, classification and mitigation processes and systems based on the Criteria and our experience and understanding of risks in the precious metals supply chains.
 - reviewing documentation and performing walkthroughs of identified key processes and controls to corroborate information provided by management.
- **Detailed Testing:**
 - conducting analytical reviews and trend analyses of transaction volumes and country of origin data and reviewing management responses for any material anomalies.
 - designing a sample selection methodology to obtain sufficient, appropriate coverage of precious metals supply chains, including new and existing suppliers, different types of material and risk classification categories, and transactions in the reporting period.
 - for the sample selected reviewing suppliers know your counterparty and due diligence files to assess completion and accurate classification against the Criteria.
 - for the sample selected reviewing details of transactions (for example volumes, assays and transportation routes) against supporting documentation and corroboration to supplier files.
- **Disclosure Review:**
 - reviewing the completeness of the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) against the applicable Criteria (Disclosure Guidance version 3).

- evaluating the assertions in the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year) based on our overall knowledge and understanding of Refiner's internal controls and supply chain due diligence processes, systems and results.

Inherent Limitations and Restriction of Liability

Non-financial information, such as that included in the Responsible Gold Guidance Refinery Compliance Report (2025 Fiscal Year), is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information.

Intended use or purpose / Restriction on use or distribution

This report has been prepared for the Directors of PT. Emas Murni Abadi for the purpose of determining whether PT. Emas Murni Abadi conforms to the LBMA Guidance, in accordance with the terms of our engagement. We understand that the Report will also be shared with the LBMA to demonstrate the Refiner's conformance with the Criteria. We consent to this on the understanding that the Assurance Report may only be used by the LBMA for this and no other purpose. We do not accept or assume responsibility to anyone other than the Refiner for our work, or for the conclusions we have reached in the Assurance Report.

Lead Approved Assurance Provider Signature



Lead Approved Assurance Provider Full Name

Kuang, Richard Chenggong

Approved Assurance Provider Firm Name

Deloitte Touche Tohmatsu Certified Public Accountants LLP

Date of Assurance Report

29/05/2026



EMAS MURNI ABADI

**PT EMAS MURNI ABADI
LBMA RESPONSIBLE GOLD GUIDANCE
REFINERY COMPLIANCE REPORT
2025 FISCAL YEAR**



TABLE OF CONTENTS

INTRODUCTION	1
TABLE 1: REFINER'S DETAIL.....	2
STEP 1 – ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS	3
1.1. Adopt and Commit to a Policy for Gold Supply Chain Due Diligence	3
1.2. Internal Management Structure to Support Supply Chain Due Diligence.....	4
1.3. Establish a gold Traceability System	8
1.4. Strengthen Company Engagement with Gold Supplying Counterparties	9
1.5. Establish a Confidential Grievance Mechanism	10
STEP 2 – IDENTIFY AND ASSESS RISKS IN THE SUPPLY CHAIN	12
2.1. Conduct Supply Chain Due Diligence to Identify Potential Risks	12
2.2. Classify Supply Chains Based on Risk Profiles	14
2.3. Undertake Enhanced Due Diligence Measures for High-Risk Supply Chains.....	17
STEP 3 – DESIGN AND IMPLEMENT A MANAGEMENT SYSTEM TO RESPOND TO IDENTIFIED RISKS.....	20
3.1. Devise a Risk Management Strategy for the Identified Risk.....	20
3.2. Monitor the Improvement Plan.....	20
3.3. Report Findings to the Board Committee	21
STEP 4 – ARRANGE FOR AN INDEPENDENT THIRD-PARTY AUDIT OF THE SUPPLY CHAIN DUE DILIGENCE	23
STEP 5 – REPORT ON SUPPLY CHAIN DUE DILIGENCE	24
TABLE 2: PT EMAS MURNI ABADI'S MANAGEMENT CONCLUSION.....	25



INTRODUCTION

PT. Emas Murni Abadi (EMA) is a subsidiary of PT. Hartadinata Abadi Tbk, specializing in gold processing and refining, located in Bandung, West Java, Indonesia. PT. Emas Murni Abadi has a refining capacity of up to 30 tons of gold and 36.5 tons of silver annually. Our refining process involves the treatment of precious metals from mined materials and recycled gold from client scrap/waste jewelry, which can be refined to a purity of 99.99% for gold and 99.95% for silver. Our primary raw materials originate from five domestic mines and one recyclable material is sourced from PT. Hartadinata Abadi, Tbk. Of our total raw materials, 61.36% is recycled materials that we obtain from PT. Hartadinata Abadi, Tbk. The remaining 38.64% comes from five local gold mines.


Our laboratory applies standard methods based on SNI 8880:2020 for gold items. In December 2025, our laboratory obtained accreditation from KAN in accordance with ISO/IEC 17025:2017. PT Emas Murni Abadi also adheres to various international standards, including ISO 9001:2015, ISO 45001:2018, and ISO 14001:2015, showing our commitment to quality and safety. Our product, EMASKU, has been certified as Sharia-compliant by the Indonesian Ulema Council (MUI).

