



PT HALMAHERA PERSADA LYGEND

SUSTAINABILITY REPORT 2024



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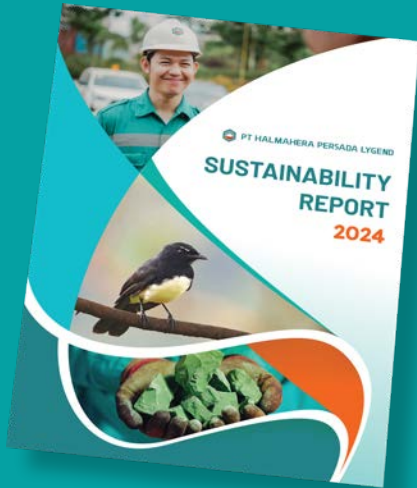
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About This Report


[GRI 2-2, 2-3, 2-5]



This 2024 Sustainability Report of PT Halmahera Persada Lygend (“PT HPL”) outlines the Company’s performance and progress throughout the year. As an affiliate company of PT Trimegah Bangun Persada Tbk (“PT TBP” or “Harita Nickel” or “the Group”), PT HPL’s operations are based within the PT TBP complex. PT HPL’s sustainability policies and frameworks are aligned with those of Harita Nickel and PT HPL’s majority shareholder, Lygend Resources & Technology Co., Ltd. (“Lygend” or “Lygend Resources”), which is listed in Hong Kong Stock Exchange. The report also outlines PT HPL’s contributions to selected Sustainable Development Goals (SDGs) and their corresponding targets (see [Contributing to the SDGs](#)). For further details, please refer to PT HPL’s [website](#), the [PT TBP 2024 Sustainability Report](#), and the [Lygend Resources ESG Report 2024](#).

This report has been prepared with reference to the latest and relevant global, Hong Kong, and Indonesian reporting frameworks and regulatory requirements, including:

- Global Reporting Initiative (GRI) Standards, including the GRI 14: Mining Sector Standard. See [GRI Content Index](#).
- The International Financial Reporting Standards Foundation (IFRS) Sustainability Standards (see [IFRS Index](#)), which incorporate:
 - » The Sustainability Accounting Standards Board (SASB) standards for Metals and Mining (see [SASB Index](#)).
 - » The Taskforce on Climate-related Financial Disclosures (TCFD) recommendations.
 - » Early adoption of elements of the IFRS S1 and S2 for sustainability-related financial disclosures, which also includes Taskforce on Climate-related Financial Disclosures (TCFD), and the Taskforce on Nature-related Financial Disclosures (TNFD).
- Hong Kong Stock Exchange (HKEX) ESG Reporting Requirements.
- The Technical Guidelines for Sustainability Reports SEOJK No.16/SEOJK.04/2021, which is a part of the implementation of the Otoritas Jasa Keuangan (OJK) Regulation (POJK) No. 51/ POJK.03/2017 on Sustainable Finance for Financial Institutions, Issuers, and Public Companies.

The reporting period spans from January 1 to January 1 to December 31, 2024, unless indicated otherwise, with historical benchmarks included where relevant. Material aspects related to third-party suppliers and contractors are also considered, in line with PT HPL’s defined organizational boundaries. PT HPL engaged KAP Purwanto Susanti dan Surja, a member firm of Ernst & Young Global Limited (KAP PSS - EY), to provide independent limited assurance on selected GRI Standards indicators in this report. Data in 2024 marked with this symbol  **Assured** has received limited assurance from KAP PSS - EY. Additionally, GHG emissions and energy data were assured by PT Intertek Utama Services in accordance with ISO 14064-1:2018, SAE 3000 and the GHG Protocol Corporate Accounting and Reporting Standard (revised edition).

Please refer to the [Appendix](#) for the complete Limited Assurance Report.

Message from the Director of PT HPL



Sustainability performance and progress should be balanced across financial, environmental and social dimensions. It is increasingly a factor in managing risks, improving efficiency, meeting stakeholder expectations, and ensuring long-term business viability.

Dear Stakeholders,

I am pleased to present PT HPL's 2024 Sustainability Report, which reflects our continued progress in advancing responsible practices across our operations. Building on a strong foundation established in previous years, we remain focused on sustainability as a key part of how we manage risk and build resilience. It underpins operational efficiency, regulatory compliance, reputation, and long-term value. More than that, it supports responsible investment and contributes to the well-being of both people and the environment.

We approach sustainability as a strategic enabler, helping us prevent negative impacts and create long-term positive outcomes. This alignment reinforces our business model and contributes to economic resilience, ethical governance, social responsibility, and environmental stewardship. We continue to align our practices with global goals such as the Sustainable Development Goals and the Paris Agreement, and frameworks including the Responsible Minerals Initiative (RMI) and the Initiative for Responsible Mining Assurance (IRMA).



Progress in 2024

In 2024, we took further steps to institutionalize sustainability across our value chain. The spirit of sustainability has gained strong support from both the Indonesian government and the business community. It is critical to identify and adopt the standards that are most relevant to our national and industrial context.

One of our key milestones this year was the commencement of a Life Cycle Assessment (LCA) in accordance with ISO 14040 and ISO 14044. This assessment identified environmental hotspots, particularly related to carbon emissions, and will guide our data-driven improvements moving forward.

In addition, we strengthened our science-based decarbonization strategy through a new partnership with Climate Smart Ventures. This collaboration will develop a roadmap to transition our coal-based power generation and nickel processing to low-carbon alternatives. The first phase, which runs through 2025, will provide strategic recommendations, including



a customized decarbonization plan, viable energy transition pathways, and a sustainable financing framework to support net-zero emissions goal by 2060.

Sustainability Implementation

Governance and Business Conduct

As an affiliate company of Harita Nickel and majority-owned by Lygend, PT HPL benefits from strategic oversight and operational guidance at the Group level. In 2024, we further strengthened our internal controls through our zero-tolerance approach to bribery, corruption, and conflicts of interest. Our ongoing conformance under the Responsible Mining Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) and the ongoing IRMA audit reinforce our commitment to transparency and ethical sourcing. PT HPL also advanced inclusivity and equal opportunity across our workforce, including increased representation of women and young professionals.

Climate and Environmental Management

We expanded our climate initiatives in line with Harita Nickel's target to reduce emissions by 30% in 2030. This included adopting low emission processing technologies, integrating more renewable energy, and enhancing waste heat recovery systems to reduce fossil fuel dependence. GHG emissions across scopes 1, 2, and 3 were monitored using internationally recognized protocols, and climate-related risks were mapped and monitored through reassessment and the implementation of risk management strategies.

To strengthen sustainable water management, the Group, including PT HPL, is conducting a comprehensive hydrology and hydrogeology study. This work is helping us optimize water efficiency, manage flood risks, and support the development of our mining areas into an integrated industrial zone. The study includes long-term watershed modeling, flood control, and coastal protection measures. Phase 1 of the study has been completed, resulting in a due diligence gap analysis report and a water management model. The implementation of the water management design will take place in the coming years.

Human Rights and Labor Practices

Respect for human rights remained a core principle throughout our operations, in line with Harita Nickel's updated policy and global frameworks such as the ILO and UN Guiding Principles. We continue to support the Group's efforts to embed human rights due diligence and participating in the development and implementation of a Human Rights Roadmap. With regards to labor practices, we consistently implement direct employment, fair compensation, and inclusive workplace policies. Our workforce is predominantly Indonesian, with strong representation from North Maluku, and we continue to invest in local hiring, training, and career development. Occupational health and safety remained a priority, with no fatalities recorded and continued alignment with ISO 45001 and SMK3 standards.



Community Engagement

PT HPL maintains its long-standing partnerships with ten village communities on Obi Island, continuing to support local social and economic development through established initiatives in education, healthcare, socio-cultural activities, infrastructure, and local economic development. These efforts remain central to our commitment to mitigate the long-term social impacts of nickel extraction and processing, while fostering inclusive growth in the surrounding communities.

External Context and Market Outlook

This year's sustainability strategy was shaped by broader external factors. Global political tensions, such as tariff disputes, continue to influence the world's economic, social, and political dynamics. The International Nickel Study Group (INSG) forecasts a 4.6% increase in global primary nickel production in 2024, followed by another 3.8% in 2025. However, a projected surplus in high-grade nickel has led producers in Indonesia to consider supply cuts to stabilize prices.

Environmental and regulatory pressures are also intensifying. Nickel mining and processing remain energy-intensive, with rising scrutiny on water usage and carbon emissions. Deforestation and biodiversity concerns in mining regions have further raised expectations for responsible production. These trends demand proactive responses and continued investment in sustainable practices.

Looking Ahead

In the next one to five years, our focus will remain on maximizing operational efficiency and conducting internal reviews to identify key areas for improvement. These efforts will enhance our strategic positioning at both national and global levels. With continued support from Lygend Resources Ltd. and Harita Nickel, we are confident in our ability to deliver long-term value, transparent operations, and inclusive growth aligned with international sustainability benchmarks.

We sincerely thank our stakeholders, communities, and employees for their ongoing support and commitment to our shared sustainability journey.

Tonny Gultom

Director, PT Halmahera Persada Lygend



Message from the Director of Lygend



It is with great pride that I present PT HPL's 2024 Sustainability Report on behalf of the Board of Directors of Lygend Resources & Technology Co., Ltd. This year's report reflects our continued progress in embedding ESG values into our business practices, further aligning sustainability not only with resilience, but with purpose.

We understand that the global expectations on sustainable sourcing and responsible operations are rapidly evolving. At Lygend, we have responded by strengthening the integration of our ESG vision across all subsidiaries, including PT HPL. Through a centralized governance framework, we ensure that PT HPL aligns its ESG implementation with Lygend's priorities in climate action, environmental compliance, supplier due diligence, and community development. Given that PT HPL operates in Indonesia, its ESG implementation also refers to and aligns with local regulations and industry practices. This alignment is further reinforced through internal audit and performance evaluations.

After successfully commissioning Indonesia's first and the world's largest nickel and cobalt sulfate hydrometallurgical facility, the year 2024 marked yet another important milestone in our production journey

with the increase of our sales. This achievement not only enhances Indonesia's strategic role in the global battery value chain but also reinforces our capacity to deliver high-quality, low-carbon materials that support the global energy transition. In addition, our hydrometallurgical tailing is currently being studied for potential reuse. If proven feasible, it will support waste reduction and resource circularity, further contributing to sustainable development.

Our approach to sustainable development is comprehensive and forward looking. In renewable energy areas, we have initiated strategic planning and phased deployment of solar power generation and waste heat recovery, all aimed at supporting the company's transition toward low-carbon development. Complementing these efforts, air quality remains a key focus. While PT HPL's hydrometallurgical processes are inherently low in



emissions, we maintain rigorous control through real-time monitoring, upgraded gas purification systems, and initiated steady improvements to our Continuous Emissions Monitoring System (CEMS) in collaboration with Harita Nickel.

In 2024, the synergy between PT HPL and Harita Nickel deepened further. Our shared initiatives in water management, biodiversity management, and community engagement have set new standards for cooperative ESG action in Obi Island. These partnerships ensure we remain aligned with government regulations and stakeholder expectations, as well as international frameworks such as RMI, RMAP, and the ongoing alignment process with the Initiative for Responsible Mining Assurance (IRMA), while contributing meaningfully to local communities. Technical knowledge exchange and joint infrastructure investment between Lygend and Harita Nickel further enhance these synergies.

Looking ahead, our ESG priorities are clear. We aim to finalize our carbon neutrality roadmap, strengthen ESG governance with board-level oversight, and align our climate disclosures with international frameworks such as TCFD and IFRS S2. We are also preparing

for the EU Battery Regulation, and global traceability standards, while promoting green procurement and building buyers' trust. In parallel, we remain committed to ensuring labor rights, workplace safety, and diversity. Equally important is our continued support for local communities, with a focus on healthcare, education, and sustainable livelihoods. PT HPL will continue implementing these ambitions in Indonesia, translating policy into practice with integrity and innovation.

As we navigate a future shaped by regulatory shifts and market demands, we see both challenges and opportunities. Stakeholders are demanding greater traceability, transparency, and tangible results. Lygend views ESG excellence and localized stakeholder engagement as strategic levers to remain competitive.

With each step toward a more sustainable future, we remain grateful for the unwavering support of our stakeholders and look forward to continued collaboration in strengthening our resilience.

Shi Wentang 石文堂

**Director, PT Halmahera Persada Lygend; General Manager,
HPL Site Lygend Resources & Technology Co., Ltd.**

Sustainability Highlights 2024



Operations and Strategy

Achieved net profit of
USD 279.11
Million

Achieved certifications of

- > ISO 14001
- > ISO 45001
- > ISO 9001
- > SMK3
- > RMI RMAP



Good Governance

Commenced third-party, Independent Responsible Mining Assurance (IRMA) Assessment

Achieved RMI RMAP conformance for PT HPL

Established Conflict of Interest Policy



Climate Change

Avoided **584,250 tCO₂e**
of GHG emission

5,819,885 GJ
Generated from renewable
energy initiatives



Human Rights

Continued prioritization of
local workers with **40%** of
total Indonesian workforce
from North Maluku

Updated Human Rights Policy



About PT HPL [GRI 2-1, 2-6] [SASB EM-MM-000.A]

Established in 2018, PT Halmahera Persada Lygend (PT HPL) is a joint venture between Lygend Resources & Technology Co., Ltd. and PT Trimegah Bangun Persada Tbk (“PT TBP” or “Harita Nickel”). As a private limited company, PT HPL is majority-owned by Lygend Resources (55%), with the remaining 45% held by PT TBP. PT HPL is the first operator in Indonesia to produce mixed hydroxide precipitate (MHP), supported by the rapid deployment of PT HPL’s state-of-the-art high-pressure acid leaching (HPAL) facilities. This technology allows the processing and refinement of mined limonite, a low-grade nickel ore, into value-added products for the electric vehicle (EV)

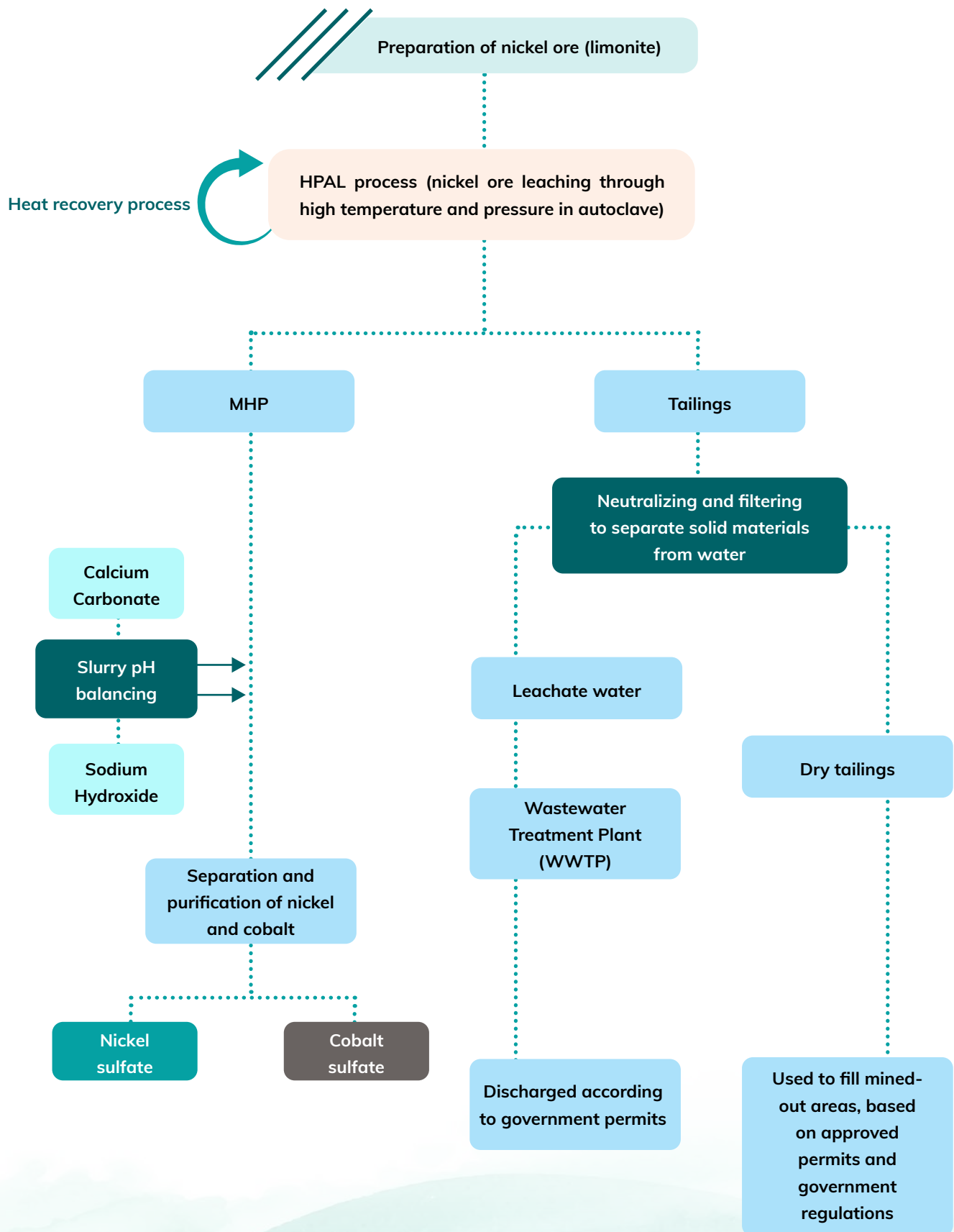
battery industry. PT HPL is headquartered in Jakarta, with operations based in Kawasi, Obi District, in the South Halmahera Regency of North Maluku, Indonesia.

Lygend Resources views technological innovation and research and development (R&D) as key drivers of its sustainable growth. The company has established clear, forward-looking strategies and goals for R&D. Through sustained investment and a strong focus on innovation, it has achieved significant advancements in industry-related technologies. This includes advancements in sustainable, low-carbon nickel processing, particularly through the continued expansion of HPAL operations in Indonesia.





The HPAL Hydrometallurgical Process



Operational and Economic Performance [GRI 201-1]

Since 2021, PT HPL has improved its production efficiency, enabling a significant increase in annual output of high-quality Mixed Hydroxide Precipitate (MHP), while reducing emissions intensity per ton of nickel content.



As of December 2024, PT HPL's sales reached:

38,622

tons of nickel
content in nickel
sulfate

28,427

tons of nickel
content in MHP



Revenue

USD **998.53**
Million

(**1.07%** increase from 2023)

Net profit

USD **279.11**
Million

(**18.73%** increase from 2023)

All of PT HPL's products are exported, contributing to Indonesia's downstream mineral development and supporting Group-wide objectives to supply responsibly processed materials for global energy transition industries. As part of the business strategy, PT HPL does not produce Cobalt Sulfate in 2024 and instead focuses on the production of MHP and Nickel Sulfate. In 2024, 1% of revenue contributes to 18% increase in the net profit.

