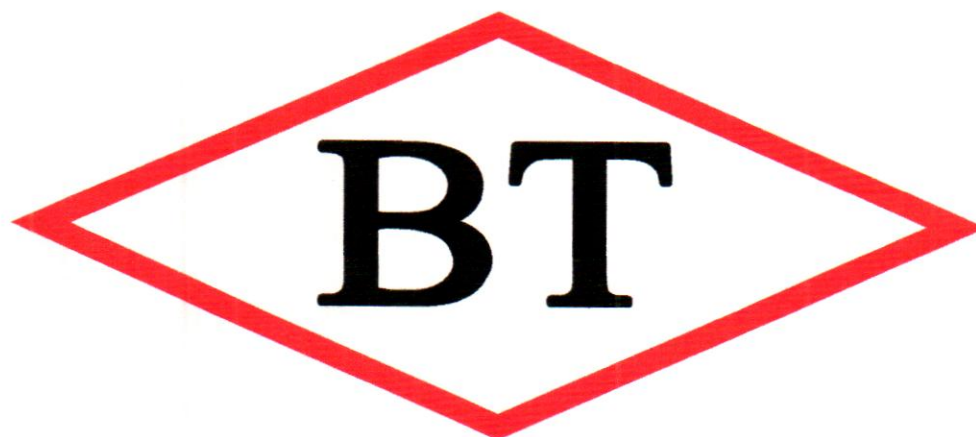


STEP 5 REPORT
RMAP
(RESPONSIBLE MINERAL ASSURANCE PROCESS)



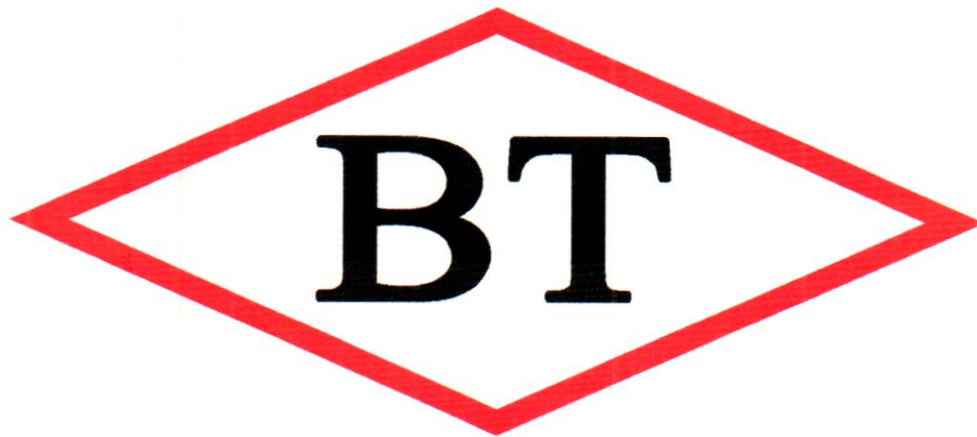
PT. BUKIT TIMAH

APPROVAL SHEET

STEP 5 REPORT

RMAP

(RESPONSIBLE MINERAL ASSURANCE PROCESS)



PT. BUKIT TIMAH



Created By :	Approved By :
	
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TABLE OF CONTENTS

TITLE SHEET i

APPROVAL SHEET ii

TABLE OF CONTENTS 1

1. INTRODUCTION 2

2. SCOPE 2

3. ABOUT RMAP 2

4. STEP 5 REPORT TEMPLATE 3

 4.1. Company Information 3

 4.2. RMAP Assessment Summary 3

 4.3. Supply Chain Policy 3

 4.4. Management System 4

 4.5. Risk Identification 5

 4.6. Risk Management 6

1. INTRODUCTION

PT. Bukit Timah is a Tin Smelter which is located in Pangkalpinang – Bangka, the finish product is Tin Ingot with a minimum Sn content 99.90%

According to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act signed into law 1 by President Obama on July 21st 2010 which defines 'Conflict Minerals and Metals' as gold, tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite. Our company supports the objectives of the law to reduce the link between mining and conflict in the eastern provinces of the Democratic Republic of Congo (DRC) and adjoining countries and further the humanitarian goal of ending violent conflict there.