As part of our environmental responsibilities, PT. Emas Murni Abadi is equipped with emission control devices such as wet scrubbers and bag filters. We conduct routine monitoring twice a year by a laboratory accredited by the Indonesian Ministry of Environment and Forestry to ensure that our operations comply with applicable environmental standards.

PT. Emas Murni Abadi is fully committed to supporting the strategic direction of QHSE in accordance with the organizational context, by allocating all necessary resources for the successful implementation of an Integrated Management System based on Indonesian Government Regulation and applicable management system standards, referring to ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO/IEC 17025:2017 standards, Annex II of OECD Due Diligence, and the LBMA Responsible Gold Guidance Ver 9.



TABLE 1: REFINER'S DETAIL

Refiner's Name	: PT Emas Murni Abadi
Location	: Jl Cirangrang Dalam No. 8, Desa/Kelurahan Cirangrang, Kecamatan Babakan Ciparay, Bandung, Indonesia
Reporting Period	: January 1 st 2025 - December 31 st 2025
Date of Report	: May 29, 2026
Board of Director Responsible for Report	: Janice Dominique  President Director

The reporting criteria for PT Emas Murni Abadi's compliance with the LBMA Responsible Gold Guidance, as presented in this Refinery Compliance Report, comprise the LBMA Responsible Sourcing Guidance, including the Responsible Gold Guidance Version 9, the Disclosure Guidance Version 3, and the Refiner's Toolkit, as implemented through the Responsible Supply Chain Guidelines (EMA.K.14.0007), covering all gold sourced during 2025. This PT Emas Murni Abadi's LBMA Responsible Gold Guidance Refinery Compliance Report contains its precious metals responsible sourcing policies, procedures, governance, management systems, and key performance information.

The scope of this report covers the gold refining operations of PT Emas Murni Abadi as a single legal entity. The Company operates one gold refining facility in Bandung, Indonesia, and has no other business units involved in the precious metals supply chain.



PT EMAS MURNI ABADI'S EVALUATION

STEP 1 – ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

PT Emas Murni Abadi has fully complied with Step 1: Establish Strong Company Management Systems.

1.1. Adopt and Commit to a Policy for Gold Supply Chain Due Diligence

LBMA Responsible Gold Guidance establishes strict principles to ensure that gold produced and traded is not linked to human rights violations, criminal activities, or terrorism financing. As part of our commitment to ethical and sustainable business practices, PT Emas Murni Abadi has fully adopted and implemented a gold supply chain policy by our parent company's supply chain policy. This Precious Metals Supply Chain Policy addresses key AML/CFT requirements and incorporates principal responsible sourcing commitments, including human rights, anti-bribery, anti-corruption, and conflict-related risk prevention. The policy is generally aligned with applicable LBMA Responsible Gold Guidance principles, while enhancements to further strengthen coverage of certain ESG and emerging financial crime risk factors continue to be reviewed as part of the Company's ongoing policy development process. This Policy is subject to senior management oversight and approval, is publicly accessible via the parent company's official website, <https://hartadinataabadi.co.id/good-corporate-government/others/id=8015> and is communicated to all relevant employees through established internal communication mechanisms and annual responsible sourcing training. The policy is subject to periodic review and is updated as necessary to reflect changes in applicable regulations, guidance, or business requirements.

The Supply Chain Policy publicly available on the parent company's official website constitutes the principal responsible sourcing policy for the entire PT Hartadinata Abadi Tbk Group. To ensure effective implementation at the refinery level, PT Emas Murni Abadi has established Responsible Supply Chain Guidelines aligned with the LBMA Responsible Gold Guidance Version 9. These guidelines are further operationalized through the Gold and Silver Supply Chain Due Diligence SOPs, which define the procedures and controls applied



throughout supply chain due diligence activities. This SOP is regularly reviewed at least once a year. Implementing this SOP ensures that all of our gold supply chain activities, from raw material procurement to distribution, comply with the highest principles of traceability, transparency, and social responsibility. It consists of supplier data collection with KYC, Risk Identification and Assessment, and Due Diligence Checklist adopted from the LBMA Refiner's Toolkit. If any of the suppliers are found as a High-Risk supplier, it will trigger Enhanced Due Diligence.

We are committed to ensuring that every aspect of our gold supply chain is free from illegal activities, money laundering, human rights violations, and threat financing as outlined in our Supply Chain Policy.

1.2. Internal Management Structure to Support Supply Chain Due Diligence

PT Emas Murni Abadi has established an internal management structure designed to support effective supply chain due diligence. Roles and responsibilities are clearly defined to ensure that each stage of the precious metals supply chain is monitored in a transparent, accountable, and responsible manner.