Contributing to Indonesia's National Strategy

With the largest nickel reserves globally, Indonesia positions nickel-based products as one of its key economic contributors. Through the technological expertise of Lygend Resources, PT HPL plays a strategic role in advancing Harita Nickel's vision of becoming a global leader in EV battery supply, while contributing to Indonesia's 2060 net-zero emissions target.



PT HPL is the:

Indonesia's **first** – and the world's largest – nickel sulfate processing facility

1ST plant using dry stack tailing placement

1ST HPAL plant in Indonesia, using low grade nickel ore deposit

1ST HPAL plant in the world to reach nameplate capacity within 12 months

PT HPL's Approach to Sustainability [GRI 2-23, 2-24]

PT HPL believes that sustainability is a journey that requires time, resource, and most importantly, commitments, both internally and externally. To ensure that the company's sustainability journey aligns with the affiliate company's values, PT HPL adopts its Sustainability Policy, a comprehensive framework that outlines the Group's ESG commitments and, among other purposes, guides the integration of these principles into PT HPL's operations. These commitments also guide PT HPL's engagement with suppliers and contractors, who are assessed against relevant policy provisions. In addition, PT HPL draws on the strategic direction of Lygend Resources & Technology Co., Ltd to further strengthen the ESG approach. To ensure effective implementation, PT HPL applies internal governance, set measurable targets, and conduct regular monitoring to drive continuous improvement.

PT HPL's sustainability strategy focuses on:

- Adopting PT TBP's policies with consistent sustainability objectives
- Reducing potential negative environmental impacts and promoting sustainable operations
- Integrating ESG into PT HPL's business and building capacity across all PT HPL's departments

- Alignment with best practice sustainability standards and frameworks
- Closely collaborating with experts and partners to advance PT HPL's sustainability agenda

PT HPL's sustainability focuses areas and targets also align with Harita Nickel's Sustainability Framework and selected Sustainable Development Goals (SDGs).

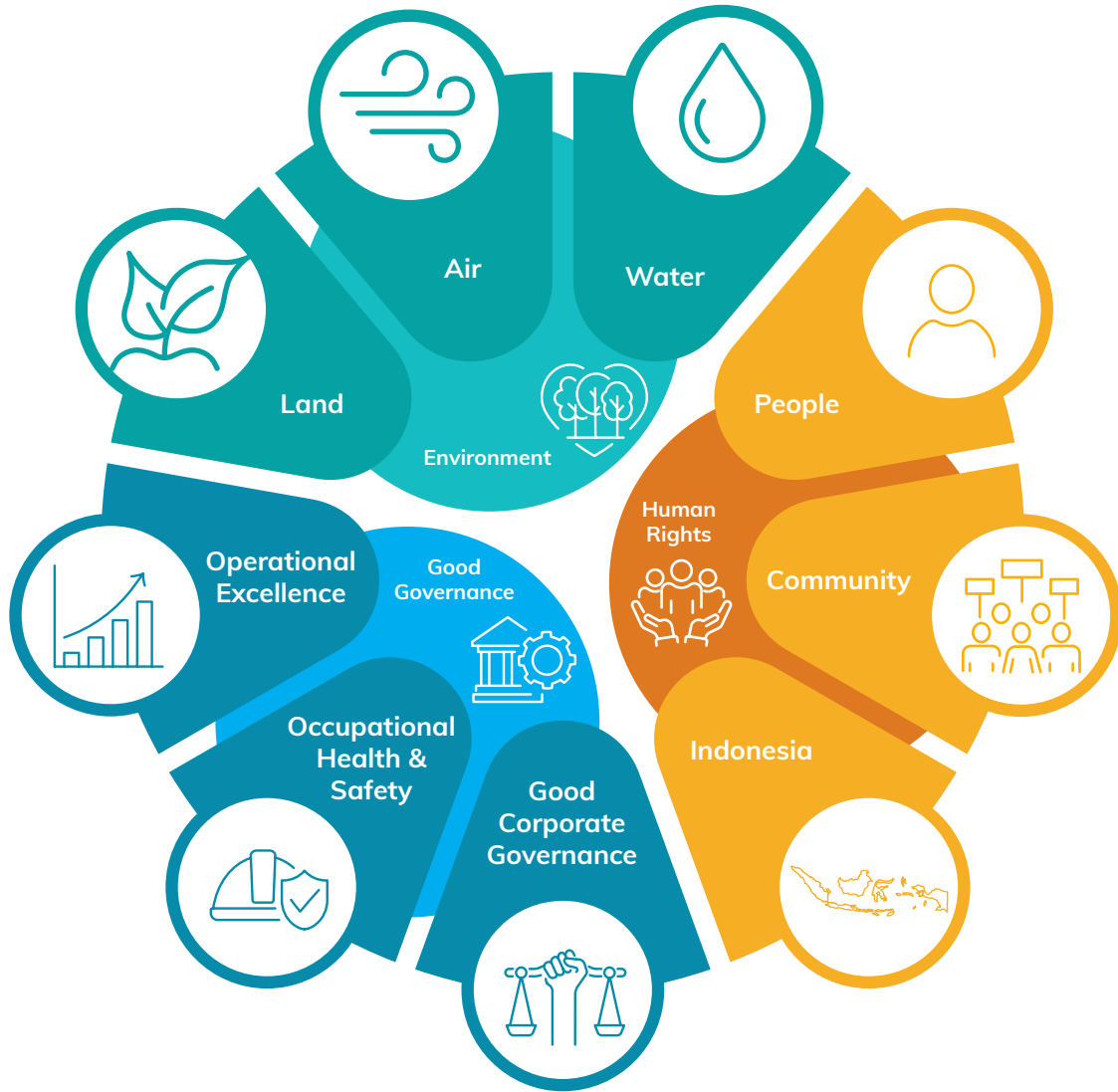
> For further information on the Group's targets and latest progress, please refer to the [PT TBP 2024 Sustainability Report](#).

> See the [Appendices](#) for PT HPL's key actions that contribute to the SDGs.

Restatement of Information [GRI 2-4]

- The 2023 non-GHG emissions data has been restated due to an incorrect unit of measurement, from kilograms (kg) to tons.
- The payment to the local government for 2022 and 2023 has been restated due to currency conversion from IDR to USD.
- The data on fixed-term contract employees in 2022 has been restated to include foreign employees based in Indonesia.

Harita Nickel Sustainability Framework



Environment

Land

Operating in an environmentally friendly manner to minimize its carbon footprint by increasing carbon storage and continuous biodiversity rehabilitation

Air

Improving air quality to protect human's health and the environment

Water

Employing responsible water management and protecting both marine ecosystems in oceans and freshwater ecosystems in lakes

Human Rights

People

Enhancing employee knowledge and capabilities through education and capacity-building initiatives

Community

Empowering the surrounding community through engagement and community development programs

Indonesia

Contributing to national human rights efforts through inclusive social development, poverty reduction, and the promotion of justice

Good Governance

Good Corporate Governance

Ensuring integrity and ethical behavior is integrated in company culture

Occupational Health and Safety (OHS)

Offering a safe workplace and embedding a culture of health and safety

Operational Excellence

Encouraging sustainability by improving business performance with targeted management principles



Stakeholder Engagement [GRI 2-16, 2-26, 2-27, 2-28, 2-29]

PT HPL engages a broad range of stakeholders through structured activities that support shared sustainability objectives and long-term value creation. In line with Group-wide practices, these include shareholders meeting, engagement with external stakeholders including local community, international outreach, and participation in discussions on critical minerals and responsible sourcing.

Due to the dynamics of various stakeholders and their interests, PT HPL finds it imperative to engage them using different methods. Nevertheless, the core of it remains the same. PT HPL prioritizes transparency in

these engagements, building trust and understanding, as well as finding win-win solutions for everyone.

Furthermore, PT HPL continues to equip its directors with up-to-date sustainability trends that are important to the company's stakeholders. For example, in February 2024, PT HPL's Director of Sustainability, Sian Choo Lim, attended the IFRS Sustainability Symposium 2024 as part of her training.

Details on stakeholder groups, methods of engagement and objective of the engagement are presented below.

Stakeholder Engagement [GRI 2-29]

STAKEHOLDER GROUP	OBJECTIVES	METHOD OF ENGAGEMENT
Academics	<ul style="list-style-type: none"> • Consultation on research and studies • Talent recruitment 	<ul style="list-style-type: none"> • Site visits • Collaborative research
Business partners	Corporate engagement with Lygend Engagement and collaboration with downstream partners to meet common EV battery supply chain goals	<ul style="list-style-type: none"> • Stakeholder trips and site visits • Regular meetings
Community	<ul style="list-style-type: none"> • Community empowerment and engagement programs • Recruitment and training of local workers • Upholding community rights and addressing needs 	<ul style="list-style-type: none"> • CSR activities • Community grievance system • Community consultation and engagement programs
Customers	<ul style="list-style-type: none"> • Economic performance • Business development • Product quality • Meeting sustainability requirements 	<ul style="list-style-type: none"> • Stakeholder trips and site visits • Feedback forms • Meetings and direct engagement • Annual and sustainability reports • Website
Employees	<ul style="list-style-type: none"> • Employee development and engagement programs • Performance reviews • Occupational health and safety management • Labor rights • Building awareness of company policies 	<ul style="list-style-type: none"> • Internal meetings/publications/memos • Electronic communications • Training programs • SOPs • Company events and programs • Whistleblowing and complaints mechanism • Extracurricular activities
Government and regulatory bodies	<ul style="list-style-type: none"> • Regulatory compliance and licensing • Regional and national socioeconomic performance • Indirect economic impacts 	<ul style="list-style-type: none"> • Meetings • Regulatory audits • Exchange of information
Industry associations	<ul style="list-style-type: none"> • Participation in nickel and mining dialogue through national and international industry associations • Contributing to common goals with peers, government authorities, and other participating stakeholders 	<ul style="list-style-type: none"> • Forums and events • Regular meetings • Global outreach
Media	<ul style="list-style-type: none"> • Transparency • Access to information 	<ul style="list-style-type: none"> • Website • News • Site visits • Social media posts
NGOs	<ul style="list-style-type: none"> • Contributing to causes with Lygend • Discussion and collaboration on critical issues 	Public consultations and dialogue
Shareholders	<ul style="list-style-type: none"> • Company performance organizational governance • ESG assessments for sustainable financing 	<ul style="list-style-type: none"> • Shareholder meetings • Lygend ESG Reports • PT HPL sustainability reports • Website • Annual audits
Suppliers and contractors	<ul style="list-style-type: none"> • Responsible supply chain • Transparency in procurement • Supporting local suppliers 	<ul style="list-style-type: none"> • Supplier audits/assessments • Supplier policies • Supplier capacity building

Materiality [GRI 2-14, 3-1, 3-2, 3-3]











PT HPL identified key material topics by gathering input from internal stakeholders, including management, employees, and the Joint Venture Partner. PT HPL also engaged external stakeholders such as government representatives, local communities, media, NGOs, investors, business partners, and customers. Stakeholder input was

collected through questionnaires and interviews. Additionally, PT HPL reviewed industry trends to supplement its findings. The identified topics were then grouped and adjusted to align with the Group's sustainability framework. Materiality is reviewed regularly to stay abreast of evolving regulations and market demands.

Materiality Assessment Process

Topic Review and Identification	Prioritization	Stakeholder Consultation and Refinement	Validation and Approval
Reviewed and revised 2021 material topics based on industry benchmarking, latest developments, external commentaries, and standards alignment	<ul style="list-style-type: none"> Determined the importance of each topic, with input from the sustainability team and implementers Sustainability team led the internal assessment with division heads and company topic champions 	Tested and revised topic inclusion and prioritization after consulting external stakeholders for PT TBP and PT HPL; consulted with a representative from Lygend specifically for this report	Validated the final materiality topics by the sustainability team; was approved by the PT TBP Board, the Lygend Board, and senior management

List of Material Topics

Material Topics 2023	Material Topics 2024	Key Issues	SDGs
Climate Action GHG Emissions and Air Quality Energy Use Tailings and Waste Management	Reducing Environmental Footprint	<ul style="list-style-type: none"> Climate action (GHG emissions, air quality, and energy management) Waste and tailings management Environmental management/compliance Effluent management 	   
Occupational Health and Safety	Workforce Health & Safety	Occupational Health and Safety (OHS)	
Water Management	Water Management and Conservation	Optimizing water efficiency	
Emergency Prevention and Handling Business Ethics and Compliance	Business Ethic, Governance & Compliance	<ul style="list-style-type: none"> Anti-corruption, anti-bribery, anti-competitive, anti-trust Regulation compliance Good mining practices such as robust systems for workforce health and safety, environmental management, and community engagement and development Complaints, grievances and access to remedy requirements 	
Labor Rights and Practices Stakeholder Engagement and Transparency Prioritizing local	Human Rights	<ul style="list-style-type: none"> Human rights governance Security practices New Kawasi resettlement 	  



Material Topics 2023	Material Topics 2024	Key Issues	SDGs
Surrounding Community	Local Communities	<ul style="list-style-type: none"> Community development activities Community rights and support Prioritizing local communities 	
Training and Development	Labour Practices	<ul style="list-style-type: none"> Labour rights and practices Anti modern slavery Anti child labour Diversity and equal opportunity Training and development 	
Diversity and Equal Opportunity			
Economic Performance	Economic Performance	Economic value generated and distributed	
Supply Chain Management	Supply Chain Management	<ul style="list-style-type: none"> Responsible sourcing standards Prioritizing local suppliers 	

Certification, Assurance, and Recognition

PT HPL continues to adhere to world-class practices in managing environmental, health, and safety performance. In 2024, PT HPL achieved the following key certifications:

- ISO 14001 for environmental management systems (EMS).
- ISO 45001 for occupational health and safety (OHS) management systems.
- ISO 9001 for quality management systems (QMS).
- Sistem Manajemen Keselamatan dan Kesehatan Kerja (SMK3) – the national standard for OHS management.

- Achieved compliant status under the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI) for smelters and refineries.
- Initiative for Responsible Mining Assurance (IRMA) assessment process in 2023, aiming for completion by 2025.

> See [Supply chain management](#)

Recognitions



Award Name	Award Giver
Outstanding Industry Influence Award	China Chamber of Commerce in Indonesia
Integrated ESG Program on Obi Island	IDX Channel
Green Ratings Appreciation	CNBC Indonesia
4 Stars TOP CSR 2024	TopBusiness
Top Leader CSR Commitment 2024	TopBusiness

Good Governance

[GRI 2-9, 2-12, 2-13, 2-14, 405-1]



Governance at PT HPL reflects a unified approach built on the principles of transparency, integrity, and alignment with Group-wide sustainability objectives. PT HPL's governance structure draws from both Harita Nickel and Lygend Resources, combining Harita Nickel's oversight of sustainability initiatives across affiliates with Lygend's technical direction and operational guidance.

> For more information on PT HPL's governance practices, please refer to [Lygend's 2024 ESG Report](#) and [PT TBP's 2024 Sustainability Report](#) (p. 58-70).



Business Ethics and Compliance [GRI 2-27, 205-2] [SASB

EM-MM-510a.1]

Ethical conduct is holistically embedded across PT HPL's operations through clearly defined policies, oversight mechanisms, and continuous capacity building. In alignment with Harita Nickel's governance framework, PT HPL upholds a strict zero-tolerance stance on bribery, corruption, gratification, money laundering, and fraud. All employees are bound by the Group-wide Code of Ethics and Conduct and the Anti-Bribery, Corruption, and Money Laundering (ABCML) Policy, which also applies to suppliers and business partners through a mandatory Integrity Pact.

In 2024, Harita Nickel established a Conflict of Interest Policy requiring all employees, service providers, and relevant stakeholders, including those at PT HPL, to declare both direct and indirect conflicts of interest.

To ensure the implementation and enforcement of these policies, the company established an internal audit committee. The policies are also regularly communicated to employees through ongoing training and internal communications. During the year, all 5,199 PT HPL employees participated in Group-led webinars covering anti-bribery protocols, whistleblowing procedures, and grievance mechanisms. PT HPL continues to uphold full compliance with national industrial regulations and operate with integrity, in alignment with Harita Nickel's Sustainability Policy and commitments.

> Please refer to PT HPL's [website](#) for the latest updates.

> Please refer to [PT TBP 2024 Sustainability Report](#) for further details.

Whistleblowing and Grievances [GRI 2-16, 2-26, 2-27]

PT HPL sees the importance of transparency in communication by providing structured, confidential channels for all stakeholders, including employees, suppliers, communities, and NGOs, to raise concerns. Available reporting options include QR codes displayed across PT HPL's operational sites and offices, a whistleblowing form, email and telephone lines, a community grievance form, and Salam (*Saluran Aspirasi Layanan Masalah*), an in-person feedback channel through site community relations officers. The company adopts PT TBP's Whistleblowing Policy and grievance mechanism as its main framework.

In 2024, 20 grievances were submitted by PT HPL employees, relating to company policy, working facilities, working tasks, colleagues and line supervisor/

line manager. All cases were reviewed and addressed. No grievances were reported in relation to suppliers. Throughout this year, a total of 93 complaints were received from external stakeholders via PT TBP's reporting system. Although the complaints were directed at the Group as a whole rather than specifically at PT HPL, they have been taken into careful consideration. The issues raised primarily related to Corporate Social Responsibility (CSR) programs, employment opportunities, environmental concerns, and local business relations. All complaints have been thoroughly addressed and resolved.

> Further details can be found on [PT TBP's 2024 Sustainability Report](#) (p. 66-68) or via PT HPL's [corporate website](#).

Supply Chain Management [GRI 2-6, 308-1, 308-2, 414-1, 414-2]

PT HPL is committed to responsible and transparent supply chain management that aligns with both Group-wide policies and international due diligence standards. Supplier selection and oversight are guided by Harita Nickel's principles on performance, business ethics, responsible sourcing, and respect for human rights. PT HPL's formal management system includes procedures for screening, evaluation, and risk management, aligned with the OECD Due Diligence Guidance and regulations like the EU Battery Regulation. PT HPL maintains ongoing engagement

with suppliers, including dialogue and a grievance mechanism, and conduct regular management reviews and publicly report the due diligence results. In 2024, PT HPL confirmed that none of its raw materials came from or passed through Conflict-Affected and High-Risk Areas (CAHRA), nor were linked to risks listed in the OECD Due Diligence Annex II or EUBR Annex X.

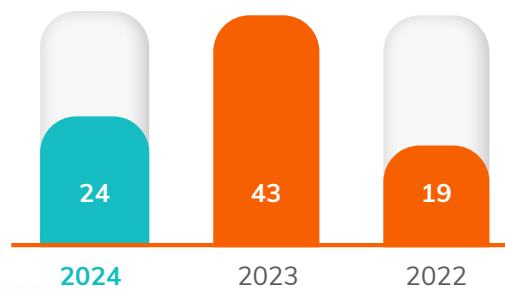
> Further details can be found on [PT TBP's 2024 Sustainability Report](#).

