

PT. Artha Cipta Langgeng Step 5 Public Due Diligence Report

1. Company Information

PT. Artha Cipta Langgeng was established in 2008 as a tin smelter company, located at Kenanga, Sungailiat, Bangka Regency, Bangka Belitung Province. The profile company of PT. Artha Cipta Langgeng can be found on website : www.acltin.com

PT. Artha Cipta Langgeng has no RMAP Assessment on 2024 and 2025. The company RMI ID: CID001399. The latest assessment summary report is published on the RMI website: <http://www.responsiblemineralsinitiative.org/tin-conformant-smelters/>

This report covers our activities from January 1st, 2025 to December, 31st 2025.

2. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, PT. Artha Cipta Langgeng has developed a supply chain policy. The supply chain policy is developed referring to Annex II in “OECD Due Diligence” for CAHRAs responsible mineral supply chain and responsible mineral initiative assurance (RMI) process, tin processes, and tantalum standards. As the tin company that running with extracting, trading, handling, and exporting minerals, PT. Artha Cipta Langgeng is aware there are risks on responsible sourcing of minerals and we commit to prevent and avoid those risks by implementing the acts referred to our supply chain policy. We declare that the products and raw materials we use, and produce are free from conflict-affected and high-risk areas. Our supply chain policy is published on our company website: www.acltin.com.

3. Company Management Systems.

3.1 Management Structure

PT. Artha Cipta Langgeng follows through on its commitments in the supply chain policy and has developed and internal procedure for due diligence with the following aspects:

- The company's director and management team is responsible to oversee the due diligence program and risk Management design and implementation.
- The company has management team to coordinate the work of the relevant departments (including the HR Department, Processing and Smelting Department, Mining Department, and HSE Department) to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified.
- The company conducts due diligence management system training once a year for key staff from all relevant departments required in due diligence program. If there is an update of the program, the company conducts additional training as necessary.

3.2 Internal Systems of Control

PT. Artha Cipta Langgeng is a company that operates its own mine and smelting plant. In 2025, tin ore processing comes from the mining process carried out by PT. Artha Cipta Langgeng.

PT. Artha Cipta Langgeng fully controls mine production, shipments from mine to smelter, and all processes up to tin ingot production. PT. Artha Cipta Langgeng ensures that affiliated company and cooperating company have passed KYC (Know Your Counterparties) procedure and CAHRAs Identification.

3.3 Record Keeping System

PT. Artha Cipta Langgeng requires that all records relating to the due diligence program are maintained at least for five years. The list of retention times can be found in Formulir Daftar Induk Dokumen Mutu with document code F-MJM-ACL-11.

4. Grievance Mechanism

PT Artha Cipta Langgeng has established the grievance mechanism to accommodate all the needs, complaints, suggestions, reports from the employees, suppliers, customers, stakeholders, and other external parties to enhance the quality of transparency, accountability, and production stability. The internal and external parties can share their opinions through:

FOR INTERNAL PARTY

- | | |
|----------------------|-----------------------------|
| • HRD Manager | : +628 21 8218 8845 |
| • Email | : pt_acl@yahoo.co.id |

FOR EXTERNAL PARTY

- | | |
|------------------------------------|---|
| • Branch Office Call Center | : (0717) 4256469 |
| • Head Office | : (021) 2525668 |
| • Email | : pt_acl@yahoo.co.id |
| • Letter | : Jl. TPA Lingkungan Kenanga Permai,
Sungailiat, Bangka, Indonesia |

Note :

- All received messages (complaints, suggestions, reports, opinions) from internal and external parties will be collected by HRD team per one month and evaluated in the management review meeting.
- HRD team will reply all received messages within work hours.
- Emergency messages will be directly informed to the senior manager to solve or evaluate them immediately.
- The evaluation result, both for general and emergency messages will be informed by the HRD team to the sender.

PT. Artha Cipta Langgeng has not received any grievance from both internal and external parties during the January 1st, 2025 to December 31st, 2025.