The responsible sourcing governance structure is led by a Senior Manager, with oversight of the gold supply chain due diligence process performed by the Compliance Officer and supported by the Customer Relations Management and Supply Chain Assessment teams. All new supplier engagements and contract extensions with existing suppliers are subject to a formal risk assessment process conducted in accordance with the Company's Responsible Supply Chain Guidelines (EMA.K.14.0007). The Supply Chain Assessment Team evaluates supplier risks by considering applicable risk indicators and due diligence criteria, with the assessment results subsequently reviewed by the Compliance Officer before submission to the Senior Manager for final approval. The Senior Manager is responsible for ensuring that any required supplier mitigation measures are appropriately implemented. Prior to establishing or continuing a business relationship with a supplier, the President Director, as a



Board member, verifies that all due diligence procedures have been completed and reviewed through the established approval process.

To support effective implementation of these responsibilities, all relevant personnel involved in the due diligence process receive annual internal Responsible Sourcing training and are provided with access to the screening tools, internal procedures, and supporting documentation necessary to conduct supplier risk assessments and ongoing monitoring activities.

Upon receipt of material, the Vault Division is responsible for verifying shipping documentation and confirming the declared origin of the material. Where any non-conformance is identified, the material is immediately segregated and reported to the Compliance Officer for verification. Where the issue is confirmed as meeting High-Risk criteria, the Company initiates Enhanced Due Diligence procedures and suspends material acceptance from the relevant supplier until appropriate mitigation measures have been implemented.

Supporting functions across the organization play an integral role in maintaining the effectiveness of the due diligence framework. The Customer Relations Management staff maintains direct communication with suppliers to ensure transparency throughout the supply chain and to communicate the Company's compliance expectations. The Legal team is responsible for preparing supplier agreements and ensuring contractual commitments reflect applicable legal requirements as well as the Company's standards relating to due diligence, reporting, risk management, and responsible sourcing compliance.

The HSE (Health, Safety, and Environment) and HR (Human Resources) divisions work in close coordination to oversee social, occupational, and workplace-related aspects of refinery operations. These divisions jointly manage the Company's grievance mechanism for operational activities, including labor, social, occupational health, and safety-related matters, thereby supporting compliance with relevant internal standards and applicable regulations.

In order to maintain the implementation of responsible supply chain practice, the internal audit team conducts annual audits covering all material received during the fiscal year. These audits are performed to verify alignment with the



Company's due diligence procedures and supply chain policies. During the reporting period, no internal violations or material non-conformances relating to due diligence processes were identified.

Following the resignation of the previous Compliance Officer in August 2025, PT Emas Murni Abadi appointed a new Compliance Officer, who currently serves as Manager of Human Resources, General Affairs, and HSE. The appointment was made directly by the Director in consideration of his extensive professional experience and his leadership role overseeing key governance and operational control functions. He brings more than 15 years of cross-industry experience in regulatory compliance, including government regulatory alignment, industrial relations compliance, and quality management system implementation.

PT Emas Murni Abadi has provided comprehensive internal training on LBMA RGG requirements on November 2025 for our new compliance officer to ensure that he possesses adequate knowledge and understanding of responsible sourcing principles and their practical implementation within the company's due diligence framework.

The Compliance Officer is appointed directly by the Director and reports functionally to the Board on all matters related to responsible sourcing and supply chain due diligence. For day-to-day operational coordination, the Compliance Officer communicates with the Senior Manager. Any material findings, high-risk supplier assessments, and due diligence outcomes are escalated directly to the Board for review and decision-making. This reporting line ensures appropriate management oversight and effective escalation of responsible sourcing matters to senior decision-making level. Ultimate decision-making authority relating to responsible sourcing matters rests with the Board of Directors, which also exercises overall oversight of the Company's supply chain due diligence framework. To support effective oversight, members of the Board receive periodic briefings and internal training covering LBMA Responsible Gold Guidance requirements, emerging supply chain risks, and responsible sourcing oversight responsibilities, ensuring they maintain the necessary competence to supervise due diligence implementation effectively.



Training

To ensure that every due diligence process aligns with the latest industry standards, in March 2025, we conducted Responsible Supply Chain training for employees of PT Emas Murni Abadi, with particular focus on personnel involved in supply chain processes, to enhance their understanding of responsible sourcing practices in line with the London Bullion Market Association Responsible Gold Guidance. The training was attended by 24 participants representing relevant divisions and personnel involved in responsible sourcing activities. The session covered key responsible sourcing principles and due diligence requirements, while also providing an overview of the specific roles and responsibilities of each relevant division within the precious metals supply chain to support effective implementation across the organization.

In addition, we provided direct briefings to the management and supply chain personnel of PT Hartadinata Abadi Tbk, our parent company, to ensure alignment and a consistent understanding of responsible sourcing principles across the Group. The briefing was attended by 12 participants, including members of the Boards of Directors of both PT Hartadinata Abadi Tbk and PT Emas Murni Abadi, together with representatives from the compliance team of PT Emas Murni Abadi.