Responsible Minerals Assurance Process

PT HPL adopts the Responsible Minerals Assurance Process (RMAP), the flagship framework of the Responsible Minerals Initiative (RMI), as part of Harita Nickel's commitment to responsible sourcing. RMAP provides independent assessments to verify ethical practices at key points in the supply chain. In 2024, PT HPL was assessed by SCS Global, a third-party auditor, and was subsequently granted conformant status by RMI. The assessment report can be found on [RMAP Assessment Report](#).



Local Suppliers 2024 (no.)



Climate Action

[GRI 201-2]



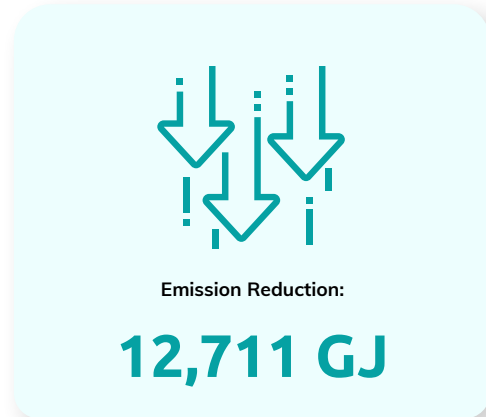
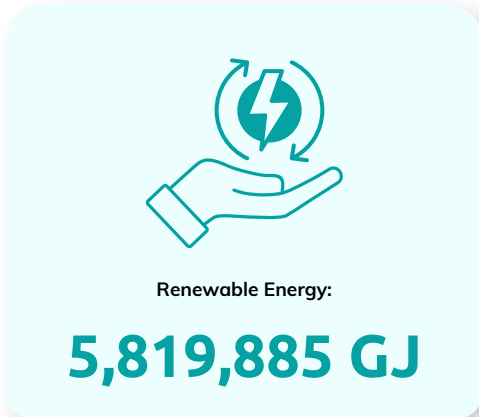
Alongside its growing production, PT HPL continues to align its operation with Harita Nickel's Sustainability and Biodiversity Policies with regulatory compliance, management of risk related to emissions, land and resources management and ensuring these policies becomes the DNA of working culture. In 2024, PT HPL met all environmental regulatory thresholds for water, waste, and air quality, with no recorded instances of non-compliance. Where concerns arise, PT HPL conducts investigations and implement immediate corrective actions.

> For more information on Group-wide climate initiatives, please refer to [PT TBP's 2024 Sustainability Report](#) (p. 78-82).

Climate Action [GRI 201-2]

PT HPL aligns and support worldwide decarbonisation initiatives for electric cars and Indonesia's national target of achieving net zero greenhouse gas (GHG) emissions by 2060 or earlier. Recognizing the urgent need to address global warming and its significant

impacts, the Group has set an interim target to reduce emissions by 30% by 2030 for operations established in or before 2022. PT HPL supports these goals through a structured approach focused on operational efficiency and emissions reduction.



In 2024, following Harita Nickel's initiative, the Company managed and mapped climate-related risks in line with IFRS Sustainability Disclosure Standards. This process begins with risk identification through post-event analysis and focus group discussion (FGD) involving Risk Management Team and Site Operations Team, followed by assessment based on probability and impact using credible sources as references. Climate-related risks are monitored regularly through reassessment and the implementation of risk

management strategies. As part of this initiative, PT HPL also conducted climate scenario analysis aligned with TCFD recommendations. The purpose is to understand how resilient PT HPL may perform under various climate conditions.

Details of climate-related risk mapping and key mitigation actions are presented in [PT TBP's 2024 Sustainability Report](#).

Energy Use [GRI 302-1, 302-3, 302-4, 302-5] [SASB EM-MM-130a.1]

The Group advanced science-based decarbonization strategy by partnering with Climate Smart Ventures (CSV) to explore energy transition pathways for its coal-fired power plants and nickel operations. The collaboration will identify effective low-carbon alternatives and assess technologies and financing options to support Harita Nickel's net zero emission in 2060 or earlier. The first phase, running through 2025, will deliver a strategic roadmap, energy transition models, and a sustainable financing framework for short, medium, and long-term decarbonization.










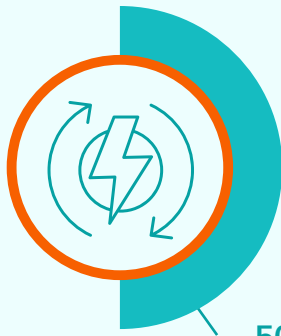
PT HPL operates in an off-grid location with operations running 24 hours a day, 7 days a week, requiring reliable and efficient energy solutions. Without access to the national grid and limited feasible sustainable energy options, coal remains PT HPL's main energy source, supplying over 46.62% of total consumption through on-site power generation as of 2024. Additional energy needs are met through limited use of

gasoline, purchased electricity for Jakarta Head Office, and liquefied petroleum gas (LPG) for operational and domestic support.

In 2024, total energy consumption reached 11.5 million gigajoules (GJ), driven by the increased production capacity.

Energy Consumption by Source 2024 (GJ, %)

Source of Energy	2024		2023	
	Energy Consumption	Percentage	Energy Consumption	Percentage
 Coal	5,366,205	46.62	4,994,903	58.93
 Diesel	321,919	2.80	334,121	3.94
 Biosolar	173,341	1.50	176,683	2.09
 Gasoline	317	0.002	304	0.004
 LPG	141	0.001	N/A	N/A
 Other Renewables	5,646,544	49.06	2,969,233	35.03
 Purchased Electricity (Jakarta Head Office)	603	0.005	355	0.004
Total	11,509,071	100.00	8,475,599	100.00



50.6%
Renewable
Energy

In 2024, renewable energy accounted for **50.6%** of PT HPL's total energy mix, reaching **5.8 million GJ**, primarily from Waste Heat Recovery and Biodiesel utilization.



**Electric Vehicle in
Nickel Sulfate Plant**

PT HPL operates electric towing and forklift vehicles in the nickel sulfate warehouse to reduce emissions. This initiative has generated **191 GJ** of renewable energy, avoiding **8 tCO₂e** GHG emissions.

Waste Heat Recovery System

PT HPL's proprietary waste heat recovery system at the acid plant, developed in collaboration with Beijing ENFI, is a key initiative that captures and repurposes heat generated from sulfuric acid production.

In 2024, the system generated **5,646,275 GJ** of energy and accounted for 584,158 tCO₂e (36.27%) of PT HPL's total avoided emissions.

GHG Emissions and Air Quality [GRI 305-1, 305-2, 305-3, 305-7]

[SASB EM-MM-110a.1, EM-MM-120a.1]

As part of its commitment to minimizing environmental impact and ensuring compliance with regulations, PT HPL actively monitors and manages its greenhouse gas (GHG) emissions and air quality. Emission tracking is conducted in alignment with Group-wide policies

and applicable regulatory standards, with a focus on identifying sources of GHG and other air pollutants, and implementing control measures where necessary to reduce their impact.

GHG Emissions

PT HPL monitors and reports greenhouse gas (GHG) emissions in line with Harita Nickel's environmental framework and applicable regulations. Emissions are calculated using the GHG Protocol and ISO 14064 standards, forming part of a structured inventory process initiated in 2022.

Total GHG emissions in 2024 were 2,040,014 tons of CO₂e, comprising 43% from scope 1 and 57% from scope 3 sources, while scope 2 emissions remained minimal.



GHG Emissions by Scope (ton CO₂e)

Assured

Sources		2024	2023	2022
Scope 1		875,619	866,913	679,608
Scope 2		146	86	114
Scope 3		1,164,250	994,117	358,486
Total	Scope 1+2	875,764	866,999	679,722
Total	Scope 1+2+3	2,040,014	1,861,116	1,038,208

Note:

PT HPL's 2024 data was externally assured by Intertek under the scope of PT TBP's 2024 Sustainability Report.

Non-GHG Air Emissions

Non-GHG air emissions are addressed in accordance with national environmental regulations, with a focus on minimizing local air quality impacts. Emission control technologies such as low-NOx boilers, desulfurization units, and electrostatic precipitators are applied to reduce pollutants from operational activities. Dust is controlled through enclosed transport systems, speed limit enforcement, dedicated dust suppression measures, and tree planting to create green buffer zones around operational areas.

Real-time emissions data is collected through a Continuous Emission Monitoring System (CEMS) installed at PT HPL's power plant stacks and acid plant chimneys. The system, calibrated to measure SO₂, NO_x, CO, H₂S, and particulates, transmits data directly to the Ministry of Environment and Forestry's SISPEK platform for continuous regulatory oversight.

To supplement automated monitoring, independent laboratories conduct ambient air quality assessments, with quarterly and semesterly reports submitted to the authorities. In 2024, all monitored emissions remained within applicable regulatory limits.

Non-GHG Air Emissions (Ton)

Emission Type	Source	2024	2023
Nitrogen Oxide (NO _x)	Power Plant	837.32	1,344.97
	Acid Plant	35.56	773.32
Sulfur Oxides (SO ₂)	Power Plant	91.97	2,663.44
	Acid Plant	1,704.69	0.00
Particulates	Power Plant	459.79	284.62
	Acid Plant	189.20	707.07

Emission Intensity

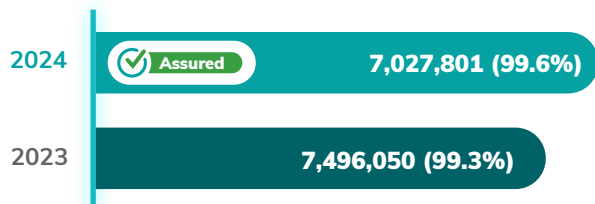
Emission Intensity	2024	2023	Reduction (%)
Emission intensity of MHP (tCO ₂ e/ton Ni) from Scope 1 & Scope 2	13.06	13.36	-2.24

Tailings and Waste Management [GRI 306-1, 306-2, 306-3]

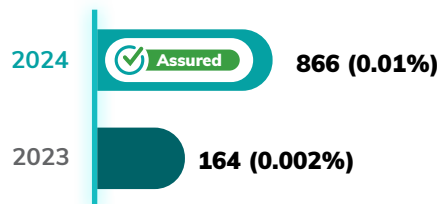
[SASB EM-MM-150a.5, EM-MM-150a.7, EM-MM-540a.2]

Waste Generated by Type 2024 (t, %)*

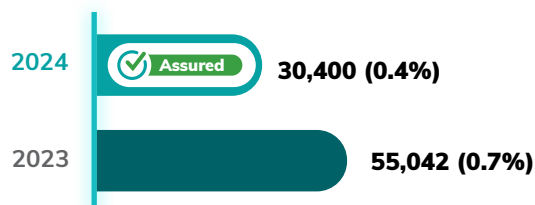
Hazardous (Dry Tailings)**



Hazardous (Others)***



Non-Hazardous (FABA and Domestic)****



Notes:

*These values include estimates to isolate PT HPL's stand-alone waste generated data from other business units within the operational area.

**Tailings calculation method changed from weight measurement (2023) to topography-based (2024).

***Include used oils, used batteries, clinical waste, and used cleaning rags.

****Refers to Fly Ash Bottom Ash (FABA) and domestic waste. There was a decrease in FABA waste due to a change in the type of coal used (from low-rank coal to sub-bituminous coal).

In 2024, PT HPL generated 7,027,801 tons of dry tailings, accounting for 99.6% of the total waste. To manage this responsibly, PT HPL employs Dry Stack Tailings Facility (DSTF) method for tailing management, which is considered as the industry best practice currently. In this method, tailings are neutralized, filtered using a filter press to reduce moisture, then transported, spread, and compacted in mined-out areas. The placement process are carefully engineered to maintain slope stability, while residual liquid recirculated into the HPAL process.

Furthermore, to manage any excess residue or water from the DSTF Process, PT HPL also build drainage systems around the facility to capture direct runoff

to leachate ponds for treatment. Water quality is monitored and treated according towards government regulation and standards. Tailings handling follows Harita Nickel's Standard Operating Procedures (SOPs), and a dedicated engineering team ensures proper implementation and oversight.

Other hazardous waste, generated in small volumes (0.01%) is handled by licensed third-party service providers. Whereas, the remaining 0.4% of the waste is nonhazardous and includes construction debris, fly ash bottom ash (FABA), and domestic or office waste. FABA is reused for backfilling at the DSTF, while the rest of the non-hazardous waste is managed at PT HPL's integrated waste facility (TPST).

Emergency Response and Mitigation of DSTF (Dry Stack Tailings Facility) [SASB EM-MM-540a.3]

To ensure safety for both employees, surrounding environment and other stakeholders, PT HPL implements the Group's Emergency Response Plan (ERP), which aligns with national regulations and international frameworks, including the World Bank and UNEP APELL guidelines for mining. Reviewed

at least every 24 months, the ERP outlines potential emergency scenarios that could affect operations and surrounding communities. Flood risks are addressed through dedicated procedures supported by site-wide drainage and rainwater collection systems.



At PT HPL's DTSF, additional controls are in place to ensure structural integrity and mitigate risk. Constructed with government approval and independently assessed by external experts, the facility incorporates the following mitigation measures:

1. Conducting various geotechnical assessments, e.g. topography, geology, hydrology, and hydrogeology

2. Adopting buttressing techniques to reinforce vulnerable terrain and bolster structural integrity
3. Ensuring proper tailings pile management, i.e. managing slope and distribution for optimal stability
4. Installing proper drainage systems to minimize the impact of heavy rainfall or potential flooding events

Water Management

[GRI 303-1, 303-2, 303-3] [SASB EM-MM-140a.1]

PT HPL recognizes the critical role of responsible water management in ensuring long-term environmental sustainability and meeting stakeholder expectations. To ensure that water can be managed well, PT HPL aims to create a near closed-loop systems across processing operations; which is in accordance with Harita Nickel's Sustainability Policy and Integrated Water Management Plan. Initially reliant on Lake Karo during the first year of operation, seawater was introduced in 2022 as a coagulation agent under government permits. PT HPL implements a closed-loop system in its production process, where water is recycled and reused to enhance water use efficiency. As part of this initiative, processed water from the acid plant is redirected back into MHP production.

These efforts, combined with ongoing awareness campaigns across offices, housing, and operational areas, contributed to a measurable reduction in surface water withdrawal compared to the previous year. The increased use of seawater also alleviated pressure on freshwater resources, supporting the site's water balance strategy and reducing potential water-related risks.

Water withdrawal and use are continuously monitored and reported according to government regulations and international standards. The data, visualized in the accompanying graph, shows a year improvement in water reuse and a decreasing trend in surface water dependency.

Water Withdrawal by Source*

Description	2024
Surface Water (ML)	20,431
Seawater (ML)	17,223
Precipitation (ML)	1,083
Total	38,737

Notes:

- Data for water withdrawal and water use intensity does not include reused water.
- PT HPL holds government permits to withdraw water from the lake and submit monthly payments based on the volume of water withdrawn.
- Surface water is used for operational processes and office and domestic.

Water Consumption (ML)* Assured

Description	2024
Total water consumption for nickel processing and domestic use	12,687

Water Discharge by Source (ML)* Assured

Description	2024
Seawater from nickel processing, rainwater runoff, and domestic use	26,050

Note:

*These values include estimates to isolate PT HPL's stand-alone water withdrawal and discharge data from other business units within the operational area.

Safeguarding Water Quality and Availability [SASB EM-MM-140a.2]

PT HPL enforces strict wastewater testing protocols to ensure water quality and availability is in compliance with internal standards and regulatory requirements. Supported by regular self monitoring and third-party assessments, PT HPL installed a comprehensive wastewater management system is in place, including three Wastewater Treatment Plants (WWTP) and source-based classification of wastewater from mining, smelting, office, and domestic areas.

Wastewater and leachate from the dry stack tailings are supported by a dual drainage system. The

wastewater runoff that is resulted from rainwater and the company's general sewer system are directed to a settling pond. Whereas tailings runoff are directed through another drainage system called the Leachate Pond. The leachate from the tailing runoff are routed to a collection pond for testing and treatment. Methods used to analyze and monitor the output of production such as sedimentation, coagulation flocculation, chrome reduction, recycling and diversion are used to meet discharge standards ensuring no untreated discharge enters the environment.

Operational WWTP Discharge Point 1

Rainwater runoff from office areas, ports/jetties, mining and processing/refining activities and domestic/office wastewater

Operational WWTP Discharge Point 2

Treats wastewater from production and processing of nickel ores

Operational WWTP Discharge Point 3

Treats rainwater runoff in stockpile area, mining and processing/refining activities of nickel ore, and wastewater from domestic/office

Working together with Government system is also part of the process in PT HPL. Through real-time water quality monitoring is carried out through the SPARING system, Ministry of Environment and Forestry's real-time monitoring system which tracks pH, total suspended solids (TSS), and flow rates using electronic analyzers and data loggers; The company is able to have consistent means to monitor the water quality real time. Discharge points and nearby natural sources are also tested by accredited laboratories for parameters such as Cr6+, nickel, cobalt, and others. Coagulant and flocculants agent are applied when needed to ensure compliance with regulatory threshold as stipulated in Regulation of the Indonesian Minister of Environment Number 9 of 2006.

Water is reused where possible, including in cooling towers at the power plant, and discharged only after meeting quality and temperature standards safe for

aquatic ecosystems. Regular groundwater monitoring is conducted to protect the surrounding ecosystem. In 2024, all monitored water quality indicators remained within the permitted limits.

Complementing these measures, PT HPL is currently conducting a comprehensive hydrology and hydrogeology study in partnership with experts to support sustainable water management. The study aims to optimize water use, mitigate flooding, and facilitate the transition of mining areas into industrial parks. It also includes flood control measures, coastal protection efforts, and watershed modeling to enhance long-term operational resilience.

These integrated efforts reflect PT HPL's commitment to safeguarding water resources as a shared environmental responsibility. By combining advanced treatment technologies, real-time monitoring, and



proactive reuse strategies, the company has not only maintained full regulatory compliance in 2024 but also taken meaningful steps toward long-term water security. As the hydrology and hydrogeology study advances, PT HPL continues to position itself

as a responsible operator—protecting ecosystems, supporting community water needs, and enhancing climate resilience through sustainable water stewardship.

Obi Industrial Park Settling Pond

The OBI Industrial Park is equipped with 52 sedimentation ponds, covering an area of 43 hectares and capable of holding 924,000 cubic meters of water. These ponds are designed to ensure that the water discharged from production operations does not harm the surrounding environment. The discharged water is effectively sedimented in the sedimentation ponds and the water discharged into the water bodies meets

Indonesia's national discharge standards through a regular and strict testing mechanism. To maintain the optimal functionality of the sedimentation ponds, the park's operational team carries out dredging when the sediment reaches 80% of the pond's capacity.

> Please refer to the [Appendices](#) for details on the regulatory limits for water discharge quality parameters.





Maintaining Water Safety and Quality



Employing patented technology developed with Lygend and China ENFI Engineering Corporation to minimize hexavalent chromium (Cr^{6+}) formation in the HPAL process.



