

PT. Smelting LME Responsible Sourcing Control Policy

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PT. Smelting as a copper cathode manufacturer shall establish and operate a control system in accordance with Responsible sourcing of London Metal Exchange (hereinafter referred to as the "LME") in order to procure raw materials for this metal and shall undergo an audit by LME or a certified auditor on the risk assessment. We will present and implement our LME Responsible Sourcing Control Policy, which applies to copper, as follows.

(1) Procure raw materials in accordance with LME Responsible sourcing and manage risks listed in "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" Annex II (listed below).

- ① Direct or indirect support to non-state armed groups
- ② Serious abuses associated with the extraction, transport or trade of minerals
- ③ Public or private security forces
- ④ Bribery and fraudulent misrepresentation of the origin of minerals
- ⑤ Money laundering
- ⑥ Payment of taxes, fees and royalties due to governments

(2) In the event of serious abuses or support to non-state armed group, we will immediately suspend or cancel the trade. In the event out of serious abuses or support to non-state armed group, we will mitigate the risk and immediately suspend transactions if we judge that the risk cannot be mitigated.

(3) The risk assessments of the raw material procurement supply chain conducted in line with the OECD Guidance's model management system policy are submitted to LME directly or will be audited by the auditor if necessary. And the system and implementation status of raw material procurement management, including copper, are reported annually.