Payments

All payments related to gold and silver refinery services are made by PT Emas Murni Abadi, and payments related to the procurement of gold-bearing materials are made by PT Hartadinata Abadi Tbk, our parent company. Our finance role is to process refinery service invoices to the customer, and all transactions are conducted via bank transfer without exception regarding the payment amount.

Record-Keeping

All documents related to suppliers—such as cooperation agreements, company licenses and legal documents, as well as other supporting documents—are stored offline in both soft copy and hard copy formats. These documents are archived by the Integrated Management System (IMS) division. The retention



period of the transaction record has been set in accordance with relevant laws and regulations which is not less than 5 years.

1.3. Establish a gold Traceability System

To enhance supply chain transparency, PT Emas Murni Abadi has developed and implemented a comprehensive and traceable gold supply chain system, ensuring traceability from the source of origin to the refiner. The initial step involves using KYC questionnaires that refer to the LBMA Refiners toolkit, for all suppliers to verify compliance, starting with supplier information, the origin of the gold, and the transportation method of gold dore from the mine to PT Emas Murni Abadi.

Before entering new business relationships with suppliers and counterparties, KYC and all associated documents must first be verified by the Risk Assessment Team, to ensure that the risk level within the supplier's supply chain is acceptable to the company.

Upon shipment of gold-bearing materials by suppliers, our Customer Relations Management staff will first verify the completeness of documents, such as material types, packing lists, weight, and delivery waybill. If all documents are complete and accurate, the gold-bearing material shipment proceeds. At the time of goods receipt, we use the Order Penerimaan (Receiving Order) form (EMA.WF.13.0001) to record the supplier's name, shipment number, arrival date, and the weight of material we received.

Throughout the reporting period, no significant incidents were encountered related to difficulties in identifying suppliers or the origin of precious metals. However, should any potential incidents arise concerning traceability or identification, the company's Compliance Officer has a clear response procedure. Each incident will be promptly reviewed, and mitigation measures will be implemented per company policy to ensure that the tracking system remains consistent and accurate. The Compliance Officer is also committed to reviewing procedures and enhancing control mechanisms as necessary to minimize future risks.



1.4. Strengthen Company Engagement with Gold Supplying Counterparties

As part of the company's commitment to strengthening engagement with counterparties, PT Emas Murni Abadi communicates its responsible sourcing expectations to counterparties through formal contractual arrangements, periodic communication as necessary, and the implementation of the Supplier Code of Conduct, which applies to all PT Hartadinata Abadi Tbk suppliers, including PT Emas Murni Abadi as the subsidiary, and serves as the basis for evaluating supplier performance. The Refining Cooperation Agreement includes specific clauses requiring suppliers to implement responsible gold supply chain due diligence in accordance with the standards set by the LBMA Responsible Gold Guidance.

In addition, counterparties are expected to provide complete and accurate Know Your Customer (KYC) documentation, disclose the origin of materials, promptly notify the Company of any material changes to ownership or business operations, and cooperate fully with due diligence reviews and risk assessment processes. These requirements are communicated to ensure counterparties understand and comply with the Company's responsible sourcing obligations, including the identification and mitigation of risks related to money laundering, conflict financing, human rights abuses, and other risks identified under the LBMA framework.

As an additional step to enhance cooperation with suppliers, PT Emas Murni Abadi also conducts regular satisfaction surveys among suppliers. This survey provides insights into areas for improvement in the business relationship and reflects the company's commitment to creating mutually beneficial, long-term partnerships based on principles of compliance and responsibility.

PT Emas Murni Abadi supports transparency and responsible sourcing principles consistent with international standards, including the EITI Principles where applicable. During the reporting period, PT Emas Murni Abadi did not purchase mined gold from any State-Owned Enterprise operating in an EITI implementing country and therefore made no first-trade payments requiring disclosure under EITI-related reporting requirements.



1.5. Establish a Confidential Grievance Mechanism

PT Emas Murni Abadi has established a confidential grievance mechanism accessible to both internal and external parties as part of its commitment to ensure corporate compliance and integrity.

For internal stakeholders, including employees, PT Emas Murni Abadi provides a dedicated grievance reporting channel through the designated reporting platform. Employees may submit complaints related to operational conduct, compliance matters, and responsible sourcing concerns, https://bit.ly/Ema_Saran either openly or anonymously, to ensure concerns can be raised without fear of retaliation or adverse consequences. All internal complaints are initially managed by the HSE and HR teams, which are responsible for conducting preliminary verification, assessing the urgency of the matter, and determining whether further investigation is required. Where necessary, cases are escalated to the relevant division or senior management for further review and corrective action.

For external stakeholders, including suppliers, business partners, and other counterparties, grievances may be submitted through dedicated email to corsec@hartadinataabadi.co.id or by phone at +62 22 5402326. These reporting channels are clearly stated in our parent company's Whistleblowing System (WBS) policy, which is publicly accessible online at <https://hartadinataabadi.co.id/good-corporate-government/whistleblowing-system/id=8007>. All external reports are received and reviewed by the Management and Report Management Team for initial verification and assessment. Where a report indicates potential non-conformance or violation, a formal investigation and analysis are conducted. Substantiated matters are escalated to the relevant division for remediation, while material or force majeure violations are handled directly by the Director, independently of the reported party and in accordance with applicable regulations.