Monitored and analyzed by independent laboratory.



Ensuring the temperature of water discharge is at a safe level for coral and other marine life.



Conducting hydrology and water availability management.



Planting grass and trees to reduce sedimentation and restoring the disturbed land.



Implement sediment control by constructing sediment ponds to reduce sedimentation.

> Refer to [PT TBP's 2024 Sustainability Report](#) for information on water management, as well as marine protection and Group-wide conservation programs.

Biodiversity [SASB EM-MM-160a.1] [GRI 101-2, 101-4] [GRI Mining 14.4.3, 14.4.4]

To minimize ecological impact and promote long-term environmental stewardship, PT HPL implements a structured framework consisting of a Sustainability Policy, a Biodiversity Management Plan (BMP), and a Biodiversity Action Plan (BAP). This integrated approach ensures consistent application of conservation principles across all operational areas. The policy is rooted in continuous improvement and is designed to deliver net conservation gains within a 20-year time frame.

The Group adopts a landscape-based approach on Obi Island to manage potential environmental impacts, following the Taskforce for Nature-related Financial Disclosures (TNFD) mitigation hierarchy and the

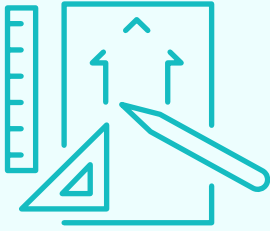
International Finance Corporation (IFC) Performance Standard 6 impact management hierarchy. This approach prioritizes avoiding impacts where feasible, minimizing unavoidable effects, rehabilitating affected areas, and implementing conservation measures.

The Biodiversity Management Plan (BMP) supports continuous improvements in biodiversity conservation efforts, reinforcing the Group's commitment to sustainable development and nature-positive outcomes. The BMP outlines biodiversity considerations across three key operational phases and is currently being updated to incorporate the Global Biodiversity Framework (GBF).



Ideopsis Vitrea

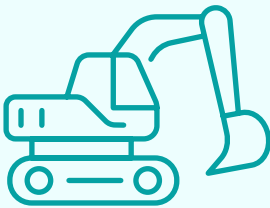
Outline of Biodiversity Management Plan for Key Operational Phases



Pre-Construction and Construction Phase

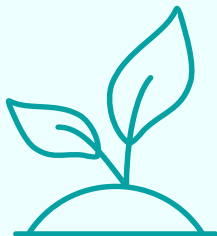
Activities such as land clearing, material mobilization, and infrastructure development are identified as potential threats to local biodiversity.

Mitigation strategies in this phase prioritize minimizing habitat disturbance and effective waste management.



Operational Phase

Ongoing mining and industrial activities are managed through operational controls, habitat conservation measures, and continuous monitoring to mitigate biodiversity risks.



Post-Operational Phase

Decommissioning activities focus on habitat restoration and pollution prevention to minimize long-term environmental impacts.

Monitoring and evaluation ensure adaptive management, with indicators tracking mitigation effectiveness and informing adjustments.

Biodiversity and Ecosystem Risk Management

Landscape-level Nature Risk Assessment (LNRA) for Obi Island has been the highlight for PT HPL's biodiversity initiatives. This assessment provided a foundation for sustainable land use and responsible development, incorporating stakeholder input for a holistic view. The LNRA identified nature-related risks

such as impacts on Key Biodiversity Areas, high-forest-density zones, and environmental human rights. As an industry standard-setting initiative, the LNRA has already been applied in other major mining regions, supporting consistent and science-based approaches to nature risk management.



In addition to LNRA, the Group has conducted several biodiversity studies on Obi Island in line with international standards such as IFC PS6, IRMA, and TNFD. The Critical Habitat Assessment identified key terrestrial and marine species of conservation concern, highlighting the need for ongoing ecological monitoring. The Ecosystem Services Assessment evaluated essential ecosystem functions, including provisioning, regulating, cultural, and supporting

services. A Biodiversity Inventory further identified species of conservation importance and recommended restoration strategies such as habitat conservation, reforestation, and monitoring. Guided by the LNRA and related studies, PT HPL pursues Net Conservation Gain by restoring and conserving priority areas through compensation models like protected zones and ecosystem restoration.

Marine Conservation

As part of its marine ecosystem restoration efforts, PT HPL has implemented a coral reef restoration program using artificial reefs constructed from by-products of its production process, specifically nickel slag and fly ash. These materials are incorporated into the construction mix, called reef-cubes, which are then deployed on the seabed.

As of now, the reef-cubes cover an area of 1,032 m². Observations indicate highly positive ecological progress, with increasing presence of fish schools that associated with the structure and other marine life (Giant clam, Moray eel, Trochus snail, Octopus) that colonize the reef-cube as their new habitat. In 2024 alone, monitoring recorded 98 species from 50 genera and 22 families of reef-associated fish occupying or interacting with the deployed reef-cubes. This initiative is designed to enhance the stability, resilience, and regenerative capacity of coral reef ecosystems, safeguarding their conservation and ecological integrity in long term conservation.

PT HPL has initiated a mangrove rehabilitation program in collaboration with Faculty of Forestry, Universitas Khairun (Unkhair), local University in Ternate North Maluku since 2021. This initiative held in recognition of the critical role mangrove ecosystems play in maintaining coastal environmental balance. The program covers a total rehabilitation area of

23.91 hectares across four sites: Soligi, Awanggoa, Belang-Belang, and Kayoa. Mangroves serve not only as habitats for diverse species of flora and fauna but also act as natural barriers against coastal erosion, seawater intrusion, and natural disasters such as tidal waves and tsunamis. Beyond their ecological benefits, mangroves contribute significantly to global climate change mitigation by absorbing and storing large amounts of carbon.

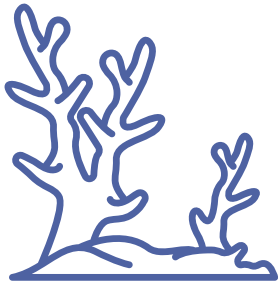
PT HPL, Unkhair, with community conducted regular monitoring every three months, beginning in July 2024. This monitoring focuses on evaluating the growth progress, survival rate, and the influence of environmental factors such as substrate type, temperature, and salinity. Baseline data for plant survival rates were established in 2021, while baseline growth data were collected starting in July 2024.

Initial findings indicate positive trends, with increase mangrove growth and increased survival rates compared to previous periods. However, challenges such as seedling mortality due to environmental factors and adaptation difficulties remain areas of concern. To enhance the success of this program, it is recommended to select seedling species that are better suited to local conditions and to conduct regular monitoring to detect potential issues early on.



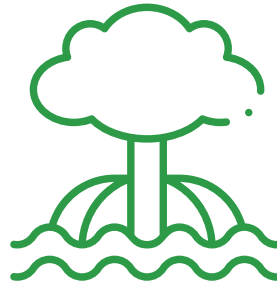
This program goes beyond ecosystem rehabilitation by integrating a participatory approach that actively involves local communities in its implementation. Through these efforts, PT HPL aims to restore healthy and productive mangrove ecosystems while simultaneously enhancing ecological and economical

benefit of surrounding communities in the future. With the collective commitment of multistakeholders, this initiative is expected to become a stepping stone toward broader coastal ecosystem recovery, ultimately fostering a healthy, productive, and sustainable environment for future generations.



1,871

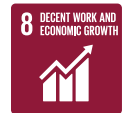
Artificial reefs placed



71,466

Mangroves planted





Human Rights

Respect for human rights is embedded across all areas of PT HPL’s operations, guided by Harita Nickel’s Human Rights Policy. The policy aligns with international frameworks, including the Universal Declaration of Human Rights (UDHR), the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In 2024, the Group updated the policy, applied across all business units, including PT HPL to align with ILO Convention 131 on Minimum Wage Fixing and to formalize Human Rights Due Diligence (HRDD) as an ongoing process. This includes conducting impact assessments, integrating findings into procedures, implementing mitigation measures, evaluating effectiveness, and engaging stakeholders. The Group also strengthened the governance by establishing a Human Rights Coordination Team and is developing a Human Rights Roadmap for implementation in 2025.

For more information on PT HPL’s Group-wide human rights practices, please refer to [PT TBP’s 2024 Sustainability Report](#) (p. 116-118).

Labor Rights and Practices [GRI 2-7, 2-8, 3-3, 401-1, 408-1, 409-1]

Fair, transparent, and responsible employment practices form the foundation of workforce management at PT HPL, guided by a Human Resources Management Policy and well-defined procedures. These practices comply with Indonesian labor laws and align with International Labor Organization (ILO) indicators, particularly those focused on eliminating child labor and forced labor. All employees are hired directly, without the use of recruitment agencies, and all hiring-related costs—including medical testing and

transportation—are fully covered by the company to ensure equal access and prevent worker exploitation.

Labor practices are aligned with the Group’s standards on working conditions, including notice periods, working hours, overtime, rest days, parental leave, and freedom of association. Regular employee engagement is maintained through established channels.

New Hires

Description		2024		2023	
		No.	%	No.	%
By Gender	Men	344	90.05	2,304	93.81
	Women	38	9.94	152	6.19
By Age Group	< 30 years old	311	81.41	1,473	59.98
	30-50 years old	69	18.06	979	39.86
	>50 years old	2	0.53	4	0.16
Indonesians and Foreigners	Indonesians from North Maluku	170	44.50	552	22.48
	Indonesian form Other Areas	183	47.91	1,510	61.48
	Foreigners	29	7.59	394	16.04

Employee Rights

1. Head office employees work eight hours per day, Monday to Friday, while site-based employees follow a roster system with one rest day every two weeks, in compliance with Indonesian government regulations.
2. A bipartite cooperative institution supports communication between employees and management.
3. All employees have access to a whistleblowing and grievance mechanism. A QR code for grievance submission is available throughout offices and operational areas. Training is provided to ensure awareness, and information is posted on bulletin boards across these areas. Employees may use the system without fear of reprisal or dismissal.
4. In 2024, 36 out of 1,681 eligible employees took parental leave.
5. All employees are covered by health insurance and enrolled in the BPJS Employment program (Indonesia’s government-run social security program for workers).



Diversity and Equal Opportunity [GRI 2-7, 2-8 405-1, 405-2, 406-1] [SASB EM-MM-000.B]

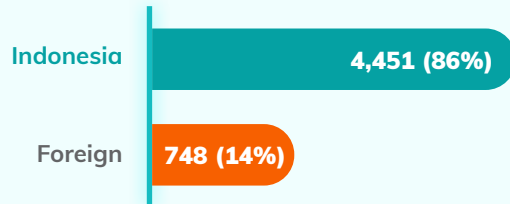
PT HPL is committed to maintaining a workplace free from discrimination, guided by Harita Nickel's Code of Ethics and Conduct and broader Group-wide policies on equality and fairness. All employees receive regular training on preventing discrimination and sexual harassment. No cases of discrimination were reported in 2024.

Of its 5,199 employees, 4,451 (86%) are Indonesian nationals, including 1,774 (40%) from North Maluku. The remaining 748 (14%) are foreign nationals based in Indonesia. Among the new hires, 92.41% were Indonesian, of which 47.91% were from North Maluku. PT HPL continues to focus on expanding recruitment and career development opportunities for local talent.

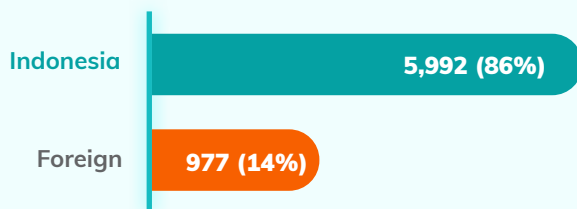
Indonesian Employees

Employee Composition by Nationality (no., %)

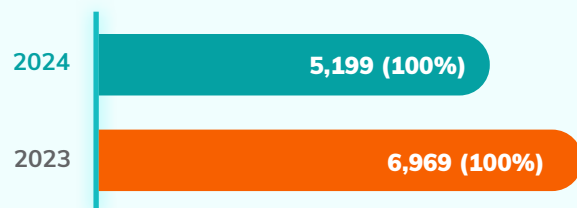
2024



2023

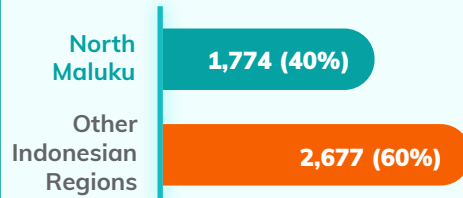


Total

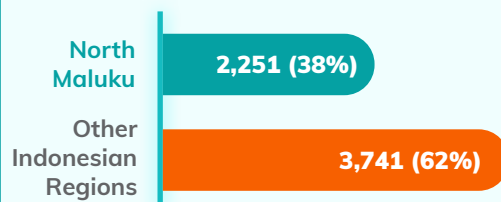


Indonesians Employed by Region (no., %)

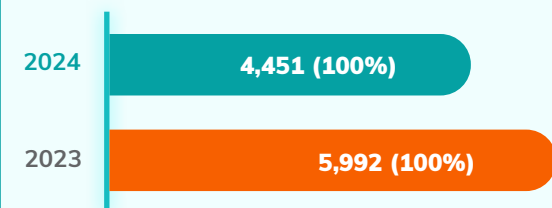
2024



2023

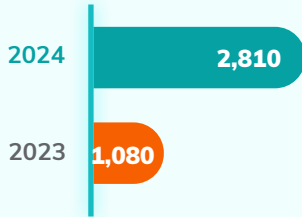


Total

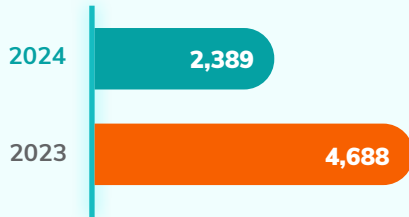


Employee by Contract Type 2023-2024 (no.)

Permanent



Fixed-Term Contract

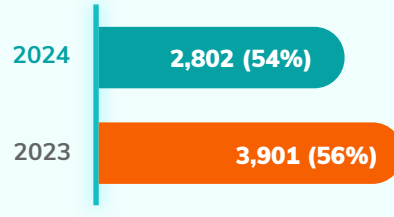


Notes:

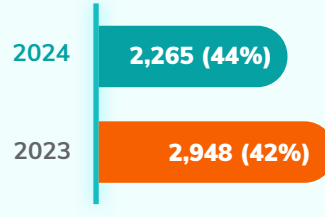
- Permanent employees are those with an indefinite contract.
- Fixed-term contract employees are hired on a definite or recurring contract basis, subject to renewal based on project needs.
- Many operational-level workers are hired on a contract basis and will be eligible for permanent status based on performance – usually after one or two years.
- There was a significant decrease in fixed-term contract employees in 2024 due to several factors, including contract terminations, the appointment of some employees as permanent staff, and the company’s implementation of manpower efficiency measures.

Employee by Age Group 2023-2024 (no.,%)

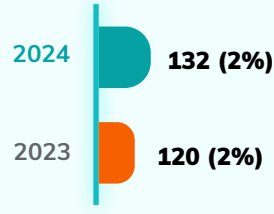
< 30 years old



30-50 years old



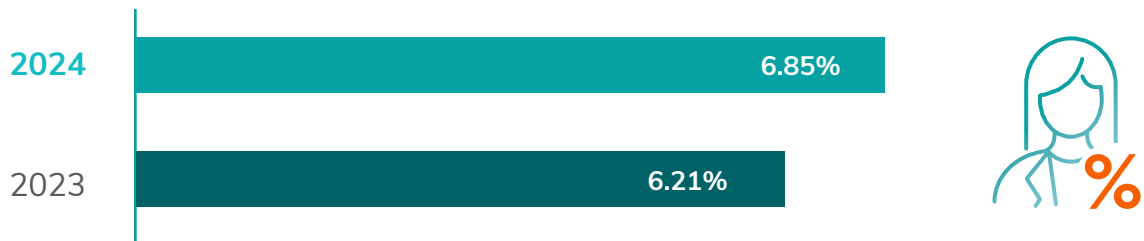
>50 years old



Gender Breakdown by Employee Category 2024 (no., %)

Description	2024			2023		
	Female	Male	Female (%)	Female	Male	Female (%)
Management	9	41	18	9	46	16.4
Superintendent	16	64	20	16	66	19.5
Supervisor	56	680	7.6	63	899	6.5
Staff	239	721	24.9	286	844	25.3
Non-Staff	37	3,336	1.1	59	4,681	1.2
Total	357	4,842		433	6,536	

Percentage of Female Employees, 2024 (%)



Note:

The non-staff category includes on-the-ground operational employees such as contracted construction workers. The staff category denotes employees holding office and administrative-level positions.






Wages and Benefits

Compensation and benefits at PT HPL are designed to promote fairness, well-being, and alignment with both Group policy and responsible labor practices. All employees—including contractors and outsourced

workers—receive wages that exceed regulatory requirements. Entry-level operational staff earn 1.31% above the provincial minimum wage in North Maluku.

Wages for Entry Level Employees by Gender (2024)

Location	Gender	Local Minimum Salary (IDR/Month)	Lowest Basic Salary (IDR/Month) *	Ratio Between Lowest Basic Salary Compared to Local Minimum Salary	
		2024  Assured	2024  Assured	2024  Assured	2023
Site (Obi Island, North Maluku)	Male	3,200,000	3,242,200	1.01	1.09
	Female	3,200,000	3,242,200	1.01	1.09

Notes:

- As of December 2024, there were no entry-level employees at PT HPL's head office
- Basic salary does not include allowances and other benefits.

Remuneration practices ensure equal pay for equal work, regardless of gender, and include overtime pay and allowances for operational roles. Additional

benefits for operational employees include housing, food and travel allowances, grade-based allowances, and role-based allowances.

Training and Development [GRI 404-1, 404-2]

PT HPL employees benefit from continuous knowledge transfer from Lygend, particularly in technical know-how related to HPAL (High Pressure Acid Leach) smelter operations. Training and development programs are delivered throughout the year based on job function needs analysis and aligned with Harita Nickel's approach. These include a combination of formal and informal learning opportunities, all of

which are evaluated for effectiveness and adjusted as needed. In 2024, employees received an average of 5.49 training hours, reflecting a 41.60% decrease from 13.2 hours in 2023. The decrease in training hours from 2023 to 2024 occurred because most mandatory training was already completed in 2023, leaving only the remaining untrained employees and new hires to be trained in 2024.

Occupational Health and Safety [GRI 403-1, 403-2, 403-3, 403-8, 403-9, 403-10] [SASB EM-MM-320a.1]

Occupational health and safety (OHS) is a core priority, with practices designed to protect workers' well-being and foster a safe working environment across all operations. OHS implementation aligns with

the Group's Health and Safety Policy, Mining Safety Technical Guidelines, and Sustainability Policy, and is further reinforced by the Company's Occupational Safety and Health, Environment, Security, and Social



Relations Policy. These commitments are translated into action through comprehensive occupational health and industrial hygiene (OH/II) programs that integrate promotive, preventive, and curative measures.