5. Risks Identifications

In order to identify and assess mineral supply chain risks. PT. Artha Cipta Langgeng has implemented the following process:

1. Identification of Supplier and Material Source
2. Identification of Conflict-affected and High-Risk Areas
3. Determination of the Scope of the Risk Assessment
4. Identification of Supply-Chain Risk(s)
5. Assessment of Supply-Chain Risk(s)

5.1 Identification of Supplier and Material Source

We ensure all supplier and material are identified and sufficient documentation is obtained or the origin and chain of custody of material in accordance with the requirements of RMI-RMAP standard and its Annexes.

a. Identifications of counterparty

We establish and implement the basic Know Your Counterparty (KYC) requirements to determine the identity, type of business relationship and legality of business operations for each artisanal miner and transporter of the tin concentrates from its mines. The KYC process include verification of individuals and entities. Based on KYC identification of PT Artha Cipta Langgeng and its affiliates, the individuals and entities are free from the sanctions list of the United Nation (UN), the European Union (EU), the United States (US), and the United Kingdom (UK). Also Indonesia is not listed as Country Subject to Comprehensive Sanctions.

b. Identifications of material

We identify the origin of materials and categorize the materials in accordance with their source using Table 4 of the RMI-RMAP Tin & Tantalum Standard. Full disclosure requirements on the origin and chain of custody of material will be demonstrated by the Delivery Orders issued for each delivery in to the smelter. The documentation required is determined in accordance with the category and source of the material using annex I for guidance on the documentation requirements. Based on materials identification, all material sources used for PT. Artha Cipta Langgeng are free from any issues listed in the RMI-RMAP Tin & Tantalum Standard.

5.2 Identification of Conflict-Affected and High-Risk Areas

PT. Artha Cipta Langgeng has established a procedure to identify CAHRAs. The objective of the following procedure is to allow the company to identify possible Conflict-Affected and High-Risk Areas (CAHRAs) and will apply to all cassiterite providers (including origin and transit routes for all primary material and the identification of any Conflict-Affected and High-Risk Areas in their supply chains).

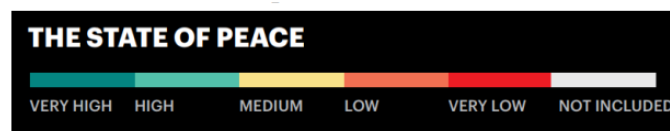
PT. Artha Cipta Langgeng determines qualification once a year or if there are any relevant occurrences, whether or not the country of operation of smelter and mine is

considered a CAHRA, based on the following criteria as identified by the OECD Due Diligence Guidance, from the link below:

<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/conflict-affected-and-high-risk-areas>

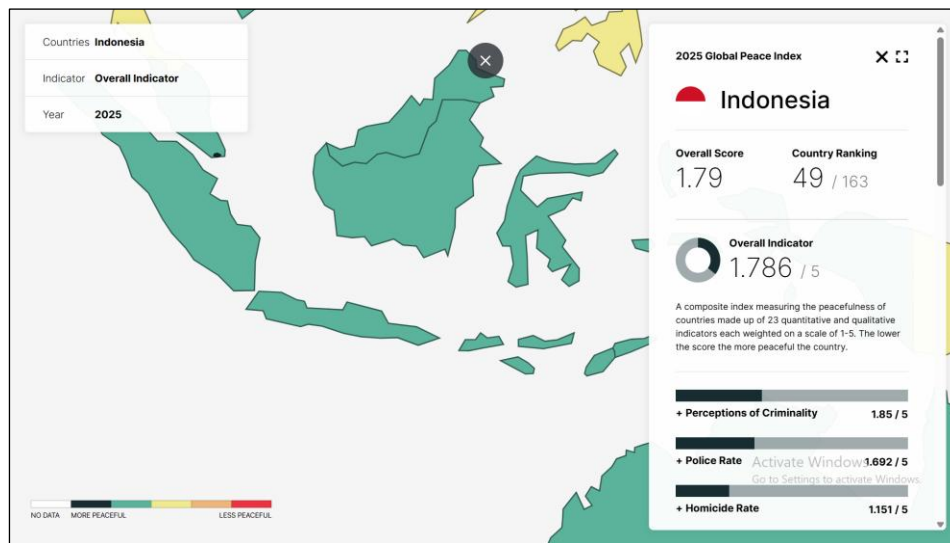
a. Conflict

The Global Peace Index (GPI) measures more than just the presence or absence of war. It captures the absence of violence or the fear of violence across three domains: Safety and Security, Ongoing Conflict, and Militarisation. Both the Ongoing Conflict and Safety and Security domains recorded deteriorations, with only the Militarisation domain recording an improvement. GPI is a composite index measuring the peacefulness of countries made up of 23 quantitative and qualitative indicators each weighted on a scale of 1-5. The lower score is the more peaceful country.