For grievances relating specifically to responsible supply chain matters, particularly those concerning PT Emas Murni Abadi, cases are initially channelled through a designated compliance officer within the Legal team at the holding company level. Following preliminary assessment by the Management



and Report Management Team, relevant matters are formally escalated to the Compliance Officer of PT Emas Murni Abadi for further review, investigation where necessary, and coordination of appropriate follow-up actions in accordance with the Company's responsible sourcing due diligence procedures. Where significant due diligence risks or material non-conformances are identified, findings are escalated through the established governance reporting line to senior management and, where required, to the Board of Directors for oversight and decision-making.

Corrective and preventive actions arising from both internal and external grievance cases may include requests for clarification, enhanced due diligence, temporary suspension of transactions, supplier remediation measures, revisions to internal procedures, and additional employee training where appropriate. Lessons learned from grievance cases are incorporated into policy reviews and employee awareness programs to strengthen the Company's responsible sourcing and compliance framework. Resolution outcomes and any required remediation actions are communicated to relevant stakeholders through formal written correspondence, internal reporting channels, and management review processes, as appropriate.

No grievances related to responsible sourcing or supply chain due diligence were reported during the reporting period through the established grievance channels.



STEP 2 – IDENTIFY AND ASSESS RISKS IN THE SUPPLY CHAIN

PT Emas Murni Abadi has fully complied with Step 2: Identify and Assess Risks in the Supply Chain.

2.1. Conduct Supply Chain Due Diligence to Identify Potential Risks

PT Emas Murni Abadi operates exclusively as a precious metals refining service provider. All business relationships with counterparties are established under refining service agreements, without involving the direct purchase or sale of precious metals by the Company. Commercial transactions relating to refined precious metals are conducted solely by the parent company, PT Hartadinata Abadi Tbk.

During the reporting period, PT Emas Murni Abadi has received sources of raw materials from:

- a. For mined source gold, PT Emas Murni Abadi has five suppliers, all of which have their mining sites and head offices located in Indonesia. All materials sourced from mining activities are delivered to the refinery in the form of gold dore, without undergoing any refining or further processing at the mine site.
- b. For our recycling source, all raw materials are supplied by our parent company, PT Hartadinata Abadi Tbk, consisting of recycled gold. Based on information obtained through due diligence process, the recycled gold received by the refinery consists of LBMA Good Delivery (GD) bullion imported from overseas, as well as melted recycled gold sourced from local traders in Indonesia, with an estimated gold content (Au) up to 90%.

Risk identification is conducted from three perspectives: location risks, supplier risks, and material risks. Location-based risk assessments are conducted through the evaluation of publicly available information, including adverse media reports, government and regulatory publications, statements from relevant authorities, and internal red-flag indicators. Geographic risks are assessed with consideration given to operational location, regulatory environment, environmental and social incidents, governance concerns, and any indicators associated with conflict-affected or high-risk areas (CAHRA).

For material risks, the company adopts different identification methods for mined gold and recycled gold. For mined gold from LSM and ASM, the company verifies



information such as the import/export gold licence for gold supplying counterparty (if applicable), mining practices (including processing and transportation methods), production data and processing capacity (if available), community engagement programmes, the suppliers of ASM gold sources, and whether the mining project can be considered legitimate ASM. For recycled gold, the company verifies information such as the profiles of the counterparty's gold and precious metals suppliers, the types and forms of precious metals sourced by the counterparty, and the types and locations of facilities operated by the counterparty.

Risk assessments are conducted by the Company's Responsible Sourcing Team, comprising Customer Relations Management, Supply Chain Assessment, Compliance Officer, and Senior Management, all of whom possess experience in supply chain due diligence and receive training on the Responsible Sourcing and internal procedures. Initial supplier assessments are conducted by the supply chain assessment team and reviewed by the compliance officer, with final risk classification approved by the Senior Manager. Assessment outcomes and recommended actions are formally communicated to relevant operational and receiving personnel to ensure appropriate controls are implemented throughout the material acceptance process.

Transaction monitoring forms an integral part of the company's risk identification process. All incoming material shipments are subject to ongoing verification against supplier profiles, shipment documentation, declared source information, and transaction consistency indicators. Where red flags or inconsistencies are identified, the material is immediately segregated and placed under quarantine in accordance with the Gold and Silver Transaction Monitoring SOP. The material is prevented from entering the receiving and refining process until Enhanced Due Diligence (EDD) has been completed and the risk has been appropriately assessed and resolved.