Employees and contractors are equipped with the necessary personal protective equipment (PPE) and receive regular OHS training.



Promotive

- Training and Awareness Campaigns through active communication methods, including Safety Induction, Safety Training, coaching, counseling, and refresher.
- Ongoing Campaigns using posters, leaflets, notice boards, and video campaigns displayed on LCD screens.
- Certified management systems, Standard Operating Procedures (SOPs), and other relevant certifications in place.
- Employee Engagement in OHS Programs, including emergency drills, Observation Report Awards, and Employee of the Month recognition.



Preventive

- Routine analysis of contaminant levels to ensure a safe working environment.
- Hazard Identification and Risk Assessments (HIRA) and Job Safety Analysis (JSA) for proactive risk management.
- Employee health screenings conducted regularly to monitor worker well-being.
- Monitoring of drinking water quality, hygiene practices, and sanitation systems to uphold health standards.
- Periodic review of risk controls, including follow-up on actions from the HIRA Report, Hazard Operability Study, Health Risk Assessment (HRA), and Chemical Health Risk Assessment.
- Senior Management Engagement Program through walk-through inspections by senior leadership.
- Regular occupational health monitoring and measurement, including scheduled potable water testing.
- Inspection and certification testing for production equipment and heavy machinery to ensure operational safety.
- Fitness and fatigue assessments for employees involved in high-risk tasks or activities.



Curative and Rehabilitative

- Regular medical check-ups to ensure employees are physically fit for work and to monitor potential health conditions.
- Management of Change (MoC) Risk Assessments to evaluate and mitigate risks arising from operational or organizational changes.
- Monitoring of return-to-work programs to support employees' reintegration following medical treatment or recovery.

Key Hazard Identification and OHS Training [GRI 403-2, 403-5]

Throughout 2024, PT HPL took proactive measures to address all conditions that posed risks to workplace health and safety including conducting thorough investigations of any incidents that occurred. Employees are empowered with the right to refuse unsafe work and are encouraged to report such

conditions to their supervisors. In line with PT HPL's commitment to maintaining a safe and healthy work environment, both employees and contractors participated in training and certification programs designed to enhance their competencies.

Occupational Health and Safety (OHS) Training 2024

Type of Workers	Number of Participants	Training Hours
Employees	1,768	8,742
Non-Employees (Contractors)	641	974

Currently, the Group is working with the Disaster Risk Reduction Center (DRRC) team from Universitas Indonesia to conduct a comprehensive review and further develop PT HPL's Integrated Disaster Management framework, which is expected to be

completed by Q1 2025. As part of this process, PT HPL is actively engaging local communities in developing emergency response plans to ensure their needs and concerns are properly addressed.

Employee Health and Occupational Diseases [GRI 403-3, 403-10]

In 2024, no occupational diseases were reported among employees or contractors, reflecting the effectiveness of PT HPL's ongoing preventive health measures. These efforts included targeted health awareness initiatives aimed at reducing the risk of commonly diagnosed illnesses. As part of its commitment to maintaining high healthcare standards, the Medical Laboratory at KHNO Clinic, PT HPL, also underwent an External Quality Assurance (EQA) assessment conducted by an accredited external body. The assessment evaluated the laboratory's performance in clinical chemistry,

hematology, immunoserology, microbiology, and urinalysis, using proficiency testing aligned with ISO 15189 standards for medical laboratories.

In line with the Group's broader health and well-being initiative, PT HPL also launched mental health screenings in 2024 to identify potential risk factors at an early stage. Building on this, a mental health consultation and management program has been prepared and is scheduled to begin in 2025.

Accident Reporting [GRI 403-1, 403-2, 403-7, 403-9]

Continued focus on health and safety performance led to zero reported cases of occupational disease in 2024. In alignment with Harita Nickel's target to reduce the Total Recordable Injury Frequency Rate (TRIFR) by 5% from the 2022 baseline by 2025, PT HPL actively monitors and manages safety outcomes for both employees and contractors. During

the reporting year, employees recorded a total of 15,980,592 man-hours with a TRIFR of 3.00 ✔ Assured while contractors contributed 6,497,004 man-hours with a TRIFR of 2.15 ✔ Assured. Meanwhile, the recordable work-related injuries of employees are 48 cases, and 14 cases are for contractors ✔ Assured. TRIFR is calculated based on 1,000,000 hours worked.

Employee and Contractor Incidents

	First Aid Cases (Minor Injuries)			Cases Requiring Further Medical Attention		
	2024	2023	2022	2024	2023	2022
Employees	84	151	133	...	61	55
Contractors	11	59	133	...	90	76
Total	95	210	266	...	151	131

	TRIFR			Severity Rate		
	2024	2023	2022	2024	2023	2022
Employees	3.00	3.6	3.01	0	4.55	1
Contractors	2.15	9.76	5.19	0	-	4.54
Total	2.76	5.77	5.89	2.94	2.96	3.46

Notes:

- First aid cases are minor injuries which are easily treated at PT HPL's first aid stations. Such incidents may include eye irritation from chemical exposure, minor cuts, and discomfort from slip-and-fall incidents.
- The TRIFR for employees covers all PT HPL permanent and fixed-term employees, while the TRIFR for contractors covers all third-party contractors.



Security Practices [GRI 410-1]

Maintaining a secure and rights-respecting operational environment is a key priority for PT HPL, especially given its status as a National Strategic Project and National Vital Object on Obi Island. The company implements proactive security measures designed to detect, prevent, and respond to potential threats while upholding individual rights. Compliance with national and international regulations—including Presidential Decree No. 63/2004 and the ISPS Code—is reinforced

through regular training of security personnel based on international human rights standards, such as the UN Basic Principles on the Use of Force and Firearms. Ongoing security risk assessments, guided by standard operating procedures, form part of PT HPL's broader human rights due diligence. Operating in a low-conflict area, PT HPL has maintained a strong track record, with no reported human rights violations or labor-related disruptions during the reporting year.

Training for Security Personnel

Assured

Human Rights Training for Security Personnel	2024	2023
Total number of security personnel	143	152
Total number of security personnel who received training	143	152
Percentage of security personnel who received training (%)	100	100

Community Development [GRI 2-25, 203-1, 203-2, 413-1, 413-2] [SASB EM-MM-210a.1, EM-MM-210a.2, EM-MM-210a.3, EM-MM-210b.1, EM-MM-210b.2]

Community development is a central part of PT HPL's commitment to creating positive, lasting impacts for surrounding communities. This commitment is realized through programs focused on five key areas: Education, Socio-Cultural Development, Healthcare,

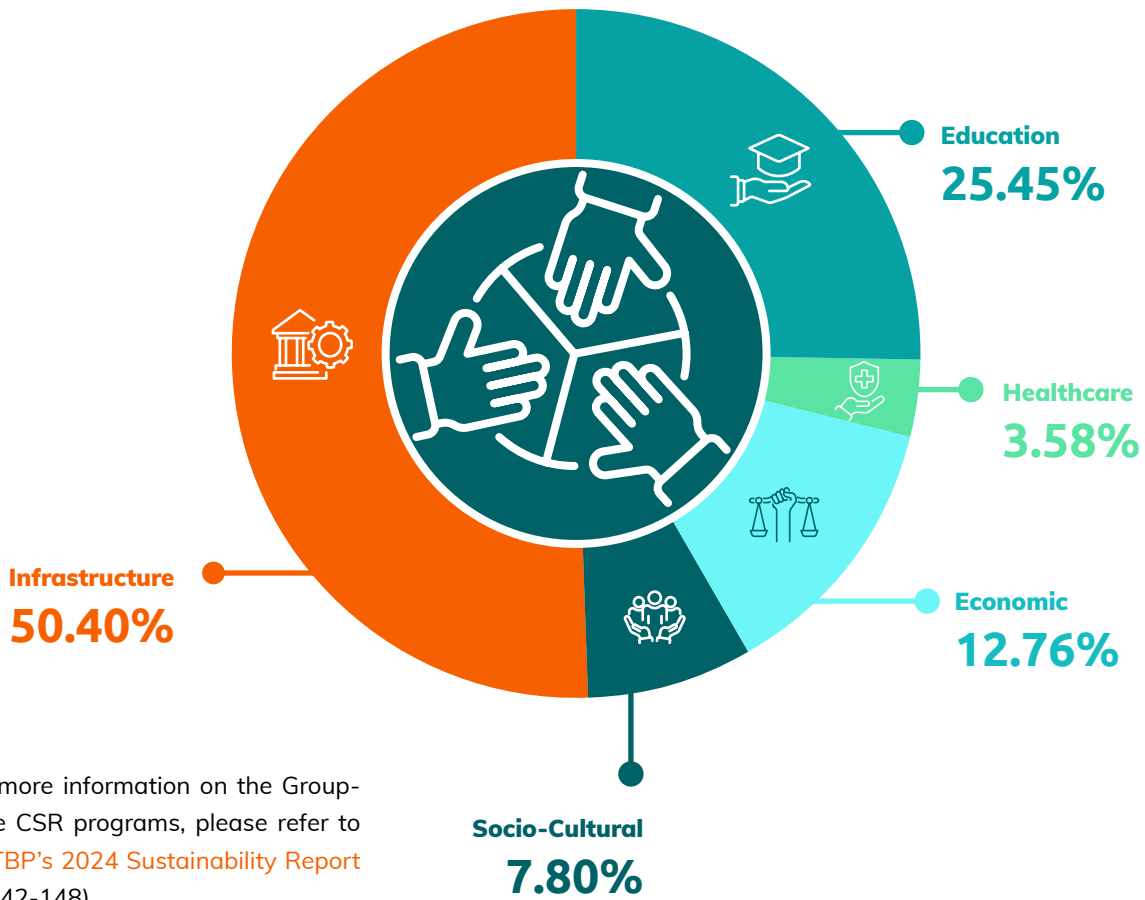
Infrastructure, and Economic Empowerment. These initiatives are designed to deliver long-term value and enhance the quality of life for communities in and around the company's operational areas.

Five Pillars of Community Development Programs





Expenditure of Community Development Program Focus Areas 2024



For more information on the Group-wide CSR programs, please refer to [PT TBP's 2024 Sustainability Report](#) (p. 142-148).

PT HPL CSR 2024 Highlights



Education

Program Highlights

Activities	Output
Program: Youth Skills and Competency Development (PELITA) Batch II	
Enhancing the competencies (skills and expertise) of young people in the Group's operational areas.	28 participants received the Overhead Crane Operator License (SIO) certification.
Program: Harita GEMILANG (Bright Young Generation of Obi)	
The Group initiated the Harita Gemilang Scholarship Program for university and diploma students from Obi to enhance their access to higher education opportunities.	60 scholarship recipients.



Healthcare

Program Highlights

Activities	Output
Program: Public Healthcare Center	
Providing adequate, free healthcare facilities for the local community.	An average of 464 people visited Village Maternity Post (POLINDES) and received free medical services each month.
Program: POSYANDU	
Providing free Posyandu (Integrated Health Service Post) services for mothers and children around Harita Nickel's operational areas.	An average of 356 mothers and children visited the Posyandu (Integrated Health Service Post) being weighed, immunized, and received supplementary food.



Economic

Program Highlights

Activities	Output
Program: Local Supplier Engagement	
Integrating the Group's business needs by involving local SMEs (Small and Medium Enterprises) as suppliers.	<ul style="list-style-type: none"> 65 local suppliers with total 254 workers established partnership with the Group including PT HPL. Total transactions of IDR150 billion in 2024.
Program: SUTAN – Sentra Usaha Tani Nelayan	
Provided a fishing boat with its engine, two fish pads, capacity building training on fish cleaning methods to meet catering standards, and financial management training.	<ul style="list-style-type: none"> Operated by 14 fishermen from Kawasi Village. Generated a total revenue of IDR 784 million in 2024.





Socio-Culture

Program Highlights

Activities	Output
Program: Ngibi Traditional Dance Festival	
Preserving local wisdom through the “Ngibi Traditional Dance Festival,” featuring Cunga Dance and Silat competitions.	60 elementary, junior, and high school students participated in this event.
Program: Religious Activities	
Supporting various religious activities for the community.	<ul style="list-style-type: none"> Sponsored 1,425 Eid al-Fitri packages gift and assistance to 500 orphans. Donated 505 Christmas packages and provided Christmas celebration assistance to 14 churches.



Infrastructure

Program Highlights

Activities	Output
Program: Water and Electricity Support	
Improve community access to electricity and clean water.	Water and electricity connections have been established for 298 households in Kawasi.
Program: New Kawasi Public Infrastructure	
Development of essential public infrastructure to enhance the well-being and quality of life of communities in New Kawasi.	Constructed elementary school, junior high school, high school, public health care center, village hall, church, and mosque in New Kawasi.





Appendices



Appendices

Tailings storage inventory as of December 2024 [SASB EM-MM-540a.1]

UNIT OF MEASUREMENT		
(1) facility name,	P2389	
(2) location,	The location for storing B3 waste is in the former P23 and P89 mining area which is located in the PT Trimegah Bangun Persada operational area in Kawasi Village, Obi District, South Halmahera Regency, North Maluku Province.	
(3) ownership status	PT Trimegah Bangun Persada Tbk Operated by PT Halmahera Persada Lygend	
(4) operational status	Operational	
(5) construction method	<p>PT HPL's tailings storage facility utilizes a former mining area as the deposition site. Several supporting facilities of the tailings storage facility include:</p> <ol style="list-style-type: none"> 1. Buttress; additional retaining structures built to compartmentalize the dry tailings and reinforce the outer parameter side of the tailings storage facility 2. Drainage system; designed to channel water from the tailings (leachate) to drain the tailings and maintain the structural stability of the facility 3. Collection pond; a pond that collects leachate before it is directed to further treatment 4. Wastewater Treatment Plant (WWTP); a wastewater (leachate) treatment installation involving processes such as filtration, neutralization, or other methods 5. Groundwater facility; wells constructed in both the downstream and upstream parts of the storage facility, serving to monitor groundwater contamination levels from tailings deposition activities 	
(6) maximum permitted storage capacity	Tonnes	49,100,000
(7) current amount of tailings stored	Tonnes	21,499,848
(8) consequence classification	III	
(9) date of most recent independent technical review	2024	
Material findings and mitigation measures	<p>Conclusion</p> <ol style="list-style-type: none"> 1. Tailings from HPAL processing have been tested and meet regulatory standards for hazardous waste, with no parameters exceeding limits. 2. The tailings storage facility is in former mining pits close to the processing plant, minimizing environmental and logistical risks. 3. Supporting infrastructure such as buttresses, drainage systems, collection ponds, and a leachate treatment plant has been constructed according to design and regulatory requirements. 4. Monitoring systems and regular reporting are in place and aligned with Indonesian regulations. 5. Risk assessments have been conducted for safety, environmental, and social aspects, and emergency response systems are operational and well-documented. <p>Suggestion</p> <ol style="list-style-type: none"> 1. Conduct testing for Acid Rock Drainage (ARD) potential due to the acidic nature of the HPAL process. 2. Include biodiversity and ecosystem risks in future risk assessments. 3. Improve maintenance of finger drainage to prevent water pooling in the stack area. 4. Ensure routine inspections and consistent documentation of operational activities. 5. Maintain regulatory compliance through permit renewal and periodic review of operational practices. 	

Contributing to the SDGs

SDG	SDG TARGET	KEY ACTIONS AND INITIATIVES
	1.4 By 2030, ensure that all society, especially the poor and vulnerable, have equal access to economic resources (such as rights to basic services), ownership and access to land	E.g., upholding the rights of the local community and supporting them through CSR programs
	3.2 By 2030, end preventable deaths in newborns and children under 5 years of age 3.9 By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination	E.g., supporting community health through CSR programs E.g., managing operational waste responsibly, including tailings; installing technology and equipment to reduce air emissions; conducting training for production personnel on chemical handling procedures and emergency response; treating and monitoring wastewater
	4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes	E.g., supporting education through CSR programs
	5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision making in political, economic, and public life	E.g., upholding human rights and principles of diversity and equal opportunity, ensuring fair remuneration regardless of gender
	6.1 By 2030, achieve universal and equitable access to safe and affordable drinking water for all	E.g., regular monitoring and testing of water, with treatment where necessary to ensure safety and quality for drinking; providing access to clean water through CSR programs
	7.1 By 2030, ensure universal access to affordable, reliable, and modern energy services	E.g., the product of HPL is used as the material for EV batteries, reducing the use of fossil fuel
	8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value 8.8 Protect labor rights and promote safe and secure working environments for all workers (including migrant workers, in particular women migrants, and those in precarious employment)	E.g., upholding human rights and principles of diversity and equal opportunity, conducting human rights due diligence assessment; ensuring a supportive and fulfilling work environment, and fair remuneration regardless of gender E.g., obtaining ISO 45001:2018 and SMK3 certification for Occupational Health and Safety Management System; conducting regular safety training and drills
	9.1 Develop quality, reliable, sustainable, and resilient infrastructure	E.g., developing infrastructure through CSR programs
	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse	E.g., ensuring proper waste management, reusing FABA for backfilling
	13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries 13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	E.g., conducting climate change risk assessment, monitoring GHG emissions, implementing measures for reduction, implement sustainable energy initiatives E.g., holding an idea competition of Harita Continuous Improvement to collect employees' aspirations for sustainable solutions within the operations



SDG	SDG TARGET	KEY ACTIONS AND INITIATIVES
	14.2 By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and act for their restoration to achieve healthy and productive oceans	E.g., conducting hydrology studies, implementing measures to reduce pollution and maintain safe water temperatures, regular monitoring, and testing of water, with treatment where necessary to ensure safety and quality for marine biodiversity
	15.1 By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements	E.g., conducting conservation initiatives across terrestrial, watershed and marine areas; implementing flora and fauna monitoring, and having postmining plan for rehabilitation in place; conducting Landscape Level Nature Risk Assessment (LNRA) and biodiversity studies

Base Data

General Disclosure

CATEGORY/INDICATOR	DESCRIPTION	UOM	FY2024	FY2023	FY2022
Production capacity	MHP	Ni content t/year	55,000	55,000	n/a
	equivalent in nickel sulfate	Ni content t/year	55,000	55,000	n/a
	equivalent in cobalt sulfate	Co content t/year	6,750	6,750	n/a
Processing capacity	MHP		55,000	55,000	n/a
	NiSO ₄	Ni content t/year	55,000	55,000	n/a
	CoSO ₄	Co content t/year	6,750	6,750	n/a
Employees [GRI 2-7]	Total (headcount)	no.	5,199	6,969	4,642
	Male	no.	357	6,536	4,362
	Female	no.	4,842	433	280

Good Governance

CATEGORY/INDICATOR	DESCRIPTION	UOM	FY2024	FY2023*	FY2022*
Financial performance and environmental investments [GRI 201-1]	Revenue	USD million	998.53	987.96	1,027.07
	Employee wages and benefits	USD million	279.11	104.54	55.69
	Payments to local government*	USD million	3.34 USD million	4.26 USD million	2.53 USD million
	Payments to central government*	USD million	30.23 USD million	17.75 USD million	12.09 USD million
	Environmental investment**	USD million	1.4 USD million	8.56 USD million**	3.03 USD million

CATEGORY/INDICATOR	DESCRIPTION	UOM	FY2024	FY2023*	FY2022*
Diversity and equal opportunity [GRI 2-7, 405-1]					
Employees by age group	Below 30 years old	no.	2,802	3,901	3,040
	30–50 years old	no.	2,265	2,948	1,568
	More than 50 years old	no.	132	120	34
Employees by locality	Locals	no.	1,774	2,251	2,036
	Non-locals	no.	2,677	3,741	2,606
	Foreigners	no.	748	977	0
Employees by contract type	Permanent	no.	2,810	2,281	1,080
	Fixed-term contract***	no.	2,389	4,688	3,562

Note:

*Data payment to local government and central government are restated due to currency conversion from IDR to USD.