Source: <https://www.visionofhumanity.org/maps/#/>

PT. Artha Cipta Langgeng determines that the country stated as **High-Risk Area** if its global average score is 2.35 and above (indicated by the orange until the red color from The State of Peace Bar). All materials processed by PT. Artha Cipta Langgeng are from Indonesia. In 2025, Indonesia has a global average score of 1.79 out of a range of 1-5 and ranks 49 out of 163 countries. It shows that the sources of PT. Artha Cipta Langgeng are considering from the category **Low-Risk Area**.



Source: <https://www.visionofhumanity.org/maps/#/>

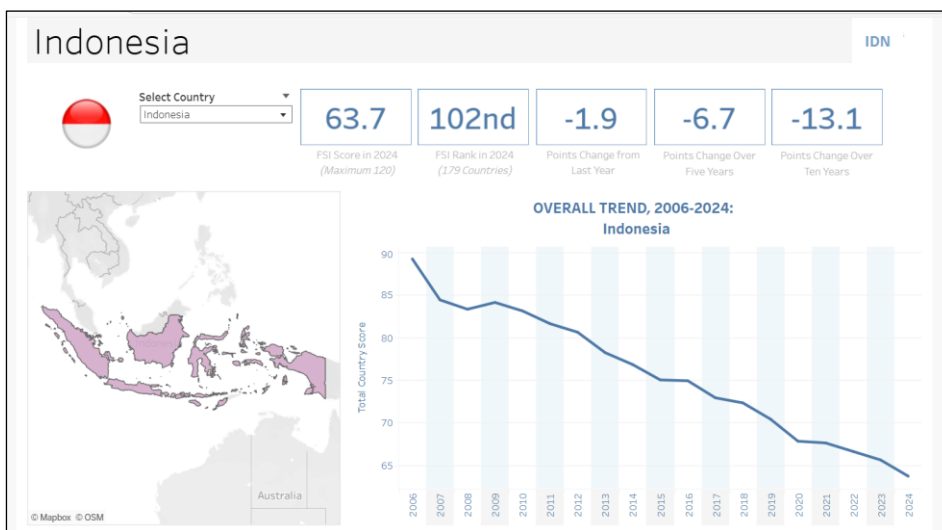
b. Governance

The Fragile States Index (FSI) produced by The Fund for Peace (FFP), is a critical tool in highlighting not only the normal pressures that all states experience, but also in identifying when those pressures are outweighing a states' capacity to manage those pressures. By highlighting pertinent vulnerabilities which contribute to the risk of state fragility, the Index — and the social science framework and the data analysis tools upon which it is built — makes political risk assessment and early warning of conflict accessible to policy-makers and the public at large.

Content Analysis used with each of the twelve indicators of the CAST framework are broken down into sub-indicators, and for each of these, hundreds of Boolean search phrases are applied to global media data to determine the level of saliency of issues for each of those sub-indicators in each country. The overall assessment is based on 4 indicators including: cohesion indicators, economic, political, and social.

PT. Artha Cipta Langgeng determines that the country was stated as High Risk Area if the score above to 70.

PT. Artha Cipta Langgeng is located in **Indonesia**, specifically in Penyusuk Luar Sea, Belinyu, Bangka Regency, Bangka Belitung Province.



Source: <https://fragilestatesindex.org/>

PT. Artha Cipta Langgeng determines that the country was stated as High Risk Area if the score above to 70. In 2024, Indonesia has score 63.7 and it shows that the sources from PT Premium Tin Indonesia is considering from the category **Low-Risk Area**.

c. Human Rights

The Global Slavery Index (GSI) is an international report published by Walk Free that measures and analyzes modern slavery worldwide, including forced labor, human trafficking, debt bondage, forced marriage, and severe child exploitation, by estimating how many people are affected in each country, assessing vulnerability to slavery, and evaluating how effectively governments are responding through laws, policies, and enforcement, with the goal of informing policy, supporting advocacy, and raising global awareness about hidden forms of exploitation.

There are three categories, low, prevalence, and high. Starting with bright color until dark color, bright color means **Low-Risk Area** and dark color means **High Risk Area**. And other color which is in the middle of that's call prevalence.



PT. Artha Cipta Langgeng determines that the country stated as High-Risk Area if its global indicated by the dark color or high category from The State of Peace

Bar. All materials processed by PT. Artha Cipta Langgeng are from Indonesia. Indonesia's Global Slavery Index (GSI) is orange, which is mean the country in prevalence category, It shows that the sources of PT. Artha Cipta Langgeng are considering the category **Low-Risk Area**.