To further strengthen risk identification and verification, PT Emas Murni Abadi conducts on-site visits to suppliers as part of its due diligence framework. On-site visits are generally conducted for newly onboarded suppliers to verify submitted KYC information and may also be triggered by identified red flags. Site



visits involve document review, interviews with relevant personnel, direct observation of operational and processing facilities, and verification of material handling practices. The results are documented in formal site visit reports prepared with reference to the LBMA Refiner's Toolkit Site Visit Report template.

2.2. Classify Supply Chains Based on Risk Profiles

The supply chain classification process of PT Emas Murni Abadi demonstrates strong compliance with LBMA standards for responsible gold sourcing. By classifying the supply chain based on risk profiles, the company has ensured that appropriate due diligence measures are taken for each identified level of risk.

PT Emas Murni Abadi classifies risks according to the following criteria:

a. Zero-tolerance supply chain

If a supplier is identified under the following criteria, PT Emas Murni Abadi will not engage in any business relationship with the gold supplier or will immediately terminate the relationship. The zero-tolerance criteria are as follows:

- Mined gold is known to originate from areas designated as World Heritage sites.
- The Mined or Recycled Gold is known to be sourced in breach of international sanctions (including but not limited to those of the UN, EU, UK and US)
- The Mined or Recycled Gold supplying counterparty, other known upstream companies or their UBOs are known money launderers, fraudsters or terrorists, or have been implicit in serious human rights abuses, or in direct or indirect support to illegitimate non-state armed groups.

b. High-risk supply chain

If a supply chain is identified under the high-risk criteria, it will trigger Enhanced Due Diligence. The following are the criteria for high-risk supply chains:

1. Location-based risks for Mined Gold

- Originates from, has transited or has been transported via a Conflict-Affected and High-Risk Area (CAHRA).



- Is claimed to originate from a country through which gold from CAHRAs is known, or reasonably suspected, to transit.
 - Is claimed to have originated from a country that has limited known reserves, likely resources or expected production levels.
2. Location-based risks for Recycled Gold
- Originates from, has transited or has been transported via a CAHRA
 - Is claimed to originate from a country through which gold from CAHRAs is known, or reasonably suspected, to transit, and/or is unjustifiably claimed to have originated from a country that has limited exports of gold.
3. Supplier-based risks for mined gold, the gold-supplying counterparty or other known upstream companies:
- Have shareholders, or UBOs, or other gold supplying interests in one of the location-based high-risk criteria.
 - Have UBOs that are Politically Exposed Persons (PEPs)
 - Have activities in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, and sects and their leaders
 - Have been known to have sourced gold from a high-risk country in the last 12 months
 - Have material discrepancies/inconsistencies in the documentation provided or have refused to provide requested documentation.
4. Supplier-based risks for recycled gold, the gold-supplying counterparty or other known upstream companies
- Operate in a money laundering high-risk country
 - Have shareholders, or UBOs, or other gold-supplying interests in one of the location-based high-risk criteria
 - Have UBOs who are Politically Exposed Persons (PEPs)
 - Have activities in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, and sects and their leaders
 - Have been known to have sourced gold from a high-risk country in the last 12 months
 - Have significant unexplained geographic routing from their supplier or counterparty in the supply chain.
5. Material-based risks for Mined Gold is:



- Sourced from ASM
- Produced with the use of mercury
- Contributing to catastrophic harm or highly adverse ESG factors, to the extent that the Refiner is able to identify this (e.g., through a record in the public domain or in the Refiner's due diligence file).

6. Material-based risks for recycled gold is:

- From an Intermediate Refinery or trader with a high-risk supply chain or a trading counterparty sourcing from an Intermediate Refinery with a high-risk supply chain.

c. Non-Risk

A supplier categorized as *non-risk* is one that does not meet the criteria for *zero-tolerance* or *high-risk*, thereby being considered to have minimal risk in terms of quality management, compliance, and safety.

Following the incident in December 2025, concerning a flash flood and landslide incident in the Sumatra region, allegedly linked to the operational area of one of our active suppliers, the Refinery conducted a risk-based review of its supply chain, resulting in the reclassification of this supplier as High-Risk. This designation was triggered by a major flash flood and landslide event in the vicinity of the supplier's operations. In alignment with the LBMA Responsible Gold Guidance, the Refinery immediately initiated Enhanced Due Diligence (EDD) to evaluate the supplier's environmental management and legal compliance.

During the reporting period, the company only involved one high-risk supplier and did not involve zero-tolerance suppliers.

Board Response and Current Mitigation Status

In response to the suspension of the supplier's operational and environmental licenses by the authorities, the Refinery implemented a strict suspension of business relations. A zero-supply policy was enforced, halting all material receipts from this entity effective from the date of the incident. While the supplier issued a formal statement attributing the disaster to external factors, specifically debris from a third-party company obstructing an adjacent river, the Refinery maintained the suspension as a precautionary measure pending official verification and legal clearance.