PT Bukit Timah's policy is to completely don't use any Conflict Minerals and Metal in the supply chain. Our material, which is Tin ore, is 100% supplied by domestic source in Indonesia.

This Step 5 Report was prepared to comply with the RMAP standards.

2. SCOPE

This Report is related to responsible supply chain from conflict affected and high risk areas based on the OECD Guidelines regarding general disclosures for supply chain due diligence from materials obtained and sent to factory for processing until deliver to the customer.

3. ABOUT RMAP

Responsible Minerals Assurance Process (RMAP), previously called Conflict Free Smelter Program (CFSP), takes a specific approach to help companies make the right choices about responsible sourcing of minerals in their supply chains. Focusing on "key points" (points with relatively having some actors) in the global metals supply chain, RMAP uses smelter management system assessments and independent third-party procurement practices to validate compliance with RMAP standards. This assessment applies a risk-based approach to validate the Smelter's enterprise-level management process regarding responsible mineral sourcing. Then downstream companies can use this information to communicate their procurement options. A list of smelters that meet the requirements of the assessment standard is published on the official RMI website <http://www.responsiblemineralsinitiative.org/>. Assessment standards are developed in accordance with global standards, including the OECD Guidelines and the Dodd-Frank Wall Street Reform and Customer

STEP 5 REPORT
PT. BUKIT TIMAH

Protection Act. As a result, assessment standards require participating Smelters to publish due diligence information in accordance with the Step 5 Report. This template is intended to help Smelters comply with these requirements.

4. STEP 5 REPORT TEMPLATE

4.1 Company Information

a. Company Name	PT. Bukit Timah
b. CID Number	CID 001428
c. Company Address	Bangka Belitung, Indonesia
d. Processed Material 3TG	TIN
e. Periode covered in this Report	01 Jan 2019 - 31 Des 2020

4.2 RMAP Assessment Summary

a. Last date of RMAP Assessment each facility	23 - 25 Jan 2018
b. Assessment periode	01 Nov 2016 - 31 Des 2017
c. Assessment Company	SCS GLOBAL SERVICES
d. URL for latest assessment overview report	www.responsiblemineralsinitiative.org/tin-conformant-smelters/

4.3 Supply Chain Policy

Company's management and executives establish and documented the company's Supply Chain policy and commit to the RMAP and ensure that all employees understand and accept their responsibilities and authorities over the company's Supply Chain policy.

The company's Supply Chain policy is used as a framework in establishing and reviewing the RMAP of PT. Bukit Timah which is communicated and implemented by all work units and reviewed for compliance with its achievements on a regular basis through management reviews and internal communication forums.

[This can be seen in the Supply Chain Policy.](#)

4.4 Management System

a. Organization structure, responsibilities, and authorities

Top Management must ensure that responsibilities and authorities are defined and communicated within the company organization. The responsibilities and authorities of all employees related to the management of RMAP are defined in the Job Description of each position and documented.

Top Management appoints a Management Representative, in this case the Operations Manager as Due Diligence Manager who has the responsibility and authority to:

- a. Ensure that RMAP has been created, executed and maintained according to standards.
- b. Reporting the implementation results of the RMAP to Top Management for review continual improvement.
- c. Ensure that RMAP is understood by the entire company organization.
- d. Responsible for matters relate with external parties related to the RMAP.
- e. Monitor and evaluate the effectiveness and control of the implementation of the RMAP on a regular basis through management review.

b. Related parties

PT. Bukit Timah establishes the company's Supply Chain policy procedures with relevant parties in the RMAP and defines the role of each party in implementing due diligence.

c. Training

PT. Bukit Timah has obligations in terms of:

- Provide the necessary socialization for each personnel in fulfilling the implementation of the due diligence program.
- Evaluate the effectiveness of the due diligence program.

d. Management Review

Management conducts management reviews at least once a year or as determined at each meeting and minutes of management review meetings with the aim of maintaining the suitability and effectiveness of the ongoing system, including opportunities to make improvements and changes to the due diligence program.