**High environmental investment in 2023 was primarily driven by capital expenditures for the construction of environmental management facilities.

***The data for 2022 has been restated to include foreign employees based in Indonesia.

Climate Change

CATEGORY/INDICATOR	DESCRIPTION	UOM	FY2024	FY2023	FY2022
Energy consumption [GRI 302-1] [SASB EM-MM 130a.1]	Total energy consumption	GJ	11,509,071	8,475,599	7,832,205
	Renewable sources	GJ	5,819,885	3,145,915	3,687,304
	Non-renewable sources	GJ	5,689,216	5,329,684	4,144,901
Energy Intensity [GRI 302-3]	Total	GJ/t MHP	33.80	29.60*	35.61*
GHG emissions [GRI 305-1, 305-2, 305-3, 305-4] [SASB EM-MM-110a.1]	Total GHG emission	tCO ₂ e	2,040,014	1,861,116	1,038,208
	Direct (Scope 1) GHG emissions	tCO ₂ e	875,619	866,913	679,608
	Indirect (Scope 2) GHG emissions	tCO ₂ e	146	86	114
	Other indirect (Scope 3) GHG emissions	tCO ₂ e	1,164,250	994,117	358,486
	GHG emission intensity: Scope 1 and 2 only	tCO ₂ e / t Ni content		13.06	13.36
Water management** [GRI 303-3, 303-4, 303-5] [SASB EM-MM-140a.1]	Total water withdrawal	ML	38,737	46,202	27,662
	Surface water	ML	20,430	30,539	17,515
	Seawater	ML	17,223	15,663	10,147
	Total water discharge (seawater from nickel processing, rainwater runoff, and domestic use)	ML	26,050	31,816	n/a
	Total water consumption for domestic use and nickel processing	ML	12,687	14,404	n/a

Note:

* The data has been restated due to a recalculation.

** Water savings achieved through a closed-loop system, reducing surface water intake and overall consumption.



Human Rights

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2024	FY2023	FY2022
New hires [GRI 401-1]	Male	no.	344	2,304	3,005
	Female	no.	38	152	192
	Under 30 years old	no.	311	1,473	2,190
	30–50 years old	no.	69	979	983
	Over 50 years old	no.	2	4	24
	Local	no.	170	552	1,274
	Non-local	no.	183	1,510	1,667
	Foreigner	no.	29	366	256
Turnover rates by age group [GRI 401-1]	Under 30 years old	%	15%	16.74%	8.32%
	30–50 years old	%	19%	15.64%	10.33%
	Over 50 years old	%	21%	15.83%	14.71%
Parental leave [GRI 401-3]	Employees entitled to parental leave	no.	1,681	2,254	1,615
	Employees took parental leave	no.	36	38	28
	Employees returned to work after parental leave ended	no.	36	0*	28
	Employees still employed 12 months after their return to work from parental leave	no.	66	0*	16
Talent development [GRI 401-1]	Average hours of training per employee per year	hours	5.49	13.21	1.38
	Total training hours	hours	28,535.75	92,032	6,405

Note:
Data is reflected in 2024.

OHS Performance

CATEGORY/ INDICATOR	DESCRIPTION	UOM	FY2024	FY2023	FY2022
Occupational health and safety [GRI 403-9] [SASB EM-MM-320a.1]					
For employees	Recordable work injuries	no.	48	62	55
	TRIFR	Rate	3.00	3.60	3.01
	Total days lost due to work related injuries	no.	0	77	0
	Total hours worked	no.	15,980,592	16,939,008	8,115,172
	Near misses	no.	14	21	16
For contractors	Recordable work injuries	no.	14	90	76
	TRIFR	Rate	2.15	9.76	5.19
	Total days lost due to work related injuries	no.	0	0	77
	Total hours worked	no.	6,497,004	9,224,353	14,144,632
	Near misses	no.	4	5	13

Local Suppliers

	UOM	FY2024	FY2023	FY2022
Total suppliers	no.	460	403	188
Local suppliers	no.	24	43	19
Prioritizing locals [GRI 204-1]				
Total procurement value including imports	IDR billion	7,261,567.09	8,188,723.09	1,570.00
Local procurement value	IDR billion	1,984,212.18	3,040.00	4.94

GRI Content Index

The Global Reporting Initiative (GRI) is a widely adopted multi-stakeholder standard for sustainability reporting, providing guidance on determining report content and indicators. It has been designed to enhance the global comparability and quality of information on environmental and social impacts, thereby enabling greater transparency and accountability of

organizations. PT HPL 2024 Sustainability Report has been prepared with reference to the 2021 GRI Standards. The GRI Content Index references the following: the Harita Nickel's 2024 Sustainability Report (PT TBP SR2024), Lygend Resources ESG Report 2024, PT HPL website, and Harita Nickel's website.

Statement of Use	PT Halmahera Persada Lygend (HPL) has reported with reference to the GRI Standards for the period of 1 January 2024 to 31 December 2024.
GRI 1 Used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Location
GRI 2: General Disclosures 2021	2-1 Organizational details	About PT HPL, p. 12
	2-2 Entities included in the organization's sustainability reporting	About This Report, p. 4
	2-3 Reporting period, frequency, and contact point	About This Report, p. 4
	2-4 Restatements of information	Restatement Information, p. 15
	2-5 External assurance	About This Report, p. 4
	2-6 Activities, value chain, and other business relationships	<ul style="list-style-type: none"> About PT HPL, p. 12 Supply Chain Management, p. 22
	2-7 Employees	<ul style="list-style-type: none"> Labor Rights and Practices, p. 38 Diversity and Equal Opportunity, p. 39 Appendices (General Disclosures), p. 53 Appendices (Good Governance), p. 53
	2-8 Workers who are not employees	<ul style="list-style-type: none"> Labor Rights and Practices, p. 38 Diversity and Equal Opportunity, p. 39
	2-9 Governance structure and composition	<ul style="list-style-type: none"> Good Governance, p.19 TBP SR 2024, p. 62 ESG Report Lygend tahun 2024, p. 26
	2-10 Nomination and selection of the highest governance body	<ul style="list-style-type: none"> TBP AR 2024, p. 170 AR Lygend 2024, p. 46
	2-11 Chair of the highest governance body	<ul style="list-style-type: none"> SR TBP 2024 AR Lygend 2024
	2-12 Role of the highest governance body in overseeing the management of impacts	<ul style="list-style-type: none"> SR TBP 2024, p. 61 AR Lygend 2024, p. 54 ESG Report Lygend tahun 2024, p. 15



GRI Standard	Disclosure	Location
	2-13 Delegation of responsibility for managing impacts	<ul style="list-style-type: none"> • Good Governance, p. 19 • TBP SR 2024, p. 61 • AR Lygend 2024, p. 54
	2-14 Role of the highest governance body in sustainability reporting	<ul style="list-style-type: none"> • Good Governance, p. 19 • Materiality, p. 18
	2-15 Conflicts of interest	<ul style="list-style-type: none"> • TBP AR 2024, p. 212 • TBP SR 2024, p. 65 • AR Lygend 2024, p. 59
	2-16 Communication of critical concerns	<ul style="list-style-type: none"> • Whistleblowing and Grievances, p. 21 • Stakeholder Engagement, p. 17
	2-17 Collective knowledge of the highest governance body	<ul style="list-style-type: none"> • TBP SR 2024, p. 62, 149 • AR Lygend 2024, p. 41
	2-18 Evaluation of the performance of the highest governance body	<ul style="list-style-type: none"> • TBP AR 2024, p. 67 • AR Lygend 2024, p. 38
	2-19 Remuneration policies	<ul style="list-style-type: none"> • TBP AR 2024, p. 170 • AR Lygend 2024, p. 43
	2-20 Process to determine remuneration	<ul style="list-style-type: none"> • TBP AR 2024, p. 170 • AR Lygend 2024, p. 43
	2-21 Annual total compensation ratio	<ul style="list-style-type: none"> • TBP AR 2024, p. 240 • AR Lygend 2024, p. 43
	2-22 Statement on sustainable development strategy	<ul style="list-style-type: none"> • Message from the Director of HPL, p. 5 • Message from the Director of Lygend, p. 8
	2-23 Policy commitments	<ul style="list-style-type: none"> • PT HPL's Approach to Sustainability, p. 15 • PT TBP Sustainability Policy
	2-24 Embedding policy commitments	<ul style="list-style-type: none"> • PT HPL's Approach to Sustainability, p. 15 • PT TBP Sustainability Policy
	2-25 Processes to remediate negative impacts	<ul style="list-style-type: none"> • Whistleblowing and Grievances, p. 21 • Community Development, p. 46
	2-26 Mechanisms for seeking advice and raising concerns	<ul style="list-style-type: none"> • Whistleblowing and Grievances, p. 21 • Community Development, p. 46
	2-27 Compliance with laws and regulations	Business Ethic and Compliance, p. 21
	2-28 Membership associations	Stakeholder Engagement Table, p. 17
	2-29 Approach to stakeholder engagement	Stakeholder Engagement Table, p. 17
	2-30 Collective bargaining agreements	Wages and Benefit, p. 42
	3-1 Process to determine material topics	Materiality, p. 18
GRI 3: Material Topics 2021	3-2 List of material topics	Materiality, p. 18
	3-3 Management of material topics	Materiality, p. 18 Labor Rights and Management, p.38
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Operational and Economic Performance, p. 14 Appendices (Good Governance), p. 53
	201-2 Financial implications and other risks and opportunities due to climate change	Climate Action, p. 24
GRI 202: Market Presence 2016	202-1 Ratios of standard entry-level wage by gender compared to local minimum wage	Wages and Benefit, p.42
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Community Development, p. 46
	203-2 Significant indirect economic impacts	Community Development, p. 46

GRI Standard	Disclosure	Location
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Appendices (Local Suppliers), p. 56
	205-2 Communication and training about anti-corruption policies and procedures	Business Ethics and Compliance, p. 21
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	TBP SR 2024, p. 65
	302-1 Energy consumption within the organization	<ul style="list-style-type: none"> Energy Use, p. 24 Appendices (Climate Change), p. 54
GRI 302: Energy 2016	302-3 Energy intensity	<ul style="list-style-type: none"> Energy Use, p. 24 Appendices (Climate Change), p. 54
	302-4 Reduction of energy consumption	Energy Use, p. 24
	302-5 Reductions in energy requirements	Energy Use, p. 24
	303-1 Interactions with water as a shared resource	Water Management, p. 29
GRI 303: Water and Effluents 2018	303-2 Management of water discharge-related impacts	Water Management, p. 29
	303-3 Water withdrawal	<ul style="list-style-type: none"> Water Management, p. 29 Appendices (Climate Change), p. 54
	303-4 Water discharge	Appendices (Climate Change), p. 54
	303-5 Water consumption	Appendices (Climate Change), p. 54
	305-1 Direct (Scope 1) GHG emissions	<ul style="list-style-type: none"> GHG Emissions and Air Quality, p. 26 Appendices (Climate Change), p. 54
GRI 305: Emissions 2016	305-2 Energy indirect (Scope 2) GHG emissions	<ul style="list-style-type: none"> GHG Emissions and Air Quality, p. 26 Appendices (Climate Change), p. 54
	305-3 Other indirect (Scope 3) GHG emissions	<ul style="list-style-type: none"> GHG Emissions and Air Quality, p. 26 Appendices (Climate Change), p. 54
	305-4 GHG emissions intensity	Appendices (Climate Change), p. 54
	305-5 Reduction of GHG emissions	TBP SR 2024, p. 85
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Tailings and Waste Management, p. 28
	306-2 Management of significant waste-	Tailings and Waste Management, p. 28
	306-3 Waste generated	Tailings and Waste Management, p. 28
	306-4 Waste diverted from disposal	TBP SR 2024, p. 151
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Supply Chain Management, p. 22
	308-2 Negative environmental impacts in the supply chain and actions taken	Supply Chain Management, p. 22
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	<ul style="list-style-type: none"> Labor Rights and Practices, p. 38 Appendices (Human Rights), p. 53
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	TBP SR 2024, p. 122
	401-3 Parental leave	Appendices (Human Rights), p. 55
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	TBP SR 2024, p. 122



GRI Standard	Disclosure	Location
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	<ul style="list-style-type: none"> Occupational Health and Safety, p. 41 Accident Reporting, p. 43
	403-2 Hazard identification, risk assessment, and incident investigation	<ul style="list-style-type: none"> Occupational Health and Safety, p. 41 Key Hazard Identification and OHS Training, p. 42 Accident Reporting, p. 43
	Occupational health services	<ul style="list-style-type: none"> Occupational Health and Safety, p. 41 Employee Health and Occupational Diseases, p. 42
	403-4 Worker participation, consultation, and communication on occupational health and safety	TBP SR 2024, p. 136
	403-5 Worker training on occupational health and	Key Hazard Identification and OHS Training, p. 44
	403-6 Promotion of worker health	TBP SR 2024, p. 136
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Accident Reporting, p. 45
	403-8 Workers covered by an occupational health and safety management system	Occupational Health and Safety, p. 42
	403-9 Work-related injuries	<ul style="list-style-type: none"> Occupational Health and Safety, p. 42 Accident Reporting, p. 45 Appendices (OHS Performance), p. 46
	403-10 Work-related ill health	<ul style="list-style-type: none"> Occupational Health and Safety, p. 42 Employee Health and Occupational Diseases, p. 44
GRI 404: Training and Education 2016	Average hours of training per year per employee	Training and Development, p. 42
	404-2 Programs for upgrading employee skills and transition assistance programs	Training and Development, p. 42
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	<ul style="list-style-type: none"> Diversity and Equal Opportunity, p. 39 Appendices (Good Governance), p. 53
	405-2 Ratio of basic salary and remuneration of women to men	Diversity and Equal Opportunity, p. 39
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Diversity and Equal Opportunity, p. 39
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	TBP SR 2024, p. 122
GRI 408: Child Labor 2018	408-1 Operations and suppliers at significant risk for incidents of child labor	Labor Rights and Practices, p. 38
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Labor Rights and Practices, p. 38
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Security Practices, p. 46
413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Community Development, p. 46
	413-2 Operations with significant actual and potential negative impacts on local communities	Community Development, p. 46
GRI 414: Supplier Social Assessment	414-1 New suppliers that were screened using social criteria	Supply Chain Management, p. 22
	414-2 Negative social impacts in the supply chain and actions taken	Supply Chain Management, p. 22

SASB Disclosure Index

The Sustainability Accounting Standards Board (SASB) Standards guide companies in communicating to investors how sustainability issues impact long-term enterprise value, and were updated and

integrated into the IFRS framework in June 2023. This 2024 Sustainability Report has been prepared with reference to the SASB Standards on Metals and Mining.

Sustainability Disclosure Topics & Accounting Metrics

Topic	Code	Accounting Metric	Category	UoM	Source of Data/Information; Modifications; Reason for Omission
Greenhouse gas emissions	EM-MM-110a.1	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	Quantitative	t CO ₂ e, %	<ul style="list-style-type: none"> GHG Emissions and Air Quality, p. 26 Appendices (Climate Change), p. 54
	EM-MM-110a.2	Discussion of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Discussion and analysis	n/a	PT TBP SR 2024, p. 83
Air quality	EM-MM-120a.1	Air emissions of the following pollutants: (1) CO, (2) NOx (excluding N ₂ O), (3) SOx, (4) particulate matter (PM ₁₀), (5) mercury (Hg), (6) lead (Pb), and (7) volatile organic compounds (VOCs)	Quantitative	Kg	GHG Emissions and Air Quality, p. 26
Energy Management	EM-MM-130a.1	(1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable	Quantitative	GJ, %	Energy Use, p. 24
Water management	EM-MM-140a.	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	ML, %	<ul style="list-style-type: none"> Water Management, p. 29 Appendices (Climate Change), p. 54
	EM-MM-140a.2	Number of incidents of non-compliance associated with water quality permits, standards and regulations	Quantitative	No.	Safeguarding Water Quality and Availability, p.30
Waste & Hazardous Material Management	EM-MM-150a.4	Total weight of non-mineral waste generated	Quantitative	T	PT TBP SR 2024, p. 94
	EM-MM-150a.5	Total weight of tailings produced	Quantitative	T	Tailings and Waste Management, p. 28
	EM-MM-150a.7	Total weight of hazardous waste generated	Quantitative	T	Tailings and Waste Management, p. 28
	EM-MM-150a.8	Total weight of hazardous waste recycled	Quantitative	T	PT TBP SR 2024, p. 92
	EM-MM-150a.9	Number of significant incidents associated with hazardous materials and waste management	Quantitative	No.	PT TBP SR 2024, p. 91
	EM-MM-150a.10	Description of waste and hazardous materials management policies and procedures for active and inactive operations	Discussion and Analysis	n/a	PT TBP SR 2024, p. 91, 151



Topic	Code	Accounting Metric	Category	UoM	Source of Data/Information; Modifications; Reason for Omission
Biodiversity Impacts	EM-MM-160a.1	Description of environmental management policies and practices for active sites	Discussion and Analysis	n/a	Biodiversity, p. 33
	EM-MM-160a.3	Percentage of (1) proved and (2) probable reserves in or near sites with protected conservation status or endangered species habitat	Quantitative	%	PT TBP SR 2024. p. 107
Security, Human Rights & Rights of Indigenous Peoples	EM-MM-210a.1	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	Quantitative	%	Community Development, p. 46
	EM-MM-210a.2	Percentage of (1) proved and (2) probable reserves in or near indigenous land	Quantitative	%	Community Development, p. 46
	EM-MM-210a.3	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	Discussion and Analysis	n/a	Community Development, p. 46
Community Relations	EM-MM-210b.1	Discussion of process to manage risks and opportunities associated with community rights and interests	Discussion and Analysis	n/a	Community Development, p. 46
	EM-MM-210b.2	Number and duration of non-technical delays	Quantitative	No., days	Community Development, p. 46
Labor Relations	EM-MM-310a.2	Number and duration of strikes and lockouts (Disclosure shall include a description of the root cause for each work stoppage.)	Quantitative	No., days	PT TBP SR 2024. p. 137
Workforce Health & Safety	EM-MM-320a.1	(1) MSHA all-incidence rate, (2) fatality rate, (3) near miss frequency rate (NMFR) and (4) average hours of health, safety, and emergency response training for (a) full-time employees and (b) contract employees	Quantitative	Rate	Occupational Health and Safety, p. 42 Appendices (OHS Performance), p. 55
Business Ethics & Transparency	EM-MM-510a.1	Description of the management system for prevention of corruption and bribery throughout the value chain	Discussion and Analysis	n/a	Business Ethics and Compliance, p. 21