Monitoring and Ongoing Progress

As of December 31, 2025, this supplier remains under High-Risk monitoring. Until the supplier can demonstrate significant and measurable improvements in their legal standing and environmental risk mitigation, the suspension will remain in effect. The progress of this case will be carried forward into the next reporting period.

2.3. Undertake Enhanced Due Diligence Measures for High-Risk Supply Chains

Risk assessments are conducted under three circumstances:

1. For new suppliers, risk assessments are conducted prior to the establishment of business relationship.
2. For existing suppliers, the customer relations management (CRM) Staff shall recollect necessary files and the supply chain assessment team shall reconduct the complementary assessment on an annual basis.
3. For suppliers in cooperation, risk assessments are conducted immediately when exceptional circumstances are identified.

PT Emas Murni Abadi implements Enhanced Due Diligence (EDD) for suppliers identified as high risk through a risk-based assessment process designed to verify identified red flags and determine appropriate mitigation measures. The EDD procedures applied to mined and recycled precious metals-bearing materials are generally consistent in structure, including enhanced document review, source verification, management interviews, and risk reassessment. However, for mined materials, the assessment is conducted in greater depth, particularly with respect to environmental, social, and governance (ESG) factors, as well as source-of-origin verification. These additional requirements are incorporated into the Company's site visit checklist, and formal site visit reporting procedures refer to the LBMA Refiner's toolkit.

On-site visits are generally conducted for new suppliers as part of direct verification of submitted KYC information. Where red flags are identified, an on-site visit is scheduled as soon as conditions reasonably permit. During the reporting period, one on-site visit was conducted in September 2025 by the



Company's Responsible Sourcing Team for a newly onboarded supplier to verify that the KYC information provided was consistent with the supplier's actual operating conditions. The assessment included document review, interviews with relevant personnel across exploration, HSE, community relations, HR, legal, operational, and management functions, as well as direct observation of the processing plant, mining site, company facilities, and material handling processes. No significant findings were identified during the visit, and the supplier demonstrated compliance with the Company's responsible sourcing requirements.

Where high-risk conditions are confirmed, the Compliance Officer recommends mitigation measures subject to Senior Management approval, and Customer Relations Management (CRM) personnel monitor implementation of corrective actions. Suppliers that successfully meet mitigation requirements in accordance with the LBMA Responsible Gold Guidance are approved and included in the Approved Customer List, while suppliers unwilling or unable to comply are rejected or considered for termination of the business relationship. For existing suppliers, ongoing verification of shipment documentation and material origin is performed as part of routine monitoring, and any identified non-conformities trigger the EDD process prior to acceptance of materials.

The supplier referenced above was subsequently reclassified as high risk in December 2025 due to the previously disclosed case. A follow-up mandatory on-site visit could not be conducted during the reporting period due to environmental conditions and restricted road access resulting from the disaster. In such circumstances, the Company applies interim alternative EDD measures, including visual and remote assessment, review of media reports, verification through statements from relevant authorities, enhanced documentary review, and requests for formal clarification from the supplier via email correspondence. Direct on-site verification remains mandatory and has been scheduled for 2026 once access to the location is restored.

During the reporting period, a total of one on-site visit was conducted for risk assessment purposes, all of which were performed internally by the Company's



Responsible Sourcing Team. No on-site visits were conducted by external assessors.

Enhanced due diligence procedures relating to recycled gold sourced from intermediate refiners with high-risk supply chains were not applicable during the reporting period, as no intermediate refiners were identified within the Company's supply chain. Accordingly, no independent assurance reports from intermediate refiners were required or obtained.



STEP 3 – DESIGN AND IMPLEMENT A MANAGEMENT SYSTEM TO RESPOND TO IDENTIFIED RISKS

PT Emas Murni Abadi has fully complied with Step 3: Design and Implement a Management System to Respond to Identified Risk

3.1. Devise a Risk Management Strategy for the Identified Risk

PT Emas Murni Abadi has formulated a comprehensive risk management strategy to address identified risks within the supply chain, based on the characteristics and risk levels classified in Section 2.2 above. This strategy ensures that all decisions related to the continuation or termination of relationships with suppliers are made objectively and in accordance with company and LBMA compliance standards.

If the results of the risk assessment indicate a non-risk category, the relationship with the supplier shall be maintained, provided that the supplier remains in compliance with the company's established compliance standards and agrees to undergo regular monitoring to ensure that potential risks do not arise in the future.

The decision to continue a relationship with a supplier will be made if the risk assessment indicates that the existing risks can be effectively managed through appropriate mitigation measures and if the supplier or counterparties demonstrates a clear commitment to adhering to the compliance standards established by the company. However, the company will suspend or terminate partnerships if risks are significant and cannot be mitigated, or if suppliers fail to align with required standards.

Suppliers categorized under zero tolerance risk are subject to immediate termination without exception. This approach reflects PT Emas Murni Abadi's commitment to maintaining supply chain integrity and ensuring full compliance with established standards.