(source: <https://www.walkfree.org/global-slavery-index/map/>)

d. Identifying Conflict-Affected and High-Risk areas for EU importers of minerals

The European Union (EU) is committed to ensuring that its imports of minerals and metals are sourced responsibly and align with European policies on conflict prevention and development. In light of this commitment, the indicative list of CAHRAs provided by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821 requires EU importers of tin, tantalum, tungsten, and gold (and the minerals containing them) to carry out supply chain due diligence based on the five-step approach established by the OECD. The list of EU CAHRAs as of 2025 are Afghanistan, Burkina Faso, Burundi, Cameroon, Central African Republic, Chad, Colombia, Democratic Republic of the Congo, Egypt, Eritrea, Ethiopia, India, Libya, Mali, Mozambique, Myanmar, Niger, Nigeria, Pakistan, Philippines, Somalia, South Sudan, Sudan, Turkey, Ukraine, Venezuela, Yemen, Zimbabwe. Based on EU identification, Indonesia is not listed as the EU CAHRAs in 2025.

(source: <https://www.cahraslist.net/cahras>)

e. Section 1502 of The U.S. Dodd-Frank Act

United States Dodd Frank Act section 1502 requires listed companies to disclose whether they use “conflict minerals” (tin, tungsten, tantalum and gold) and whether those minerals originated in the Democratic Republic of the Congo (DRC) or its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. Based on Section 1502 of The U.S. Dodd-Frank Act identification or its nine adjoining countries, Indonesia is not listed as CAHRAs.

f. Conclusion

We conclude if 2 out of 3 criteria was found to be “High Risk Area”, then the area will be considered as CAHRAs and will not source any materials from that CAHRAs. The areas listed in European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821 and Section 1502 of the Dodd Frank Act will automatically stated as CAHRAs and will not source any materials from that CAHRAs. Based on all of CAHRAs identifications, PT. Artha Cipta Langgeng get High Risk Area just in 1 criteria, it means that all materials used for PT. Artha Cipta Langgeng are free from conflict affected and high risk areas.

5.3 Determination of the Scope of the Risk Assessment

We review the information noted in steps 1 and 2 above on the category and source of material to identify CAHRA and will note any red flags, inconsistencies, or discrepancies related to the counterparty or material, especially with regard to the primary raw material sources. The proper corrective actions will be taken in accordance with the standard and the guidelines. Based on steps 1 and 2 identifications, there are no red flags, inconsistencies, or discrepancies related to the counterparty or material, especially with regard to the primary raw material sources.

We determine the sourcing risk level for each transaction of primary material in accordance with table 5 of the RMI-RMAP Protocol.

Primary Material Risk Level

Type of Material	Sourcing Risk Level	Definition
Primary Material	Low-Risk	For low-risk supply chains, all of the following criteria apply: 1. Supply chains where tin or tantalum material is not mined or transported through a CAHRA; AND 2. Material originates in a country with know active ore production for tin and/or tantalum; AND 3. There are no red flags identified
	High-Risk	For high-risk chains, all of the following criteria apply: 1. Supply chains where tin or tantalum material is mined or transported through a CAHRA; and/or tantalum; and/or there are discrepancies, inconsistencies or other issues identified during the review of material and documentation that have not been addressed; 2. There is one or more red flag identified.

Based on Risk Level Identification, all material sources from PT. Artha Cipta Langgeng is not mined and transported through CAHRAs, material originates in a country with know active ore production for tin which is Indonesia, and there are no red flags identified. It shows that PT. Artha Cipta Langgeng is on **Low-Risk Level**.

5.4 Identification of Supply-Chain Risk(s)

Each High-Risk sources as identified in table 5 of the protocol will require completion of the audit High-Risk Sources workbook prior to the audit program. In accordance with the RMI-RMAP protocol and considered with our supply chain, we currently use the Low-Risk workbook.

5.5 Assessment of Supply-Chain Risk(s)

We assess presences and severity of risks in the supply chain by comparing the tactual circumstances against the risks included in the OECD Guidance Annex II Model Supply Chain Policy.

5.6 Risk(s) Management

Since PT. Artha Cipta Langgeng supplies tin ore from the mining process carried out by PT. Artha Cipta Langgeng in 2025 that is coming from Indonesia also, there are no risks associated with CAHRAs. But if in the future PT. Artha Cipta Langgeng supplies tin ore from other suppliers and risks are found, PT. Artha Cipta Langgeng will implement risk management procedure according to the rules and suggestions from RMI Organization.

This report is published on January, 08th 2026 and the next report will be published annually. The 2026 report will be published in January 2027.

Sungailiat, 08th January 2026
PT Artha Cipta Langgeng

Management