Topic	Code	Accounting Metric	Category	UoM	Source of Data/Information; Modifications; Reason for Omission
Tailings Storage Facilities Management	EM-MM-540a.1	Tailings storage facility inventory table: (1) facility name, (2) location, (3) ownership status, (4) operational status, (5) construction method, (6) maximum permitted storage capacity, (7) current amount of tailings stored, (8) consequence classification, (9) date of most recent independent technical review, (10) material findings, (11) mitigation measures, (12) site-specific EPRP	Quantitative	Various	Appendices (Tailings Storage Inventory), p. 51
	EM-MM-540a.2	Summary of tailings management systems and governance structure used to monitor and maintain the stability of tailings storage facilities	Discussion and Analysis	n/a	Tailings and Waste Management, p. 28
	EM-MM-540a.3	Approach to development of Emergency Preparedness and Response Plans (EPRPs) for tailings storage facilities	Discussion and Analysis	n/a	Emergency Response and Mitigation of DSTF (Dry Stack Tailings Facility), p. 28

Sustainability Disclosure Topics & Accounting Metrics

Activity Metric	Code	Category	UoM	Source of Data/Information; Modifications; Reason for Omission
Production of (1) metal ores and (2) finished metal products	EM-MM-000.A	Quantitative	t saleable	About PT HPL, p. 12
Total number of employees, percentage contractors	EM-MM-000.B	Quantitative	No., %	Diversity and Equal Opportunity, p. 39



IFRS Index

IFRS S1

PAR	INDICATOR	LOCATION OF DISCLOSURE
Governance		
	a. The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of sustainability-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about:	
	i. how responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).	Charter of Sustainability & Diversity Committee - Responsibilities
	ii. how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities.	Ethics & Risk Committee Charter
	iii. how and how often the body(s) or individual(s) is informed about sustainability-related risks and opportunities.	
27	iv. how the body(s) or individual(s) takes into account sustainability-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities.	PT TBP SR 2024 - Good Governance – Governance Structure – Sustainability and Diversity Committee p. 63
	v. how the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies.	PT TBP SR 2024 - Good Governance – Governance Structure – Sustainability and Diversity Committee p. 63
	b. Management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:	
	i. whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee.	Charter of Sustainability & Diversity Committee - Responsibilities Ethics & Risk Committee Charter
Strategy		
Sustainability-related risks and opportunities		
30	a. Describe sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	PT TBP SR 2024 - Materiality and Stakeholder Engagement – Material Topics p. 50-52 Appendix – Risks & Opportunity Mapping p. 204-226
	b. Specify the time horizons—short, medium or long term—over which the effects of each of those sustainability-related risks and opportunities could reasonably be expected to occur.	PT TBP SR 2024 - Appendix – Risks & Opportunity Mapping p. 204-226
Business model and value chain		
32	a. A description of the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain.	PT TBP SR 2024 – Good Governance – Risk Management p. 69
Strategy and decision-making		
	b. How the entity has responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making.	PT TBP SR 2024 – Sustainability at PT TBP – Contribution to Achieving the SDGs p. 42-48
33	c. The progress against plans the entity has disclosed in previous reporting periods, including quantitative and qualitative information.	
	d. Trade-offs between sustainability-related risks and opportunities that the entity considered (for example, in making a decision on the location of new operations, an entity might have considered the environmental impacts of those operations and the employment opportunities they would create in a community).	Climate Action p. 24

PAR	INDICATOR	LOCATION OF DISCLOSURE
Financial position, financial performance and cash flows		
35	i. Its planned sources of funding to implement its strategy.	Climate Action p. 24 PT TBP AR 2024 – Capital structure p. 122
Risk Management		
44	a. the processes and related policies the entity uses to identify, assess, prioritise and monitor sustainability-related risks, including information about: <ul style="list-style-type: none"> i. the inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes). ii. whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks. iii. how the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria). iv. whether and how the entity prioritises sustainability-related risks relative to other types of risk. v. how the entity monitors sustainability-related risks. 	PT TBP SR 2024 – Good Governance – Risk Management p. 69
Metrics and Targets		
46	An entity shall disclose, for each sustainability-related risk and opportunity that could reasonably be expected to affect the entity's prospects: <ul style="list-style-type: none"> a. metrics required by an applicable IFRS Sustainability Disclosure Standard. b. metrics the entity uses to measure and monitor: <ul style="list-style-type: none"> i. that sustainability-related risk or opportunity. ii. its performance in relation to that sustainability-related risk or opportunity, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation. 	SASB Disclosure Index p. 60-62 IFRS Index p. 63-69 SASB Disclosure Index p. 60-62 PT TBP SR 2024 - Sustainability at PT TBP – Contribution to Achieving the Sustainable Development Goals p. 42-48.
51	An entity shall disclose information about the targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation. For each target, the entity shall disclose: <ul style="list-style-type: none"> a. the metric used to set the target and to monitor progress towards reaching the target. b. the specific quantitative or qualitative target the entity has set or is required to meet. c. the period over which the target applies. d. any milestones and interim targets. 	PT TBP SR 2024 - Sustainability at PT TBP – Contribution to Achieving the Sustainable Development Goals p. 42-48.
General Requirements		
55	In addition to IFRS Sustainability Disclosure Standards: <ul style="list-style-type: none"> a. an entity shall refer to and consider the applicability of the disclosure topics in the SASB Standards. An entity might conclude that the disclosure topics in the SASB Standards are not applicable in the entity's circumstances. 	SASB Disclosure Index, p. 60-62
59	An entity shall identify: <ul style="list-style-type: none"> a. the specific standards, pronouncements, industry practice and other sources of guidance that the entity has applied in preparing its sustainability-related financial disclosures, including, if applicable, identifying the disclosure topics in the SASB Standards. b. the industry(s) specified in the IFRS Sustainability Disclosure Standards, the SASB Standards or other sources of guidance relating to a particular industry(s) that the entity has applied in preparing its sustainability-related financial disclosures, including in identifying applicable metrics. 	PT TBP SR 2024 - About this Report – Reporting Principles p. 7 PT TBP SR 2024 - Good Governance – Beyond Compliance p. 57



IFRS S2

PAR	INDICATOR	LOCATION OF DISCLOSURE
Governance		
	a. the governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about:	
	i. how responsibilities for climate-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).	PT TBP SR 2024 – Good Governance – Governance Structure p. 61
	ii. how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities.	
6	iii. how and how often the body(s) or individual(s) is informed about climate-related risks and opportunities.	PT TBP SR 2024 – Good Governance – Governance Structure p. 63
	iv. how the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities.	PT TBP SR 2024 – Good Governance – Governance Structure p. 61
	v. how the body(s) or individual(s) oversees the setting of targets related to climate-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies.	
	b. management's role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about:	
6	i. whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee.	PT TBP SR 2024 – Good Governance – Governance Structure p. 61 Charter of Sustainability & Diversity Committee, and Sustainability Policy
Strategy		
10	a. Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	PT TBP SR 2024 – Appendix – Risks & Opportunity Matrix p. 204-226
	b. Explain, for each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk.	
Business model and value chain		
13	a. A description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain.	PT TBP SR 2024 – Good Governance – Risk Management p. 69
	a. Information about how the entity has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the entity plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation. Specifically, the entity shall disclose information about:	
14	i. Current and anticipated changes to the entity's business model, including its resource allocation, to address climate-related risks and opportunities (for example, these changes could include plans to manage or decommission carbon-, energy- or water-intensive operations; resource allocations resulting from demand or supply-chain changes; resource allocations arising from business development through capital expenditure or additional expenditure on research and development; and acquisitions or divestments).	PT TBP SR 2024 – Climate Action p. 77

PAR	INDICATOR	LOCATION OF DISCLOSURE
	<p>ii. Current and anticipated direct mitigation and adaptation efforts (for example, through changes in production processes or equipment, relocation of facilities, workforce adjustments, and changes in product specifications).</p> <p>iii. Any climate-related transition plan the entity has, including information about key assumptions used in developing its transition plan, and dependencies on which the entity's transition plan relies.</p> <p>iv. How the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets, described in accordance with paragraphs 33–36.</p> <p>b. Information about how the entity is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 14(a).</p> <p>c. Quantitative and qualitative information about the progress of plans disclosed in previous reporting periods in accordance with paragraph 14(a).</p>	<p>PT TBP SR 2024 - Good Governance – Beyond Compliance p. 59</p> <p>PT TBP SR 2024 - Good Governance – Beyond Compliance – Initiative for Responsible Mining Assurance p. 60</p> <p>PT TBP SR 2024 - Good Governance – Responsible Supply Chain p. 70</p> <p>PT TBP SR 2024 - Respect for the Environment – Biodiversity p. 99</p> <p>PT TBP SR 2024 - Good Governance – Risk Management p. 69</p> <p>PT TBP SR 2024 - Respect for the Environment – Climate Action p. 77</p>
Climate Resilience		
22	<p>a. The entity's assessment of its climate resilience as at the reporting date, which shall enable users of general purpose financial reports to understand:</p> <p>i. The implications, if any, of the entity's assessment for its strategy and business model, including how the entity would need to respond to the effects identified in the climate-related scenario analysis.</p> <p>b. How and when the climate-related scenario analysis was carried out, including:</p> <p>i. Information about the inputs the entity used, including:</p> <p>(1) Which climate-related scenarios the entity used for the analysis and the sources of those scenarios.</p>	<p>PT TBP SR 2024 - Good Governance – Risk Management p. 69</p> <p>PT TBP SR 2024 - Climate Action- Decarbonization Roadmap p. 77</p> <p>PT TBP SR 2024 - Good Governance – Risk Management p. 69</p>
Risk Management		
25	<p>a. The processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about:</p> <p>i. The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes).</p> <p>ii. Whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks.</p> <p>iii. How the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria).</p> <p>iv. Whether and how the entity prioritises climate-related risks relative to other types of risk.</p> <p>v. How the entity monitors climate-related risks.</p> <p>vi. Whether and how the entity has changed the processes it uses compared with the previous reporting period.</p>	<p>PT TBP SR 2024 - Good Governance – Risk Management p. 69</p>



PAR	INDICATOR	LOCATION OF DISCLOSURE
	<p>b. The processes the entity uses to identify, assess, prioritise and monitor climate-related opportunities, including information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities.</p> <p>c. The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process.</p>	
Metrics and Targets		
Climate-related metrics		
	An entity shall disclose information relevant to the cross-industry metric categories of:	
	a. Greenhouse gases—the entity shall:	
	i. Disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO ₂ equivalent, classified as:	
	(1) Scope 1 greenhouse gas emissions.	GHG Emissions and Air Quality p. 26-27
	(2) Scope 2 greenhouse gas emissions.	Base Data p. 53
	(3) Scope 3 greenhouse gas emissions.	
	ii. Measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or an exchange on which the entity is listed to use a different method for measuring its greenhouse gas emissions.	GHG Emissions and Air Quality p. 26-27 Base Data p. 53
29		PT TBP SR 2024 – Limited Assurance Statement p. 8
	iii. Disclose the approach it uses to measure its greenhouse gas emissions including:	
	(1) The measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions.	GHG Emissions and Air Quality p. 26 Base Data p. 53
	(2) The reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions.	GHG Emissions and Air Quality p. 26 Base Data p. 53 PT TBP SR 2024 - Respect for the Environment – Climate Action – Emissions p. 83
	iv. For Scope 1 and Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(1)–(2), disaggregate emissions between:	
	(1) The consolidated accounting group (for example, for an entity applying IFRS Accounting Standards, this group would comprise the parent and its consolidated subsidiaries).	GHG Emissions and Air Quality p. 26-27
	(2) Other investees excluded from paragraph 29(a)(iv)(1) (for example, for an entity applying IFRS Accounting Standards, These investees would include associates, joint ventures and unconsolidated subsidiaries).	
	v. For Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(2), disclose its location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse gas emissions.	GHG Emissions and Air Quality p. 26-27
29		
	vi. For Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(3), and with reference to paragraphs B32–B57, disclose:	
	(1) The categories included within the entity's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011).	GHG Emissions and Air Quality p. 26-27
	(2) additional information about the entity's Category 15 greenhouse gas emissions or those associated with its investments (financed emissions), if the entity's activities include asset management, commercial banking or insurance.	Not Applicable



PAR	INDICATOR	LOCATION OF DISCLOSURE
Climate-related targets		
33	An entity shall disclose the quantitative and qualitative climate-related targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation, including any greenhouse gas emissions targets. For each target, the entity shall disclose:	
	a. The metric used to set the target.	
	b. The objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives).	PT TBP SR 2024 - Sustainability at TBP – Contribution to Achieving the Sustainable Development Goals p. 42-48
	c. The part of the entity to which the target applies (for example, whether the target applies to the entity in its entirety or only a part of the entity, such as a specific business unit or specific geographical region).	
	d. The period over which the target applies.	PT TBP SR 2024 - Respect for the Environment – Climate Action – Emissions p. 83
	e. The base period from which progress is measured.	
	f. Any milestones and interim targets.	
	g. If the target is quantitative, whether it is an absolute target or an intensity target.	
34	h. How the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target.	Climate Action p. 24 PT TBP SR 2024 - Respect for the Environment – Climate Action p. 77
	An entity shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target, including:	
34	a. Whether the target and the methodology for setting the target has been validated by a third party.	PT TBP SR 2024 - Respect for the Environment – Climate Action – Emissions p. 83
	b. The entity's processes for reviewing the target.	
	c. The metrics used to monitor progress towards reaching the target.	
	d. Any revisions to the target and an explanation for those revisions.	No changes from previous reporting period
35	An entity shall disclose information about its performance against each climate-related target and an analysis of trends or changes in the entity's performance.	PT TBP SR 2024 - Sustainability at TBP – Contribution to Achieving the Sustainable Development Goals p. 42-48 PT TBP SR 2024 – Respect for the Environment – Climate Action p. 77
	For each greenhouse gas emissions target disclosed in accordance with paragraphs 33–35, an entity shall disclose:	
36	a. which greenhouse gases are covered by the target.	PT TBP SR 2024 – About this Report – External Assurance p. 8
	b. whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target.	
	c. whether the target is a gross greenhouse gas emissions target or net greenhouse gas emissions target. If the entity discloses a net greenhouse gas emissions target, the entity is also required to separately disclose its associated gross greenhouse gas emissions target.	PT TBP SR 2024 - Respect for the Environment – Climate Action – Emissions p. 83
	d. whether the target was derived using a sectoral decarbonisation approach.	PT TBP SR 2024 – Respect for the Environment – Climate Action p. 77



Glossary

Conflict-Affected or High-Risk Areas (CAHRA)

Conflict-affected and high-risk areas that are identified by armed conflict, widespread violence, or other risks of harm to people.

Carbon dioxide equivalent (CO₂e)

A universal measurement for the impact of releasing (or avoiding the release of) greenhouse gases.

Effluent

Water from industrial activities, including mill processes, which is discharged into another body of water.

Fly ash bottom ash (FABA)

Residues generated during the combustion process of coal in thermal power plants. The composition can vary depending on several factors, such as the type of coal burned, combustion conditions, and the efficiency of the power plant's ash collection systems.

Greenhouse gas (GHG)

Atmospheric gases that absorb and emit radiation within the thermal infrared range. The primary greenhouse gases are water vapor, carbon dioxide, methane, nitrous oxide, and ozone.

High-pressure acid leaching (HPAL)

A hydrometallurgical process used primarily in extracting metals, particularly nickel and cobalt from lateritic ores. The procedure involves subjecting the ore to high pressure and temperature in the presence of sulfuric acid, typically in autoclaves or reactors.

Hexavalent chromium (Cr⁶⁺)

Also known as chromium (VI) or Cr(VI), this is a chemical compound in which chromium is present in its +6 oxidation state. It is a highly toxic and carcinogenic form of chromium, mainly found in industrial processes and certain chemical compounds. Hexavalent chromium compounds can exist in several forms, including chromates and dichromates, and are commonly produced as by-products in industrial activities, such as metal plating, welding, and pigment production.

Initiative for Responsible Mining Assurance (IRMA)

An organization offering independent assessment against a comprehensive standard for all mined materials.

Landscape-Level Nature Risk Assessment (LNRA)

A comprehensive framework that evaluates potential environmental risks and impacts on ecosystems within a specific geographic area.

Limonite

Mineral formed as a weathering product in an environment where iron-rich minerals are exposed to oxygen and water over extended periods.

Mixed Hydroxide Precipitate (MHP)

A solid substance formed through the precipitation of metal hydroxides from an aqueous solution containing multiple metal ions, including nickel, cobalt, and manganese.

Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This guidance is given to any company potentially sourcing minerals or metals from conflict-affected and high-risk areas. OECD Guidance is global in scope and applies to all mineral supply chains.

Tailings

Portions of milled ore that is too poor to be treated further or remain after extracting the required metals and minerals. Tailings are treated as hazardous waste from the MHP production process.