3.2. Monitor the Improvement Plan

Following the implementation of risk mitigation strategies, monitoring is conducted regularly by the Customer Relations Management (CRM) Staff in coordination with the Compliance Officer and the Risk Assessment Team, who



are responsible for reviewing the effectiveness of supplier remediation efforts. The monitoring process includes evaluation of corrective actions taken by suppliers, including adjustments to operational practices, adherence to responsible sourcing requirements, and implementation of enhanced compliance and traceability procedures. Where necessary, additional documentation and verification measures are requested to strengthen chain of custody controls and ensure continued alignment with the LBMA Responsible Gold Guidance. If monitoring indicates insufficient improvement or failure to implement agreed mitigation measures, PT Emas Murni Abadi will assess whether to continue, suspend, or terminate the business relationship with the relevant supplier.

During the reporting period, mitigation measures were applied to one counterparty following its reclassification as a high-risk supplier in December 2025 due to environmental conditions affecting site accessibility and limiting immediate physical verification. To strengthen traceability and chain-of-custody controls, the Company implemented enhanced documentary review, formal clarification requests, remote visual assessment, and continued segregation of incoming material pending completion of further verification procedures. A follow-up on-site visit could not be conducted during the reporting period due to restricted access resulting from the disaster and has therefore been scheduled for 2026. As the mitigation strategy was initiated late in the reporting period, the formal six-month follow-up assessment to evaluate measurable improvement will be conducted in 2026.

The Company did not disengage from any counterparties during the reporting period. No formal cooperation with national or local government authorities was required, although publicly available information and statements issued by relevant authorities were considered as part of the verification process.

3.3. Report Findings to the Board Committee

PT Emas Murni Abadi has established a structured management system to address supply chain risks, ensuring strong oversight and accountability. Risk assessment results are systematically reported to the Board Committee,



including findings related to compliance, environmental, and social risks, as well as the mitigation measures implemented by suppliers.

In cases where suppliers are classified under zero-tolerance risk and cooperation cannot be continued, the decision to terminate the relationship is subject to Board Committee approval and subsequently reported to the LBMA, ensuring oversight at the highest level. Potential risk cases are also escalated to the Board Committee for review and monitoring. Meanwhile, non-risk assessments are documented and reported as part of the due diligence process, with continued monitoring to prevent future risks.



STEP 4 – ARRANGE FOR AN INDEPENDENT THIRD-PARTY AUDIT OF THE SUPPLY CHAIN DUE DILIGENCE

PT Emas Murni Abadi has fully complied with Step 4: Arrange for an Independent Third-Party Audit of the Supply Chain Due Diligence.

PT Emas Murni Abadi has appointed and engaged Deloitte Touche Tohmatsu Certified Public Accountants LLP (hereinafter referred to as "Deloitte") as the independent assurance provider to conduct a reasonable assurance engagement over the Company's supply chain due diligence framework in accordance with the LBMA Responsible Gold Guidance. The assurance provider was selected based on its professional qualifications, demonstrated experience in conducting LBMA Responsible Sourcing assurance engagements, and its inclusion on the LBMA Approved Service Provider List for the Asia region. The appointment was reviewed and approved by the Board to ensure that the assurance provider possesses the necessary technical competence and industry expertise to perform the engagement.

To ensure assurance provider independence and objectivity, the Board considered Deloitte's professional standing, LBMA-approved status, and applicable professional independence requirements in appointing the assurance provider. PT Emas Murni Abadi maintains a clear separation between assurance activities and operational responsible sourcing functions. The Compliance Report, together with the independent reasonable assurance report, will be publicly disclosed on the official website of PT Hartadinata Abadi Tbk upon issuance.

During the previous reporting period, a low-risk non-conformance was identified relating to the use of a Know Your Customer (KYC) questionnaire that was not fully aligned with the KYC Questionnaire contained in the LBMA Refiner's Toolkit for one supplier. Corrective action was promptly implemented through the reissuance of an updated KYC questionnaire fully aligned with LBMA requirements to the relevant supplier. In addition, the revised KYC questionnaire has been adopted as the standard onboarding and due diligence documentation for all new suppliers. This corrective action was completed during the reporting period, and the matter has been formally closed.



STEP 5 – REPORT ON SUPPLY CHAIN DUE DILIGENCE

PT Emas Murni Abadi has fully complied with Step 5: Report on supply chain due diligence.

PT Emas Murni Abadi has prepared the compliance report, which includes information on the sources of gold, identified risks, and the mitigation measures undertaken.



TABLE 2: PT EMAS MURNI ABADI'S MANAGEMENT CONCLUSION

Does the Refinery comply with the requirements contained in LBMA's Gold Responsible Program Guide for the fiscal year?

Yes

PT Emas Murni Abadi confirms that all operational processes and policies during this fiscal year have met the requirements of the LBMA Responsible Gold Program Guide. We maintain this compliance through rigorous tracking systems, supplier risk management, and regular audits. These steps demonstrate our firm commitment to upholding the integrity of a responsible gold supply chain.
