



Responsible Sourcing Public Due Diligence Report PT. Obi Nickel Cobalt

Reporting Period: May 1st 2024 – May 30th 2025

Company Information

PT. Obi Nickel Cobalt ("The Company" or "PT ONC") is a Nickel Processing Company operating on Obi Island, Kawasi, North Maluku which started operation in 2024. PT ONC (Cobalt CID No: CID005253; Nickel CID No: CID005247) processes low grade nickel ore (Limonite), as an input to produce Mixed Hydroxide Precipitate (MHP).

Assessment summary

PT. Obi Nickel Cobalt has been subject to an RMAP assessment, on:

Date : 28 – 29 May 2025

Conducted by : Arche Advisors

Auditor Name : Arifzal Adrianto and Paulus Yudha Perwira Palendeng

Audit Period : 1 May 2024 – 30 April 2025

Company Supply Chain Policy

PT ONC has fully adopted the Responsible Sourcing Policy ("The Policy") from its Mother company, PT. Trimegah Bangun Persada Tbk. ("PT TBP"). PT ONC's operations is located in the PT TBP's mining concession which require The Company subject to align with relevant policies, procedures and regulations of the concession holder. The Policy is fully aligned with the third edition of the OECD *Due Diligence Guidelines* for Mineral Supply Chains from Conflict-Affected and High-Risk Areas (OECD Guidelines). Following the Policy, The Company avoids sourcing minerals from the Conflict-Affected and High-Risk Areas ("CAHRA"). Such areas are where there is identified armed conflict, widespread violence, including violence caused by criminal networks, or other risks that cause serious and widespread harm to society. The Policy has been approved by Management and also communicated to relevant stakeholders, and it is publicly accessible at the following link: [Responsible Sourcing Policy](#)

Company Management Systems

Management Structure

PT ONC is committed to implementing responsible sourcing practices. Therefore, The Company has developed a Due Diligence Management System. Implementation of the Due Diligence Management System is carried out by the Purchasing Department as the owner of the main process of procurement in The Company, including the sourcing process of mineral raw materials. The Due Diligence Management System implementation is supported by other related departments according to their competencies. The Due Diligence Management System is designed to identify and minimize supply chain risks at PT ONC.

PT ONC provides sufficient resources so that the Due Diligence Management System can be implemented properly. This includes appointment of a Senior Manager to oversee the implementation of The Company's Due Diligence Management System.

The Company carries out due diligence training at least once a year or whenever there is a change and/or update on the standard and/or management system to the Department involved in carrying out due diligence. Training is included in the induction training for new employees in relevant departments. In



May 2024, The Company has conducted training and disseminating the latest's Responsible Sourcing Policy to all relevant departments to strengthen the implementation of its Due Diligence Management System. Moreover, The Company has also communicated the Responsible Supply Chain Policy to all primary raw material suppliers in May 2024 - April 2025 period. The company has incorporated due diligence requirements into legally binding agreements with those suppliers.

Internal Control Systems

The Company implements a control system to ensure that information on the origin of mineral raw materials is maintained and available. The control is integrated into the operational policies and procedures that apply to all operational areas of The Company, especially the production and procurement areas of mineral raw materials. The control system is fully aligned with the OECD Guidelines, Joint Due Diligence Standard, Cobalt Refiner Supply Chain Due Diligence Standard, Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains (All Minerals) and the ISO 31000:2018 risk management framework.

PT ONC is committed to conduct capacity building with all parties involved in its procurement process. The Company conducts regular trainings and disseminations to employees and suppliers regarding its Policy, including supply chain risks listed in the Annex 2 of the OECD Guidelines and Annex X of the European Union Battery Regulation (EU Battery Regulation).

PT ONC has a complaint handling system in the form of a whistleblowing and grievance system that can be accessed by relevant parties to report violations or concerns about potential violations in its supply chain. The complaint system can be accessed through the following link:

[ONC Complaint Handling](#)

The Company requires that all records and documents related to the Due Diligence Management System be kept for a minimum of 10 (ten) years and stored in The Company's database.

Risk Identification

Referring to the Responsible Sourcing Policy, The Company seeks to prevent or reduce all risks identified in Annex II of the OECD Guidelines and Annex X of the EU Battery Regulation, namely:

- Any forms of torture, cruel, inhuman and degrading treatment;
- Any form of forced or compulsory labor;
- The worst forms of child labor according to ILO Convention No. 182;
- Other serious human rights violations such as sexual violence;
- War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide;
- Direct and indirect support for non-state armed groups and their affiliates and public or private armed forces;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Money laundering;
- Non-payment of taxes, royalties and other mandatory fees to the Government;
- Inadequate occupational health and safety conditions to maintain the physical and mental health of mine workers, both directly and indirectly;



- Environment, climate and human health, taking into account direct, consequential, indirect and cumulative impacts.

The Company has implemented Due Diligence framework to obtain information on the region, production process, supply chain, legal status and identity of suppliers, including the potential risks mentioned above. All suppliers of mineral raw materials are required to undergo the Know Your Supplier (KYS) process, which includes completing the KYS form and passing the screening procedure prior to commencing any engagement with PT ONC. Furthermore, the Company also verifies whether a supplier is listed or associated with any sanction lists issued by credible sources. These include but not limited to Europe Union Sanction Tracker, UN Security Council Consolidated List, and the Daftar Terduga Teroris dan Organisasi Teroris (Indonesia sanction list). Incompleteness or inconsistency of supplier information or mineral raw materials in the KYS process will lead to a request to update the KYS form and complete supporting documents before cooperation is carried out.

The Company also has implemented procedures to identify CAHRAs and to identify red flags in the supply chain. These procedures apply to all primary raw material suppliers. The procedures are including the credible source and also the criteria to determine CAHRAs. The procedures will be reviewed at least annually. The following credible sources are used to determine CAHRAs:

- Heidelberg Conflict Barometer
- Global Peace Index
- World Governance Indicator
- Rule of Law Index
- UNDP Human Development Index
- European Union CAHRA List
- Section 1502 of the Dodd Frank Act

Based on these resources, PT ONC creates and documents a list of CAHRAs, which will be updated at least once every 3 (three) months or after a significant change in circumstances. The CAHRA list then will be communicated to personnel that related to the due diligence process.

If any supply chain risks are identified, PT ONC will determine the risk mitigation plan and monitor its implementation periodically. Relevant stakeholders (including suppliers) are invited to participate in the risk mitigation process.

During the 2024 period, there were no high-risk mineral raw material sourced for PT ONC. PT ONC did not source mineral raw materials originating from or passing through any CAHRAs. All mineral raw materials obtained by PT ONC are minerals originating from non-conflict areas.

Support for Transparency

PT ONC is committed to continue strengthening governance practices according to global standards for transparency. The company complies with applicable regulations and reports relevant information regarding its operations to Indonesian government institutions