Abbreviations

ABCML	Anti-Bribery, Corruption, and Money Laundering
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CBAM	Carbon Border Adjustment Mechanism
CEMS	Continuous Emissions Monitoring System
CSV	Climate Smart Ventures
DRRC	Disaster Risk Reduction Center
ERP	Emergency Response Plan
FABA	Fly Ash, Bottom Ash
GBA	Global Battery Alliance
GBF	Global Biodiversity Framework
HIRA	Hazard Identification and Risk Assessments
HRA	Health Risk Assessment
HPAL	High-Pressure Acid Leaching
HPL	Halmahera Persada Lygend
HRDD	Human Rights Due Diligence
IFC	International Finance Corporation
ILO	International Labour Organization's
INSG	International Nickel Study Group

IRMA	Initiative for Responsible Mining Assurance
JSA	Job Safety Analyst
KAP	Kantor Akuntan Publik (Public Accounting Firm)
LCA	Life Cycle Assessment
LNRA	Landscape-level Nature Risk Assessment
LPG	Liquefied Petroleum Gas (LPG)
MHP	Mixed Hydroxide Precipitate
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
SDGs	Sustainable Development Goals
SMK3	Sistem Manajemen Keselamatan dan Kesehatan Kerja (Occupational Safety and Health Management System)
TBP	PT Trimegah Bangun Persada
TNFD	Taskforce for Nature-related Financial Disclosures
TSS	Total Suspended Solids
UNGP	United Nations Guiding Principles on Business and Human Rights
WWTP	Wastewater Treatment Plant





Assurance Statement

PT Halmahera Persada Lygend

Informasi hal pokok yang tercantum dalam laporan keberlanjutan tanggal 31 Desember 2024 dan untuk tahun yang berakhir pada tanggal tersebut beserta laporan keyakinan terbatas praktisi independen/
Subject matter information included in the sustainability report as of December 31, 2024 and for the year then ended with the independent practitioner's limited assurance report



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The original limited assurance report included herein is in Indonesian language

Laporan Keyakinan Terbatas Praktisi Independen

Independent Practitioner's Limited Assurance Report

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025

Pemegang Saham, Dewan Komisaris, dan Direksi
PT Halmahera Persada Lygend

The Shareholders and the Boards of Commissioners and Directors
PT Halmahera Persada Lygend

Ruang lingkup

Scope

Kami telah melakukan perikatan dengan PT Halmahera Persada Lygend ("Perusahaan") untuk melaksanakan suatu perikatan keyakinan terbatas, sebagaimana yang didefinisikan oleh Standar Perikatan Asurans 3000 (Revisi 2022) "Perikatan Asurans Selain Audit atau Reviu atas Informasi Keuangan Historis" ("SPA 3000"), yang ditetapkan oleh Institut Akuntan Publik Indonesia ("IAPI"), yang selanjutnya disebut sebagai "Perikatan", untuk melaporkan informasi hal pokok terlampir yang tercantum dalam laporan keberlanjutan Perusahaan tanggal 31 Desember 2024 dan untuk tahun yang berakhir pada tanggal tersebut ("Laporan Keberlanjutan") sebagaimana yang dispesifikasikan dalam Lampiran 1 dari laporan keyakinan terbatas praktisi independen ini ("Informasi Hal Pokok").

We have been engaged by PT Halmahera Persada Lygend (the "Company") to perform a limited assurance engagement, as defined by the Standard on Assurance Engagement 3000 (Revised 2022) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" ("SAE 3000"), established by the Indonesian Institute of Certified Public Accountants ("IICPA"), hereafter referred to as the "Engagement", to report on the accompanying subject matter information included in the sustainability report of the Company as of December 31, 2024 and for the year then ended (the "Sustainability Report") as specified in Appendix 1 of this independent practitioner's limited assurance report (the "Subject Matter Information").



Shape the future
with confidence

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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Ruang lingkup (lanjutan)

Scope (continued)

Selain Informasi Hal Pokok yang dijelaskan pada paragraf sebelumnya, yang menegaskan ruang lingkup dari Perikatan kami, kami tidak melaksanakan prosedur apapun atas informasi lainnya yang tercantum dalam Laporan Keberlanjutan, dan oleh karena itu, kami tidak menyatakan suatu opini, kesimpulan, maupun bentuk keyakinan lain apapun atas informasi-informasi di bawah ini:

Other than the Subject Matter Information as described in the preceding paragraph, which sets out the scope of our Engagement, we did not perform any procedures on the remaining information included in the Sustainability Report, and accordingly, we do not express an opinion, a conclusion, or any other forms of assurance on the following information:

- Set data, pernyataan, informasi, sistem, atau pendekatan selain indikator yang ditentukan dan dipilih oleh manajemen Perusahaan untuk tujuan pelaporan Informasi Hal Pokok dalam Laporan Keberlanjutan.
- Informasi apapun (termasuk informasi keberlanjutan) yang disajikan atau dipublikasikan dalam laporan, situs web, atau publikasi Perusahaan lainnya selain informasi keberlanjutan yang disajikan dalam Lampiran 1 dari laporan keyakinan terbatas praktisi independen ini.
- Informasi apapun (termasuk informasi keberlanjutan) sebelum tanggal 1 Januari 2024 dan setelah tanggal 31 Desember 2024.

- Data sets, statements, information, systems, or approaches other than the indicators determined and selected by the Company's management for the purpose of reporting the Subject Matter Information in the Sustainability Report.
- Any information (including sustainability information) presented or published elsewhere in the Company's reports, website, or other publications other than those presented in Appendix 1 of this independent practitioner's limited assurance report.
- Any information (including sustainability information) prior to January 1, 2024 and subsequent to December 31, 2024.



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Kriteria yang digunakan oleh manajemen

Criteria applied by management

Dalam penyusunan dan penyajian Informasi Hal Pokok terlampir, manajemen Perusahaan telah menggunakan definisi yang berlaku bagi dan relevan dengan Informasi Hal Pokok sebagaimana diatur dalam Standar Global Reporting Initiative 2021 ("Kriteria"). Kriteria tersebut digunakan untuk tujuan pelaporan Informasi Hal Pokok dan pencantumannya dalam Laporan Keberlanjutan oleh manajemen Perusahaan. Sebagai akibatnya, Informasi Hal Pokok belum tentu sesuai untuk tujuan lain.

In preparing and presenting the accompanying Subject Matter Information, the Company's management applied the definitions that are applicable and relevant to the Subject Matter Information as set out in the Global Reporting Initiative Standards 2021 (the "Criteria"). Such Criteria were used for the purpose of reporting the Subject Matter Information and its inclusion in the Sustainability Report by the Company's management. As a result, the Subject Matter Information may not be suitable for other purposes.

Tanggung jawab manajemen

Management's responsibilities

Manajemen Perusahaan bertanggung jawab untuk memilih Kriteria, serta menyusun dan menyajikan Informasi Hal Pokok terlampir sesuai dengan Kriteria, dalam semua hal yang material. Tanggung jawab tersebut mencakup penetapan dan pemeliharaan atas pengendalian internal, pemeliharaan catatan yang memadai, dan penggunaan estimasi yang relevan dengan penyusunan dan penyajian Informasi Hal Pokok yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

The Company's management is responsible for selecting the Criteria, and for preparing and presenting the accompanying Subject Matter Information in accordance with the Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation and presentation of the Subject Matter Information that it is free from material misstatement, whether due to fraud or error.



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Tanggung jawab praktisi independen

Independent practitioner's responsibility

Tanggung jawab kami adalah untuk menyatakan suatu kesimpulan atas penyusunan dan penyajian Informasi Hal Pokok terlampir berdasarkan bukti yang cukup dan tepat yang telah kami peroleh selama Perikatan kami.

Our responsibility is to express a conclusion on the preparation and presentation of the accompanying Subject Matter Information based on the sufficient and appropriate evidence we have obtained during our Engagement.

Kami melaksanakan Perikatan kami berdasarkan SPA 3000 yang ditetapkan oleh IAPI, dan kerangka acuan Perikatan ini sebagaimana telah disepakati dengan manajemen Perusahaan. Standar tersebut mengharuskan kami untuk merencanakan dan melaksanakan Perikatan kami untuk menyatakan kesimpulan atas apakah terdapat hal-hal yang menjadi perhatian kami yang menyebabkan kami yakin bahwa Informasi Hal Pokok terlampir tidak disusun dan disajikan, dalam semua hal yang material, berdasarkan Kriteria. Sifat, saat, dan luas prosedur-prosedur yang dipilih bergantung pada pertimbangan profesional kami, termasuk penilaian atas risiko kesalahan penyajian material, baik yang disebabkan oleh kecurangan atau kesalahan.

We conducted our Engagement in accordance with the SAE 3000 established by the IICPA, and the terms of reference for this Engagement as agreed with the Company's management. The standard requires that we plan and perform our Engagement to express a conclusion on whether anything has come to our attention that causes us to believe that the accompanying Subject Matter Information has not been prepared and presented, in all material respects, in accordance with the Criteria. The nature, timing, and extent of the procedures selected depend on our professional judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

Kami yakin bahwa bukti yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi kesimpulan keyakinan terbatas kami.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Independensi dan manajemen mutu praktisi independen

Independent practitioner's independence and quality control

Kami telah mematuhi ketentuan independensi dan ketentuan etika lainnya yang relevan dalam Kode Etik Profesi Akuntan Publik yang ditetapkan oleh IAPI berlandaskan prinsip dasar etika yaitu integritas, objektivitas, kompetensi dan kehati-hatian profesional, kerahasiaan, serta perilaku profesional.

We have complied with the independence and other relevant ethical requirements of the Code of Ethics for Public Accountants issued by the IICPA, which is founded on fundamental ethic principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Kantor Akuntan Publik kami menerapkan Standar Pengendalian Mutu 1, "Pengendalian Mutu bagi Kantor Akuntan Publik yang Melaksanakan Perikatan Asurans (Audit, Reviu, dan Perikatan Asurans Lainnya) dan Perikatan Selain Asurans", yang ditetapkan oleh IAPI, yang mensyaratkan bahwa kami merancang, mengimplementasikan, dan mengoperasikan suatu sistem pengendalian mutu yang mencakup kebijakan dan prosedur mengenai kepatuhan terhadap ketentuan etika, standar profesi, dan ketentuan peraturan perundang-undangan yang berlaku.

Our Public Accounting Firm applies Standard on Quality Control 1, "Quality Control for Public Accounting Firms that Perform Assurance Engagements (Audits, Reviews, and Other Assurance Engagements) and Other Than Assurance Engagements", established by the IICPA, which requires that we design, implement and operate a system of quality control including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Penjelasan tentang prosedur-prosedur yang dilakukan

Description of procedures performed

Prosedur-prosedur yang dilakukan dalam perikatan keyakinan terbatas bervariasi dalam sifat dan saat dari, serta luas yang lebih terbatas dibandingkan dengan, suatu perikatan keyakinan memadai. Akibatnya, tingkat keyakinan yang diperoleh dari perikatan keyakinan terbatas secara substansial lebih rendah daripada keyakinan yang akan diperoleh seandainya suatu perikatan keyakinan memadai dilaksanakan. Prosedur-prosedur kami dirancang untuk memperoleh suatu tingkat keyakinan terbatas sebagai basis dari kesimpulan kami dan tidak menyediakan semua bukti yang diperlukan untuk menyatakan suatu tingkat keyakinan memadai.

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Meskipun kami mempertimbangkan keefektifitasan pengendalian internal manajemen dalam menentukan sifat dan luas prosedur-prosedur kami, perikatan asuransi kami tidak dirancang untuk menyediakan keyakinan terhadap pengendalian internal. Prosedur-prosedur kami tidak mencakup pengujian pengendalian atau melaksanakan prosedur-prosedur terkait untuk pengecekan atas pengumpulan atau penghitungan data di dalam sistem teknologi informasi.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within information technology systems.



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Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner’s Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Penjelasan tentang prosedur-prosedur yang dilakukan (lanjutan)

Description of procedures performed (continued)

Sebuah perikatan keyakinan terbatas terdiri dari pengajuan pertanyaan, terutama kepada pihak yang bertanggung jawab atas penyusunan dan penyajian Informasi Hal Pokok terlampir dan informasi terkait, dan penerapan prosedur analitis dan prosedur-prosedur lain yang tepat.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing and presenting the accompanying Subject Matter Information and related information, and applying analytical and other appropriate procedures.

Prosedur-prosedur kami mencakup:

Our procedures included:

- Mewawancarai personel kunci untuk memahami proses pengumpulan, penyusunan, dan pelaporan Informasi Hal Pokok selama periode pelaporan.
- Melakukan prosedur reviu analitis untuk mendukung kewajaran data yang digunakan.
- Membandingkan konsistensi kriteria perhitungan yang diterapkan terhadap Informasi Hal Pokok dengan metodologi yang diuraikan dalam Kriteria.
- Menghitung kembali metrik kinerja untuk mengonfirmasi kuantitas yang dinyatakan dapat direplikasi.
- Melakukan pengecekan atas keakurasian data yang digunakan dengan menelusurinya ke sumber informasi yang mendasarinya berdasarkan sampel.

- Inquiring with key personnel to understand the process for collecting, collating and reporting the Subject Matter Information during the reporting period.
- Performing analytical review procedures to support the reasonableness of data used.
- Comparing the consistency of the calculation criteria applied to the Subject Matter Information in accordance with the methodologies outlined in the Criteria.
- Recalculating the performance metrics to confirm the quantities stated as replicable.
- Checking the accuracy of data used by tracing them to the underlying source information on a sample basis.



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The original limited assurance report included herein is in Indonesian language

Laporan Keyakinan Terbatas Praktisi Independen (lanjutan)

Independent Practitioner's Limited Assurance Report (continued)

Laporan No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (lanjutan)

Report No. 00001/2.1505/NS.0/02/0705-2/1/VII/2025 (continued)

Kesimpulan

Conclusion

Berdasarkan prosedur-prosedur kami dan bukti yang cukup dan tepat yang diperoleh, tidak terdapat hal-hal yang menjadi perhatian kami yang menyebabkan kami yakin bahwa Informasi Hal Pokok terlampir, tidak disusun dan disajikan, dalam semua hal yang material, sesuai dengan Kriteria.

Based on our procedures and the sufficient appropriate evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Subject Matter Information is not prepared and presented, in all material respects, in accordance with the Criteria.

Tujuan laporan keyakinan terbatas praktisi independen

Purpose of the independent practitioner's limited assurance report

Laporan keyakinan terbatas praktisi independen ini disusun dan diterbitkan hanya untuk dicantumkan dalam Laporan Keberlanjutan sehubungan dengan pelaporan dan pencantuman Informasi Hal Pokok terlampir dalam Laporan Keberlanjutan oleh manajemen Perusahaan, serta tidak ditujukan, dan tidak diperkenankan untuk digunakan, untuk tujuan lain.

This independent practitioner's limited assurance report was prepared and issued solely for inclusion in the Sustainability Report in connection with the reporting and inclusion of the accompanying Subject Matter Information in the Sustainability Report by the Company's management, and is not intended to be, and should not be, used for any other purposes.

KAP Purwanto Susanti dan Surja

Susanti

Registrasi Akuntan Publik No. AP.0705/Public Accountant Registration No. AP.0705

30 Juli 2025/July 30, 2025

The original subject matter information included herein is in Indonesian language

Lampiran 1. Informasi hal pokok yang tercantum dalam laporan keberlanjutan PT Halmahera Persada Lygend tanggal 31 Desember 2024 dan untuk tahun yang berakhir pada tanggal tersebut

Appendix 1. Subject matter information included in the sustainability report of PT Halmahera Persada Lygend as of December 31, 2024 and for the year then ended

No	Indikator/ Indicator	2024				
		Lokasi/ Location	Jenis Kelamin/ Gender	Upah Minimum Provinsi (UMP) (Rp/ Bulan)/ Local minimum wage (Rp/ Month)	Gaji pokok karyawan pemula terendah (Rp/ Bulan)/ Lowest basic salary of entry level employee (Rp/ Month)	Rasio antara UMP dengan gaji pokok karyawan pemula terendah/ Ratio between local minimum wage to lowest basic salary of entry level employee
1	Rasio upah karyawan pemula berdasarkan jenis kelamin di lokasi yang signifikan terhadap upah minimum regional (sebagai bagian dari GRI 202-1 Rasio standar upah karyawan pemula berdasarkan jenis kelamin terhadap upah minimum regional)/ Ratio of the entry level wage by gender at significant locations of operation to the minimum wage (as part of GRI 202-1 Ratios of standard entry level wage by gender compared to local minimum wage)	Lapangan (Pulau Obi, Maluku Utara)/ Site (Obi Island, North Maluku)	Laki-laki/ Male	3.200.000	3.242.200	1,01
			Perempuan/ Female	3.200.000	3.242.200	1,01
2	Total pembuangan air ke seluruh wilayah dalam megaliter, dan perincian jumlah total ini berdasarkan tujuan pembuangan berikut (sebagai bagian dari GRI 303-4 Pembuangan air)/ Total water discharge to all areas in megaliters and a breakdown by the types of destination (as part of GRI 303-4 Water discharge)	Water discharge destination/ Tujuan pembuangan air			Total (dalam megaliter)/ Total (in megaliter)	
		Air laut dari pengolahan nikel, limpasan air hujan dan penggunaan domestik/ Seawater from nickel processing, rainwater runoff and domestic use			26.050	
3	Total konsumsi air dari semua wilayah dalam megaliter (sebagai bagian dari GRI 303-5 Konsumsi air)/ Total water consumption from all areas in megaliters	Konsumsi air/ Water consumption			Total (dalam megaliter)/ Total (in megaliter)	
		Total konsumsi air untuk pengolahan nikel dan penggunaan domestik/ Total water consumption for nickel processing and domestic use			12.687	



No	Indikator/ Indicator	2024		
	(as part of GRI 303-5 Water consumption)			
4	Berat total limbah yang ditimbulkan dalam metrik ton, dan perincian jumlah tersebut menurut komposisi limbah (sebagai bagian dari GRI 306-3 Timbulan limbah)/ Total weight of waste generated and a breakdown by composition of the waste (as part of GRI 306-3 Waste generated)	Limbah yang ditimbulkan per jenis/ Waste generated by type		Berat (dalam ton)/ Weight (in tons)
		Limbah berbahaya (tailings kering)/ Hazardous (dry tailings)		7.027.801
		Limbah berbahaya (lainnya)/ Hazardous (others)		866
		Limbah tidak berbahaya (FABA, domestik)/ Non-hazardous (FABA, domestic)		30.400
		Total limbah yang ditimbulkan/ Total weight of waste generated		7.059.067
5	Jumlah dan tingkat cedera terkait pekerjaan yang dapat dicatat dan jumlah jam kerja (sebagai bagian dari GRI 403-9 Cedera terkait pekerjaan)/ The number and rate of recordable work-related injuries and the number of hours worked (as part of GRI 403-9 Work-related injuries)	Cedera terkait pekerjaan/ Work-related injuries	Jenis pekerja/ Worker type	Kinerja/ Performance
		Jumlah cedera terkait pekerjaan yang dapat dicatat/ Number of recordable work-related injuries	Karyawan/ Employee	48
			Kontraktor/ Contractor	14
		Tingkat cedera terkait pekerjaan yang dapat dicatat (dihitung berdasarkan 1.000.000 jam kerja)/ Rate of recordable work-related injuries (calculated based on 1,000,000 hours worked)	Karyawan/ Employee	3,00
			Kontraktor/ Contractor	2,15
		Jumlah jam kerja/ Number of hours worked	Karyawan/ Employee	15.980.592
Kontraktor/ Contractor	6.497.004			
6	Persentase personel keamanan yang telah menerima pelatihan formal mengenai kebijakan hak asasi manusia atau prosedur khusus organisasi dan penerapannya pada keamanan (sebagai bagian dari GRI 410-1 Personel keamanan yang dilatih dalam kebijakan atau prosedur hak asasi manusia)/ Percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security (as part of GRI 410-1 Security personnel trained in human rights policies or procedures)	Pelatihan hak asasi manusia untuk personel keamanan/ Human rights training for security personnel		Kinerja/ Performance
		Jumlah personel keamanan/ Total number of security personnel		143
		Jumlah personel keamanan yang menerima pelatihan hak asasi manusia/ Total number of security personnel who received human rights training		143
		Persentase personel keamanan yang menerima pelatihan hak asasi manusia/ Percentage of security personnel who received human rights training		100%

2024 Sustainability Report



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