



POLICY
WHISTLEBLOWING SYSTEM (WBS)

No.: AMI-POL-07

Rev: 0

Date: 26/11/2025

APPROVAL SHEET

(the original policy signed in Bahasa Indonesia)

Jakarta, November 26th, 2025

Certified by:		
President Director	Director	Director
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Director	Director	
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	POLICY WHISTLEBLOWING SYSTEM (WBS)		
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I. POLICY BACKGROUND AND PURPOSE

PT Alamtri Minerals Indonesia Tbk (“**the Company**”) consistently applies the good corporate governance (GCG) principles and corporate values in its business activities, in order to achieve the company goals and objectives as well as preventing any conduct that does not conform to the corporate values and/or has the potential to harm the Company and its subsidiaries (“**the Group**”). To support this, the Company uses a system for reporting any action or suspected action of fraud, wrongdoing, or violation within the Group’s work environment (“**Violation(s)**”), which is managed professionally by an independent party (**whistleblowing system** or “**WBS**”). The reporting of Violations may be made anonymously or otherwise, in order to guarantee the confidentiality of the informer or the report on Violations.

This WBS Policy of the Company serves as a guideline for all users, which include all the Group’s employees and other stakeholders for submitting reports on Violations through WBS. This WBS Policy of the Company has been made aligned to the WBS Policy of the Company’s parent company PT Alamtri Resources Indonesia Tbk (“AlamTri”), which provide WBS for AlamTri and its subsidiaries, including the Company’s group (collectively referred to as “**the AlamTri Group**”).

II. RESPONSIBILITY

WBS is managed by an independent party and placed under the responsibility of WBS members, which consist of representatives of the AlamTri Group’s management (“**WBS Team**”). In managing WBS, the independent party shall submit the reports on Violations to the WBS Team, to be forwarded AlamTri’s Board of Directors and followed up by AlamTri’s management, subsidiaries’ management, and/or the independent party based on the applicable procedure. The WBS Team shall regularly report on the process and progress of the handling of the reports on Violations to AlamTri’s Board of Directors, who carry out supervision on the AlamTri Group’s WBS.

III. REPORTING SCOPE AND MECHANISM

The informer may submit a report in the event that they know, believe, or suspect any Violation within the Group’s work environment that has the potential to incur damage to and/or harm the Group.

1. The scope of Violations that may be reported through the Company’s WBS among others concern:

- a. Corruption;
- b. Bribery/Gratification;
- c. Fraud;
- d. Theft/Embezzlement;
- e. Extortion;
- f. Forgery;
- g. Conflict of Interest;
- h. Harassment;
- i. Violation of the Law; and
- j. Violation of the Company Regulations/Collective Labor Agreements.

2. The reporting on Violations may be made through the channels provided, i.e. the website, email, telephone, facsimile, SMS/Whatsapp, and postal service, for which information is provided at the whistleblowing system menu on the Company's website (www.alamtriminerals.id).
3. The requirements for reporting Violations:
 - a. The reports may be made entirely anonymously, partly anonymously, or with full disclosure of the informer's identity, supported with the information or initial evidence of Violations.
 - b. The reports conveyed shall not be of personal complaints or problems. Each reporting on Violation shall fulfill the requirement of being impartial on ethnicity, race, religion, and group, and not being defamation and/or hoax.
4. Follow-ups on Violations:
 - a. The Company will respond to the parties reporting the Violations through the channels as explained in point 2 above.
 - b. Each report on Violations will be followed up and processed by the Company in accordance with the applicable procedure.

IV. PROTECTION FOR INFORMERS

- (i) The Company will protect the informers who make the report on Violations in good faith, including the witness of the Violations, by keeping their identity or the information reported confidential.
- (ii) The Company also keeps the identity of the reported parties confidential as long as the suspected Violations have not been proven.