4.4.1 Internal control system

Company determines internal control system for the company's supply chain and how it operates and the data provided as part of the due diligence program.

- a. Controlling the origin of the material to ensure that the material is only comes from the IUP location of PT. Bukit Timah or IUP cooperation and does not contribute to conflict, human rights violations, tax violations, money laundering activities or bribery.
- b. Create and socialize all policies related to RMAP to external parties of the company.
- c. PT. Bukit Timah establishes and implements effective arrangements for communication with Suppliers in correlation with material information, handling requests, contracts or orders, including amendments thereto, as well as supplier feedback, including Supplier complaints. Communication with suppliers is carried out by means of field visits, direct communication, and handling inputs including Supplier complaints.
- d. PT. Bukit Timah has grievance mechanism by implementing the Whistle-Blowing System (WBS) policy to ensure healthy, ethical, integrity, and transparent business practices as well as continuous disclosure of information.
- e. *PT. Bukit Timah has established grievance mechanism regulated in the company's internal standard operating procedures (SOP-BT-005).*

4.4.2 Record Keeping System

- a. PT. Bukit Timah ensure that all information required in the RMAP has been prepared, documented, implemented, maintained and developed.
- b. All documents related to RMAP are kept for at least 5 years.
- c. PT. Bukit Timah establish and maintain a system of procedures to control all documents and data according to international standards so they can be traced. Ensure all documents are controlled for distribution to prevent unwanted use of expired documents and provide appropriate identification when documented. All documented information both internal documents and external documents will be controlled and maintained by the personnel appointed as Document Controller.

4.5 Risk Identification

- a. PT. Bukit Timah using 3 (three) references, namely the Heidelberg Conflict Barometer (Conflict), Worldwide Governance Indicators (Government), and the Fragile State Index (Human Rights) as the basis for identifying conflict-affected and high-risk areas (CAHRA).

Reference and Criteria for Identification of CAHRA		
Reference	Description	CAHRA criteria:
Conflict: Heidelberg Conflict Barometer	<ul style="list-style-type: none">• Armed conflict• Widespread violence	1. Has score 4-5 (war/high risk)
Government: Worldwide Governance Indicators (WGI)	<ul style="list-style-type: none">• Voice and accountability• Political stability and absence of violence/ terrorism• Government effectiveness• Regulatory quality• Rule of law• Control of corruption	1. Has score 76-100 (high risk)
Human Rights: Fragile State Index	<ul style="list-style-type: none">• Other human rights violations• Political instability or repression• Institutional weaknesses• Insecurity• Fall of public infrastructure• Widespread human rights violence• Violations of national and international laws	1. Has score 91-120 (high risk)

- b. PT. Bukit Timah create a KYC questionnaire that must be filled out by Suppliers in order to obtain information about Suppliers as the basis for CAHRA's risk assessment. Whenever a discrepancy, error or incomplete information is identified in the questionnaire, clarification and review will be carried out as necessary.
- c. Based on the information obtained through the questionnaire, including the origin for all materials, Supply Chain identification will be carried out in each category including: origin of materials, material transit routes, and Supplier locations.
- d. If a risk is identified based on the CAHRA criteria, a due diligence will be carried out on the supplier.
- e. *PT. Bukit Timah has established a grievance mechanism regulated in the company's internal standard operating procedures (SOP-BT-005).*

4.6 Risk Management

PT. Bukit Timah is not included in the category of conflict-affected and high-risk areas but still follows the RMAP standard.